

Independent Reporting Mechanism

Action Plan Review:
Greece 2022–2024

Open
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Partnership



Independent
Reporting
Mechanism

Introduction

In January 2021, the Independent Reporting Mechanism (IRM) rolled out the new products that resulted from the IRM Refresh process.¹ The new approach builds on the lessons learned after more than 350 robust, independent, evidence-based assessments conducted by the IRM and inputs from the OGP community. The IRM seeks to put forth simple, timely, fit for purpose, and results-oriented products that contribute to learning and accountability in key moments of the OGP action plan cycle.

IRM products are:

- **Co-Creation Brief:** Brings in lessons from previous action plans, serves a learning purpose, and informs co-creation planning and design.
- **Action Plan Review:** A quick, independent technical review of the characteristics of the action plan and the strengths and challenges IRM identifies to inform a stronger implementation process.
- **Results Report:** An overall implementation assessment that focuses on policy-level results and how changes happen. It also checks compliance with OGP rules and informs accountability and longer-term learning. This product was rolled out in a transition phase in 2022, beginning with action plans ending implementation on 31 August 2022. Results Reports are delivered up to four months after the end of the implementation cycle.

This product consists of an IRM review of the Greek 2022–2024 action plan. The action plan comprises 19 commitments that the IRM has filtered and clustered into two clusters and retained 13 separate commitments. This review emphasizes its analysis on the strength of the action plan to contribute to implementation and results. For the commitment-by-commitment data, see Annex 1. For details regarding the methodology and indicators used by the IRM for this Action Plan Review, see Section III.

¹ “IRM Refresh,” Open Government Partnership, <https://www.opengovpartnership.org/process/accountability/about-the-irm/irm-refresh/>.

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Section I: Overview of the 2022–2024 Action Plan

Greece's fifth action plan includes promising commitments on lobbying regulation, whistleblower protection and open land administration data. While there were improvements to the co-creation process compared to the previous action plan cycle, the brief timeframe limited the opportunities for civil society organizations (CSOs) to develop the action plan with the government. Greater dialogue between government and civil society during implementation would strengthen the OGP process and help achieve stronger results.

Greece's fifth action plan contains 19 commitments covering transparency and accountability, anti-corruption, open data, public participation, and services for citizens and businesses.¹ Some commitments continue policy areas from previous action plans, such as digital transformation, access to information, open data, public administration reform, and open parliamentary data. A commitment on holding two public deliberations on the public participation platform of the municipality of Moschato-Tavros is also included.²

Promising commitments on lobbying regulation and whistleblower protection have modest potential for results. Commitment 7 would record and publish lobbying activities in the new online Transparency Register, lobbying statistics and any sanctions imposed. Commitment 8 would create an online platform for reporting whistleblowing on breaches of European Union (EU) law. While they address their thematic priorities, CSOs believe the commitments have a narrower scope of work than what they would have liked.³ A cluster comprising Commitments 11–13 is also assessed as promising and has substantial potential for results. It could provide open, standardized, and accurate statistical data of land transactions, as well as georeferenced addresses and toponyms of high value, particularly in climate-related emergencies.

The Ministry of Digital Governance and a multi-stakeholder Focus Group oversaw the development of the action plan.⁴ Ministry officials published an open invitation on the opengovmonitor.gr website for a workshop on open governance at the 12th Annual Conference e-Government Forum where participants could submit thematic ideas for further discussion as commitment proposals.⁵ After the workshop, officials also posted an open call form for public

AT A GLANCE

Participating since: 2011
Action plan under review: 2022–2024
IRM product: Action Plan Review
Number of commitments: 19

Overview of commitments:
Commitments with an open government lens: 19 (100%)
Commitments with substantial potential for results: 3 (15%)
Promising commitments: 5 (26%)

Policy areas:
Carried over from previous action plans:

- Digital transformation
- Whistleblowing protection
- Public administration reforms
- Open parliamentary data
- Open data on migration

Emerging in this action plan:

- Lobbying regulation
- Local level engagement
- Open land administration data

Compliance with OGP minimum requirements for co-creation:
Acted according to OGP process: No

proposals which would meet commitment criteria on opengovmonitor.gr.⁶ The draft plan was published for public comments on the opengov.gr consultation website. Twelve CSOs set out their concerns about the co-creation process and the final action plan in a public letter sent via opengov.gr to the Minister of Digital Governance in December 2022.⁷ A meeting organized with the minister to address the CSO letter occurred after the submission of the action plan to OGP. While the government produced reasoned response to the other comments received via opengov.gr, it was not shared with those stakeholders or made public before the submission of the action plan. Representatives from the Ministry of Digital Governance stated that publishing the reasoned response was paused until they held the meeting with the minister on the CSO letter.

Despite an improved process compared to the previous cycle, Greece did not meet OGP minimum requirements for co-creation because while reasoned response to proposals or input received from the participants of the co-creation process was developed, it was not shared with stakeholders or made public before the submission of the action plan. The government stated that civil society proposed most of the policy areas covered in the action plan.⁸ It also acknowledged that the breadth of citizen and civil society participation in the OGP process was limited.⁹ Some Focus Group members reported that the three-month timeline to co-create the action plan either did not provide adequate time to submit proposals and get feedback on meetings and proposals or fell short of involving diverse voices.¹⁰ Through education and robust communication, the Ministry of Digital Governance wants to reestablish trust between the government and other stakeholders and broaden public participation in the co-creation and implementation of current and future action plans.¹¹

Although the Focus Group was constituted for the purposes of the co-creation process, private sector participants expressed wish to continue their involvement in implementing and monitoring the action plan.¹² Civil society would like the Ministry of Digital Governance to clarify the role of the Focus Group during implementation and to provide a timeline for the changes to the group’s framework for overseeing implementation.¹³ The Ministry of Digital Governance has stated it is working to develop a mechanism for ongoing dialogue with civil society during the implementation period.¹⁴ The IRM recommends more regular updates to the website and repository, as well as regular dialogue with civil society and private sector stakeholders to oversee implementation of the plan, ideally through a multistakeholder forum.

The commitments not analyzed further in Section II have modest or unclear potential for results. Commitments 2–4 build on earlier commitments to improve access to parliamentary information, they offer only immediate technical solutions. Commitment 9 sets out Greece’s open data training framework but does not actually commit to training public officials. The potential of Commitments 15, 18, and 19 to generate results is unclear. Joint implementation of Commitment 14 by government and CSOs could reach the goal to improve transparency and accountability around organizations that receive state funding as well as Commitment 17 to encourage data reuse.¹⁵

¹ “Greece Action Plan 2022–2024,” Open Government Partnership, 9 January 2023, <https://www.opengovpartnership.org/documents/greece-action-plan-2022-2024-december>, 6.

² While this is not the first time Greece has included a commitment to be implemented by a local municipality in its action plan, it is the first such commitment since the 2016–2018 action plan.

