

# Independent Reporting Mechanism

Results Report:  
Greece 2019-2022

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Open  
Government  
Partnership



Independent  
Reporting  
Mechanism

## Executive Summary

**From Greece’s fourth action plan, one ambitious commitment on whistleblowing in sports saw major early results. Other commitments, which were largely about opening datasets in different ministries, saw few early results. Civil society was not meaningfully involved in the co-creation of the action plan or the implementation of most commitments, and the action plan cycle suffered overall from a lack of accountability as there was no Multi-Stakeholder Forum (MSF). By the end of the action plan cycle, efforts to monitor implementation created opportunities for engagement between civil society and government.**

### Early Results

Most commitments in Greece’s fourth action plan centered on publishing open data. Out of the eighteen commitments, ten saw marginal early results following implementation, while seven produced no evidence of early results. Only one commitment, on whistleblowing in sports, saw major early results. Under this commitment, a new online reporting platform has received whistleblowing reports from various sports since launching in January 2021, with some reports taken forward for further investigation and at least one report leading to a disciplinary sanction.

Under other commitments, government ministries published many new datasets in several policy areas. For the most part, these improvements only led to marginal early results in opening government—in many cases because they were ongoing practices required by Law 4305/2014 on the “Open access and re-use of documents, information and public sector data.” Furthermore, the added value of the data disclosed was no clearer following its publication as there were no documented cases of reuse, highlighting the likelihood that data was published according to government priorities and interests rather than those of end users or beneficiaries. Other commitments—to hold a teleconference with stakeholders informing them about the openness actions of the Ministry of Rural Development and Food, to implement a participatory process for the annual update of the Digital Transformation Bible (DTB), and to develop an online platform for monitoring Greece’s fourth Open Government Partnership (OGP) action plan—were also implemented with no more than marginal results.

### Completion

The level of implementation of commitments was higher than that of the previous action plan, with 12 out of 18 commitments fully or substantially completed. Commitment 6, to publish data held by the Ministry of Administrative Reconstruction on a new open data website and engage with civil society on open data topics, was canceled as the Ministry of Administrative Reconstruction was dissolved as part of a ministerial reorganization.

Following the OGP Criteria and Standards Subcommittee’s resolution on the COVID-19 pandemic,<sup>1</sup> the government decided to extend the end of the action plan’s implementation period from 2021 to 2022, which may have aided implementation of the commitments as more time was granted than originally planned. As part of the process to extend the action plan implementation period, seven new commitments were added to the original 11-commitment action plan.

## IMPLEMENTATION AT A GLANCE

### LEVEL OF COMPLETION

12/18

Complete or substantially complete commitments

### EARLY RESULTS

11/18

Commitments with early results

1/18

Commitments with major or outstanding early results

### COMPLIANCE WITH MINIMUM REQUIREMENTS

Acting according to OGP process.

For some commitments and topics, evidence of open datasets can be found on the OpenGovMonitor, the central repository, the new open data portal, or various ministries' websites.<sup>2</sup> However, the lack of links to evidence on the OpenGovMonitor website made it hard to verify the level of completion for all commitments.

### **Participation and Co-Creation**

The Ministry of Digital Governance has guided the OGP process in Greece since the ministerial reorganization that followed the 2019 parliamentary elections and the formation of a new government. Various public officials acknowledged that the changes to OGP leadership and the responsibilities of the public administration, as well as staff turnover, presented challenges to the implementation of the action plan.<sup>3</sup>

The Independent Reporting Mechanism (IRM) found that Greece acted contrary to the OGP process during the co-creation period (before the elections and before institutional and staff changes) because there was no functioning MSF, there was limited engagement with civil society, and the government did not provide reasoned responses to commitment proposals. The OGP Criteria and Standards Subcommittee subsequently placed Greece under procedural review.<sup>4</sup> At the start of the implementation period, the government sought to strengthen collaboration with civil society after two civic organizations requested that the Ministry reopen the action plan development process.<sup>5</sup> With the outbreak of the pandemic, the government dropped the initial plan to establish working groups and instead moved the process online in the form of an open call for proposals held in July 2020 (named 'Ideathon').<sup>6</sup> New commitments were added to the action plan in December 2020 (Commitments A1-A7), but only some stemmed from civic organizations or citizens and few of them were ambitious. Despite greater engagement in the process of amending the action plan, there was still no MSF in place.

During implementation, civil society set in motion an initiative to improve transparency of the OGP process through development of the monitoring website OpenGovMonitor.gr. Civil society organization Open Technologies Alliance (GFOSS) built the website using an open-source platform (with financial support from the OGP Support Unit), with the objective of tracking the progress of the fourth action plan's implementation. Development and maintenance of the monitoring tool became Commitment A6 in the amended action plan. The website includes a description of commitments and their objectives and milestones. The Ministry of Digital Governance updated the status of these milestones at least once before the end of August 2022.<sup>7</sup> However, not all milestone statuses provide links to evidence. By the end of the implementation period, GFOSS, Transparency International Greece, and the Ministry of Digital Governance formally agreed to change the scope of the website and repurpose it as the central OGP website and repository. It provides comprehensive information on OGP governance and the co-creation process and serves as a common space for public bodies and civil society to openly participate.<sup>8</sup>

### **Implementation in Context**

Greece held general elections in July 2019, just over a month after the adoption of the action plan. This election brought in a new governing party that implemented substantial institutional changes affecting the OGP process—the Ministry of Administrative Reform, the previous institution in charge of the action plan, was dissolved and its competences divided between the Ministry of Digital Transformation and the Ministry of the Interior. The Ministry of Digital Transformation took over responsibility for the OGP process.

During the first half of the implementation period, the COVID-19 pandemic greatly affected the OGP process in Greece. In addition to affecting the process of amending the action plan, the pandemic also affected the government's capacity to oversee the OGP process as institutional resources were diverted to tackle the crisis.

Overall, while the economic situation in Greece improved over the course of the implementation period, the government came under scrutiny for widespread wiretapping that also led to a drop in Greece's international rankings in freedom of the press.<sup>9</sup>

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- <sup>1</sup> OGP, “Criteria and Standards Subcommittee Resolution – COVID19 Pandemic,” 18 March 2020, <https://www.opengovpartnership.org/documents/criteria-and-standards-subcommittee-resolution-covid19-pandemic/>.
- <sup>2</sup> OpenGovMonitor is available at <http://www.opengovmonitor.gr/>. The central repository is now archived at <https://web.archive.org/web/20230403105933/https://repository.data.gov.gr/> (Until May 2023, it was available at <http://www.repository.data.gov.gr/>). The new open data portal is available at <https://data.gov.gr/>. Prior to 2021, each ministry could update their data on the portal [www.data.gov.gr](http://www.data.gov.gr). However, this information was migrated to [www.archive.data.gov.gr](http://www.archive.data.gov.gr) (now archived at <https://web.archive.org/web/20230330173913/http://www.archive.data.gov.gr/>) and [www.repository.data.gov.gr](http://www.repository.data.gov.gr), which includes 10,659 datasets classified by topic and institution (as of 28 October 2022). As of 2021, the Ministry of Digital Governance is now the only ministry that can update information on the new, restructured <http://data.gov.gr> open data portal, which currently provides access to 49 datasets from public entities, covering 10 topics. The government considers the data on this portal to be high value data and oriented toward their reuse in products and services by external stakeholders. They are accessible and downloadable via API for free but require registration. Anastasios Papazarifis (Special Scientific Personnel, OGP Greece Point of Contact, Ministry of Digital Governance—Secretariat General of Digital Governance and Simplification of Procedures, Department of Transparency and Open Government), interview by IRM, 5 October 2022; Hara Tessa (Department of Innovative Services and Simplification of Procedures, Directorate of e-Governance, Ministry of Culture and Sport), interview by IRM, 7 October 2022; Tessa, correspondence with IRM, 6 and 10 October 2022.
- <sup>3</sup> Papazarifis, interview; Papazarifis, correspondence with IRM, 4 October 2022; George Chalkias (Director of Documentation, Research and Innovation Institute [ITEK], National Centre for Public Administration and Local Government [EKDDA]), correspondence with IRM, 7 October 2022; Panagiota Mpoura (Head of Coordination Unit of Hellenic Ministry of Justice), interview by IRM, 7 October 2022; Dimitrios Zampakolas (Head of Digital Governance Agency, Ministry of National Defence), correspondence with IRM, 14 October 2022.
- <sup>4</sup> OGP, “Greece – Under Review Letter – February 2021,” 3 March 2021, <https://www.opengovpartnership.org/documents/greece-under-review-letter-february-2021/>.
- <sup>5</sup> Alexandros Melidis (Director, Open Technologies Alliance GFOSS), interview by IRM, 4 October 2022.
- <sup>6</sup> OGP Greece Ideathon, Government of Greece, <https://covidhackgr.gov.gr/ogp/ideathon2020-gr.html>.
- <sup>7</sup> Papazarifis, interview.
- <sup>8</sup> Melidis, interview; Papazarifis, interview.
- <sup>9</sup> “Greece,” Reporters Without Borders, accessed 6 April 2023, <https://rsf.org/en/country/greece>.

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## Section I: Key Observations

This analysis of Greece’s action plan demonstrates a clear need for improvements to its OGP process and implementation of commitments. This cycle has shown that greater involvement of civil society during co-creation and implementation could have led to more ambitious commitments and stronger early results. Furthermore, the lack of a space for ongoing dialogue between government and non-governmental actors limited co-creation and monitoring of implementation. Successful commitment implementation could have been improved through strong internal coordination and communication between public bodies involved in the OGP process, and it is essential that the government communicate its decisions and monitor and publish the results of commitment implementation. Finally, commitments to publish open data without considering their purpose or usefulness led to very limited early results.

### **Observation 1: A lack of civil society involvement in co-creation and implementation limited the commitments’ ambition and strong early results.**

The limited ambition of the fourth action plan and its focus on open data was the consequence of a rushed co-creation process with little civil society input. Efforts to address this through the call for proposals to amend the action plan produced some more diverse commitments.

