

Independent Reporting Mechanism

Results Report:
Greece 2022–2024

Open
Government
Partnership



Independent
Reporting
Mechanism

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Executive Summary

Two thirds of the commitments in Greece’s action plan were fully or substantially completed, with commitments on whistleblower protection, public sector disciplinary board cases, open land data and public participation in digital transformation showing early results in opening government. Recently, the government has promised to set up an institutionalized multi-stakeholder forum to elevate trust and engagement between civil society and government.

Implementation

Greece’s fifth action plan comprised 19 commitments covering digital transformation, open parliamentary data, whistleblowing protection, lobbying regulation, open land administration data, and public administration reforms. Greece fully or substantially completed two-thirds of the commitments. This completion rate is similar to the previous action plan.

Five commitments achieved early results: reports of breaches of EU whistleblowing law are steadily increasing (Commitment 8), official statistical property transactions data is now available to the public (Commitment 11), and results from active participation in the Community of Practice on Greece’s National Interoperability Framework are noteworthy (Commitment 19). Furthermore, information on lobbying activities and public sector disciplinary board cases are now available to the public.

The five commitments identified as promising in the Action Plan Review had mixed early results. Three commitments achieved moderate or significant early results and two recorded no notable results. Reports on lobbying activities in 2022 and 2023, released later than promised, revealed a small number of registered lobbyists reporting their activities. 34 whistleblowing reports falling within the scope of the whistleblowing platform were made between August 2023 and the end of the action plan cycle. Two out of three land administration datasets were created and released publicly in open data format in April 2025, after the end of the implementation period.

Action plan implementation was affected by the 2023 double snap parliamentary elections, which led to changes of ministers, responsibilities and priorities, and delays in approvals to

At a Glance

LEVEL OF COMPLETION

14/19

Complete or substantially complete commitments

EARLY RESULTS

5/19

Commitments with early results

1/19

Commitments with significant results

KEY OBSERVATIONS

- Despite the formation of the Focus Group to oversee the fifth action plan’s co-creation, stakeholder participation in the OGP process remained low.
- EU and OECD-related commitments demonstrated higher completion rates and stronger early results.
- Commitments largely reflected government policy priorities.

Met the minimum requirements during implementation: No

publish information.¹ Some of the unfulfilled commitments are now due to be completed in 2025, including upgrading the parliament’s portal, digitising meteorological documents, and creating a central register of all public bodies. The policy areas which saw the most progress were whistleblower protection, open land administration data, public participation in digital transformation, and lobbying transparency.

Participation and Co-Creation

The Ministry of Digital Governance oversees the OGP process in Greece. An ad hoc multi-stakeholder Focus Group with government, civil society members and non-governmental members co-created the action plan.² However, there was no multi-stakeholder space to monitor the implementation of the 2022-2024 action plan. A formal meeting of some members of the former Focus Group in October 2024 to finalize progress reporting on the plan provided some implementation oversight.³ The OGP Point of Contact’s (POC) regular online progress reports indicate active networking with commitment leads during implementation.⁴ There was little public promotion of the action plan over its cycle. Only one 2024 news item was published on the opengovmonitor.gr website.

On 19 December 2022, as the action plan was being finalised, two civil society organizations (CSOs) participating in the OGP process and ten other CSOs sent a public letter to the Minister of Digital Governance expressing concerns about the process and substance of the action plan.⁵ Government officials and three civil society members have reported little to no interaction since then, which limited civil society engagement in monitoring implementation progress.⁶

The implementation of Greece’s fifth action plan did not meet the minimum requirements for a space for dialogue and open implementation as per the OGP Participation and Co-Creation Standards as the Focus Group only met once during implementation (see Section III).⁷ Greece has been under procedural review since February 2021. In May 2024, the OGP Criteria & Standards Subcommittee decided that that Greece would remain under procedural review until confirmation was provided about compliance with minimum implementation requirements of the 2022-2024 action plan.⁸

In March 2025, the Secretary General for Digital Governance, presenting at civil society’s third WeOpenGov forum,⁹ promised to create a legally mandated multi-stakeholder forum for the OGP process. This MSF would be created with civil society, using the Ministry of the Interior’s registered CSOs database (Commitment 14) and the resources from a National Infrastructures for Research and Technology (GRNET) project about open data and participation.¹⁰

Implementation in Context

EU and OECD-related commitments, such as the whistleblower platform and the public participation work supporting digital transformation, had high completion rates, and implementation of Greece’s lobbying law meets the OECD’s lobbying standards.

Changes in ministerial roles, competent agencies, responsibilities, and new priorities following the 2023 parliamentary elections delayed the implementation timelines of several commitments. During the action plan cycle, civil society expressed concerns about the lack of government response to civil society’s 2022 public letter about the substance and process of the action plan. In January 2025, the city of Athens became a member of the OGP Local program.¹¹

¹ “Greece – Hellenic Parliament,” Inter-Parliamentary Union, 21 May 2023, <https://data.ipu.org/parliament/GR/GR-LC01/election/GR-LC01-E20230521>.

² “Focus Group meeting for the completion of the 5th NAP OGP Greece,” OGP Greece, 25 October 2025,

<https://opengovmonitor.gr/focus-group-%ce%b3%ce%b9%ce%b1-%cf%84%ce%bf-5%ce%bf-%ce%95%ce%a3%ce%94>.

³ “Objectives of the Focus Group,” OGP Greece, 13 September 2022, <https://opengovmonitor.gr/focus-group>.

⁴ “Monitoring of fifth national action plan,” OGP Greece, https://opengovmonitor.gr/5o_ethinko_sxedio_drashs.

⁵ “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>.

⁶ Anastasios Papazarifis (OGP Greece Point of Contact), interview by IRM researcher, 24 February 2025; Angelos Kaskanis (Executive Director of Transparency International Greece), correspondence with IRM researcher, 22 February 2025; Alexandros Melidis (Director of GFOSS Open Technologies Alliance), interview by IRM researcher, 25 February 2025; Stefanos Loukopoulos (Director of Vouliwatch), interview by IRM researcher, 6 March 2025.

⁷ “Greece Under Review Letter,” Open Government Partnership, 10 February 2021, https://www.opengovpartnership.org/wp-content/uploads/2021/03/Greece_Under-Review-Letter_February2021.pdf.

⁸ “Greece Participation Status Resolution by the Criteria & Standards Committee,” Open Government Partnership, 28 May 2024, https://www.opengovpartnership.org/wp-content/uploads/2024/06/Greece_Participation-Status-Resolution-CS-Subcommittee_20240528.pdf.

⁹ “Program of 3rd WeOpenGov forum,” GFOSS Open Technologies Alliance, 5 March 2025, <https://opengov.ellak.gr/wp-content/uploads/sites/10/2025/02/%CE%95%CE%BD%CE%B9%CF%83%CF%87%CF%8D%CE%BF%CE%BD%CF%84%CE%B1%CF%82-%CF%84%CE%B7%CE%BD-%CE%91%CE%BD%CE%BF%CE%B9%CF%87%CF%84%CE%AE-%CE%94%CE%B9%CE%B1%CE%BA%CF%85%CE%B2%CE%AD%CF%81%CE%BD%CE%B7%CF%83%CE%B7-1.pdf>.