³ Angelos Kaskanis (Transparency International Greece), interview by IRM researcher, 4 April 2023; Stefanos Loukopoulos (Vouliwatch), interview by IRM researcher, 29 March 2023.

⁴ The multistakeholder working group comprised the Secretariat General for Coordination of the Presidency of the Government, the National Network of Technology and Research Infrastructure, the Central Union of Municipalities of Greece, GFOSS Open Technologies Alliance, Solidarity Now, Association of Businesses and Industries, Transparency International Greece, and Expertise France.

⁵ “Invitation to a conference,” OGP Greece, updated 1 November 2022, <https://opengovmonitor.gr/callforworkshop>.

⁶ These 12 criteria ranged from thematic relevance to open government, financial resources, responsibilities, and more as listed on: “Call for collaborative planning of the 5th national open government action plan,” OGP Greece, 31 October 2022, <https://opengovmonitor.gr/callforcodesign/>.

⁷ “CSO letter to the Minister of Digital Development,” GFOSS Open Technologies Alliance, 19 December 2022, <https://eellak.ellak.gr/wp-content/uploads/sites/23/2022/12/epistoli-organwsewn-ktp.pdf>.

⁸ Anastasios Papazafiris (OGP Point of Contact), written correspondence with the IRM, 6 April 2023.

⁹ Presidency of the Government, written answer to the IRM, 30 April 2023.

¹⁰ Alexandros Melidis (GFOSS Open Technologies Alliance), interview by IRM researcher, 28 March 2023; Lefteris Antoniadis (Solidarity Now), interview by IRM researcher, 12 April 2023; Athena Vounatsou and Maria Bozoudi (SEV Hellenic Federation of Enterprises), interview by IRM researcher, 12 April 2023.

¹¹ Papazafiris, written correspondence.

¹² Vounatsou & Maria Bozoudi, interview: “We would be eager to continue working on the plan. We would like to be part of this process throughout the implementation as well as start with the preparation, instead of a few months rush.”

¹³ Antoniadis, interview.

¹⁴ Ministry of Digital Governance, letter to the IRM during the pre-publication review, 2 August 2023.

¹⁵ “Greece Action Plan 2022–2024,” Open Government Partnership, 18.

Section II: Promising Commitments in Greece’s 2022–2024 Action Plan

The following review looks at one commitment and a cluster of three commitments that the IRM has identified as having the potential to realize the most promising results. Promising commitments address a policy area that is important to stakeholders or the national context. They must be verifiable, have a relevant open government lens, and have modest or substantial potential for results. This review also provides an analysis of challenges, opportunities, and recommendations to contribute to the learning and implementation process of the action plan.

Table 1. Promising commitments

Promising Commitments
Commitment 7: Lobbying Activity. This commitment seeks to ensure implementation of Greece’s lobbying regulation law 4829/2021 and compliance with the requirements of Greece’s recently-launched Transparency Register.
Commitment 8: Whistleblowing platform in accordance with EU Directive 2019/1937. This reform would implement an online whistleblowing reporting platform according to the requirements of the EU Whistleblower Directive (transposed in Greece as Law 4990/2022) that introduced common standards for the protection of whistleblowers.
Commitments 11–13: Open land administration data. This cluster of commitments looks to improve the data held by the Hellenic Cadaster. The actions would improve the quality and increase the quantity of data in relation to land transactions, as well as provide complete public datasets of georeferenced postal addresses and toponyms.

Commitment 7: Lobbying Activity *National Transparency Authority (NTA)*

For a complete description of this commitment, see Commitment 7 in Greece’s 2022–2024 action plan: <https://www.opengovpartnership.org/documents/greece-action-plan-2022-2024-december>.

Context and objectives

A 2017 review of lobbying in Europe reported that a more robust regulatory environment for lobbying activities in Greece would help ensure greater transparency, integrity, and accountability in the decision-making process.¹ In 2021, Greece passed the law on “Strengthening Transparency and Accountability of State Institutional Bodies.” This legislation was Greece’s first attempt to regulate lobbying activities between state institutions and interest representatives.² As a consequence, the NTA launched the Transparency Register in December 2022 and published a Code of Conduct and Guidelines.³

A NTA representative confirmed that current members of the legislature and executive branches of government and their spouses cannot act as lobbyists, and former members cannot engage in lobbying consulting until 18 months after leaving office.⁴ They added that non-governmental organizations and professional organizations can be registered lobbyists. Registered lobbyists and members of the legislature and the executive must report annually on their activities in the Transparency Register. Registered lobbyists must declare the policy area, the decision for which they exercised lobbying activities, the name of the person who exercised lobbying activities and

the name of the client, the method used and the public official targeted. The NTA, as the supervisory authority, may impose sanctions if interest representatives breach the law. The Transparency Register must publish activity statistics and breaches annually online.

This commitment progresses activities in the National Anti-Corruption Action Plan.⁵ Lobbying activities in 2023 and 2024 would be recorded in the Transparency Register and lobbying statistics and any sanctions imposed published.⁶ The NTA advised the IRM that it plans to also carry out activities to inform the public about the law and the Transparency Register.⁷ During co-creation, civil society had proposed an open and accessible registry, expansion of the definition of lobbyist to register, as part of this commitment.⁸

Potential for results: Modest

As the register was launched in December 2022, technically before the adoption of the action plan, this commitment aims to ensure compliance in practice with the new legislation. A NTA representative suggested the commitment would strengthen democratic principles, good governance, trust in the political system and to encourage publicly a change in culture and behavior.⁹ They said all data from public officials and interest representatives in the Transparency Register would be open and public accessible and thus would enhance the legitimacy and integrity of lobbying activities.

The government notes in the action plan that according to the initial proposals formulated in July 2022, this commitment reflects civil society priorities. However, CSOs questioned the value of including it in the action plan, given that the law was adopted in 2021 and is already being implemented.¹⁰ They also note that the law has several deficiencies that inhibit full transparency. Namely, it excludes in-house lobbyists, it lacks a clear timeframe by which lobbyists must register, and the requirement for annual submissions of their lobbying activities allows disclosures to be made long after the activities have taken place. For example, a CSO said it was concerned that the public would not be able in real time (or close to real time) to know who has influenced decision makers in the lead up to the national elections in June 2023, as lobbyists are required to submit their lobbying activities only annually.¹¹

Despite the notable limitations, the publication of data in a public lobbying register is a significant step forward as it intends for the first time to give the public a sense of the lobbying landscape in Greece and who is trying to influence decision-makers. However, limitations around the definition of lobbyists mean that the register may not capture much of the lobbying that happens in Greece. The publication of statistics would also help the public and watchdogs to understand the overall performance of the register and legal framework – such as for number of site visitors, number of registrants, sanctions applied etc. Furthermore, there is scope for improvements in the timeliness and regularity for submitting and publishing data, as well as to address concerns around data accuracy and verification. Therefore, this commitment is identified as having modest potential for results because it introduces a positive but limited change to transparency of lobbying activities in Greece.