When citizens and non-governmental stakeholders contribute to the design of the action plan, commitments correspond better to the priorities and needs of different social groups. Providing enough time for proper and meaningful collaboration and dialogue between government and civil society to co-create commitments is essential. As part of this dialogue, it is important that the government provides a reasoned response about how it takes proposals from non-governmental actors into account, following OGP Participation and Co-Creation Standards.<sup>10</sup> Future OGP commitments could also link to open government-related commitments made in other international initiatives, such as the U.S. Summit for Democracy, or build on progress reported in Group of States against Corruption (GRECO) reviews or projects for public sector integrity supported by the Organisation for Economic Co-operation and Development.<sup>11</sup>

It is often the commitments that respond to needs in a society that produce notable early results in opening government. The commitments in Greece’s fourth action plan for which responsible institutions consulted with civil society during implementation (including with potential data users on their priorities for opening up data) were also those with some early results to report in opening government. Commitments that dealt with pressing issues in Greek society—such as a whistleblowing platform to tackle corruption in sports by the Ministry of Culture and Sports—also saw early results from implementation.

Therefore, it is essential that the government, including the Ministry of Digital Governance and all institutions involved, engages with a broad range of actors and systematically provides opportunities for civil society to provide input on OGP processes through the action plan cycle. This can help to ensure that commitments address significant issues that require open government solutions.

### **Observation 2: The absence of a space for ongoing dialogue between government and non-governmental actors limited co-creation and monitoring of implementation.**

As evidenced in this Results Report and highlighted in the IRM Design Report 2019–2021 and Co-Creation Brief 2022, the OGP process in Greece has lacked a space or forum through which government and civil society actors involved in OGP can communicate on a regular basis, jointly draft and decide on commitments, and monitor their implementation. Establishing a space for collaboration is a minimum requirement of the OGP Participation and Co-Creation Standards.<sup>12</sup> The absence of a space negatively impacted the ambition of Greece’s action plan commitments during co-creation and oversight of implementation to ensure completion of commitments.

The Ministry of Digital Governance set up a focus group with a view to preparing the fifth action plan. This could serve as a stepping stone to an MSF with balanced representation from government and civil society and fair and transparent rules about membership, including the selection of civil society representatives by their peers.<sup>13</sup> The forum or platform should convene regular meetings (at least every six months) and report back to the wider public on its activities and decisions. Examples of institutionalized forums can be found in Spain or Italy. Similarly, Latvia and Estonia have employed innovative platforms to facilitate civic involvement in co-creation processes.<sup>14</sup> Other examples are mentioned in Greece's Co-Creation Brief.<sup>15</sup>

**Observation 3: Successful commitment implementation could have been improved via strong internal coordination and communication between public bodies involved in the OGP process.**

The responsibility for commitment implementation in the fourth action plan was initially very specific and clear.<sup>16</sup> However, changes to the national point of contact, reorganization of government ministries, and turnover of public officials after elections posed challenges to implementation. Over the course of this three-year action plan cycle, these obstacles led to a lack of coordination, oversight, or publishing of regular updates on implementation.

Future action plan cycles would benefit from established mechanisms for internal communication and coordination between public institutions to follow up on the implementation of commitments, especially when changes of staff are involved in the OGP process.

**Observation 4: It is essential that the government communicates its decisions, monitors the results of commitment implementation, and makes this information public.**

The OpenGovMonitor website was updated in later stages of the action plan cycle, when the Ministry of Digital Governance took a more active approach to the OGP process. The website has now been repurposed as a repository and online resource for OGP in Greece.

Furthermore, monitoring implementation should also include collaboration and oversight with civil society, in particular through an MSF, as outlined by the OGP Participation and Co-Creation Standards. The lack of an MSF during this action plan cycle reduced the scope for public oversight and monitoring and accountability of implementation.

Part of this coordination and communication effort requires public bodies involved in OGP to document implementation of OGP commitments in detail and publish this information on the OGP repository. Furthermore, the Ministry of Digital Governance could aim for best practices in maintaining the OpenGovMonitor website, such as publishing agendas and minutes of meetings between government and non-governmental stakeholders, information about OGP contact persons from the institutions involved, the main civil society organizations involved in the process, and opportunities for the general public to take part in activities or to contribute their perspectives, including an account of comments and proposals received and the government's response to them.

**Observation 5: Commitments to publish open data without considering their purpose or usefulness led to very limited early results.**

Greece's 2019–2021 action plan contained almost identical commitments to publish open data. These commitments were driven by institutions with little or no input from civil society or Greek citizens—in many cases because they were ongoing practices required by Law 4305/2014 on the “Open access and re-use of documents, information and public sector data.” In this sense, there was little clarity about their added value in the action plan. For the most part, these improvements only led to marginal early results in opening government. As such, the added value of the data disclosed was no clearer following its publication as there were no documented cases of reuse, highlighting the likelihood that data was published according to government priorities and interests rather than those of end users or beneficiaries.

Considerations about the demand side of open data-related commitments in the future could help to ensure greater early results from publishing information. Online and interactive consultation processes that are properly promoted to relevant stakeholders could help to identify priority datasets and relevant interests of citizens.

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<sup>10</sup> OGP, “OGP Participation and Co-Creation Standards,” 24 November 2021, <https://www.opengovpartnership.org/ogp-participation-co-creation-standards/>.

<sup>11</sup> “Open Government Approaches in Summit for Democracy Commitments,” OGP, accessed 6 April 2023, <https://www.opengovpartnership.org/open-government-approaches-in-summit-for-democracy-commitments/>; Hellenic National Transparency Authority, “Follow-up on Challenges in Implementation, UNCAC Review Cycle II – Chapters II and V,” accessed 6 April 2023, [https://www.unodc.org/documents/treaties/UNCAC/CountryOtherReports/GREECE\\_NTA\\_Measures\\_taken\\_following\\_the\\_Cycle\\_II\\_country\\_visit\\_16.11.2021.pdf](https://www.unodc.org/documents/treaties/UNCAC/CountryOtherReports/GREECE_NTA_Measures_taken_following_the_Cycle_II_country_visit_16.11.2021.pdf); “Greece-OECD Project: Technical Support on Anti-Corruption,” Organisation for Economic Co-operation and Development (OECD), accessed 6 April 2023, <https://www.oecd.org/gov/ethics/greece-oecd-anti-corruption.htm>.

<sup>12</sup> OGP, “OGP Participation and Co-Creation Standards.”

<sup>13</sup> IRM, “Greece Co-Creation Brief 2022,” 13 May 2022, <https://www.opengovpartnership.org/documents/greece-co-creation-brief-2022/>.

<sup>14</sup> “Faces of Open Government: Inita Pauloviča,” OGP, 21 March 2022, <https://www.opengovpartnership.org/stories/faces-of-open-government-inita-paulovica/>; “Lessons from Reformers: Estonia Shifts from Online Consultation to Co-Creation,” OGP, 10 August 2020, <https://www.opengovpartnership.org/stories/lessons-from-reformers-estonia-shifts-from-online-consultation-to-co-creation/>.

<sup>15</sup> IRM, “Greece Co-Creation Brief 2022.”

<sup>16</sup> IRM, “Greece Design Report 2019–2021,” 4 January 2021, <https://www.opengovpartnership.org/documents/greece-design-report-2019-2021/>.



## Section II: Implementation and Early Results

The following section looks at the one commitment that the IRM identified as having the strongest results from implementation.

To assess implementation and early results, the IRM referred to commitments identified as noteworthy in the Design Report as a starting point. After verification of completion evidence, the IRM also took into account commitments or clusters that were not determined as noteworthy but that, as implemented, yielded significant results.

### **Commitment A1: Create a whistleblowing platform to promote integrity in sports— Ministry of Culture and Sports, General Secretariat of Sports**

#### **Context and Objectives:**

The commitment was introduced in the amended action plan with the objectives of creating an online platform to report corruption and irregularities in the field of sports and promoting a culture of integrity in sports.<sup>17</sup> According to the director of the Secretary General of Sport Private Office, the commitment relates to an obligation derived from the Convention on the Manipulation of Sports Competitions (the Macolin Convention)<sup>18</sup> that Greece ratified in 2019, which requires it to adopt measures to address manipulation of sport competitions.<sup>19</sup> The commitment is one of the few in the action plan that focuses on civic participation and public accountability.

The Ministry of Culture and Sports, and the General Secretariat of Sport in particular, as the responsible entity, identified the different forms of corruption that persist in sports, such as match-fixing, doping, abuse of power, physical and sexual abuse, bullying, fan violence, intimidation, financial crime, and other unfair practices as endemic practices that need to be addressed. Greece's domestic football league has experienced multiple corruption scandals since the 1990s. Examples of recent scandals include the 2011 Koriopolis investigation of match-fixing and the criminal investigation into allegations of blackmail and fraud by the owner of Greek champions Olympiakos in 2015. The Union of European Football Associations has attempted to address these issues in Greece since 2016, although without success.<sup>20</sup> Transparency International Greece also has a project that seeks to tackle corruption in Greek football.<sup>21</sup>

#### **Did It Open Government? Major**

According to the OpenGovMonitor website, the three milestones of the commitment were completed.<sup>22</sup> However, there is no evidence of the review of relevant institutional frameworks and international best practices in consultation with partners and stakeholders (milestone 1)<sup>23</sup> nor of piloting and regulatory compliance with national and European legislation and regulatory framework (milestone 3). Nevertheless, the most significant milestone (milestone 2) was successfully completed: In January 2021, the General Secretariat of Sport launched a whistleblowing platform called the National Platform for Sport Integrity (EPATHLA), which is available at <https://www.epathla.gov.gr>.<sup>24</sup>

According to a report by the secretary general on 2 October 2022, between January 2021 and June 2022 EPATHLA handled 69 reports and forwarded 22 for further investigation.<sup>25</sup> The majority of reports in 2022 related to football, but there were also reports in relation to basketball, volleyball, karate, rowing, and cycling, with 16 reports in total forwarded for further investigation.<sup>26</sup> IRM has not been able to compare this number with the preexisting situation as the General Secretariat had not established a baseline. A representative from the Ministry reported that at least one of the reports has resulted in a disciplinary sanction.<sup>27</sup>