¹⁰ Alexandros Melidis (Director of GFOSS Open Technologies Alliance), correspondence with IRM researcher, 6 March 2025.

¹¹ “Press release: the Municipality of Athens became the first and only Municipality in the country to join OGP Local (Open Government Partnership),” City of Athens, 14 January 2025, <https://www.cityofathens.gr/o-dimos-athinaion-egine-o-protos-monadikos-dimos-tis-choras-poy-entassetai-ogp-local-sympraxi-tin-anoikti-diakyvernisi>.

Section I. Key Observations

The key observations below offer reflections from Greece’s fifth action plan cycle. These lessons aim to support Greece’s future action plans and broader open government journey.

Observation 1: Despite the formation of the Focus Group to oversee the fifth action plan’s co-creation, stakeholder participation in the OGP process remained low.

Several factors led to a decline in CSO participation in this action plan, with one CSO withdrawing completely from the OGP process. Differing expectations between government officials and CSOs came to a head towards the end of the co-creation process when two CSOs participating in the OGP process and ten other CSOs sent a public letter to the Minister of Digital Government.¹ The government has offered no official response to date and collaboration between government and civil society declined during the monitoring of action plan implementation. The Secretary General of Digital Governance’s March 2025 announcement that a new multi-stakeholder forum would be legally mandated and co-created with civil society is a welcome step for future action plans.

Observation 2: EU and OECD-related commitments demonstrated higher completion rates and stronger early results.

Commitments aimed at implementing international obligations had higher completion rates and stronger early results. The new whistleblower platform, funded by the European Union (EU) to transpose EU Directive 2019/1937 into national law, received 34 complaints of EU law breaches by the time of this assessment. The National Interoperability Framework Community of Practice, funded by the European Stability Mechanism and supporting the newly enhanced European interoperability strategy, follows an active co-design and consultation process with 50 private and public stakeholders. As measured against the OECD standards on lobbying regulation and implementation, the implementation of Greece’s lobbying regulation law is above the OECD average, despite limited information disclosure requirements. Moving forward, there is opportunity to link priorities raised during the co-creation process to any relevant future EU- and OECD-related obligations.

Observation 3: Commitments largely reflected government policy priorities.

Commitments in Greece’s most recent action plans have generally implemented work or interventions that were already planned or started by the government. In the future, government and civil society stakeholders could use the new multi-stakeholder forum to deliberate and co-create commitments that respond to civil society priorities. Learning from the approaches taken by others could be beneficial. For example, Australia’s multi-stakeholder forum established working groups around three themes: public participation and engagement, government and corporate sector integrity, and strengthening democratic processes.²

¹ “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>.

² “Australia’s Open Government Forum. Working Group Terms of Reference,” Attorney General’s Department of Australia, 13 August 2023, <https://www.ag.gov.au/sites/default/files/2023-08/open-government-forum--working-group-terms-of-reference.pdf>; “Australia’s Third National Action Plan 2024–2025,” Attorney General’s Department of Australia, 15 December 2023, <https://www.ag.gov.au/integrity/publications/australias-third-national-action-plan-2024-2025>.

Section II. Early Results

This section analyzes commitments that achieved the strongest early results in the action plan. To assess early results, the IRM considers commitments' objective, the country context, the policy area, and the evidence of changes. The IRM early results assessment is determined by the depth of change that occurred and evidence that the change is expected to be sustained in time.

Table 1. Commitments with Early Results

Commitment 8: Established an external whistleblowing platform for breaches of EU law, transposing EU Directive 2019/1937 into Greek law.
Commitment 11: Led to the publication of open land administration data, a first in the country.

Commitment 8: Whistleblowing Platform following EU Directive 2019/1937

Implementer: National Transparency Authority

Context and Objectives

This commitment, funded by the National Recovery and Resilience Plan 'Greece 2.0',¹ aimed to create an electronic external whistleblowing system in line with Law 4990/2022, which would transpose the EU Whistleblower Directive 2019/1937 into Greek law. It would replace the National Transparency Authority's (NTA) receipt of anonymous or named reports on a complaints page on its website. This system would receive, manage, and monitor reports from public and private sector employees on EU law violations. Whistleblowers choosing to remain anonymous could create a secure post-box which would allow two-way communication with the case investigator. It was identified as promising in the Action Plan Review.

This commitment is important in strengthening whistleblower protection as it could enhance citizens' trust in public institutions and accountability processes. In the 2017 Novartis scandal, which included the manipulation of drug prices through bribery, whistleblowers repeatedly chose to give evidence to the United States government rather than the Greek government.² In 2024, 27% of citizens reported trusting the justice system and 18% of citizens reported trusting the Parliament and government.³

Early Results: Significant Results

This commitment is assessed as having significant early results as the external whistleblowing platform has been created and breaches of EU law are increasingly being reported. This is the first time Greece establishes a whistleblowing platform. Moving forward, the limited number of relevant reports filed to the NTA suggests a need to conduct awareness raising efforts.

The NTA released the external whistleblowing platform for breaches of EU law in August 2023.⁴ Private and public employees can report via in-person submission or meeting with the authorized inspector at the NTA, electronic channel, phone call or email.⁵ If they report via the channel, they can follow the progress of their report using a 16-digit code. Separate webpages link the public to NTA's other complaint channels, including the external and internal whistleblowing channels.⁶

According to the government, 79 breaches were logged in 2023, of which 14 fell within the scope of the whistleblowing platform.⁷ All but one of the 14 reports were anonymous. Three reports were forwarded to competent authorities, as required by Law 4990/2022. One was forwarded to the Hellenic Competition Commission, and the other two passed to the competent prosecutorial offices, following indications of criminal activity.⁸ In 2024, 82 breaches were logged, of which 20 fell within the scope of the whistleblowing platform.⁹ Two reports were forwarded to other competent authorities, one to the Hellenic Data Protection Authority, and one to the Internal Affairs Directorate of the Independent Authority for Public Revenue.¹⁰

The planned project impact assessment, report management policy, and educational and informational materials were developed, and some communication and awareness raising efforts around the new whistleblowing protections were carried out. An information day on whistleblowing and transparency, held at the 87th Thessaloniki International Fair in September 2023, was attended by more than 200 public and private sector employees as well as streamed online,¹¹ along with relevant presentation materials.¹² A meeting was held in April 2023 with private sector representatives, involving peer exchanges.¹³ A newsletter by the National Centre for Public Administration and Local Government describing the system was published in 2024 as part of communication and awareness raising efforts.¹⁴

Work still to be completed under this commitment includes the approval of an opinion by the Governor of the NTA outlining the terms for the establishment and operation of the electronic platform in line with Law 4990/2022 as well as the release of the joint decision between the Ministers of Justice and Digital Governance, following that opinion.