Opportunities, challenges, and recommendations during implementation

Civil society wants immediate publicity of the legislation and promotion of its statutory requirements.¹² They are troubled that the government has not yet carried out the campaign to promote the legal obligation to register, noting that, by March 2023, only two lobbyists were registered, and their information was incomplete and seemed unverified and inaccurate.

Furthermore, civil society say that the Transparency Register needs an improved search functionality and data to be released in open data formats to facilitate public oversight. Currently, searches can be made if you know exactly the name of the lobbyist.¹³

To encourage a more ambitious approach to implementation of this commitment, the IRM recommends:

- **The NTA ensure compliance among lobbyists by raising awareness about the Transparency Register’s disclosure requirements.** The NTA could hold meetings with interest representatives or run trainings to inform them of their legal obligations. The government could further promote existing guidance materials and produce audiovisual materials to explain the requirements and how to register. While the law stipulates annual updates, the NTA could promote best practice from other countries where submission and publication of the data is timelier to improve the usefulness of the data submitted. For example, in Ireland, lobbyists update the register every four months, in the UK they update the register every three months, and in Lithuania, lobbyists update their records within seven days of conducting lobbying activities.¹⁴
- **The NTA could train public officials on the new rules to ensure compliance among lobbyists.** In the same manner of raising awareness amongst lobbyists themselves, the NTA could also raise awareness and provide training for public officials to ensure they are aware of the lobbying transparency rules. In a change of cultural practice, civil servants and public officials could ensure that representatives are registered on the Transparency Register before accepting any meetings with lobbyists. For example, European Commission officials are only able to meet with interest representatives if they are registered in the EU’s transparency register.¹⁵
- **Improve the functionality of the Transparency Register to ensure transparency and public oversight of lobbying activities.** Currently, the register has limited search capacities. The search function would benefit from a browse function that allows for more general searches or open access to all entries and updates, for example in order of most recently updated entries. For example, the EU’s transparency register allows for search and browse of the data by keyword or general criteria.¹⁶ Greece’s Transparency Register could also consider allowing download of the Transparency Register dataset in full. This would better serve the objective of providing open and accessible information to the public on lobbying activities.
- **Develop a framework for publishing relevant statistics through collaboration with civil society.** The Transparency Register is due to contain lobbying and sanctions statistics. However, the details of exactly what statistics, in what format and regularity are details that could be developed in collaboration with CSOs so that the information published is relevant and useful for ensuring public oversight of the functioning of lobbying transparency and regulation in Greece. This would enhance the aim to strengthen democratic principles, good governance, trust in the political system and encourage a change in culture and behavior. Publication of sanctions data (including fines administered) would help to publicize cases of infringement and reinforce adherence to the law. Information on sanctions could be published on the Transparency Register website on an ongoing basis. The statistics could be used to later produce recommendations to improve the register, potentially looking at making it easier to record information, increase the detail of the information collected and published, as well as potentially suggest legal amendments to broaden the scope of the legislation.

Commitment 8: Whistleblowing platform in accordance with EU Directive 2019/1937

National Transparency Authority (NTA)

For a complete description of this commitment, see Commitment 8 in Greece’s 2022–2024 action plan: <https://www.opengovpartnership.org/documents/greece-action-plan-2022-2024-december>.

Context and objectives

By the end of 2021, all EU member states were expected to transpose the EU Whistleblower Directive 2019/1937 that introduced common standards for the protection of whistleblowers. In Greece, Law 4990/2022 (Government Gazette, Series 1, No. 210), adopted on 11 November 2022, transposed the EU Directive into national law. It seeks to encourage individuals to report to the competent authorities an event or information that has come to their notice that constitutes or is likely to constitute a breach of EU law.

This commitment implements Article 11 of Law 4990/2022 which requires the NTA to maintain an electronic system for external reporting (whistleblowing). Currently, the NTA receives anonymous or named reports via a complaints page on its website. The new system would receive, manage, and monitor reports from employees in the public and private sectors on violations which fall within the scope of the new law. Whistleblowers who choose to remain anonymous may create a secure post-box which will allow two-way communication with the case investigator.

The commitment’s activities are scheduled to end on 11 August 2023 with the completion of a data privacy impact assessment and an external reporting platform. Over the nine-month period (January–August 2023), the NTA along with the Ministry of Justice and the Ministry of Interior would develop educational and information materials, and issue Ministerial Decisions and Governor’s Opinions. As of April 2023, the project team was consulting the private and public sectors to develop an operational framework to implement the law, designing the platform’s specifications, and carrying out three-yearly compliance reviews.¹⁷

This work progresses activities set out in the National Anti-Corruption Action Plan.¹⁸ The NTA proposed the commitment during co-creation with support from the Ministry of Digital Governance, the Ministry of Interior, the Ministry of Justice, and the Ministry of Labor and Social Affairs. It supports the OGP values of public accountability and access to information.

Potential for results: Modest

The government expects whistleblowing on breaches of EU law to enhance integrity, accountability, and trust within Greek organizations and protect public interest.¹⁹ Citizens have demonstrated that there is a lot of ground to cover in building this trust. For example, whistleblowers of the 2017 Novartis scandal—manipulation of drug prices through bribery—reportedly chose to give evidence of the bribery to the United States government rather than to Greek authorities.²⁰

Before Law 4990/2022, there existed specific mechanisms only for whistleblower reports in relation to the Hellenic Competition Commission, the Hellenic Single Public Procurement Authority, and the General Secretariat of Sports.²¹ CSOs see Law 4990/2022 and this commitment as a positive but limited reform as it only provides protection for whistleblowers

from retaliation when they submit anonymous reports related to EU law.²² On the other hand, a single platform would address Transparency International Greece’s recommendation to enact a single national legal framework to protect whistleblowers when transposing the EU Directive.²³

By implementing a new anonymous whistleblowing mechanism, there is an expectation that the number of such reports would increase. A similar commitment by the Ministry of Culture and Sports in the previous action plan on whistleblowing in sports, albeit unrelated to this particular commitment, resulted in an increase in the number of whistleblowing reports, including cases that went to court and led to sanctions.²⁴

The IRM assesses this commitment as having modest potential for results because the new platform would only support whistleblowing in breaches of EU law but not necessarily the national law broadly. Civil society advised the Minister for Digital Governance in a letter that the commitment would have greater impact if it also covered complaints about violations to national law.²⁵ Therefore, there are limitations to the extent to which whistleblowers may be protected by law if reports are not in relation to EU law. A civil society representative also stated that business employees might question the effectiveness of the reporting channel and prefer to use other channels—potentially via leaks to the media.²⁶

Opportunities, challenges, and recommendations during implementation

Now that the EU Directive is transposed, the NTA could collaborate with civil society and businesses to monitor and report on the implementation of Law 4990/2022. They can develop recommendations to improve implementation or suggest refinement of any legal limitations. The NTA could also monitor the efficacy of the new platform and introduce refinements if necessary.