The website contains information about the structure and governance of the platform, legal information and guidance on whistleblowing in sports, educational and promotional materials, updates, and news, as well as a link to an anonymous form for reporting.<sup>28</sup> The news section contains published press releases demonstrating that the members of the EPATHLA Education

and Awareness working group have engaged with potential users of the platform.<sup>29</sup> It has undertaken awareness-raising activities, such as disseminating educational material (leaflets, presentations) and visits to sports clubs, and is preparing an e-learning tool, according to a Ministry representative.<sup>30</sup> However, an academic pointed to the lack of public-facing information on the reports filed and their handling and investigation results, as no such data seem to be available on the public website.<sup>31</sup>

Although members of civil society were not involved directly in the design of the platform, non-governmental stakeholders, such as associations of athletes, coaches, and referees as well as sports universities and betting operators, can get involved in the working groups established by the platform and thus take part in the discussions alongside official bodies.<sup>32</sup> Furthermore, the Ministry's representative noted that the platform protects whistleblowers and corresponds to the demands of specialized civil society organizations as it "fulfills the standards from GlobalLeaks<sup>33</sup> platforms."<sup>34</sup>

In sum, the implementation of this commitment has produced major early results in terms of accountability in the area of whistleblower protection in sports. Establishing a whistleblowing platform for sports for the first time in the country, which has received multiple whistleblowing reports across different sports—with some taken forward and, in one case, reportedly leading to disciplinary action—shows early promise. A civil society representative mentioned that this demonstrates strong political will, especially considering the fact that the platform was up and running before the transposition of the EU whistleblowing directive.<sup>35</sup>

### Looking Ahead:

The General Secretariat of Sport could enhance longer-term outcomes of the EPATHLA whistleblowing platform in sports and be an example for other sectors by:

- following-up on whistleblowing reports in sports, and therefore demonstrating in a practical sense that these reports are taken seriously and that whistleblowers are protected
- improving transparency and providing regular information on the number and types of reports received and how they were acted upon
- publishing the decisions and analysis of the working groups
- systematically cooperating with sports associations and other external stakeholders to raise awareness about the whistleblowing platform

More broadly, Greece could use lessons learned from the implementation of this commitment when implementing the EU Whistleblower Directive, having now passed Law 4990/2022 in November 2022.

<sup>17</sup> "Additional Commitment 1: Create a Unified Platform for Anonymous and Confidential Reports (Whistleblowing Platform) to Promote integrity in sport," OpenGovMonitor, accessed 6 April 2023, <https://opengovmonitor.gr/desmeuseis/%cf%83%cf%85%ce%bc%cf%80%ce%bb%ce%b7%cf%81%cf%89%ce%bc%ce%b1%cf%84%ce%b9%ce%ba%ce%ae%ce%b4%ce%ad%cf%83%ce%bc%ce%b5%cf%85%cf%83%ce%b7-1-%ce%b4%ce%b7%ce%bc%ce%b9%ce%bf%cf%85%cf%81%ce%b3%ce%af%ce%b1/>

<sup>18</sup> "The Convention on the Manipulation of Sports Competitions (the Macolin Convention)," Council of Europe, accessed 6 April 2023, <https://www.coe.int/en/web/sport/macolin>.

<sup>19</sup> Amalia Kaperoni (Director of the Secretary General of Sport Private Office, Ministry of Culture and Sports), correspondence with IRM, 7 October 2022.

<sup>20</sup> Alexandros Kottis, "The Infinite Chaos of Greek Football: How the Latest Hope for Change Was Lost," *BBC*, 24 February 2022, <https://www.bbc.co.uk/sport/football/60483819>.

<sup>21</sup> "Integrity in Football," Transparency International Greece, accessed 6 April 2023, <https://transparency.gr/ti-kanoume/akeraiotita-sto-podosfairo/>.

<sup>22</sup> OpenGovMonitor, "Additional Commitment 1."

<sup>23</sup> OpenGovMonitor, "Additional Commitment 1."

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<sup>24</sup> Hellenic Republic Ministry of Culture and Sports General Secretariat of Sport, “Hellenic National Platform for Sport Integrity,” April 2021, [https://www.epathla.gov.gr/docs/EPATHLA\\_presentationEN.pdf](https://www.epathla.gov.gr/docs/EPATHLA_presentationEN.pdf).

<sup>25</sup> G. Mavrotas, “EPATHLA Has Managed 69 Reports of Possible Match Manipulation and Forwarded 22 for Further Investigation,” Ministry of Culture and Sports, 22 October 2022, <https://gga.gov.gr/grafeio-tupou/deltia-tupou/3661-69-22>.

<sup>26</sup> “The EPATHLA Is Increasingly Protecting the Integrity of Our Sport,” Ministry of Culture and Sports, 7 December 2022, <https://gga.gov.gr/grafeio-tupou/deltia-tupou/3698-2022-12-07-16-22-07>.

<sup>27</sup> Kaperoni, correspondence.

<sup>28</sup> “National Platform for Sport Integrity (EPATHLA),” General Secretariat of Sport, accessed 6 April 2023, <https://www.epathla.gov.gr/en/>.

<sup>29</sup> For example, “Awareness and Education Working Group of EPATHLA Initiates Its Meetings with Sport Teams Aiming in Raising Awareness against Competition Manipulation,” General Secretary of Sport website, 23 November 2021, <https://gga.gov.gr/grafeio-tupou/deltia-tupou/3466-2021-11-23-12-15-09>.

<sup>30</sup> Kaperoni, correspondence.

<sup>31</sup> Dimitris Gouscos, correspondence with IRM, 30 January 2023.

<sup>32</sup> EPATHLA, the platform for whistleblowing in sports, is set up as a collective body incorporated in the General Secretariat of Sport and has the following membership: the secretary general of sport, the governor of the National Transparency Authority, the chairman of the Hellenic Gaming Commission, the sports prosecutor of the Public Prosecutor’s Office in Athens, and a representative of the Hellenic Police. EPATHLA’s working groups accept participation of external actors such as the Hellenic Olympic Committee; associations of athletes, coaches and referees; organizing authorities; higher education institutions; betting agencies, etc. EPATHLA is expected to sign a Memorandum of Cooperation with the above-mentioned bodies. See “Structure,” General Secretariat of Sport, accessed 6 April 2023, <https://www.epathla.gov.gr/en/epathla/structure/>.

<sup>33</sup> GlobaLeaks is free, open-source software enabling easy set-up and maintenance of a secure and anonymous whistleblowing platform. It was initially developed by the Hermes Center for Transparency and Digital Human Rights (HERMES), a non-profit association founded in 2012 by a group of hackers, lawyers, and digital rights defenders, and is currently supported by a number of civil society organizations. “Digital Rights Are Human Rights,” HERMES, accessed 6 April 2023, <https://www.hermescenter.org/>.

<sup>34</sup> Kaperoni, correspondence.

<sup>35</sup> Alexandros Melidis (Director, GFOSS) and GFOSS, email interview by IRM, 24 January 2023.

## Section III. Participation and Co-Creation

**Limited civil society engagement throughout the action plan cycle resulted in an action plan largely focused on open data and lacking ambition, with few early results despite most commitments being substantially or fully completed. The absence of a functioning MSF, regular dialogue with civil society, or regular monitoring mechanisms limited the open government process in Greece during this action plan cycle.**

After the general elections in July 2019 that led to a change in government, the newly established Ministry of Digital Governance took over responsibility for implementing the fourth OGP action plan, which had been adopted under the leadership of the former Ministry of Administrative Reconstruction. The national representative and the government point of contact remained the same. After a government cabinet reshuffle in October 2021, the Department of Transparency and Open Government within the General Secretariat of Digital Governance and Simplification of Procedures became,<sup>36</sup> by presidential decree, the competent authority responsible for the OGP process, along with a new point of contact.<sup>37</sup> These major institutional changes, alongside changes to staffing, significantly affected the action plan cycle. Several of the current contact persons in different ministries interviewed by the IRM researcher acknowledged a lack of complete knowledge of the status of commitments they oversaw, in terms of which activities had been undertaken by previous teams, due to reorganizations within the public administration. They also underlined difficulties in tracking progress due to the lack of a monitoring system of the action plan as a whole and of implementation of each commitment.<sup>38</sup>

During co-creation (completed before the 2019 general elections), the ministries developed the action plan under the guidance of the former Ministry of Administrative Reconstruction and focused on open data and other reforms already underway. One meeting was held with civil society (although only one organization was able to attend) and included presentations by the Ministry, an intervention by the civil society organization present, and no further discussion. As per the previous action plan cycle, there was no MSF. Government and civil society representatives signaled that this was detrimental to the ambition of commitments and to achieving the commitments' full potential during implementation.<sup>39</sup>

The government amended the action plan in 2020 (once implementation had begun). These amendments originated from a letter by GFOSS and Transparency International Greece to the National Representative asking to reopen the action plan development process given the very short co-creation period.<sup>40</sup> As a result, several meetings were organized, including a kick-off meeting in December 2019 in which the Ministry of Digital Governance convened civil society representatives (including the above-mentioned organizations, Vouliwatch, and Open Knowledge Foundation Greece, among others) with the aim of setting up working groups and a concrete timeline to amend the action plan.

However, the outbreak of the COVID-19 pandemic slowed down the process. The Ministry dropped the initial plan to establish working groups and instead launched an online call to civil society for innovative open government proposals (Ideathon).<sup>41</sup> The event took place in July 2020 and provided a limited opportunity for civil society participation.<sup>42</sup> Non-governmental organizations, businesses, and individuals submitted 15 proposals, some more ambitious than those in the original action plan, according to a civil society organization (CSO) representative.<sup>43</sup> Only two were among the seven additional commitments included in the amended action plan at the end of 2020. As noted by civil society representatives,<sup>44</sup> the Ministry of Digital Governance did not provide a reasoned response to civil society participants and organizations involved with the OGP process regarding the criteria for accepting or rejecting proposals and selecting new commitments.