Overall, 34 relevant reports were submitted since the launch of the whistleblowing platform. According to the NTA, this reporting demonstrates a growing level of trust from citizens and anticipates increased usage as the public becomes more familiar with the platform. The NTA also reports that Greece's commitment to adopting the relevant EU directive and implementing a key recommendation of Recommendation 13(e) on whistleblower protection from the Organization for Economic Co-operation and Development (OECD) Working Group on Bribery positively influenced the completion and implementation of the initiative, ensuring alignment with international best practices and reinforcing the country's efforts in strengthening transparency and anti-corruption measures.¹⁵ Constructive cooperation with the competent authorities at the Ministry of the Interior was another positive driver. The reception of 14 reports in four months in 2023 and only 20 reports over 2024 suggests there is opportunity for wider publicity and promotion across the country. It is also possible that the narrow scope of this legislation has restricted reporting opportunities and that there could be unreported violations in Greece which are not covered by the EU directive.

Civil society stakeholders see this whistleblower protection law as an important step towards transparency and accountability in Greece. Two of them expressed concerns about the scope of the legislation and the level of compliance showcased by public bodies to date. Another observed that the required Officer for Receipt and Follow up on Reports (Reporting Officer) at the NTA had not yet been appointed.¹⁶ They had requested details from the NTA on public and private sectors' compliance with the internal reporting channel obligation.¹⁷ According to the government, the Officer for Receipt and Follow up on Reports at the NTA was appointed by the NTA Governor in August 2023.¹⁸ A different civil society stakeholder noted that awareness raising and training around the law and whistleblowing platform, as well as CSO involvement in relevant policy-making, could be stronger.¹⁹ They also recommended broadening the national legislation to include violations of national, European, and international law.²⁰

In 2024, the scope of whistleblowing was expanded to include giving and taking bribes in high political offices, including the Prime Minister and Council of Ministers, members of parliament, regional governors, mayors, and members of international organizations, the European Commission, and the European Parliament, as well as the judiciary and the private sector.²¹

Some evidence suggests that whistleblower protection is becoming more embedded for the government. The NTA is now an official member of the Network of European Integrity and Whistleblowing Authorities and one of the founding members of the National Platform for Sports Integrity (EPATHLA), which was established in the context of the implementation of the Macolin Convention to enhance transparency and prevent manipulation of sports events.²²

Looking Ahead

According to the NTA, the commitment will not be included in the next action plan because it has been completed. However, evidence suggests there is still much to do in implementing a comprehensive whistleblower protection framework in Greece. Moving forward, the NTA and Ministry of the Interior could:

- **Design and implement a public awareness campaign** about the whistleblowing platform and its scope. The NTA and the Ministry of the Interior could learn from the whistleblower protection awareness conducted by the Ministry of Justice of the Czech Republic and the CSO Oziveni.²³
- **Publish regular and timely reports on whistleblower breaches** and the government's response to these. The Slovak Whistleblower Protection Agency regularly reports on whistleblower reports received as well as action taken as a result.²⁴
- **Produce methodological materials and develop trainings for public sector bodies and private companies on whistleblowing processes.** The Slovak Republic's Whistleblower Protection Office, which produces methodological materials and regularly convenes public and private sector contact persons responsible for handling whistleblower reports for trainings and peer learning, could serve as an example.²⁵
- Use the sixth action plan co-creation process to **develop a commitment to support and encourage government agencies to introduce internal whistleblowing platforms** as required by law.

In the longer-term, the NTA and Ministry of the Interior could:

- **Secure funding to extend the external whistleblower system to cover the scope of Greek whistleblowing law**, following its expansion in 2024.

These actions would build on the early success to date and extend public trust and confidence that Greece is committed to comprehensive whistleblower protection across the country.

Commitment 11: Quantitative and Qualitative Characteristics of Land Transactions

Implementer: Hellenic Cadastre

Context and Objectives

Commitment 11 aimed to address the lack of reliable and authoritative statistical data about real estate property transactions. It was identified as promising in the Action Plan Review as part of the Open Land Administration Data cluster. It is one component of the ongoing reform of Greece's land administration data. To advance the transparency and digital transformation of the country, the Hellenic Cadastre (HC) aimed to release online statistical datasets showing the

type and number of land transactions since the first cadastral office opened in 2003. Depending on resources, the cadastre would also offer this data through application processing interfaces (APIs) to allow machine-based analysis and reuse. This data could be used by public bodies such as the Hellenic Statistical Agency, the Bank of Greece, the Ministry of Finance, as well as local governments, businesses, academia, journalists and citizens.

Prior to this commitment, data was kept on the HC's central land registry and updated by local land registries based on their transactions. Registered property owners used their Taxisnet codes to access this data. The HC also supplied transaction data to the Bank of Greece for analysis and public reporting and responded to ad hoc requests from interested parties, although this data was not available online to the public.

Early Results: Moderate Results

The commitment is assessed as having moderate early results as the Greek Land Registry's open data portal is now operational, a first for the country. This property transaction data currently covers approximately only 26% of the municipalities and 50% of registered rights in the country.²⁶

All commitment milestones were completed. The Greek Land Registry's open data portal lists property transaction data in all areas where the HC operates.²⁷ Its coverage is extending as the cadastral survey of new areas is completed. This data is listed by local government entities and covers the number of land plots, purchases and sales, foreclosures, mortgages, owners, horizontal properties, the total area of horizontal properties, and the status of land registration process. It is uploaded monthly in JSON and CSV formats, meets international open data standards, has open licenses, offers APIs to allow machine-based analysis and reuse, and is accessible to any interested party.²⁸ As it uses the HC's core information technology systems, standards, and procedures, publishing this data has become part of the HC's standard procedures. The HC is using Microsoft Azure's OpenAI to speed up its land registry transactions, reducing transaction processing to ten minutes. The Deputy Minister of Digital Government reported a reduced cost of each contract assessment to EUR 0.11 from EUR 15 previously.²⁹

In October 2024, Prime Minister Mitsotakis stated that completion of the new cadastre would offer many advantages, such as facilitating new investments in the real estate market, stopping encroachments in the environment, and transparently regulating a critical sector that affects many aspects of daily life.³⁰ The HC's data would be displayed on digital maps beside urban planning maps, the Greek statistical authority, fibre optic networks, forests, protected areas, monuments, and archaeological sites.³¹

Greece's geospatial community is working with this open data. The non-profit organization Hellas GIS uses the APIs and other data formats to integrate real-time property transactions into their systems, reporting that they can now conduct real-time thorough validations, analyses and make more accurate decisions about land ownership. Previously, they had to request data for each government project, and land development projects undertaken by the private sector had no access to a cadastral parcel (a land plot or specific area of land ownership), with consequent opportunities for illegal development. They advise that this access is promoting transparency in Greece's real estate market, building trust among investors and stakeholders, and that the transparency and reliability of the HC's data is strengthening their reputation on property market insights.³² Accurate official information about property parcels can prevent suspicious property transaction deals, particularly as the coverage extends. Substantial results, showing increased access to and use of this information, increased business investments and

fewer land encroachments and illegal deals, could be achieved after the expected completion of the coverage by the end of 2025.³³

Looking Ahead

The Single Properties Registry - E-Registries Project, announced on 26 February 2025 by the Ministries of Digital Governance and National Economy and Finance, continues implementation of this commitment. It seeks to create an integrated information system which will collect, systematize, and integrate digital information maintained by different bodies in the public and private sectors relating to Greece's real estate data as well as data on their exploitation, such as energy and telecommunications infrastructure, rentals and tax obligations. It will be funded by the Recovery and Resilience Fund, with a total public expenditure of 8,285,308 Euros.³⁴

Moving forward, the Hellenic Cadastre could:

- **Complete the development of APIs and encourage public and commercial usage** of this and other open land administration data by holding public events (such as hackathons) to invite creative use of the HC's newly available open datasets. It could also conduct awareness-raising about this data and its uses among interested stakeholders, such as the private sector, professional associations, academics, and civil society organizations.
- **Consult with civil society and the private sector** on any other types of information that could be most useful to consolidate and publish, like land use, land development and land value data. This could identify information that could help civil society act as public watchdogs of potential land encroachment and enable the private sector to make better business decisions by having greater clarity over property ownership and rights.