Promoting the new legal protections and the mechanisms for submitting whistleblower reports would also help improve the outcomes of implementing this commitment. In their 2021 analysis of whistleblower scandals and protection in Greece, Anna Damaskou and Antonios Baltas recommended keeping management and employees up to date about the new protection framework.²⁷

The IRM recommends that the government considers:

- **Engaging the Ministry of Culture and Sports to learn from the implementation of the EPATHLA whistleblowing platform for sport**, which has been running for over two years and resulted in 69 reports with over 20 cases being investigated further within 18 months. The NTA could learn from their experience, including on how to encourage reporting and deal with reports efficiently. Further engagement with other countries such as the Czech Republic, Latvia, Spain, and Italy who are also implementing the whistleblower directive could provide useful models to replicate.²⁸
- **Communicating and raising awareness about the new whistleblowing protection towards those in policy areas that may be directly affected, as well as more broadly to the public.** Ensuring that information is provided directly in the workplace (such as in the form of posters or leaflets), online on social media, via television and radio, or other mediums will help enhance the results from awareness raising activities. These efforts would benefit from going beyond a narrow campaign towards also including messaging from managerial level and senior officials in support of whistleblowers. There might need to be some educational information about which policy areas are covered by the whistleblower protections and what would constitute a

breach in those laws that could be subject to reporting. A strong media campaign and vocal support from business and institutions could foster a culture of whistleblowing, as seen through Ireland’s OGP commitment from its 2014–2016 action plan.²⁹ Monitoring the efficacy of the new whistleblowing platform and the awareness raising efforts could help introduce refinements where/if necessary.

- **Studying best practices to guide implementation of the whistleblower protection law in Greece and how it may also deal with whistleblowing in relation to national law.** The study could look at the functions and operations of any independent agency on whistleblower protection, the best mechanisms for ensuring whistleblowers can provide information in a confidential and/or anonymous manner. The study could also cover how to best conduct whistleblower disclosures and remedies in a timely manner, produce regular statistics, train stakeholders—including judges and prosecutors—as well as ensure rapid intervention and effective mechanisms to give whistleblowers free legal support and advice.³⁰ Some studies have highlighted whistleblower protection practices in France (where whistleblowers have recourse to a fast-track court system), Ireland (providing immunity from prosecution for disclosing sensitive information), and the Netherlands (releasing comprehensive statistical information to the public).³¹ The NTA could commit to extending its treatment of any whistleblowing reports in the same way it would treat reports made under Law 4990/2022.

Commitments 11–13: Open land administration data

Hellenic Cadaster (HC)

For a complete description of the commitments included in this cluster, see Commitments 11–13 in Greece’s 2022-2024 action plan: <https://www.opengovpartnership.org/documents/greece-action-plan-2022-2024-december>.

Context and objectives

This cluster seeks to publish three key land administration datasets in open data formats. Initiated by the HC, which is responsible for mapping and administering Greece’s geospatial information, these commitments continue the joint work with the Ministry of Digital Government to open up cadastral data and services to the public. The Minister of Digital Governance presented this work to the Prime Minister in April 2021 and attracted widespread media and public attention.³² The HC’s 24/7 maps service was the first stage.

These commitments aim to address the lack of reliable and authoritative statistical data about real property transactions and to provide digital geospatial datasets of postal addresses of land properties in the Cadastre and the country’s toponyms (geographical names). These activities meet the OGP value of transparency, but civil society was not involved in their development during co-creation. A business group representative stated that they also pushed for a commitment on geospatial data, but it is not captured in the scope of these commitments.³³

Commitment 11 covers property transaction data. Under Law 2664/1998, in the areas where the Greek land registry has replaced the existing registration system of property transfers and mortgages, data must be kept on the HC’s central land registry and updated by local land registries based on their transactions.³⁴ Registered property owners can use their Taxisnet³⁵ codes to access this data. The HC currently supplies transaction data to the Bank of Greece for

analysis and public reporting and responds to ad hoc requests from interested parties. This initiative would make open online statistical datasets which show the type and number of land transactions since 2003 as well as other unspecified open land administration data freely available. Depending on resources, the HC would make the data available through application processing interfaces (APIs) to allow machine-based analysis and reuse.

Commitment 12 seeks to create a comprehensive registry of postal addresses across Greece. Not all municipalities have created street registers, and state agencies have not developed a national register.³⁶ The HC advises that the absence of this dataset causes difficulties for a vast array of stakeholders, both in the public and private sectors. Virtually all public services, regardless of administrative levels (centralized, decentralized, regional, and local), are unable to access and employ this dataset for their requirements.³⁷ The HC's geoportal would therefore offer a free and open geospatial dataset of the postal addresses in properties declared in the Cadastre since 1996.³⁸ The postal addresses would be georeferenced at the Hellenic Geodetic Reference System '87 and linked to Cadastral Identification Codes (KAEKs).

Commitment 13 would create an open and free geospatial dataset of the toponyms (geographical names) declared since 1996 by property owners during the development of the Cadastre. This data, which would also be geolocated in the Hellenic Geodetic Reference System '87, is a fundamental data theme of the EU 2007/2/EC (INSPIRE) Directive,³⁹ and would provide a more comprehensive set than what is currently available from the Hellenic Military Geographical Service.⁴⁰ The lack of geospatial toponym data affects all parties that need to determine the location of a phenomenon or an event, such as climate change events, fires or accidents in non-urban areas or in areas without postal addresses, or individual calls for emergency assistance.

Potential for results: Substantial

As the government moves to online service delivery, it needs reliable infrastructure, authoritative online information and data, and knowledgeable online users. The 2022 Global Data Barometer score for Greece's open land data was 22/100, slightly below the global average of 25;⁴¹ whereas land tenure data scored 31, higher than the global average of 17. This cluster would improve public access to Greece's online land administration data.

In addition to meeting the EU's fundamental data requirements as outlined in the INSPIRE Directive, this cluster would make statistical datasets of property transactions transparent across the country and increasingly standardize and make accurate georeferenced datasets of addresses and toponyms for professionals and citizens. In time, it could reduce the number of urban geographical locations of emergencies that cannot be identified or the number of municipal or rural areas with incomplete or no address details. Crowdsourcing efforts to correct errors and omissions as well as update the address and toponym databases with interested parties—local authorities or individuals—looks ahead to real-time address data.

Given the low coverage of the Cadastre at this stage and the potential for coverage to become extensive over this action plan, the results of implementation could be substantial.