Following the amendment process, there was limited engagement between civil society and government during the rest of the implementation period. Most commitments were conducted without civil society involvement or collaboration. During this cycle, the government's collaboration with civil society declined compared to previous action plan cycles, according to

several CSOs.<sup>45</sup> An interviewed public official said the COVID-19 pandemic and a lack of permeation of the values and culture of open government in institutions, alongside the changes in OGP leadership and management, hindered the ability of the government to convene and work with civil society during co-creation and implementation of the action plan.<sup>46</sup>

Throughout the implementation period, the action plan commitments were not consistently monitored by responsible institutions, the leading ministry (following the reorganization), or CSOs. The lack of a comprehensive website with all documentation related to the OGP process and activities made it difficult for CSOs participating in the OGP process and other interested external stakeholders to monitor commitment implementation. Eventually, CSOs established a monitoring platform via the OpenGovMonitor website in 2020, which the Ministry of Digital Governance updated in the last months of 2022.

At the time of writing this report, IRM recognizes the efforts underway by the Ministry of Digital Governance to improve cooperation with civil society and to restructure and update the online OpenGovMonitor website.<sup>47</sup> IRM also acknowledges ongoing initiatives carried out by a number of CSOs and academics to raise awareness of open government, develop thematic areas and commitment proposals, and promote collaboration between government and non-governmental partners ahead of the fifth action plan co-creation process.<sup>48</sup>

### Compliance with the Minimum Requirements

The IRM assesses whether member countries met the minimum requirements under OGP's Participation and Co-Creation Standards for the purposes of procedural review.<sup>49</sup> During co-creation, Greece did not act according to the OGP process.<sup>50</sup> The two minimum requirements listed below must achieve at least the level of 'in progress' for a country to have acted according to OGP process.

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

Acted according to OGP process during the implementation period?	
<p><b>The government maintained an OGP repository that is online, updated at least once during the action plan cycle, and contains evidence of development and implementation of the action plan.</b> Civil society created the OpenGovMonitor website, which was updated at least once during the action plan cycle. It provides links to evidence on implementation of many commitments and is now updated by the Greek government.</p>	Green
<p><b>The government provided the public with information on the action plan during the implementation period.</b> The government published information in relation to events to amend the action plan.<sup>51</sup> Some specific events, as part of commitment milestones, were also published, but the OpenGovMonitor repository was the only place to find information on implementation across the plan. There was no MSF and therefore no information about meetings or other decisions in relation to the action plan cycle.</p>	In progress

<sup>36</sup> Homepage, Ministry of Digital Governance, accessed 6 April 2023, <https://www.secdigital.gov.gr/>.

<sup>37</sup> Anastasios Papazarifis (Special Scientific Personnel, OGP Greece Point of Contact, Ministry of Digital Governance - Secretariat General of Digital Governance and Simplification of Procedures, Department of Transparency and Open Government), correspondence with IRM, 4 October 2022; Papazarifis, interview by IRM, 5 October 2022.

<sup>38</sup> Papazarifis, correspondence; Papazarifis, interview; George Chalkias (Director of Documentation, Research and Innovation Institute [ITEK], National Centre for Public Administration and Local Government [EKDDA]), correspondence with IRM, 7 October 2022; Panagiota Mpoura (Head of Coordination Unit of the Ministry of Justice), interview by IRM, 7 October 2022; Dimitrios Zampakolas (Head of Digital Governance Agency, Ministry of National Defence), correspondence with IRM, 14 October 2022.

<sup>39</sup> Papazarifis, interview; Stefanos Loukopoulos (Vouliwatch), interview by IRM, 3 October 2022; Melidis (GFOSS), interview by IRM, 4 October 2022; Angelos Kaskanos (TI Greece), interview by IRM, 7 October 2022.

<sup>40</sup> Melidis, copy of letter provided to IRM via correspondence, 5 October 2022.

<sup>41</sup> Melidis, interview; Yiannis Giannarakis (Digital Innovation Coordinator, Greek Research and Technology Network GRNET), interview by IRM, 7 October 2022.

<sup>42</sup> “OGP Greece Ideathon: Call for Submission of Innovative Proposals for Open Government,” Ministry of Digital Governance, 7 July 2020, <https://mindigital.gr/archives/1511>.

<sup>43</sup> A copy of the proposals received at the Ideathon was provided by Yiannis Giannarakis (GRNET) to IRM, 25 October 2022; Melidis, interview; Giannarakis, interview.

<sup>44</sup> Loukopoulos, interview; Melidis, interview.

<sup>45</sup> Loukopoulos, interview; Melidis, interview; Angelos Kaskanis (Executive Director, Transparency International Greece), interview by IRM, 7 October 2022.

<sup>46</sup> Papazarifis, correspondence; Papazarifis, interview.

<sup>47</sup> “News and Actions,” OpenGovMonitor, accessed 6 April 2023,

[https://opengovmonitor.gr/category/%ce%bd%ce%ad%ce%b1\\_%ce%b4%cf%81%ce%ac%cf%83%ce%b5%ce%b9%cf%82/](https://opengovmonitor.gr/category/%ce%bd%ce%ad%ce%b1_%ce%b4%cf%81%ce%ac%cf%83%ce%b5%ce%b9%cf%82/).

<sup>48</sup> “Call for Participation in the Open Governance and Open Data Group of the Open Technologies Organization EELLAK,” ELLAK, 20 September 2021, <https://opengov.ellak.gr/2021/09/20/opengov/>; “WeOpenGov: Civil Society-Public Agencies Network for Open Government,” EEA, accessed 6 April 2023, <https://eeagrants.org/archive/2014-2021/projects/GR-ACTIVECITIZENS-0111>.

<sup>49</sup> Please note that future IRM assessment will focus on compliance with the updated OGP Co-Creation and Participation Standards that came into effect on 1 January 2022: <https://www.opengovpartnership.org/ogp-participation-co-creation-standards/>.

<sup>50</sup> IRM, “Greece Design Report 2019–2021,” 4 January 2021, <https://www.opengovpartnership.org/documents/greece-design-report-2019-2021/>.

<sup>51</sup> Ministry of Digital Governance, “OGP Greece Ideathon.”

## Section IV. Methodology and IRM Indicators

This report supports members' accountability and learning through assessment of (i) the level of completion for commitments' implementation, (ii) early results for commitments with a high level of completion identified as noteworthy in the Design Report or that yielded significant results through implementation, and (iii) participation and co-creation practices throughout the action plan cycle. The IRM commenced the research process after the first year of implementation of the action plan with the development of a research plan, preliminary desk research, and verification of evidence provided in the country's OGP repository.<sup>52</sup>

In 2022, OGP launched a consultation process to co-create a new strategy for 2023–2028.<sup>53</sup> The IRM will revisit its products, process, and indicators once the strategy co-creation is complete. Until then, Results Reports continue to assess the same indicators as previous IRM reports:

### Completion

The IRM assesses the level of completion for each commitment in the action plan, including commitments clustered in the Action Plan Review.<sup>54</sup> The level of completion for all commitments is assessed as one of the following:

- *No evidence available*
- *Not started*
- *Limited*
- *Substantial*
- *Complete*

### Did It Open Government?

The IRM assesses changes to government practices that are relevant to OGP values, as defined in the OGP Articles of Governance, under the “Did it open government?” indicator.<sup>55</sup> To assess evidence of early results, the IRM refers to commitments or clusters identified as noteworthy in the Design Report as a starting point. The IRM also takes into account commitments or clusters with a high level of completion that may not have been determined as noteworthy but that, as implemented, yielded significant results. For commitments that are clustered, the assessment of “Did it open government?” is conducted at the cluster level, rather than the individual commitment level. Commitments or clusters without sufficient evidence of early results at the time of assessment are designated as “no early results to report yet.” For commitments or clusters with evidence of early results, the IRM assesses “Did it open government?” as one of the following:

- *Marginal*: Some change, but minor in terms of its effect on level of openness
- *Major*: A step forward for government openness in the relevant policy area but remains limited in scope or scale
- *Outstanding*: A reform that has transformed “business as usual” in the relevant policy area by opening government

This report was prepared by the IRM in collaboration with Ana Revuelta Alonso and was reviewed by Andy McDevitt, IRM external expert. The IRM methodology, quality of IRM products and review process is overseen by the IRM's International Experts Panel (IEP). The current IEP membership includes:

- Snjezana Bokulic
- Cesar Cruz-Rubio
- Mary Francoli
- Maha Jweied
- Rocio Moreno Lopez

This review process, including the procedure for incorporating comments received, is outlined in greater detail in Section III of the Procedures Manual<sup>56</sup> and in Greece’s Design Report 2019-2021. For more information, refer to the “IRM Overview” section of the OGP website.<sup>57</sup> A glossary on IRM and OGP terms is available on the OGP website.<sup>58</sup>

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<sup>52</sup> Greece. OGP Repository. Date accessed: 28 October 2022: [www.opengovmonitor.gr](http://www.opengovmonitor.gr).

<sup>53</sup> See OGP, “Creating OGP’s Future Together: Strategic Planning 2023–2028,” <https://www.opengovpartnership.org/creating-ogps-future-together/>.

<sup>54</sup> The IRM clusters commitments that share a common policy objective during the Action Plan Review process. In these instances, the IRM assesses “potential for results” and “Did it open government?” at the cluster level. The level of completion is assessed at the commitment level. For more information on how the IRM clusters commitments, see Section IV on Methodology and IRM Indicators of the Action Plan Review.

<sup>55</sup> See OGP, *Open Government Partnership Articles of Governance*, published 17 June 2019, [https://www.opengovpartnership.org/wp-content/uploads/2019/06/OGP\\_Articles-of-Governance\\_2019.pdf](https://www.opengovpartnership.org/wp-content/uploads/2019/06/OGP_Articles-of-Governance_2019.pdf).

<sup>56</sup> Independent Reporting Mechanism, *IRM Procedures Manual, V.3*, 16 September 2017, <https://www.opengovpartnership.org/documents/irm-procedures-manual>.