¹ National Transparency Authority representative, information provided during the report's pre-publication commenting period, 30 June 2025.

² Angus Liu, "Novartis faces Greek bribery lawsuit as government prepares to seek compensation," Fierce Pharma, 17 May 2022, <https://www.fiercepharma.com/pharma/novartis-face-greek-bribery-lawsuit-government-seeks-compensation>.

³ "Εμπιστοσύνη στους θεσμούς," [Trust in institutions], Public Issue, 11 April 2024, <https://www.publicissue.gr/institutions-2024>.

⁴ "External whistleblowing channel," National Transparency Authority, accessed 8 March 2025, <https://extwhistle.aead.gr/#>.

⁵ National Transparency Authority representative, information provided during the report's pre-publication commenting period.

⁶ "Whistleblower complaints," National Transparency Authority, accessed 8 March 2025, <https://aead.gr/submit-complaint>;
<https://aead.gr/submit-complaint>.

⁷ In 2023, out of the 14 whistleblower reports falling within the scope of the whistleblowing platform, five were investigated, six were archived and three were forwarded to the competent authorities.

⁸ "2023 Annual Report," National Transparency Authority, <https://aead.gr/images/essays/2023-ekthesi-apologismou.pdf>.

⁹ In 2024, out of the 20 whistleblower reports falling within the scope of the whistleblowing platform, five were investigated, 13 were archived and two were forwarded to the competent authorities.

¹⁰ National Transparency Authority representative, correspondence with IRM researcher, 27 February 2025.

¹¹ "Participation of the National Transparency Authority in the 87th TIF with an informative workshop on "Whistleblowing & Transparency," National Transparency Authority, 14 September 2023, <https://aead.gr/en/press-en/press-releases-en/ekdilwsh-tis-ethnikis-arxis-diafanias-whistleblowing-kai-diafania-sto-plaisio-tis-parousias-ths-stin-87deth-en>; National Transparency Authority, "ΕΑΔ - 87η ΔΕΘ | Ενημερωτική Ημερίδα: Whistleblowing & Διαφάνεια," [NDA - 87th TIF | Information Day: Whistleblowing & Transparency], YouTube, 10 September 2023, https://www.youtube.com/watch?v=gpiCOxGjf_Q.

¹² "NTA Information Day (10.09.2023) on the topic: 'Whistleblowing & Transparency' - Day Materials," National Transparency Authority, accessed 8 March 2025, <https://aead.gr/education/draseis-evesthitopoiisis/87tif-hmerida-whistleblowing-diafaneia-yliko>.

¹³ National Transparency Authority, "Συνάντηση εργασίας πραγματοποιήθηκε...", [A working meeting was held...], Facebook, 6 April 2023, https://www.facebook.com/story.php?story_fbid=528994096082500&id=100069157421297&rdid=1jj3CVkFa24JHsL3.

- ¹⁴ “Innovative practices in the Greek public administration,” National Centre for Public Administration & Local Government, February 2024, <https://www.ekdd.gr>, p. 21–24.
- ¹⁵ National Transparency Authority representative, correspondence.
- ¹⁶ “Whistleblowing,” Vouliwatch, accessed 20 February 2025, <https://vouliwatch.gr/tag/whistleblowing>.
- ¹⁷ “2 years Whistleblowers Law: where is its implementation?” Vouliwatch, 22 November 2024, <https://vouliwatch.gr/actions/article/whistleblowers-ead>.
- ¹⁸ National Transparency Authority representative, information provided during the report’s pre-publication period.
- ¹⁹ “Whistleblowers in Greece and steps to strengthen their protection,” Transparency International Greece, 3 February 2025, <https://transparency.gr/%ce%b4%ce%b5%ce%bb%cf%84%ce%af%ce%bf-%cf%84%cf%8d%cf%80%ce%bf%cf%85-%ce%bf%ce%b9-whistleblowers-%cf%83%cf%84%ce%b7%ce%bd-%ce%b5%ce%bb%ce%bb%ce%ac%ce%b4%ce%b1-%ce%ba%ce%b1%ce%b9-%ce%b2%ce%ae%ce%bc>.
- ²⁰ “Whistleblowers in Greece and steps to strengthen their protection,” Transparency International Greece.
- ²¹ See Section 4 in: “Implementing laws at a glance: Greece,” Morrison Foerster, accessed 7 April 2025, <https://www.mofo.com/gdpr-european-privacy/whistleblowing/whistleblower-qa>.
- ²² European Network (NEIWA), Huis Voor Klokkeluiders (House for Whistleblowers), <https://www.huisvoorklokkeluiders.nl/samenwerking/internationaal/europees-netwerk>; National Platform for Sports Integrity (EPATHLA), <https://epathla.gov.gr/en/>; The Convention on the Manipulation of Sports Competitions (the Macolin Convention), Council of Europe, <https://www.coe.int/en/web/sport/macolin>.
- ²³ Government of the Czech Republic, “Adopt Legislation on Whistleblower Protections (CZ0036),” Open Government Partnership, <https://www.opengovpartnership.org/members/czech-republic/commitments/CZ0036>; “O Nas,” [About us], Oziveni, <https://oziveni.cz/o-nas>; “What you need to know before filing a report”, Oziveni, <https://www.oznamovatelia.sk/en/chcem-oznamit/>.
- ²⁴ “About us,” Oziveni.
- ²⁵ “About us,” Oziveni.
- ²⁶ Lolonis Panagiotis (Hellenic Cadastre), correspondence with IRM researcher, 5 March 2025.
- ²⁷ “Number of purchases and sales per local government,” Hellenic Cadastre, accessed 15 April 2025, <https://data.ktimatologio.gr/dataset/168f9d8d-2a58-44f5-a114-981249ced51d>.
- ²⁸ Hellenic Cadastre open data platform, <https://data.ktimatologio.gr>.
- ²⁹ “From months to days: Hellenic Cadastre speeds up land registry transactions with Azure OpenAI,” Microsoft, 12 September 2024, <https://www.microsoft.com/en/customers/story/20308-hellenic-cadastre-azure-open-ai-service>.
- ³⁰ “Greece to establish land registry by 2025,” Greek Herald, 4 October 2024, <https://greekherald.com.au/news/greece-to-establish-land-registry-by-2025>.
- ³¹ Greek Herald, 4 October 2024.
- ³² “About Us,” Hellenic Society for Geographic Information Systems, accessed 22 April 2025, <https://hellasgi.gr/organization/about-us-el>; George Soulis (Hellenic Society for Geographic Information Systems), correspondence with IRM researcher, 16 April 2025; Soulis, correspondence.
- ³³ Giorgos Lialios, “Greece completes transition to National Cadastre with closure of last land registry office,” Kathimerini, accessed 25 February 2025, <https://www.ekathimerini.com/economy/real-estate/1259275/greece-completes-transition-to-national-cadastre-with-closure-of-last-land-registry-office>.
- ³⁴ “The Unified Real Estate Registry in the Recovery Fund, joint press statement,” Ministry of Digital Governance & Ministry of National Economy and Finance, 26 February 2025. <https://mindigital.gr/archives/7252>.