Opportunities, challenges, and recommendations during implementation

The HC's priority is to release data whose availability can add value for public administration, society, the scientific community, and the market.⁴² This is in line with the principles of the

Open Data Charter.⁴³ Developing APIs for Commitments 11 and 12 would affirm this strategic alignment.

The IRM recommends that the government considers:

- **Completing the development of APIs to encourage public and commercial usage of these fundamental geospatial datasets.** Allocating more resources to the HC to create APIs would greatly increase the reusability of the data. This could have a huge effect not only on the use of online public services, but also in the business world (for example, delivery services). Building on API development, the Hellenic Cadastre could also hold public events such as hackathons to invite creative use of the newly available data (for example, to create new useful applications).
- **Consulting with civil society and the private sector on the types of information that would be most useful.** This would not only inform the HC about the most useful kinds of information but may help prioritize the publishing of information that would particularly help civil society act as public watchdogs (e.g., monitoring suspicious land transactions), and for the private sector to be able to make better business decisions (e.g., having greater clarity over property ownership and rights).

Other commitments

Other commitments that the IRM did not identify as promising commitments are discussed below. This review provides recommendations to contribute to the learning and implementation of these commitments.

Commitment 1 aims to digitize around 100 cultural and scientific books of the Academy of Athens and to 3D-scan and document five statues. While being a worthy transparency initiative, it is not clear that this particular commitment would open access to government-held information.

Commitments 2, 3, and 4 seek to improve access to parliamentary information and are supported by civil society stakeholders who look forward to increased parliamentary transparency and accountability through easier access to this information.⁴⁴ They build on commitments in the second and third action plans.⁴⁵ The goal of Commitment 2 to provide detailed indices which meet international standards could be a short-term response to “a chronic problem” of inadequate indexing and proprietary document formats.⁴⁶ Changing to optical character recognition (OCR) digitization of the minutes would provide a permanent solution and elevate its potential for results. Publishing data about MP profiles and legislative activity (Commitment 3) in open formats would enable data reuse, while consulting civil society on designing and upgrading the parliament website and search engine (Commitment 4) would be welcomed by users and provide stronger results.

For **Commitment 5**, the Municipality of Moschato-Tavros has contracted a private company to conduct two public deliberations on its public participation platform. The government hopes this commitment may inspire other local governments to pursue open government activities.⁴⁷ However, this commitment’s potential for results is unclear as it appears to continue existing public deliberation practices without any added value or intended enhancement.

Commitment 6 implements the application developed by the NTA on disciplinary proceedings for public officials. It will record progress across stages of all cases before single disciplinary

bodies and Disciplinary Boards as required by Article 24 of Law 4807/2021.⁴⁸ Data imported by authorized users would remain confidential.⁴⁹ Requiring regular times to publish status reports on a dedicated site or on an existing site as well as publishing the tables as open data would provide greater public transparency about the functioning and outcomes of these processes.

Commitment 9 carries an ambition for public administration executives to develop a framework to strengthen open governance and enable optimal utilization of open data. It reflects civil society priorities to incorporate open governance principles across the public administration and strengthen public interest in public policies.⁵⁰ However, this work only calls for a methodology and plans for two training programs for open data managers. The commitment would benefit from actually delivering the trainings and measuring their outcomes.

Commitment 10 aims to digitize the Hellenic National Meteorological Service’s archive of meteorological documents and implement a publicly available meteorological database from state and private sector meteorological station networks. Plans around open data fusion,⁵¹ particularly with respect to climate data, are commendable. The IRM recommends requiring progress reports in 2023 and 2024 and reporting on the open data fusion activities.

Commitment 14 establishes, in accordance with Law 4873/2021, a centralized electronic process for registering CSOs that wish to receive state funding, replacing the many registers and procedures across the public administration. A civil society representative expressed concern that the new process on gov.gr may become an administrative obstacle to accessing public funds, particularly for smaller organizations.⁵² Tracking uptake of the new register and working with the CSOs that have expressed concern to the Ministry of Interior would support this commitment’s goal to create stronger civil society.⁵³

As part of **Commitment 15**, Information Society SA would create an online feedback mechanism for citizens to evaluate the quality of public services. As no further details are provided, its potential for results is unclear. It would be beneficial to publish the work program, set out the role of CSOs during implementation, and monitor activities.

Commitment 16 will create a centralized up-to-date register of all public bodies which sets out their responsibilities and legal status. It will cover all four levels of public administration (centralized, decentralized, regional, and local) and is expected to provide users with consistent information about each public body and resolve the complexity of the public administration’s current institutional and regulatory frameworks.⁵⁴ It would be beneficial to pilot the platform and monitoring system with government and civil society representatives over 2023 and 2024 and enable the public to provide valuable feedback.

Commitment 17 aims to release open and anonymized migration and asylum datasets. It continues a commitment on open immigration datasets from the fourth action plan.⁵⁵ However, civil society stakeholders were disappointed that the Ministry of Migration and Asylum did not initiate co-design with CSOs working on migration/refugee policies.⁵⁶ The IRM recommends government and CSOs jointly agree on an updated list of datasets to be published.

The aim of **Commitment 18** to create a collaborative online space for the public, private, and civil society sectors to consider issues relating to the digital divide in Greece has insufficient detail to determine potential for results. It would be beneficial to draw up a detailed work

[europe-deliver-mixed-results--seguro-o-arrepentido--leyes-de-proteccion-de-alertadores-en-europa--resultados-diversos--.pdf](#).

³¹ “National transposition of the EU Whistleblower Directive: How is Europe progressing on protecting whistleblowers,” Blueprint for Free Speech, 2021,

<https://static1.squarespace.com/static/5e249291de6f0056c7b1099b/t/61717395ab7df13842fa6e86/1634825110048/Gaps+in+the+System+update+Oct+2021+FINAL.pdf>.

³² “Enabling direct 24/7 access to Hellenic Cadastre maps and data (web archive),” Eurogeographics, 30 June 2022, <https://web.archive.org/web/20230323082705/https://eurogeographics.org/news/enabling-direct-24-7-access-to-hellenic-cadastre-maps-and-data>.

³³ Athena Vounatsou & Maria Bozoudi (SEV Hellenic Federation of Enterprises), interview by IRM researcher, 12 April 2023.

³⁴ “Land registers in EU countries: Greece,” European e-Justice Portal, updated 26 April 2023, https://e-justice.europa.eu/109/EN/land_registers_in_eu_countries?GREECE&member=1.

³⁵ Taxisnet is an online government platform to facilitate tax returns and payments for individuals and businesses in Greece.

³⁶ Note that the Hellenic Postal Service’s current list of street names and numbers is not available for free use.

³⁷ Hellenic Cadastre, information provided to the IRM, 27 April 2023.

³⁸ “Greek land registry open data portal,” Hellenic Cadastre, <https://data.ktimatologio.gr/>.