<sup>57</sup> <https://www.opengovpartnership.org/irm-guidance-overview/>

<sup>58</sup> Open Government Partnership, OGP Glossary, <https://www.opengovpartnership.org/glossary/>



## Annex I. Commitment Data<sup>59</sup>

### Commitment 1: Open access to data of the Ministry of Education, Research and Religious Affairs

- |   |   |
|---|---|
| <ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Relevant:</b> Yes, access to information</li> <li>• <b>Potential impact:</b> Minor</li> </ul> | <ul style="list-style-type: none"> <li>• <b>Completion:</b> Substantial</li> <li>• <b>Did it open government?</b> Marginal</li> </ul> |
|---|---|

This commitment sought to increase the quantity and quality of data publicly available from the Ministry of Education, Research and Religious Affairs and supervised entities. The Ministry published over 100 more datasets on the government’s old open data portal (<http://repository.data.gov.gr/>), which now contains 371 datasets.<sup>60</sup> Integrated datasets can also be accessed in the Ministry’s dedicated open data directories 2021 and 2022 on issues such as professional training, schools and higher education centers, and student and personnel recruitment covering the years 2019 to 2022.<sup>61</sup> IRM estimates that the vast majority of the files are in user-friendly formats such as Excel and CSV, while very few are in PDF. The new open data portal [data.gov.gr](http://data.gov.gr) also published three files from the Ministry of Education—a list of schools by municipality, number and gender of students, and number of teaching staff (university professors).<sup>62</sup> These data can be downloaded (in JSON or CSV format) by registering on [data.gov.gr](http://data.gov.gr) to use the Application Programming Interface (API) service. The ministries’ decisions about data release supported publication of new data, although there is only evidence for two of the three anticipated decisions.<sup>63</sup>

Despite being available via the new [data.gov.gr](http://data.gov.gr) website, according to the OpenGovMonitor, the milestone to create APIs to access the data was not completed.<sup>64</sup> IRM did not find any evidence of (re)use of the datasets by government or non-governmental actors. It was not possible to determine any concrete improvement in terms of quality or open formats. Despite over 100 new datasets being released, IRM assesses that the commitment had a marginal impact on opening government.

### Commitment 2: Open access to data of the Ministry of Rural Development and Food

- |  |   |
|--|---|
| <ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Relevant:</b> Yes, access to information</li> <li>• <b>Potential impact:</b> None</li> </ul> | <ul style="list-style-type: none"> <li>• <b>Completion:</b> Substantial</li> <li>• <b>Did it open government?</b> Marginal</li> </ul> |
|--|---|

During the implementation period, over 120 datasets from the Ministry of Rural Development and Food were updated or uploaded to the old open data portal, increasing from approximately 130<sup>65</sup> to 224 total datasets.<sup>66</sup> Many relate to the datasets outlined by this commitment, but it is unclear whether they are exactly the datasets that were expected to be published. Most datasets are available as Excel files. Open datasets are also scattered throughout the Ministry’s website.<sup>67</sup> The Ministry’s data is not available on the [data.gov.gr](http://data.gov.gr) open data portal. In terms of the remainder of the commitment, OpenGovMonitor states that all the milestones were achieved. However, it does not provide links to the open data release decisions or the new digital applications. While recognizing the large jump in the number of datasets made available by the Ministry, the IRM researcher was unable to gather further evidence of change of practice in the public administration related to this commitment or on reuse of released datasets.

### Commitment 3: Open access to data of the Ministry of Immigration Policy

- |  |   |
|--|---|
| <ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Relevance:</b> Yes, access to information</li> <li>• <b>Potential impact:</b> Minor</li> </ul> | <ul style="list-style-type: none"> <li>• <b>Completion:</b> Limited</li> <li>• <b>Did it open government?</b> No evidence of early results yet</li> </ul> |
|--|---|

This commitment sought to publish “datasets” including Memoranda of Understanding, national legislation, and communications and press releases. Near the end of the implementation period, on the old open data portal, implementers added a single PDF metadata document with links to the items targeted by the commitment in addition to presidential and ministerial decrees and other similar information.<sup>68</sup> Some of the links in the PDF do not work, while others lead to legislation or decrees in the Official Gazette or previously published articles. There is no evidence that this PDF opened government as it merely collates already published information. There is no evidence of completion of the milestone to adopt three data release decisions.

### Commitment 4: Open access to data of the Ministry of National Defence

- |   |   |
|---|---|
| <ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Relevant:</b> Yes, access to information</li> <li>• <b>Potential impact:</b> Minor</li> </ul> | <ul style="list-style-type: none"> <li>• <b>Completion:</b> Substantial</li> <li>• <b>Did it open government?</b> Marginal</li> </ul> |
|---|---|

This commitment sought to increase the quantity and quality of data publicly available from the Ministry of Defence and supervised entities as the Ministry had not published any datasets prior to the action plan. During the implementation period, it published 100 datasets, which can be accessed through a metadata table on the old open data portal.<sup>69</sup> The datasets contain information on issues such as public procurement regulations and procedures, contracts with public bodies, staff promotions and transfers, salary rankings, and ministerial decisions. This process was supported by a ministerial decision on data release, according to the head of the Digital Governance Agency of the Ministry of Defence. IRM has been unable to verify that the decision is available on the Ministry’s website.<sup>70</sup> The OpenGovMonitor states that the other two intended decisions on data release were completed, and that milestones to improve the quality of datasets were ongoing, but it did not provide evidence of these developments. Overall, this commitment made a marginal improvement to the transparency of the Ministry of National Defence because it began publishing data, although it is not clear whether the data is useful for stakeholders, has been reused, or is high quality.<sup>71</sup>

### Commitment 5: Open access to data of the Ministry of the Interior

- |   |   |
|---|---|
| <ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Relevant:</b> Yes, access to information</li> <li>• <b>Potential impact:</b> Minor</li> </ul> | <ul style="list-style-type: none"> <li>• <b>Completion:</b> Substantial</li> <li>• <b>Did it open government?</b> Marginal</li> </ul> |
|---|---|

The commitment sought to increase the quantity and quality of data publicly available from the Ministry of Interior and supervised entities. The Ministry has published election results data from 2019 on a specialized, user-friendly website,<sup>72</sup> downloadable by constituency or by party on the Ministry of Interior website.<sup>73</sup> This website has been available and provided electoral results information since 2002. It also published intended data on election results, financial data for the FILODIMOS program (PDF),<sup>74</sup> financial data on local authorities (PDF),<sup>75</sup> information on administrative changes to local government,<sup>76</sup> and information on Greek citizenship acquisition (on the old open data portal).<sup>77</sup> However, IRM was unable to find data that the commitment included publishing of the expenses of electoral candidates, financial data of the

THISEAS program, or financial data on local authority grants.

The Ministry’s representative stated that in some cases they took into account how data facilitate civic participation. For instance, public expenditure and budgets of local authorities provide information that citizens can challenge in municipal councils.<sup>78</sup> While data have been published, most of it is not in reusable formats, which limits the extent to which the information can be reused. Some datasets (such as elections data) are continuations of ongoing practices, and there is no evidence of reuse of these data. This has led to no more than marginal early results from implementation of this commitment.

### Commitment 6: Open access to data of the Ministry of Administrative Reconstruction

- |   |   |
|---|---|
| <ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Relevant:</b> Yes, access to information</li> <li>• <b>Potential impact:</b> Minor</li> </ul> | <ul style="list-style-type: none"> <li>• <b>Completion:</b> Not started</li> <li>• <b>Did it open government?</b> No early results to report yet</li> </ul> |
|---|---|

The commitment intended to increase the quantity and quality of data publicly available from the Ministry of Administrative Reconstruction and supervised entities. It was canceled, according to the OpenGovMonitor,<sup>79</sup> after the 2019 ministerial reorganization eliminated the Ministry of Administrative Reconstruction and divided its competences between the Ministry of Digital Governance and the Ministry of Interior.

### Commitment 7: Open access to data of the Ministry of Economy and Development

- |   |   |
|---|---|
| <ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Relevant:</b> Yes, access to information</li> <li>• <b>Potential impact:</b> Minor</li> </ul> | <ul style="list-style-type: none"> <li>• <b>Completion:</b> Substantial</li> <li>• <b>Did it open government?</b> Marginal</li> </ul> |
|---|---|

The commitment sought to increase the quantity and quality of data publicly available from the Ministry of Economy and Development and supervised entities to foster better scrutiny and reusability of the data by citizens.

The OpenGovMonitor states that five out of six milestones are ongoing—concerning integration and improvement of datasets, upgrading digital applications and visualizations, and taking three decisions about data publication. According to OpenGovMonitor, the milestone to enable entities to publish data is completed. However, OpenGovMonitor does not contain links to evidence. A staff member of the General Directorate of Digital Policies and Governance of the current Ministry of Development and Investments provided evidence of the level of completion.<sup>80</sup> Data from the Ministry can be accessed on a specific page of the official website, and it has been regularly updated since 2016.<sup>81</sup> However, in many cases, links on the webpage point to datasets available as PDFs, not open data. On the other hand, the old open data portal showed an increase from 30 to 279 datasets from the Ministry of Economy and Development.<sup>82</sup> The new open data portal contained six datasets under the “Business and economy” topic, but these were last updated between 2016–2018, before the start of the action plan cycle.<sup>83</sup>

According to a Ministry representative, the General Directorate reportedly maintains statistics on the increase of the datasets published and encourages all departments and supervised entities to provide data in user-friendly formats (e.g., Excel, CSV) or provide website links.<sup>84</sup> Furthermore, the Ministry has nominated open data contact points per Directorate to improve the quality of the datasets and make digital applications for their use, involving external partners, which indirectly addresses milestones 2 and 3 of this commitment.

While there was a large increase in the number of datasets on the old open data portal by the Ministry, it is not clear to what extent these are stakeholder priorities, as Ministry representatives confirmed they did not undertake activities to engage potential users of their data. This, as well as the lack of evidence for the remaining activities that are ongoing, means that the implementation of this commitment had only marginal early results in opening government.

**Commitment 8: Open access to data of the National Centre for Public Administration and Local Government (EKDDA)**

- |   |   |
|---|---|
| <ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Relevant:</b> Yes, access to information</li> <li>• <b>Potential impact:</b> Minor</li> </ul> | <ul style="list-style-type: none"> <li>• <b>Completion:</b> Substantial</li> <li>• <b>Did it open government?</b> Marginal</li> </ul> |
|---|---|

Following a preparatory study,<sup>85</sup> EKDDA published a digital repository of research designed to categorize data according to users' potential interests.<sup>86</sup> It includes studies, research, evidence, data, and reports produced by public bodies or on their behalf by other bodies, as well as data coming from innovation laboratories, the educational material of the EKDDA training institute, and the works of students of the EKDDA. Users can search for documents based on criteria and metadata found in the repository and read open access documents. Users can also navigate files and records, search documents, and retrieve metadata.<sup>87</sup> In terms of data quality, according to EKDDA, the repository's metadata is user-friendly and its format was partially transformed from PDF to HTML.<sup>88</sup>

During the implementation period, EKDDA also published several datasets on the old open data portal, categorized by issuing institution (Documentation, Research and Innovation Institute [ITEK], Institute of Training [INEP], EKDDA, directorates of new technologies and financial services, public procurement department).<sup>89</sup> In practice, the director of ITEK (who is in charge of data governance) and the manager of the IT department (who is technically responsible for online consultations) manage open data publications.<sup>90</sup>

The commitment also intended to conduct a study concerning the process of public online consultations, but it was canceled due to the latest restructuring of the public administration (Law 4622/2019), which removed EKDDA's role as manager of online consultations.