Section III. Participation and Co-Creation

While there were improvements to the co-creation process of Greece’s fifth action plan compared to the previous action plan, the brief timeframe limited the opportunities for civil society organizations (CSOs) to develop the action plan with the government. There was no space for dialogue for CSOs to discuss the implementation. In March 2025, the Secretary General for Digital Governance’s announcement that it would establish an MSF and work with registered civil society organizations is promising. Wider CSO engagement during co-creation of the next action plan could achieve greater public participation.

OGP in Greece

The Ministry of Digital Governance coordinates the OGP process in Greece. Organization, leadership, and coordination of the OGP process are undertaken by the ministry’s OGP Point of Contact (POC) with the Director General and Secretary General assuming formal approval roles.

In September 2022, the Ministry of Digital Governance established an ad hoc Focus Group comprising three representatives each from government and civil society alongside one local government association and one business association to co-create the fifth action plan.¹ The POC stated that most of the Focus Group’s membership and governance was jointly decided.² The Focus Group was Greece’s first formal multi-stakeholder space for dialogue for the OGP process. The ministry did not set up the planned permanent multi-stakeholder forum (MSF), named the Open Dialogue Forum, during the action plan period.³ Changes in ministerial roles, competent agencies, responsibilities, and priorities following the 2023 election delayed some decisions and timelines. Regular progress reports were posted on opengovmonitor.gr. Only one 2024 news item publicly promoted the action plan.⁴

Action Plan Co-Creation

The Ministry of Digital Governance and the Focus Group oversaw the action plan co-creation process.⁵ Officials invited attendees at an open governance workshop at the 12th Annual Conference e-Government Forum to submit commitment themes and posted an open call for public proposals on opengovmonitor.gr.⁶ According to the POC, civil society proposed most of the action plan’s priority areas.⁷ Four CSOs and non-governmental stakeholders observed that the Ministry of Digital Governance used different criteria to assess the government and civil society proposals, and that the timeline to submit proposals, involve new stakeholder groups, and receive feedback on meetings and proposals was tight.⁸ While the commitments addressed their thematic priorities, two CSO stakeholders believed the commitments’ scope of work was narrower than they would have liked.⁹ A letter by two CSOs, supported by 10 other CSOs, addressed to the Minister of Digital Governance in December 2022 recommended an extension to the co-creation process, meetings to discuss and co-create commitments, and a specific commitment to create a multi-stakeholder forum.¹⁰ In 2023, the government stated that it planned to use education and communication channels to re-establish trust with civil society and gain broader public participation.¹¹

Participation during Implementation

A non-governmental stakeholder of the Focus Group asked the Ministry of Digital Governance to involve them in monitoring the implementation.¹² They wanted clarity about their role, more public accountability during implementation, and a timeline to create the implementation oversight framework.¹³ However, only one implementation monitoring meeting was held to finalize progress reporting, in October 2024.¹⁴ Government officials and three civil society members reported little dialogue during implementation, with Transparency International (TI) Greece withdrawing from the OGP process after January 2023.¹⁵ The ministry published regular progress reports on the implementation of the commitments on opengovmonitor.gr, but did not organize consultations with civil society to discuss the status of the action plan.

In March 2025, the Secretary General for Digital Governance spoke at the 3rd WeOpenGov forum, a network for participation and open governance managed by TI Greece, held under the auspices of the Municipality of Athens and the European Innovation Hub for Digital Government.¹⁶ The Secretary General pledged to work with civil society to create a legally institutionalized MSF, use the Ministry of the Interior’s civil society database, and use the resources from a National Infrastructures for Research and Technology (GRNET) open data and participation project.¹⁷ This relationship with GRNET resources is in line with one of the recommendations in the civil society letter to the Minister of Digital Governance from December 2022.¹⁸ While restricting MSF membership to organizations registered in the database may prevent the participation of some former members of the Focus Group, this progress is welcome. This MSF could engage other CSOs and public and private sector organizations to co-create and implement the next plan. A challenge for CSOs and NGOs is adding this work to their core activities, given potential capacity and resource constraints.¹⁹ The Ministry of Digital Governance could ensure clear communication with non-governmental stakeholders to re-establish trust between stakeholders, as it promised in 2023. Finally, it could use broader communication channels such as social media to promote the co-creation and implementation of the next action plan.

Table 2. Compliance with Minimum Requirements

The IRM uses the OGP Participation and Co-Creations Standards to assess countries’ participatory practices throughout the action plan cycle.²⁰ Countries are encouraged to aim for the full ambition of the standards and to comply with the minimum requirements under each standard.²¹

Minimum requirement	Co-creation	Implementation
1.1 Space for dialogue: For the co-creation of Greece’s fifth action plan, the Ministry of Digital Governance created an ad hoc multi-stakeholder space for dialogue named the Focus Group. Its basic rules are available online. ²² The minimum requirement states that countries should have a space for ongoing dialogue with participation from both government and civil society members which meets at least every six months. As the Focus Group only met once during the implementation period, in October 2024, the minimum requirement is assessed as not being met. ²³	Yes	No
2.1 OGP website: Greece’s OGP website, opengovmonitor.gr , contains all five action plans and regular updates of commitment implementation, the latest being on 30 December 2024.	Yes	Yes

2.2 Repository: Greece’s OGP website serves as the repository for co-creation and implementation updates. ²⁴ It was updated regularly during the implementation of the fifth action plan.	Yes	Yes
3.1 Advanced notice: See the Action Plan Review. ²⁵	Yes	Not applicable
3.2 Outreach: See the Action Plan Review.	Yes	Not applicable
3.3 Feedback mechanism: See the Action Plan Review.	Yes	Not applicable
4.1 Reasoned response: See the Action Plan Review.	No	Not applicable
5.1 Open implementation: Only one meeting between government and civil society to discuss action plan implementation was held, in October 2024. ²⁶ The minimum requirement states that the space for dialogue must hold at least two meetings per year to discuss action plan implementation and collect comments from CSOs. As Greece’s Focus Group met once during implementation, the minimum requirement is assessed as not being met.	Not applicable	No

¹ “Focus Group meeting for the completion of the 5th NAP OGP Greece,” OGP Greece, 25 October 2024, <https://opengovmonitor.gr/focus-group-%ce%b3%ce%b9%ce%b1-%cf%84%ce%bf-5%ce%bf-%ce%95%ce%a3%ce%94>.

² Anastasios Papazarifis (OGP Point of Contact at the Ministry of Digital Governance), correspondence with and interview by IRM researcher, 6 April 2023.