³⁹ “Directive 2007/2/EC of the European Parliament and of the Council of 14 March 2007 establishing an Infrastructure for Spatial Information in the European Community (INSPIRE),” EUR-Lex, 14 March 2007, <https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX%3A32007L0002>.

⁴⁰ “Hellenic Military Geographical Service,” Hellenic Military Geographical Service, https://www.gys.gr/index_en.html.

⁴¹ “Greece,” Global Data Barometer, <https://globaldatabarometer.org/country/greece>.

⁴² See statement on: “Open data of the Greek land registry,” Hellenic Cadastre, <https://data.ktimatologio.gr/opendata>.

⁴³ “International Open Data Charter,” Open Data Charter, <https://opendatacharter.net/principles>.

⁴⁴ Loukopoulos, interview.

⁴⁵ Loukopoulos, interview. See open parliament commitments in: “Greek Action Plan 2014–2016,” Open Government Partnership, 23 October 2015, <https://www.opengovpartnership.org/documents/greece-second-action-plan-for-2014-2016/>, 25; see Commitment 34 - Milestone 1 in: “Greece 3rd National Action Plan on Open Government 2016–2018,” Open Government Partnership, 27 July 2016, <https://www.opengovpartnership.org/documents/greece-national-action-plan-2016-2018>, 70.

⁴⁶ “Greece Action Plan 2022–2024,” Open Government Partnership, 28.

⁴⁷ “Greece Action Plan 2022–2024,” Open Government Partnership, 14.

⁴⁸ Law 4807.2021 on Institutional Framework for Teleworking, Provisions for Human Resources in the Public and Other Urgent Regulations.

⁴⁹ Konstantinos Spanos (National Transparency Authority), written correspondence with IRM researcher, 2 May 2023.

⁵⁰ ITEK Documentation, Research, and Innovation Institute, information provided to IRM, 7 April 2023.

⁵¹ “Data Fusion,” Science Direct, accessed April 2023, <https://www.sciencedirect.com/topics/computer-science/data-fusion>.

⁵² Loukopoulos, interview.

⁵³ “Civil Society Bill: ‘Yes’ to regulation, ‘No’ to shrinkage,” Vouliwatch, 13 December 2021,

<https://vouliwatch.gr/actions/article/koinonia-ton-politon-nai-sti-rythmisi-ohi-sti-syrriknosi>.

⁵⁴ “Greece Action Plan 2022–2024,” Open Government Partnership, 89.

⁵⁵ “Greece 4th National Action Plan on Open Government 2019–2021 – updated version including addendum with additional commitments incorporated through the OGP Greece Ideathon,” Open Government Partnership, 17 May 2019, https://www.opengovpartnership.org/wp-content/uploads/2019/05/Greece_Action-Plan_2019-2022_Update_EN.pdf.

⁵⁶ Lefteris Antoniadis (Solidarity Now), interview by IRM researcher, 12 April 2023.

⁵⁷ “Interoperability Initiatives - Greece,” European Commission, updated 25 August 2023, <https://joinup.ec.europa.eu/collection/nifo-national-interoperability-framework-observatory/interoperability-initiatives-greece>.

Section III. Methodology and IRM Indicators

The purpose of this review is not an evaluation. It is intended as a quick, independent, technical review of the characteristics of the action plan and the strengths and challenges the IRM identifies to inform a stronger implementation process. The IRM highlights commitments that have the highest potential for results, a high priority for country stakeholders, a priority in the national open government context, or a combination of these factors.

The IRM follows a filtering and clustering process to identify promising reforms or commitments:

Step 1: Determine what is reviewable based on the verifiability of the commitment as written in the action plan.

Step 2: Determine if the commitment has an open government lens. Is it relevant to OGP values?

Step 3: Review commitments that are verifiable and have an open government lens to identify if certain commitments need to be clustered. Commitments that have a common policy objective or contribute to the same reform or policy issue should be clustered. The potential for results of clustered commitments should be reviewed as a whole. IRM staff follow these steps to cluster commitments:

- a. Determine overarching themes. If the action plan is not already grouped by themes, IRM staff may use OGP's thematic tagging as reference.
- b. Review commitment objectives to identify commitments that address the same policy issue or contribute to the same broader policy or government reform.
- c. Organize commitments into clusters as needed. Commitments may already be organized in the action plan under specific policy or government reforms.

Step 4: Assess the potential for results of the clustered or standalone commitment.

Filtering is an internal process. Data for individual commitments is available in Annex 1. In addition, during the internal review process of this product, the IRM verifies the accuracy of findings and collects further input through peer review, OGP Support Unit feedback as needed, interviews and validation with country stakeholders, an external expert review, and oversight by IRM's International Experts Panel (IEP).

As described earlier, IRM relies on **three key indicators** for this review:

I. Verifiability

- **Yes, specific enough to review:** As written in the action plan, the stated objectives and proposed actions are sufficiently clear and include objectively verifiable activities to assess implementation.
- **No, not specific enough to review:** As written in the action plan, the stated objectives and proposed actions lack clarity and do not include explicitly verifiable activities to assess implementation.
- Commitments that are not verifiable will be considered not reviewable, and further assessment will not be carried out.

II. Open government lens

This indicator determines if the commitment relates to the open government values of transparency, civic participation, or public accountability as defined by the Open Government Declaration and the OGP Articles of Governance by responding to the following guiding questions. Based on a close reading of the commitment text, the IRM first determines whether the commitment has an open government lens:

- **Yes/No:** Does the commitment set out to make a policy area, institution, or decision-making process more transparent, participatory, or accountable to the public?

The IRM uses the OGP values as defined in the Articles of Governance. In addition, the following questions for each OGP value may be used as a reference to identify the specific open government lens in commitment analysis:

- **Transparency:** Will the government disclose more information, improve the legal or institutional frameworks to guarantee the right to information, improve the quality of the information disclosed to the public, or improve the transparency of government decision-making processes or institutions?
- **Civic Participation:** Will the government create or improve opportunities, processes, or mechanisms for the public to inform or influence decisions? Will the government create, enable, or improve participatory mechanisms for minorities or underrepresented groups? Will the government enable a legal environment to guarantee freedoms of assembly, association, and peaceful protest?
- **Public Accountability:** Will the government create or improve opportunities to hold officials answerable for their actions? Will the government enable legal, policy, or institutional frameworks to foster accountability of public officials?

III. Potential for results

The IRM adjusted this indicator—formerly known as the “potential impact” indicator—to take into account the feedback from the IRM Refresh consultation process with the OGP community. With the new results-oriented strategic focus of IRM products, the IRM modified this indicator to lay out the expected results and potential that would be verified in the IRM Results Report after implementation. Given the purpose of this Action Plan Review, the assessment of potential for results is only an early indication of the possibility the commitment has to yield meaningful results based on its articulation in the action plan in contrast with the state of play in the respective policy area.