EKDDA's representative reported that the new digital repository and dissemination actions, such as the presentation of the study on the repository, enabled easier access to useful administrative information for citizens.<sup>91</sup> The launch of the digital repository of research is a significant achievement in terms of publishing government-held information, but there is no evidence yet that this information is valued by stakeholders or has been reused, limiting the assessment of early results to marginal.

**Commitment 9: Open access to data of the Ministry of Justice, Transparency and Human Rights**

- |  |   |
|--|---|
| <ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Relevant:</b> Yes, access to information</li> <li>• <b>Potential impact:</b> None</li> </ul> | <ul style="list-style-type: none"> <li>• <b>Completion:</b> No evidence available</li> <li>• <b>Did it open government?</b> No evidence of early results yet</li> </ul> |
|--|---|

This commitment sought to publish justice-related datasets, including statistical data from the National Crime Register, statistical data on the results of competitions for lawyers and notaries, the number of grants of pardon awarded by the president of the Republic per year, and

monthly/annual bulletins of economic interest. A public official from the Ministry of Justice stated that from 2019 to 2021, the Ministry of Justice’s previous open data team released approximately 39 datasets.<sup>92</sup> The datasets can be accessed through the Ministry’s official website<sup>93</sup> and in the old open data portal.<sup>94</sup> It is not clear whether the Ministry published the datasets outlined in the action plan as part of these 39 identified datasets.

Other data on the Ministry of Justice website (although not identified as datasets to be published in the action plan) is up to date, but datasets for 2020 onward are only available as non-reusable PDFs (except for statistical data on administrative courts). The central repository points to five searchable databases concerning civil case processes, civil procedure tables, criminal procedure exhibits, the integrated judicial management system, and the progress of court cases conducted in Athens’ First Instance Court. Greece’s new open data portal contained seven datasets under the “Crime and Justice” topic, of which the two published directly by the Ministry of Justice were published before the action plan was submitted.<sup>95</sup> As for the remainder of the commitment, the OpenGovMonitor states that the commitment mobilized entities of the Ministry for data publication, and its three other milestones were ongoing—improvement of datasets, upgrading digital applications and visualizations, and three data disposal decisions. It does not offer evidence of this progress.<sup>96</sup>

**Commitment 10: Open access to data of the Ministry of Environment and Energy**

- |  |   |
|--|---|
| <ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Relevant:</b> Yes, access to information</li> <li>• <b>Potential impact:</b> None</li> </ul> | <ul style="list-style-type: none"> <li>• <b>Completion:</b> No evidence available</li> <li>• <b>Did it open government?</b> No evidence of early results yet</li> </ul> |
|--|---|

The commitment sought to increase the quantity and quality of data publicly available from the Ministry of Environment and Energy and supervised entities to foster better scrutiny and reusability of the data by citizens.

The OpenGovMonitor states that two milestones are ongoing—concerning creation of new datasets and three data release decisions—but there is no publicly available evidence of this. It also shows that three milestones on integrating and improving datasets and creating an API have been canceled. The government’s old open data portal showed 126 documents from the Ministry of the Environment, but none of these have been added or updated since the action plan was originally submitted.<sup>97</sup> The new open data portal contains 16 datasets under the topic “Environment.”<sup>98</sup> The only one of these datasets published directly by the Ministry of Environment was published before the action plan was originally submitted.

**Commitment 11: Open access to data of the Ministry of Culture and Sports**

- |  |   |
|--|---|
| <ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Relevant:</b> Yes, access to information</li> <li>• <b>Potential impact:</b> None</li> </ul> | <ul style="list-style-type: none"> <li>• <b>Completion:</b> Completed</li> <li>• <b>Did it open government?</b> Marginal</li> </ul> |
|--|---|

This commitment was completed. A public official from the Ministry’s Directorate of e-Governance confirmed that it has continuously published<sup>99</sup> datasets in a cloud link,<sup>100</sup> adapting, grouping, and homogenizing the datasets according to the new structure of the services of the Ministry of Culture and improving metadata.<sup>101</sup> It also published data disposal decisions in 2016, 2019, and 2022.<sup>102</sup> The datasets are available through a link at the bottom of the Ministry website and on a specific Ministry webpage for open data.<sup>103</sup> The comparison of the quantity and quality of available data before and after the commitment’s implementation shows that 23

new datasets were introduced, increasing from 41 to 64, following the 2022 dataset disposal decision, on a free and open basis.<sup>104</sup> They encompass topics such as lists of sites, digital applications, cultural events, and cultural geospatial information and also information touching on public policy decision-making, such as financial reports, committee meeting minutes, daily provisions, etc.<sup>105</sup> The data portal [data.gov.gr](https://data.gov.gr) does not contain data on culture as, according to the government’s digital policy, culture is not one of the 10 topics included.<sup>106</sup>

As reported by the Ministry’s representative, “even when the information is in ‘under no further disposal status,’ the Ministry still helps and provides the information to citizens by anonymization or pseudonymization of the datasets.”<sup>107</sup> Despite being fully completed, this commitment saw, at best, marginal changes toward opening government as new information was released, but there is no evidence this created a greater change in practice or that the information released was of particular importance for decision-making or reuse.

**Commitment A1 (additional commitment 1): Creation of a whistleblowing platform for integrity in sports**

- |   |  |
|---|--|
| <ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Relevant:</b> Yes, civic participation, accountability</li> <li>• <b>Potential impact:</b> Major</li> </ul> | <ul style="list-style-type: none"> <li>• <b>Completion:</b> Completed</li> <li>• <b>Did it open government?</b> Major</li> </ul> |
|---|--|

This commitment was added to the amended action plan. This commitment’s implementation and early results are assessed in Section II above.

**Commitment A2: Open data availability of the Ministry of Culture and Sports**

- |   |   |
|---|---|
| <ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Relevant:</b> Yes, access to information</li> <li>• <b>Potential impact:</b> Minor</li> </ul> | <ul style="list-style-type: none"> <li>• <b>Completion:</b> Completed</li> <li>• <b>Did it open government?</b> Marginal</li> </ul> |
|---|---|

This commitment was added to the amended action plan. The Ministry conducted an online public consultation to ensure relevance of published open data and increase the potential for reuse by engaging with external stakeholders.<sup>108</sup> It was held between 5 March and 5 April 2021 and consisted of a range of questions on what citizens considered important and how to improve the Ministry’s datasets regarding access to information, accountability, technology and innovation, and public participation. Due to technical reasons, the consultation was not carried out in the form of interactive questions but as a questionnaire that participants had to complete and send to a specific email address. There were only four respondents, and the report on conclusions from the consultation concluded that this may have been due to the design of the consultation, the lack of promotion, and low public interest. The report proposed running a better consultative process next year, for a longer period of time, that will be more interactive and better promoted in order gather citizen insights on the open data policy and datasets to be published.

A representative from the Ministry of Culture said that they continue to update the quality of published datasets, for instance by taking into account comments on open data received through the feature “Tell us your opinion” on the Ministry’s main website or received via the email address [opendata\\_yppoa@culture.gr](mailto:opendata_yppoa@culture.gr).<sup>109</sup>

**Commitment A3: Inclusion of additional data in the register of farmers and agricultural holdings**

- **Verifiable:** Yes
- **Relevant:** Yes, access to information
- **Potential impact:** None

- **Completion:** No evidence available
- **Did it open government?** No evidence of early results yet

This commitment was added to the amended action plan. It continues the publication of datasets from the Ministry of Rural Development and Food. Specifically, it committed to publishing data in relation to the ages of farmers and their educational level and agricultural incomes, crop capital (type of cultivation, area), livestock (species, number of animals), facilities (species), and agricultural machinery. The lack of further detail leads to an assessment that there is no potential impact from this commitment. The OpenGovMonitor states that the commitment is complete, but there is no link to evidence.<sup>110</sup> A simple search on the Ministry website brings up datasets from the named topic areas, but it is not clear whether these are the intended datasets as outlined in the commitment. Therefore, there is no evidence to date that this commitment has had an impact on opening government.

**Commitment A4: Teleconference on the openness actions of the Ministry of Rural Development and Food**

- **Verifiable:** Yes
- **Relevant:** Yes, access to information
- **Potential impact:** Minor

- **Completion:** Completed
- **Did it open government?** Marginal

This commitment was added to the amended action plan. Along with commitments 2 and A3, it aimed to open access to information from the Ministry of Rural Development and Food. In particular, this commitment concerned holding an open teleconference with potential stakeholders (universities, research institutions, IT companies, etc.) to inform them about the openness actions of the Ministry, with the prospect of submitting proposals for data that are useful to them. This online discussion was held in May 2021.<sup>111</sup> Based on the minutes of the meeting, public officials were open to publishing datasets related to the proposals from external stakeholders, including civil society, and to continuing conversations with them.<sup>112</sup> It is not clear whether datasets have been published directly due to these conversations, but a CSO representative said it was one of the only current examples of such collaboration between government and civil society.<sup>113</sup>

**Commitment A5: Annual Update of the DTB with citizen participation—Ministry of Digital Governance and GRNET**

- **Verifiable:** Yes
- **Relevant:** Yes, civic participation
- **Potential impact:** Minor

- **Completion:** Substantial
- **Did it open government?** No evidence of early results yet

This commitment was added to the amended action plan. It aimed to enhance a participatory process for the annual update of the DTB with public agencies and citizens to improve both the design of digital services and interaction between government and citizens. The DTB translates the government’s digital policy into processes and actions for the Greek’s public sector.<sup>114</sup> It seeks to counter the fragmentation of responsibilities and actions for electronic governance in the public sector, with measurable targets. This is one of the few commitments in the action

plan focusing on civic participation, but the lack of detail about how it would engage with citizens means it was rated as having minor potential impact.

