

Independent Reporting Mechanism

Greece Co-Creation Brief
2024

Open
Government
Partnership



Independent
Reporting
Mechanism

Introduction

This brief from the OGP's Independent Reporting Mechanism (IRM) serves to support the co-creation process and design of Greece's sixth action plan and to strengthen the quality, ambition, and feasibility of commitments. It provides an overview of the opportunities and challenges for open government in the country's context and presents recommendations. These recommendations are suggestions, and this brief does not constitute an evaluation of a particular action plan. Its purpose is to inform the planning process for co-creation based on collective and country-specific IRM findings. This brief is intended to be used as a resource as government and civil society determine the next action plan's trajectory and content. National OGP stakeholders will determine the extent of incorporation of this brief's recommendations.

The co-creation brief draws on the results of the research in prior [IRM reports for Greece](#), the [OGP National Handbook](#), [OGP Participation and Co-Creation Standards](#), and IRM guidance on [the assessment of OGP's minimum requirements](#). The brief aims to provide up-to-date recommendations with lessons from comparative international experience in the design and implementation of OGP action plans as well as other context-relevant practices in open government. The brief was reviewed by IRM senior staff for consistency, accuracy, and with a view to maximizing the context-relevance and actionability of the recommendations. Where appropriate, the briefs are reviewed by external reviewers or members of the IRM International Experts Panel (IEP).

The IRM drafted this co-creation brief in November 2024.

Table of Contents

Section I: Action Plan Co-Creation Process2

Section II: Action Plan Design4

Section I: Action Plan Co-Creation Process

Greece's first five action plans achieved important progress in the areas of anti-corruption and integrity, and fiscal openness. The country has been under [procedural review](#) since February 2021, as it did not meet the OGP minimum requirement for public influence during the previous two action plan cycles. Neither of the co-creation processes provided sufficient reasoned response to commitment proposals raised by civil society stakeholders. [Development](#) of Greece's fourth plan also lacked a functioning multistakeholder forum and sufficient engagement with civil society. Greece took steps to strengthen the development process for its fifth action plan, although it did not comply with the OGP minimum requirements for co-creation. The government published an open call for collaboration and created a temporary oversight body called the Focus Group, with equal government and civil society representation. It recorded commitment proposals submitted by civil society organizations and updated the [national OGP website](#).

To ensure that Greece meets the minimum requirements of *OGP's Participation and Co-Creation Standards* and strengthens the sixth action plan's co-creation process, the IRM recommends:

1. Establish a permanent multi-stakeholder forum
2. Provide a centralized process for evaluating government and civil society commitment proposals
3. Provide more space and opportunities for iterative dialogue with civil society during action plan co-creation
4. Provide a timely reasoned response to civil society on how their input shaped the action plan

RECOMMENDATIONS

Recommendation 1: Establish a permanent multi-stakeholder forum

In 2021, the government created a temporary oversight body called the Focus Group to collaboratively develop Greece's fifth Action Plan with civil society. This strengthened participation in the co-creation process. It was seen as a precursor to a multi-stakeholder forum.

Moving forward, Greece could take the next steps to establish a permanent multi-stakeholder forum. Civil society have also [expressed](#) support for a multi-stakeholder forum. The space should have formal rules (such as a mandate, membership selection processes, and decision-making and accountability mechanisms) which are made public. Steps could be taken towards non-government members of the forum being selected in a transparent manner, having leadership in their selection process, and having equal representation and decision-making powers as government members. Among the OGP community, [Australia](#) and [Norway](#) are good examples of how to publish MSF mandates and compositions. The Ministry of Digital Governance could take stock of learnings from attempts to establish a multi-stakeholder forum in Greece and other countries. OGP would be able to support and provide further insights into different multi-stakeholder forums from across the partnership.

Recommendation 2: Provide a centralized process for evaluating government and civil society commitment proposals

During the previous co-creation process, Greece had separate commitment proposal processes for civil society and government. Government submitted proposals via documents

and letters, while civil society submitted proposals via an electronic platform and their proposals were evaluated using different criteria. This [reportedly](#) discouraged civil society participation.

For the sixth action plan, Greece can instead develop a unified set of criteria for commitment proposals. The multi-stakeholder forum could take part in determining the criteria and evaluating the commitment proposals, to ensure that government and civil society have equal footing in the co-creation process. The criteria can be publicly shared alongside the call for commitment proposals. The IRM advises publishing these specific criteria that would be used to select proposals for the final plan.