The scale of the indicator is defined as:

- **Unclear:** The commitment is aimed at continuing ongoing practices in line with existing legislation, requirements, or policies without indication of the added value or enhanced open government approach in contrast with existing practice.
- **Modest:** A positive but standalone initiative or change to processes, practices, or policies. The commitment does not generate binding or institutionalized changes across government or institutions that govern a policy area. Examples are tools (e.g., websites) or data release, training, or pilot projects.
- **Substantial:** A possible game changer for practices, policies, or institutions that govern a policy area, public sector, or the relationship between citizens and state. The commitment generates binding and institutionalized changes across government.

This review was prepared by the IRM in collaboration with Keitha Booth and Ana Revuelta and was externally expert reviewed by Ernesto Velasco Sánchez. The IRM methodology, quality of

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IRM products, and review process are overseen by IRM’s IEP. For more information, see the IRM Overview section of the OGP website.¹

¹ “IRM Overview,” Open Government Partnership, <https://www.opengovpartnership.org/irm-guidance-overview/>

Annex 1. Commitment by Commitment Data¹

Commitment 1: Innovate actions to utilize and promote cultural and scientific archives

- Verifiable: Yes
- Does it have an open government lens? No
- Potential for results: Modest

Commitment 2: Index Hellenic Parliament’s plenary and committee minutes

- Verifiable: Yes
- Does it have an open government lens? Yes
- This commitment is clustered as: Access to parliamentary information (Commitments 2–4 of the action plan)
- Potential for results: Modest

Commitment 3: Digital profiles of MPs’ legislative activity

- Verifiable: Yes
- Does it have an open government lens? Yes
- This commitment is clustered as: Access to parliamentary information (Commitments 2–4 of the action plan)
- Potential for results: Modest

Commitment 4: Overhaul of parliament portal

- Verifiable: Yes
- Does it have an open government lens? Yes
- This commitment is clustered as: Access to parliamentary information (Commitments 2–4 of the action plan)
- Potential for results: Modest

Commitment 5: Activate citizen participation in decision-making in Moscatotavros

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Unclear

Commitment 6: Digital applications for monitoring progress of disciplinary cases

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Modest

Commitment 7: Lobbying activity

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Modest

Commitment 8: Whistleblowing platform in accordance with EU Directive 2019/1937

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Modest

Commitment 9: Training of public administration executives to optimize open data

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Modest

Commitment 10: National database for meteorological data

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Modest

Commitment 11: Quantitative and qualitative characteristics of land transactions

- Verifiable: Yes
- Does it have an open government lens? Yes
- This commitment has been clustered as: Open land administration data (Commitments 11–13 of the action plan)
- Potential for results: Substantial

Commitment 12: Development of the country's addresses

- Verifiable: Yes
- Does it have an open government lens? Yes
- This commitment has been clustered as: Open land administration data (Commitments 11–13 of the action plan)
- Potential for results: Substantial

Commitment 13: Development of the country's toponyms

- Verifiable: Yes
- Does it have an open government lens? Yes
- This commitment has been clustered as: Open land administration data (Commitments 11–13 of the action plan)
- Potential for results: Substantial

Commitment 14: Public database and special register of civil society organizations

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Modest

Commitment 15: Platform for the assessment of public service quality by citizens

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Unclear

Commitment 16: Platform and system for monitoring responsibilities between entities

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Modest

Commitment 17: Provision of open datasets by the Ministry of Migration and Asylum

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Modest

Commitment 18: Community of good practice for digital skills

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Unclear

Commitment 19: Community of good practice for the national interoperability framework

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Unclear

¹ **Editorial notes:**

1. For commitments that are clustered, the assessment of potential for results is conducted at the cluster level, rather than the individual commitments.
2. Commitment short titles may have been edited for brevity. For the complete text of commitments, see: “Greece Action Plan 2022–2024,” Open Government Partnership, 9 January 2023, <https://www.opengovpartnership.org/documents/greece-action-plan-2022-2024-december>.

Annex 2: Action Plan Co-Creation

OGP member countries are encouraged to aim for the full ambition of the updated OGP Participation and Co-Creation Standards that came into force on 1 January 2022.¹ IRM assesses all countries that submitted action plans from 2022 onward under the updated standards. OGP instituted a 24-month grace period to ensure a fair and transparent transition to the updated standards. During this time, IRM will assess countries’ alignment with the standards and compliance with their minimum requirements.² However, countries will only be found to be acting contrary to the OGP process if they do not meet the minimum requirements, starting with action plans submitted to begin in 2024 and onward. Table 2 outlines the extent to which the countries’ participation and co-creation practices meet the minimum requirements that apply during development of the action plan.

Table 2. Compliance with minimum requirements

Minimum requirement	Met during co-creation?	Met during implementation ?
<p>1.1 Space for dialogue: On 13 September 2022, the General Secretariat of Digital Governance and Simplification of Processes of the Ministry of Digital Governance announced the creation and objectives of the multistakeholder Focus Group, which comprised four government and four civil society members, on Greece’s OGP website.³ The group was formed specifically for collaborative preparation of the action plan.⁴ The ministry invited civil society organizations (CSOs) to join the group in August 2022⁵ and decided the final composition.⁶ The Focus Group has no mandate to continue after the adoption of the fifth action plan.</p> <p>A public administration representative stated that most of the membership and governance was jointly decided, while the rest was decided by the Ministry of Digital Governance.⁷ Basic rules on the work of the Focus Group are available online.⁸ It met regularly between 19 September and 11 November 2022, mostly online, but with an in-person meeting at the 12th Annual Conference “e-Government Forum” on 3 November.⁹ During co-creation, the Focus Group therefore met the OGP minimum requirements. However, no meeting agendas or minutes are available online. A public administration representative acknowledged the need for more concrete “housekeeping” and rules to build trust among participants and increase the group’s productivity.¹⁰</p> <p>Following co-creation, the Ministry of Digital Governance plans to create an Open Dialogue Forum (ODF) that would bring together stakeholders and serve as the</p>	<p>Yes</p>	<p><i>To be assessed in the Results Report</i></p>