According to the OpenGovMonitor, the four milestones have been completed (namely, development of proposals, co-creation workshops and activities, update of DTB, and DTB publication), with evidence of an online form for collecting citizen proposals<sup>115</sup> and an updated version of the DTB published.<sup>116</sup> However, there is no publicly available evidence about citizen participation in this commitment. The OpenGovMonitor links to the online form to collect proposals, but there is no information on outreach activities or whether the government conducted workshops or activities to collect proposals as per the milestones. There is no evidence available about any proposals received via the online contact form or in what ways (if any) they influenced the update to the DTB. The DTB references consultations with citizens in a general manner. Therefore, there is no evidence of changes to open government from this commitment.

**Commitment A6: Development of a cooperative monitoring tool for the fourth action plan**

- |   |  |
|---|--|
| <ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Relevant:</b> Yes, access to information</li> <li>• <b>Potential impact:</b> Minor</li> </ul> | <ul style="list-style-type: none"> <li>• <b>Completion:</b> Complete</li> <li>• <b>Did it open government?</b> Marginal</li> </ul> |
|---|--|

This commitment was added to the amended action plan. It sought to develop an online platform for monitoring Greece’s fourth OGP action plan, including information on the implementation of each commitment and milestone. OpenGovMonitor now operates as Greece’s online repository. It includes information on commitment implementation for the fourth action plan and generally provides links to online evidence (such as relevant webpages). The website was initially launched by civil society in 2020, but is now updated by the Ministry of Digital Governance, which hosts Greece’s OGP process. The website provides information for monitoring progress, which did not exist for previous action plan cycles. However, it is not clear whether the website was updated every six months, and evidence is not provided for completion of all the milestones (as required by OGP Participation and Co-Creation Standards in effect at the time). Implementation was assessed as having marginal impact on opening government as monitoring of OGP action plans are a minimum requirement of the OGP process.

**Commitment A7: Amendment of Hellenic Telecommunications and Post Commission’s (EETT’s) Regulation about Quality Indicators of Electronic Communications Services and publication of open datasets**

- |  |   |
|--|---|
| <ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Relevant:</b> Yes, access to information, civic participation</li> <li>• <b>Potential impact:</b> Minor</li> </ul> | <ul style="list-style-type: none"> <li>• <b>Completion:</b> Limited</li> <li>• <b>Did it open government?</b> No evidence of early results yet</li> </ul> |
|--|---|

This commitment was added to the amended action plan. The commitment sought to modify the EETT’s outdated regulation on the quality indicators for electronic communications services provided to citizens and the EETT’s publication of open datasets about these services’ level of customer service.<sup>117</sup> The regulation update was necessary given technological developments (such as telecommunications over the internet) and experience from its implementation so far. The update was expected to be carried out in consultation with citizens, but as this is not a new practice for EETT, the commitment was rated as having minor potential impact.<sup>118</sup>



Four out of five milestones related to the public consultation were completed. A public consultation was held from 1 December 2022 to 15 January 2021 on the draft decision on the amendment of the existing regulation of quality indicators.<sup>119</sup> The results of the consultation and the new regulation (Decision of EETT AP. 991/7B/17-5-2021),<sup>120</sup> regarding the quality indicators of fixed telephony, fixed broadband and Voice over Internet Protocol (VoIP) services, end-user services and directory information services, are publicly available.<sup>121</sup> However, the intended new datasets were not published during the implementation period despite being the most important milestone of the commitment. The 47 existing EETT datasets remained on the old open data portal.<sup>122</sup> The new open data portal includes one dataset concerning telecommunications indicators and statistics, which was last updated in 2017.<sup>123</sup> There is no evidence of early results yet, since EETT did not publish new information.

<sup>59</sup> Editorial notes:

1. For commitments that are clustered: The assessment of potential for results and “Did it open government?” is conducted at the cluster level, rather than the individual commitment level.
2. Commitments’ short titles may have been edited for brevity. For the complete text of commitments, please see Greece’s action plan: <https://www.opengovpartnership.org/documents/greece-action-plan-2019-2022/>.
3. For more information on the assessment of the commitments’ design, see Greece’s Design Report: <https://www.opengovpartnership.org/documents/greece-design-report-2019-2021/>.

<sup>60</sup> Search results for “Ministry of Education, Research and Religions,” Repository.data.gov.gr, accessed 6 April 2023, <http://repository.data.gov.gr/dataset?organization=minedu>.

<sup>61</sup> “Opendata Directory 2021,” Ministry of Education and Religious Affairs, accessed 6 April 2023, <https://www.minedu.gov.gr/publications/opendata/>; “Opendata Directory 2022,” Ministry of Education and Religious Affairs, accessed 6 April 2023, <https://www.minedu.gov.gr/publications/opendata2/2022/>.

<sup>62</sup> Search results for “education,” Data.gov.gr, accessed 6 April 2023, <https://data.gov.gr/search/?topic=education>.

<sup>63</sup> “Commitment 1: Open Availability of Ministry of Education, Research and Religious Affairs Data,” OpenGovMonitor, accessed 6 April 2023,

<https://opengovmonitor.gr/desmeuseis/%ce%b4%ce%ad%cf%83%ce%bc%ce%b5%cf%85%cf%83%ce%b7-1/>.

<sup>64</sup> OpenGovMonitor, “Commitment 1.”

<sup>65</sup> IRM, “Greece Design Report 2019–2021,” 4 January 2021, <https://www.opengovpartnership.org/documents/greece-design-report-2019-2021/>.

<sup>66</sup> As evidence, the government’s old open data portal shows 224 datasets from the Ministry of Rural Development and Food, while Greece’s IRM Design Report mentioned as a baseline more than 130 open datasets on the central open data directory and more than 80 open datasets on the Ministry’s own institutional website. Over 120 datasets on the old open data portal have been updated or uploaded as new since May 2019, when the action plan was adopted. Search results for “Ministry of Agricultural Development and Food,” Repository.data.gov.gr, accessed 6 April 2023, <http://repository.data.gov.gr/dataset?organization=ypagr>.

<sup>67</sup> For example: Ministry of Rural Development and Food, “Lists of Approved or Registered Plants Handling Animal by Products under Regulation (EC) 1069/2009,” 24 February 2023, <http://www.minagricr.gr/index.php/en/farmer-menu-2/livestock-menu/animalbyprod-menu>.

<sup>68</sup> Ministry of Immigration Policy, “Making Data Sets Available for Citizen Use,” Repository.data.gov.gr, updated 29 August 2022, <http://repository.data.gov.gr/dataset/yttoupyeio-metavaoteutlknsttojtftlknst>.

<sup>69</sup> Ministry of National Defence, “Data Table on Open Data Under the Competence of the Ministry,” updated 29 July 2022, <http://repository.data.gov.gr/dataset/yttoupyeio-e0v1kns-auuvas/resource/a31039bd-1626-456e-b397-7eb9af4aa694>.

<sup>70</sup> Ministry of National Defence, accessed 6 April 2023, <http://www.mod.mil.gr/>; Dimitrios Zampakolas (Head of Digital Governance Agency, Ministry of National Defence), correspondence with IRM, 14 October 2022.

<sup>71</sup> Zampakolas, correspondence.

<sup>72</sup> “National Elections July 2019,” Ministry of Interior, accessed 6 April 2023, <https://ekloges.ypes.gr/current/v/home/>.

<sup>73</sup> “July 7, 2019 National Election Results Files,” Ministry of Interior, 7 July 2019, <https://www.ypes.gr/lipsi-archeion-apotelesmaton-ethnikon-eklogon/arxeia-eklogon-07072019/#syndyasmoi>.

<sup>74</sup> “Policies and Actions, Program FILODIMOS II,” Ministry of Interior, accessed 6 April 2023, <https://www.ypes.gr/politikes-kai-draseis/programma-filodimos-2>.

<sup>75</sup> “Self-government, Financial Data of OTAs,” Ministry of Interior, accessed 6 April 2023, <https://www.ypes.gr/apokentromeni-dioikisi-aytodioikisi/oikonomika-stoicheia-ota>.

<sup>76</sup> “Self-government, Kallikrates Program,” Ministry of Interior, accessed 6 April 2023, <https://www.ypes.gr/apokentromeni-dioikisi-aytodioikisi/>.

<sup>77</sup> “Data and Resources,” Ministry of Interior, Repository.data.gov.gr, accessed 6 April 2023, <http://repository.data.gov.gr/dataset/yttoupyeio-eowtep1kwy>.

<sup>78</sup> Petros Exarchos (Ministry of Interior), correspondence with IRM, 7 October 2022.

<sup>79</sup> “Commitment 6: Open Availability of Ministry of Administrative Reconstruction Data,” OpenGovMonitor, accessed 6 April 2023, <https://opengovmonitor.gr/desmeuseis/%ce%b4%ce%ad%cf%83%ce%bc%ce%b5%cf%85%cf%83%ce%b7-6/>.