Recommendation 3: Provide more space and opportunities for iterative dialogue with civil society during action plan co-creation

The co-creation period during the development of the fifth action plan was lengthened from one to three months compared to the fourth action plan. While lengthening the time allocated to co-creation is a positive step, the timeframe was [assessed](#) as brief and limiting opportunities for collaboration in developing the action plan with the government. Meeting minutes were not shared with civil society participants, and there was a lack of opportunities for substantial exchange on the content of commitments. Both the government and civil society members of the Focus Group acknowledged that the co-creation process could be more inclusive.

The IRM encourages Greece to provide more time for the co-creation process, by including multiple opportunities for iterative dialogue between the government and civil society organizations. This requires regular meetings of the MSF, where agendas and meeting minutes are shared with all multi-stakeholder forum participants in a timely manner. It also would require various opportunities for the public and civil society organisations to provide input – whether that be in suggesting and prioritising topic areas, substantial exchange in developing proposals into commitments, or also making suggestions about the commitments in the near-final version of the action plan. Greece's open government process would also benefit from broader outreach to diverse civil society organizations that have not traditionally been part of the co-creation process, i.e. environmental organizations or migrant inclusion organizations. This would ensure diverse voices and civil society concerns are represented and registered. Designing a more lengthy and inclusive co-creation process would strengthen trust between government and civil society stakeholders, the OGP process, and help achieve a more ambitious action plan.

Recommendation 4: Provide timely reasoned response to civil society on how their input shaped the action plan

Under the [OGP Participation and Co-Creation Standards](#), Greece is required to document stakeholders' contributions or input related to the development of the action plan and report back or publish written feedback to stakeholders on how their contributions were considered. This must take place prior to the publication of the action plan. During development of the previous two action plans, Greece did not meet this requirement. However, across OGP, reasoned response has been shown to be highly correlated with the resulting action plans' [ambition, completion, and early results](#).

For the sixth action plan, the IRM recommends proactively embedding reasoned response into the planned co-creation timeline, allocating enough time to account for delays that may

arise. Reasoned response would be published significantly in advance of the action plan's finalization. This would provide stakeholders with enough time to understand why commitments were included or rejected and participate in deliberations on next steps. Greece could follow Canada's example, which published the ['What We Heard' report](#) to showcase recording of commitments and to provide clear feedback on the input received during co-creation of its 2022-2024 Action Plan. Greece could also follow the tabular format that [Estonia](#) used in its 2018-2020 action plan to publish results from public and interdepartmental consultations.

Section II: Action Plan Design

AREAS OF OPPORTUNITY FOR COMMITMENTS

Areas of opportunity for Greece's sixth action plan include lobbying transparency, whistleblower protection and introducing high-value open data and promotion of open data reuse and open municipal data. The government and civil society could also jointly select new or ongoing reforms to be pursued as part of the [Open Gov Challenge](#), such as anti-corruption, civic space and justice reform.

AREA 1. Lobbying transparency

In December 2022, Greece launched an online [Transparency Register](#) on lobbying activities, following passage of [Law 4829/2021](#). However, measures are needed to ensure uptake. By October 2024, the register only contained information on 34 lobbyists, just 10 of whom had submitted a required annual report on their lobbying activities in 2023. A commitment in the next action plan could focus on ensuring that all active lobbyists are registered and regularly submit their activity reports. It could introduce a clear timeframe by which lobbyists must register and enforcement mechanisms to address non-compliance.

Greece could evaluate the implementation of the Register so far and look into what could be improved, such as including in-house lobbyists in the Register, i.e. lobbyists employed directly by an organization to advance its goals, publicly recording the date of lobbyist registry in the Register, or increasing the frequency of lobbyist activity reports to twice per year. Efforts to strengthen Greece's lobbying transparency can draw on the examples of lobbying registries in [Ireland](#), [France](#), and [Germany](#).

Useful resources:

- OGP Open Gov Guide: [Lobbying](#)
- [International Standards on Lobbying Regulation](#)
- [OECD Council Recommendation: Principles for Transparency and Integrity in Lobbying](#)
- [Common Challenges in Lobbying Transparency: Lessons from Europe](#)
- [Transparency International: Recommendations on lobbying for OGP action plans](#)
- Finland ([2019-2023](#)), Latvia ([2019-2021](#)), and Ireland ([2014-2016](#)) are working on this policy area
- Partners that can provide technical support: [Transparency International](#), [OECD](#)

Potential commitments under this thematic area can also be submitted as [Open Gov Challenge commitments](#), under the Challenge Area #2, Anti-Corruption.