³ Ministry of Digital Governance, pre-publication comment provided to IRM, 2 August 2023.

⁴ “Focus Group meeting for the completion of the 5th NAP OGP Greece,” OGP Greece.

⁵ Focus group members included 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, Open Technologies Organization, Solidarity Now, the Association of Businesses and Industries, Transparency International Greece, and Expertise France.

⁶ “Invitation to a conference,” OGP Greece, updated 1 November 2022, <https://opengovmonitor.gr/callforworkshop>; See “5th National Action Plan,” OGP Greece, <https://www.opengov.gr/digitalandbrief/?p=2988>, p. 11.

⁷ Papazarifis, correspondence.

⁸ Alexandros Melidis (Director, GFOSS Open Technologies Alliance), interview by IRM researcher, 28 March, 2023. No response to their proposal to incorporate a commitment to adopt the Open Contracting Data Standard; SEV Hellenic Federation of Enterprises, interview by IRM researcher, 12 April 2023. No feedback on why the interoperability of systems was “out of plan”; Vouliwatch, interview by IRM researcher, 29 March, 2023. None of their proposals became commitments, civil society could barely contribute to the action plan design, the co-creation process and lack of inclusiveness were of concern; CSOs in general were left aside in the co-creation process; Solidarity Now, interview by IRM researcher, 12 April 2023. A wider range of government bodies and CSOs was expected.

⁹ Angelos Kaskanis (Transparency International Greece), interview by IRM researcher, 4 April 2023; Loukopoulos, interview.

¹⁰ CSO letter to the Minister of Digital Governance, 19 December 2022. <https://eellak.ellak.gr/wp-content/uploads/sites/23/2022/12/epistoli-organwsewn-ktp.pdf>.

¹¹ Papazarifis, correspondence.

¹² SEV Hellenic Federation of Enterprises, interview.

¹³ Solidarity Now, interview.

¹⁴ “Focus Group meeting for the completion of the 5th NAP OGP Greece,” OGP Greece.

¹⁵ Anastasios Papazarifis (OGP Point of Contact at the Ministry of Digital Governance), correspondence with IRM researcher, 24 February 2025; GFOSS Open Technologies Alliance, interview by IRM researcher, 25 February 2025; Stefanos Loukopoulos (Vouliwatch), correspondence with IRM researcher, 6 March 2025; Angelos Kaskanis (Executive Director of Transparency International Greece), correspondence with IRM researcher, 22 February 2025.

¹⁶ “Program of 3rd WeOpenGov forum,” GFOSS Open Technologies Alliance, 5 March 2025, <https://opengov.ellak.gr/wp-content/uploads/sites/10/2025/02/%CE%95%CE%BD%CE%B9%CF%83%CF%87%CF%8D%CE%BF%CE%BD%CF%84%CE%B1%CF%82-%CF%84%CE%B7%CE%BD-%CE%91%CE%BD%CE%BF%CE%B9%CF%87%CF%84%CE%AE-%CE%94%CE%B9%CE%B1%CE%BA%CF%85%CE%B2%CE%AD%CF%81%CE%BD%CE%B7%CF%83%CE%B7-1.pdf>; “Municipal actions: 3rd WeOpenGov Forum: Strengthening Open Government in Greece,” Ministry of Digital Governance, accessed 11 March 2025, <https://www.myota.gr/2025/03/03/3%CE%BF-weopengov-forum-%CE%B5%CE%BD%CE%B9%CF%83%CF%87%CF%8D%CE%BF%CE%BD%CF%84%CE%B1%CF%82-%CF%84%CE%B7%CE%BD-%CE%B1%CE%BD%CE%BF%CE%B9%CF%87%CF%84%CE%AE-%CE%B4%CE%B9%CE%B1%CE%BA%CF%85%CE%B2%CE%AD>.

¹⁷ Alexandros Melidis (Director, GFOSS Open Technologies Alliance), correspondence with IRM researcher, 6 March 2025.

¹⁸ “CSO letter to the Minister of Digital Development,” GFOSS Open Technologies Alliance.

¹⁹ SEV Hellenic Federation of Enterprises, interview.

²⁰ “OGP Participation and Co-Creation Standards,” Open Government Partnership, 2021,

<https://www.opengovpartnership.org/ogp-participation-co-creation-standards>.

²¹ “IRM Guidelines for the Assessment of Minimum Requirements,” Open Government Partnership, 2022,

https://www.opengovpartnership.org/wp-content/uploads/2022/05/IRM-Guidelines-for-Assessment-of-Minimum-Requirements_20220531_EN.pdf.

²² “Focus Group meeting for the completion of the 5th NAP OGP Greece,” OGP Greece.

²³ “5th National Action Plan,” OGP Greece.

²⁴ <https://opengovmonitor.gr/>

²⁵ “Greece Action Plan Review 2022-2024”, Open Government Partnership, 3 November 2023,

https://www.opengovpartnership.org/wp-content/uploads/2023/11/Greece_Action-Plan-Review_2022-2024_EN.pdf.

²⁶ “Focus Group meeting for the completion of the 5th NAP OGP Greece,” OGP Greece.

Section IV. Methodology

This report supports countries' accountability and learning through assessment of the action plan's level of completion and early results. The report provides in-depth analysis of commitments or clusters that achieved the strongest early results in the action plan. It also assesses the country's participation and co-creation practices throughout the action plan cycle.¹

The IRM products provided during a national action plan cycle include:

- **Co-Creation Brief:** A concise brief that highlights lessons from previous IRM reports to support a country's OGP process, action plan design, and overall learning.
- **Action Plan Review:** A technical review of the characteristics of the action plan and the strengths and challenges the IRM identifies to inform a stronger implementation process.
- **Midterm Review:** A review for four-year action plans after a refresh at the midpoint. The review assesses new or significantly amended commitments in the refreshed action plan, compliance with OGP rules, and provides an informal update on implementation progress.
- **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.

In Results Reports, the IRM assesses commitments using two indicators:

Completion

The IRM assesses the level of completion for each commitment in the action plan, including commitments clustered in the Action Plan Review.² The level of completion for all commitments is assessed as one of the following:

- No Evidence Available
- Not Started
- Limited
- Substantial
- Complete

Early Results

The IRM assesses the level of early results from implementation for each commitment or cluster. To do so, the IRM considers commitments' objective, the country context, the policy area, and the evidence of changes. The Early Results indicator is determined by the depth of change that occurred and the evidence of whether the change will be sustained in time. The early results indicator establishes three levels of results:

- **No Notable Results:** According to the evidence collected (through desk research, interviews, etc.), the implementation of the open government commitment led to little or no positive results. After assessing the activities carried forward during the period of implementation and its outcomes (if any), the IRM did not find meaningful changes towards:
 - improving practices, policies or institutions governing a policy area or within the public sector,
 - enhancing the enabling environment to build trust between citizens and the state.