- <sup>80</sup> Vasileios Mavroeidis (Head of Unit in the development of software applications and web gates, Ministry of Development and Investments—General Directorate of Digital Policies and Governance), correspondence with IRM, 7 October 2022.
- <sup>81</sup> “Open Data of the Ministry of Development and Investments,” Ministry of Development and Investments, December 2022, <https://www.mindev.gov.gr/open-data/>; Mavroeidis, correspondence.
- <sup>82</sup> Search results for “Ministry of Economy and Development,” Repository.data.gov.gr, accessed 6 April 2023, <http://repository.data.gov.gr/dataset?organization=yttovpreio-oikonomiae-anatttyehe-kahtoypiemoy>.
- <sup>83</sup> Search results for “business,” Data.gov.gr, accessed 6 April 2023, <https://data.gov.gr/search/?topic=business>.
- <sup>84</sup> Mavroeidis, correspondence.
- <sup>85</sup> National Center for Public Administration and Self-Government (EKDDA), “EKKDA Digital Repository Study,” accessed 6 April 2023, <https://dr.ekdd.gr/bitstream/123456789/909/1/%ce%9c%ce%95%ce%9b%ce%95%ce%a4%ce%97.%ce%a8%ce%b7%cf%86%ce%b9%ce%b1%ce%ba%ce%bf%cf%8d%ce%91%cf%80%ce%bf%ce%b8%ce%b5%cf%84%ce%b7%cf%81%ce%af%ce%bf%cf%85%ce%95%ce%9a%ce%94%ce%94%ce%91.pdf>.
- <sup>86</sup> The repository moved from <https://resources.ekdd.gr> to <https://digitalrepository.ekdd.gr/>. George Chalkias (Director of Documentation, Research and Innovation Institute [ITEK], National Centre for Public Administration and Local Government [EKDDA]), correspondence with IRM, 7 October 2022.
- <sup>87</sup> “EKKDA Digital Repository,” EKKDA, 2019, <https://digitalrepository.ekdd.gr/>.
- <sup>88</sup> Chalkias, correspondence.
- <sup>89</sup> Search results for “National Center for Public Administration and Self-Government,” Repository.data.gov.gr, accessed 6 April 2023, <http://repository.data.gov.gr/dataset/e0v1ko-kevtpo-anuoo1as-a1oiknons-ka1-autod1oiknons>.
- <sup>90</sup> Chalkias, correspondence.
- <sup>91</sup> Chalkias, correspondence.
- <sup>92</sup> Panagiota Mpoura (Head of Coordination Unit of the Ministry of Justice), interview by IRM, 7 October 2022.
- <sup>93</sup> “Statistics from 2016 to Now,” Ministry of Justice, accessed 6 April 2023, [https://ministryofjustice.gr/?page\\_id=1603](https://ministryofjustice.gr/?page_id=1603).
- <sup>94</sup> Search results for “Ministry of Justice,” Repository.data.gov.gr, accessed 6 April 2023, <http://repository.data.gov.gr/dataset/yttoupyeio-a1ka1oouvns>.
- <sup>95</sup> Search results for “crime,” Data.gov.gr, accessed 6 April 2023, <https://data.gov.gr/search/?topic=crime>.
- <sup>96</sup> Mpoura, interview.
- <sup>97</sup> Search results for “Ministry of Environment & Energy,” Repository.data.gov.gr, accessed 6 April 2023, [http://repository.data.gov.gr/dataset?\\_organization\\_limit=0&organization=ypeka&\\_tags\\_limit=0](http://repository.data.gov.gr/dataset?_organization_limit=0&organization=ypeka&_tags_limit=0).
- <sup>98</sup> Search results for “environment,” Data.gov.gr, accessed 6 April 2023, <https://data.gov.gr/search/?topic=environment>.
- <sup>99</sup> Hara Tessa (Ministry of Culture and Sport), interview by IRM, 7 October 2022; Tessa, correspondence with IRM, 6 and 10 October 2022.
- <sup>100</sup> “Open Data for Ministry of Culture & Sports,” box.com, modified 5 October 2022, <https://app.box.com/s/f491mh2kfn18ztwtvo7wq1nezby3ake>.
- <sup>101</sup> “Metafile Data YPPOAv2.xls,” Open Data for Ministry of Culture & Sports, box.com, accessed 6 April 2023, <https://app.box.com/file/987210702024?s=rptypoo5ity6r2ubwbxvxsxvgtqx5v25>.
- <sup>102</sup> “Dataset Distribution Decision MCS 2022 eng,” Ministry of Culture and Sport, box.com, accessed 6 April 2023, <https://app.box.com/s/w57cidcss0rdn77vznd53aj42xp05nbn>; “Open Availability and Further Use of Documents, Information and Data of the Ministry of Culture and Sports,” Ministry of Culture and Sport, accessed 6 April 2023, <https://www.culture.gov.gr/el/service/SitePages/view.aspx?iID=2714>.
- <sup>103</sup> “Open Data for Ministry of Culture & Sports”; Ministry of Culture and Sport, “Open availability and further use of documents.”
- <sup>104</sup> “Open Datasets 2022 Decision eng,” Ministry of Culture and Sports, box.com, accessed 6 April 2023, <https://app.box.com/s/7bhlf2wc9jv450tr4vv2ebji4i5yding>. There were 41 open datasets available in 2019, out of which twenty-six were in Excel format and one was in ODT format; the remaining datasets did not contain any files, only the URLs, and were thus in HTML format. Ministry of Culture and Sports, Archive.data.gov.gr, accessed 6 April 2023, <http://archive.data.gov.gr/organization/yppoa>. The 2022 Dataset Disposal Decision implemented through the commitment provided for 64 available open datasets, composing more than 700 files in user-friendly formats (XLS, CSV, DOCX). “Open datasets 2022 decision eng.xlsx” and “Open Data for Ministry of Culture & Sports.” Hara Tessa provided the IRM researcher with detailed documentation on both commitments’ progress, including tables accounting for number and type of datasets published, the online public consultation, and examples of reuse of the data.
- <sup>105</sup> “Financial Reports,” Ministry of Culture and Sports, box.com, accessed 6 April 2023, <https://app.box.com/s/f491mh2kfn18ztwtvo7wq1nezby3ake/folder/164173752200>.
- <sup>106</sup> Tessa, correspondence.
- <sup>107</sup> Tessa, correspondence.
- <sup>108</sup> “Open Data Sets,” Ministry of Culture and Sports, April 2021, <https://app.box.com/s/rc4golzxvzvr389649xd152pgvj3gyd8>.
- <sup>109</sup> Tessa, correspondence.
- <sup>110</sup> “Additional Commitment 3: Enrichment of the Register of FARMERS AND AGRICULTURAL FARMING with More Anonymized Data,” OpenGovMonitor, accessed 6 April 2023, <https://opengovmonitor.gr/desmeuseis/%cf%83%cf%85%ce%bc%cf%80%ce%bb%ce%b7%cf%81%cf%89%ce%bc%ce%b1%cf%84%ce%b9%ce%ba%ce%ae%ce%b4%ce%ad%cf%83%ce%bc%ce%b5%cf%85%cf%83%ce%b7-3-%ce%b5%ce%bc%cf%80%ce%bb%ce%bf%cf%85%cf%84%ce%b9%cf%83%ce%bc/>.
- <sup>111</sup> OpenGovMonitor links to evidence of an invitation to register for the teleconference. “Additional Commitment 4: Teleconference on the Openness Actions of the Ministry of Rural Development and Food,” OpenGovMonitor, accessed 6 April 2023, <https://opengovmonitor.gr/desmeuseis/%cf%83%cf%85%ce%bc%cf%80%ce%bb%ce%b7%cf%81%cf%89%ce%bc%ce%b1%cf%84%ce%b9%ce%ba%ce%ae%ce%b4%ce%ad%cf%83%ce%bc%ce%b5%cf%85%cf%83%ce%b7-4-%cf%84%ce%b7%ce%bb%ce%b5%ce%b4%ce%b9%ce%ac%cf%83%ce%ba%ce%b5/>.

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<sup>112</sup> Ministry of Agriculture and Food, “Open Data 2021: Transparency, Innovation, Development Online Open Discussion Ministry of A.A.T.,” accessed 6 April 2023,

[http://www.minagric.gr/images/stories/docs/ypoyrgeio/anoixta\\_dedomena/praktika\\_thlediaskepsis\\_260521.pdf](http://www.minagric.gr/images/stories/docs/ypoyrgeio/anoixta_dedomena/praktika_thlediaskepsis_260521.pdf).

<sup>113</sup> Alexandros Melidis, GFOSS, Email correspondence with IRM researcher, 24 January 2023.

<sup>114</sup> “Digital Transformation Bible 2020–2025,” Government of Greece, accessed 6 April 2023,

<https://digitalstrategy.gov.gr/>.

<sup>115</sup> “Digital Transformation Bible 2020–2025, Proposals,” Government of Greece, accessed 6 April 2023,

<https://digitalstrategy.gov.gr/proposals>.

<sup>116</sup> Government of Greece, “Digital Transformation Bible 2020–2025,” published June 2021,

[https://digitalstrategy.gov.gr/website/static/website/assets/uploads/digital\\_strategy.pdf](https://digitalstrategy.gov.gr/website/static/website/assets/uploads/digital_strategy.pdf).

<sup>117</sup> Hellenic Telecommunications & Post Commission, accessed 6 April 2023,

[https://www.eett.gr/opencms/opencms/EETT\\_EN/index.html](https://www.eett.gr/opencms/opencms/EETT_EN/index.html).

<sup>118</sup> “Public Consultations,” Hellenic Telecommunications & Post Commission, accessed 6 April 2023,

[https://www.eett.gr/opencms/opencms/EETT\\_EN/Electronic\\_Communications/Consultations/index.html](https://www.eett.gr/opencms/opencms/EETT_EN/Electronic_Communications/Consultations/index.html).

<sup>119</sup> Hellenic Telecommunications & Post Commission, “Draft Decision of EETT on the Amendment of the Existing Regulation of Quality Indicators,” November 2020,

<https://www.eett.gr/opencms/export/sites/default/admin/downloads/Consultations/PCQualityIndicators2020.pdf>; “Press

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[https://www.eett.gr/opencms/opencms/admin/News\\_new/news\\_1340.html](https://www.eett.gr/opencms/opencms/admin/News_new/news_1340.html).

<sup>120</sup> Hellenic Telecommunications & Post Commission, DECISION, “Amendment and Codification of the EETT AP Decision. 621/011/27-09-2011 (Regulation of Quality Indicators) Regarding the Quality Indicators of Fixed Telephony, Fixed Broadband and VoIP Services, End-User Services and Directory Information Services,” 17 May 2021,

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<sup>121</sup> Hellenic Telecommunications & Post Commission, DECISION, “Results of Public Consultation on the Amendment of EETT Decision 621/011/27-9-2011,” 17 May 2021,

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<sup>122</sup> Search results for “National Telecommunications & Post Commission,” Repository.data.gov.gr, accessed 6 April 2023, <http://repository.data.gov.gr/organization/eonikh-ettitpotth-thaettikoinonion-taxyapomeion-eett>.

<sup>123</sup> “Telecommunications Indicators & Statistics,” Data.gov.gr, updated 31 December 2017,

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