AREA 2. Whistleblower protection

The next action plan could strengthen protections for whistleblowers. Currently, Greece affords whistleblower protections to those who report breaches of EU law. Citizens can report breaches of EU law via an [online whistleblowing platform](#), either identified by name or anonymously, and follow the progress of their report by using a 16-digit code. However, no comprehensive whistleblowing platform exists for national law.

A gov.gr [webpage](#) lists 41 different authorities' complaint mechanisms, only 9 of which offer the option to submit anonymous reports. An OGP commitment could ensure that the same protections are afforded to whistleblowers who report breaches of national law as to those who report breaches of EU law. It could also entail the creation of a centralized whistleblowing platform for breaches of national law, using the technical knowledge of the National Authority Agency or the Ministry of Justice, and utilizing the [2018 OECD recommendations for whistleblower protection in Greece](#). It could also raise public awareness on the whistleblowing process and protections available. Greece could also use the learnings from the development of the [sports whistleblowing platform](#) during the 2019-2022 action plan.

Useful resources:

- [OGP: Open Government Reforms Need to Protect Whistleblowers](#)
- [OECD: Whistleblower Protection](#)
- [Czech Republic](#), [Estonia](#), [Italy](#), [Latvia](#) and [Spain](#) are working on this policy area.
- Partners that can provide technical support: [Blueprint for Free Speech](#), [Transparency International Greece](#), [OECD](#).

Potential commitments under this thematic area can also be submitted as [Open Gov Challenge commitments](#), under the Challenge Area #8, Justice.

AREA 3. Ensuring high-value open data and promoting open data reuse

Open data is a sustained policy area across Greece's action plans. The fifth action plan included commitments on training civil servants in optimizing use and distributing open data, on the creation of a national meteorological database and on publicizing migration and asylum datasets. The government also maintains the country's open data portal, [data.gov.gr](#), which contains 73 datasets categorized into 10 thematic areas. According to the EU's [2023 Open Data Maturity report](#), while Greece is performing well in terms of open data policy making and open data quality, there is space for growth in terms of the impact of open data in the country. Specifically, Greece does not measure data reuse and has a low score for public awareness about open data and for open data's impact on politics, society, the environment, and the economy.

In the next action plan, Greece could include commitments to identify high-value datasets that are not yet included in data.gov.gr and publish them. Identification of high-value datasets could be done in collaboration with interested civil society organizations, academics, journalists and interested citizens. Greece could measure reuse of open data on its portal and organize an awareness-raising campaign about open data and their potential reuses. Finally, Greece could consider including a commitment adopting the six [Open Data Charter Principles](#): open by default, timely and comprehensive data, accessible and usable data, comparable and interoperable data, for improved government and citizen engagement and for inclusive development and innovation.

Useful resources:

- OGP: [Digital Governance](#)
- [European Commission: 2023 Open Data Maturity Report](#), [Open Data Charter: Adopt the Open Data Charter Principles](#), OECD: [OECD: 2023 OECD Open, Useful and Re-usable Data Index](#).
- The [Netherlands](#) and [Sweden](#) and are working on this policy area.
- Partners that can provide technical support: [Open Data Charter](#), [Open Data Institute](#), [Access Now](#), [OECD](#).

AREA 4. Open municipal procurement data

In 2023, Greece passed [Law 5056/2023](#), which included an article to create deiktesota.gov.gr, a centralized open data portal for municipal public procurement contracts. By October 2024, this portal was not yet active. The portal could be a crucial step for public procurement transparency, as the country's 30 largest municipalities receive approximately €30 million per month. The next OGP action plan could support this portal's implementation, incentivizing municipalities to open their procurement data, as required by the law, and then publish the data in accessible and interoperable formats. Greece could also create a framework for municipalities to start publishing open data beyond public procurement contracts either independently or via a centralized portal like data.gov.gr. To achieve this, the Ministry of Digital governance could identify and train data officers in municipalities on the value and uses of open data. The Ministry could also create tools and guidelines to make it easier for municipalities to share open data with the national government. Such efforts could engage key actors, like the [Central Association of Greek Municipalities](#) (Kentriki Enosi Dimon Elladas or KEDE).

Useful resources:

- [OGP Local Deep Dive on Open Data](#)
- [European Commission's Local governments as open data providers and reusers](#)
- [Detmold](#) in Germany, [Asturias](#) in Spain, [Timisoara](#) in Romania and [Quebec](#) in Canada are working on this policy area.
- [Helsinki](#), [Berlin](#) and [Zaragoza](#) all have dedicated portals for the publication of open data.
- Partners that can provide technical support: [Open Data Charter](#), [Access Now](#), [OECD](#).