- **Moderate Results:** According to the evidence collected (through desk research, interviews, etc.) the implementation of the open government commitment led to positive results. After assessing the activities carried forward during the period of implementation and its outcomes, the IRM found meaningful changes towards:
 - improving practices, policies or institutions governing a policy area or within the public sector, or
 - enhancing the enabling environment to build trust between citizens and the state.
- **Significant Results:** According to the evidence collected (through desk research, interviews, etc.) the implementation of the open government commitment led to significant positive results. After assessing the activities carried forward during the period of implementation and its outcomes, the IRM found meaningful changes towards:
 - improving practices, policies or institutions governing a policy area or within the public sector, or
 - enhancing the enabling environment to build trust between citizens and the state.

Significant positive results show clear expectations for these changes (as defined above) will be sustainable in time.

The Action Plan Review for Greece’s 2022–2024 Action Plan clustered commitments relating to open land administration data. In terms of design, the cluster aimed to further a shared policy objective. However, implementation of these commitments varied widely. As such, the Results Report does not assess the commitments at cluster level and conducts the assessment of early results at the individual level, rather than the cluster level.

This report was prepared by the IRM in collaboration with Keitha Booth 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).³ For more information, refer to IRM webpage⁴ or the glossary of IRM and OGP terms.⁵

¹ For definitions of OGP terms, such as co-creation and promising commitments, see “OGP Glossary,” <https://www.opengovpartnership.org/glossary/>.

² 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 “Early Results” 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 in the Action Plan Review.

³ “International Experts Panel,” Open Government Partnership, Independent Reporting Mechanism, <https://www.opengovpartnership.org/about/who-we-are/international-experts-panel/>.

⁴ “IRM Overview,” Open Government Partnership, <https://www.opengovpartnership.org/irm-guidance-overview/>.

⁵ “OGP Glossary,” Open Government Partnership, <https://www.opengovpartnership.org/glossary/>.

Annex I. Commitment Data¹

Commitment 1: Innovate actions to utilize and promote cultural and scientific archives	
<ul style="list-style-type: none"> ● Verifiable: Yes ● Does it have an open government lens: No ● Potential for Results: Modest 	<ul style="list-style-type: none"> ● Completion: Substantial ● Early Results: No Notable Results
<p>Under this commitment, the Academy of Athens aimed to digitize and document high-value data from its Cultural and Scientific Archives, including mobile monuments, and to list them on the Open Archives and Search Culture websites.² This was an action of the Ministry of Development’s Initiative 118 “Creation, promotion and exploitation of a Digital Cultural Stock”.</p> <p>Digitization of five of the Academy’s centers was completed, but the extent to which they are listed online is unclear. They are not in the Open Archives’ list of 436 items (accessed on 7 February 2025), and it is unclear whether the Academy’s Search Culture items were included these digitized items. The data from the Research Center for Atmospheric Physics and Climatology is being tested and corrected online in beta version before its final release. The Digital Repository of the Academy of Athens,³ accessed 7 February 2025, lists items which appear to be those covered by this commitment. As there are no details of the items’ digitization dates, this could not be verified. It is positive that the Creative Commons non-commercial, no derivatives 4.0 attribution statements allow legal re-use of this data.</p> <p>As the commitment’s relevance to open government did not become relevant during implementation, it is assessed as having no notable results in opening government at this stage. If the Academy of Athens promotes the online availability of information to the domestic and international research community, there could be increased use, particularly by international researchers who are unable to travel to Greece.</p>	
Commitment 2: Index Hellenic Parliament’s plenary and committee minutes	
<ul style="list-style-type: none"> ● Verifiable: Yes ● Does it have an open government lens? Yes ● This commitment was clustered as: Access to Parliamentary information (Commitments 2–4 of the action plan) ● Potential for results: Modest 	<ul style="list-style-type: none"> ● Completion: Limited ● Early results: No Notable Results

Under this commitment, the Hellenic Parliament sought to upgrade the publication and presentation of Plenary and Committee minutes to give the public faster and more complete information about the parliamentary process, legislative procedures, and the activities of members of parliament (MPs). It also expected to improve the connectivity between the sections of the parliament’s legislative archive, providing a searchable index of minutes. It also aimed to produce a user guide and to release the minutes in both pdf and e-book formats.

Progress has been limited. The application has been created but work to date only covers the 1st and 2nd Sessions (17 July 2019 to 1 October 2021) of the 18th Period. The Indexes of Plenary Minutes offer online searching by keyword, date, period, and meeting and in PDF format, which offers a full text index (for pages I–XX and 1–14).⁴ However, the remaining pages of scanned votes from each of the 300 MPs cannot be searched. According to the government, the full plenary minutes are available on the Parliament’s website and the indexes to the plenary session minutes are being uploaded with links to the relevant material for each session. The plenary minutes flipping books are also in the progress of being uploaded at the time of writing.⁵

The Indexes of Committees only cover the minutes of the 30 committees of the 1st Session of Period 18 (17 July 2019 to 2 October 2020), comprising 19 volumes, and the Committee on Public Administration, Public Order, and Justice, by keyword, date, period, meeting and committee or sub-committee.⁶ An online index of the minutes of the Standing Committee on Public Administration, Public Order, and Justice is also available in PDF flipping book format. Work is underway to post indexes of standing committees of all the Sessions of the 18th Period in this index. Indexes of the Constitution (Periods IZ and IH) can be found at the Constitutional Review.⁷ The foreseen portal user guide has been rendered obsolete due to the upgrade of the Parliament’s portal.⁸ The December 2024 progress report states that information retrieval will be provided using AI models.⁹ According to the government, the update of the Parliament’s website with numbered committee minutes, indexes and flipping books of documented committee minutes is underway at the time of writing.¹⁰

The IRM assesses this commitment as having no notable results in opening government at this stage, as the online searching for the minutes relating to only a part of the 18th Period was not completed until late 2024. While this work is commendable, it is a small step. According to civil society, meeting minutes are only available for most committees in video format. CSOs have been pushing for their publication in machine readable format for about 10 years now.¹¹

Commitment 3: Digital profiles of MPs’ legislative activity

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

- **Completion:** Not Started
- **Early results:** No Notable Results

This commitment aimed to create a dedicated section in the parliament’s portal showing the legislative activity of each MP. No milestones have been completed due to delays in awarding

the external service contract. The creation of digital profiles and the collection and appropriate processing (graphs, statistics, etc.) of the currently available information on the parliamentary activity of each MP is expected to be completed by the end of 2025.¹²

Commitment 4: Overhaul of Parliament portal

- | | |
|---|--|
| <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • This commitment was clustered as: Access to Parliamentary information (Commitments 2–4 of the action plan) • Potential for results: Modest | <ul style="list-style-type: none"> • Completion: Limited • Early results: No Notable Results |
|---|--|

This commitment aimed to upgrade the parliament's web portal to improve access to information about the legislative process, the activities of MPs, and the initiatives of the parliament's services and the Hellenic Parliament Foundation for Parliamentarianism and Democracy. The study for the new portal and the technical specifications were completed. The third milestone, the new portal, was expected to be completed by December 2025, outside the implementation period, as part of the reform of the parliament's management information system. According to the government, due to a delay in awarding the external service contract, the project is expected to be completed by mid-2026.¹³

Commitment 5: Activate citizen participation in decision-making in Moschato-Tavros

- | | |
|---|--|
| <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Unclear | <ul style="list-style-type: none"> • Completion: Completed • Early results: No Notable Results |
|---|--|