<p>multistakeholder forum for discussions between civil society organizations and public institutions.¹¹</p>		
<p>2.1 OGP website: Greece’s OGP website repurposes the website (opengovmonitor.gr) previously developed to monitor the fourth action plan.¹² It contains key items relating to the development of the action plan and links to OGP website.</p>	<p>Yes</p>	<p><i>To be assessed in the Results Report</i></p>
<p>2.2 Repository: The CSO GFOSS Open Technologies Alliance created Greece’s OGP website (opengovmonitor.gr) to monitor the fourth action plan using an open-source platform. The Ministry of Digital Governance later repurposed it as the national OGP repository. It provided updates during the co-creation of the action plan, but no further updates have been made since the release of the fifth action plan on 9 January 2023. To continue meeting minimum requirements, the website needs to be updated with information about action plan implementation at least every 6 months.</p>	<p>Yes</p>	<p><i>To be assessed in the Results Report</i></p>
<p>3.1 Advanced notice: The government point of contact to OGP said that the timeframe for co-creation was made available to the Focus Group almost two months ahead of the first meeting.¹³ A timeline was published on opengovmonitor.gr on 13 September 2022. The Focus Group met twice in September to discuss the plan, but the first public event on co-creation was held on 28 October 2022.¹⁴ While members of the Focus Group were informed of changes by email a few days before meetings, there was no advanced notice of these changes on the website.¹⁵</p>	<p>Yes</p>	<p>Not applicable</p>
<p>3.2 Outreach: On 30 October 2022, the government published an open call on opengovmonitor.gr for collaborative planning from 31 October to 30 November 2022.¹⁶ On 31 October 2022, the government also published on the website an invitation to participate in the E-Government Forum workshop on 3 November 2022 was.¹⁷ On 1 December 2022, the government published an invitation for public consultation on the draft action plan from 1 to 19 December 2022 on the National Open Deliberation website.¹⁸ In each case, the open calls were published online on the day (or less than a week before) the consultation started, but matched the dates in the original timeline published on 13 September 2022.</p>	<p>Yes</p>	<p>Not applicable</p>
<p>3.3 Feedback mechanism: An open call for proposals was published on opengovmonitor.gr on 31 October 2022.¹⁹ The government also published an online invitation for public consultation on the proposed</p>	<p>Yes</p>	<p>Not applicable</p>

<p>commitments for the new action plan from 1 to 19 December 2022, which received seven comments.</p> <p>Article 61 of Law 4622/2019 requires public consultation to last at least two weeks. While the mechanisms met OGP minimum requirements, CSOs interviewed by the IRM researcher stated that the consultation mechanisms were not announced early enough to encourage participation from a wide range of stakeholders and had significant effect on the project decisions.²⁰</p>		
<p>4.1 Reasoned response: The final action plan contains information on the co-creation process including ad hoc examples of civil society input during working group discussion. There were no minutes from Focus Group meetings during the co-creation process.²¹ The progress report, which covered July to November 2022, did not contain evidence of reasoned response from the government on how the feedback from stakeholders informed the development of the action plan.</p> <p>The government has stated that it provided reasoned response verbally during Focus Group (and sub-group) conversations, but relevant CSOs and private sector participants considered interactions with and feedback from government to be inadequate and not constitute reasoned response.²² For example, the stakeholders who proposed a commitment on open justice data did not receive clear reasons behind the decision.²³</p> <p>The formal public consultation on opengovmonitor.gr received seven comments from the public and civil society. The government shared the drafted reasoned responses with the IRM, but these have yet to be published. This is because one of the comments (in the form of a letter addressed to the Minister of Digital Development) triggered an internal mechanism for responding to the letter (a meeting with the minister) which delayed the publishing of the rest of the reasoned response. The Political Office of the Minister organized a meeting with the organizations that had signed the letter to discuss its content in January 2023. Unfortunately, due to the meeting occurring after the submission of the action plan, and no reasoned response published before the submission of the action plan, the co-creation process did not meet the technical obligation of meeting minimum requirement 4.1.</p>	<p>No</p>	<p>Not applicable</p>

<p>5.1 Open implementation: The IRM will assess whether meetings were held with civil society stakeholders to present implementation results and enable civil society to provide comments in the Results Report.</p>	<p>Not applicable</p>	<p><i>To be assessed in the Results Report</i></p>
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Greece did not comply with OGP minimum requirements for co-creation because while reasoned response to proposals or input received from the participants of the co-creation process was developed, unfortunately it was not shared with stakeholders or made public before the submission of the action plan (as explained in the above table). A meeting was organized with the coordinating minister on the issues raised during consultation, but it occurred after the action plan was submitted to OGP. Minimum requirement 4.1 necessitates that the reasoned response should be provided any time before the action plan is published or sent to the OGP Support Unit for publication.

¹ “2021 OGP Participation and Co-Creation Standards,” Open Government Partnership, <https://www.opengovpartnership.org/ogp-participation-co-creation-standards/>.

² “IRM Guidelines for the Assessment of Minimum Requirements,” Open Government Partnership, <https://www.opengovpartnership.org/documents/irm-guidelines-for-the-assessment-of-minimum-requirements/>.

³ “OGP Greece,” OGP Greece, <https://opengovmonitor.gr>.

⁴ “Focus group for the 5th ESA,” OGP Greece, 13 September 2022, <https://opengovmonitor.gr/focus-group-%ce%b3%ce%b9%ce%b1-%cf%84%ce%bf-5%ce%bf-%ce%95%ce%a3%ce%94>.

⁵ Anastasios Papazafiris (OGP Point of Contact), written answer and interview with IRM researcher, 6 April 2023.

⁶ Presidency of the Government, written answer to the IRM, 30 April 2023.

⁷ Papazafiris, written answer and interview.

⁸ “Focus group for the 5th ESA,” OGP Greece.

⁹ “Completion of the 1st workshop for the 5th OGP national action plan,” OGP Greece, 11 November 2022, <https://opengovmonitor.gr/1st-workshop>.

¹⁰ Papazafiris, written answer and interview.

¹¹ Ministry of Digital Governance, comment provided to IRM during pre-publication review, 2 August 2023.

¹² Papazafiris, written answer and interview.

¹³ Papazafiris, written answer and interview.

¹⁴ “1st report of the training activities of the 5th ESA,” OGP Greece, updated 13 December 2022, https://opengovmonitor.gr/1st_report.

¹⁵ Lefteris Antoniadis (Solidarity Now), interview by IRM researcher, 12 April 2023; Athena Vounatsou & Maria Bozoudi (SEV Hellenic Federation of Enterprises), interview by IRM researcher, 12 April 2023.

¹⁶ “Call for collaborative planning of the 5th national open government action plan,” OGP Greece, 31 October 2022, <https://opengovmonitor.gr/callforcodesign>.

¹⁷ “Invitation to a conference,” OGP Greece, updated 1 November 2022, <https://opengovmonitor.gr/callforworkshop>.

¹⁸ “Public online consultation on the 5th OGP national action plan,” OGP Greece, 1 December 2022, <http://www.opengov.gr/digitalandbrief/?p=2990>.

¹⁹ “Call for collaborative planning of the 5th national open government action plan,” OGP Greece.

²⁰ Antoniadis, interview.

²¹ Antoniadis, interview.

²² Alexandros Melidis (GFOSS Open Technologies Alliance), interview by IRM researcher, 28 March 2023; Vounatsou & Bozoudi, interview. CSOs shared with the IRM researcher in March 2023 a letter sent to the Minister of Digital Governance on 19 December 2022 outlining their concerns which also included a reference to a lack of reasoned response to proposals.

²³ Vounatsou & Maria Bozoudi, interview.