Under this commitment, the municipality of Moschato-Tavros aimed to conduct two public consultations in 2023 using its public consultation platform, assisted by a private company. This work was completed. The municipality conducted public consultations on drafting the technical program and budget for 2024,¹⁴ the operational program for the management of stray companion animals of the municipality,¹⁵ and on the declaration document for the open electronic tender for implementing Subproject 1: Implementing marketplace actions for the digital transformation of the municipality.¹⁶ No comments were submitted for either consultation. There is no entry for the digital transformation program in the municipality's public participation website or evidence about the public consultations or their results.¹⁷

This commitment is assessed as having no notable results in opening government. Non-governmental stakeholders praised the public consultations held but suggested that holding public consultations on municipalities' social media sites such as Facebook, not only on their official websites, would reach more members of the public.¹⁸

Commitment 6: Digital applications for monitoring progress of disciplinary cases

- | | |
|--|--|
| <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes | <ul style="list-style-type: none"> • Completion: Substantial • Early results: Moderate Results |
|--|--|

<ul style="list-style-type: none"> ● Potential for results: Unclear 	
<p>Under this commitment, the National Transparency Authority (NTA) aimed to further develop a single application, e-Peitharxika, to monitor and report on all disciplinary cases before public sector disciplinary boards.¹⁹ The work was substantially completed as the NTA launched an early version of the e-Peitharxika application in June 2022, before the action plan cycle commenced.²⁰ The application had 1,104 users and six ministries, independent state bodies, and local governments during a pilot in 2023,²¹ and became fully operational in January 2024.²² Users must register. The dictionaries used by the application and anonymized statistical data from the e-Peitharxika platform are publicly accessible.²³</p> <p>The NTA is promoting the application. In 2023, the Ministry of Digital Governance awarded it the second prize for Best Applied Idea in the Public Administration, Municipal Governance, and Justice category.²⁴</p>	
<p>Commitment 7: Lobbying activity</p>	
<ul style="list-style-type: none"> ● Verifiable: Yes ● Does it have an open government lens? Yes ● Potential for results: Modest 	<ul style="list-style-type: none"> ● Completion: Substantial ● Early results: Moderate Results
<p>This commitment aimed to implement lobbying regulation Law 4829/2021, the lobbying code of conduct and guidelines, and to ensure the operation of the NTA’s Transparency Register, launched in December 2022.²⁵ The commitment included an obligation for lobbyists to register and record lobbying activities, public officials to submit annual declarations, and the NTA to publish annual activity statistics and any sanctions imposed.²⁶ This commitment responded to the proposal from civil society during the co-creation process to create an open and accessible registry that the public could search, and to expand the definition of lobbyists required to register.²⁷ Going beyond the commitment, the NTA planned to inform the public about the law and register.²⁸ CSOs noted deficiencies in the law, which inhibited full transparency.²⁹ The commitment was featured as a promising commitment in the IRM’s Action Plan Review.</p> <p>The commitment was completed. Lobbyists can register, complaints about lobbyists can be submitted, and the public can search online by interest representatives, institutions, or policy areas. Registered interest representatives have started to submit annual declarations. The NTA held four promotional activities about the law and the register in 2022 and 2023,³⁰ contacted all registered interest representatives and institutional bodies, and posted guidance on the Transparency Register in 2024. The first report covering all registrations since the register became operational in December 2022 was released in March 2025.³¹ Seventeen lobbyists were registered in December 2022 and 33 in 2024.³² The NTA has not published sanctions information on the register.</p> <p>At this stage, the commitment is assessed as having moderate results due to the low number of registered lobbyists and reported lobbying activities as well as the delayed publication of the 2024 activity report.³³ Transparency International EU has suggested that the limited set of registrations so far and only nine recorded lobbying meetings point to a lack of enforcement.³⁴ As measured against Organisation for Economic Co-operation and Development (OECD) standards on lobbying regulation and implementation, in March 2024</p>	

the OECD reported that Greece is above the OECD average.³⁵ Civil society stakeholders expressed concerns about the implementation of the law and have recommended that the definition of lobbyist include in-house lobbyists.³⁶ Moving forward, the commitment could have broader impact once more lobbyists register and record their activities, and sanctions are published.

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

- | | |
|--|---|
| <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Modest | <ul style="list-style-type: none"> • Completion: Substantial • Early results: Significant Results |
|--|---|

This commitment is assessed in Section II above.

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

- | | |
|--|---|
| <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Modest | <ul style="list-style-type: none"> • Completion: Complete • Early results: No Notable Results |
|--|---|

This commitment aimed to organize two workshops for public administration executives to design training programs to strengthen open government and train open data managers. Both workshops were held by the Ministry of Digital Governance and the National Centre for Public Administration and Local Government (EKDDA) in October 2023. The first covered open government, promoting it in policy planning and adapting it to Greece, good practices from Greece and abroad, as well as strengthening inclusion and cooperation with civil society and the Greek whistleblowing platform. The workshop report was published.³⁷ The second workshop focused on data import, value recognition and reuse, institutional background for open data, methodology/publication techniques, open data repositories, interoperability, and new challenges. Its report was also published.³⁸ Civil society praised the Ministry of Digital Governance’s leadership of these workshops.³⁹ However, at the time of writing this report, there is no evidence of early results in opening government.

Commitment 10: National database for meteorological data

- | | |
|--|--|
| <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Modest | <ul style="list-style-type: none"> • Completion: Limited • Early results: No Notable Results |
|--|--|

Under this commitment, the Hellenic National Meteorological Agency (HNMA) aimed to digitize its archive of meteorological documents in a publicly available database of documents from all public and private sector entities operating meteorological observation networks.

In May 2024, the HNMA reported that this digitization, proposed as a sub-project of the digitization of the archive of the Ministry of National Defense, had not been implemented, and that the HNMA was digitizing the most important ones using its own resources. In February 2025, the HNMA reported that it has installed a new central database to replace the old one

and that 75% of the data had been transferred to the new database, which is being piloted. The HMNA expects open data to be available to citizens in a fully automated way within the second half of 2025, following an API integration into the new web portal. At present, citizens have full access to HNMA’s open data through its website, upon request. Their data is sent in machine-readable formats i.e., csv, txt, pdf, gif, png, etc.⁴⁰ Based on this evidence provided to the IRM, it is unclear whether this database includes the archive of meteorological documents.

Commitment 11: Quantitative and qualitative characteristics of land transactions

- | | |
|--|---|
| <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • This commitment was clustered as: Open land administration data (Commitments 11–13 of the action plan) • Potential for results: Substantial | <ul style="list-style-type: none"> • Completion: Complete • Early results: Moderate Results |
|--|---|

This commitment is assessed in Section II above.

Commitment 12: Development of the country’s addresses

- | | |
|--|---|
| <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • This commitment was clustered as: Open land administration data (Commitments 11–13 of the action plan) • Potential for results: Substantial | <ul style="list-style-type: none"> • Completion: Complete • Early results: No Notable Results |
|--|---|

This commitment aimed to compile and provide a freely available geospatial dataset of land properties’s postal addresses declared in the Hellenic Cadastre (HC) since 1996. This dataset would address the lack of municipalities’ street registers, the lack of a national register, and the unavailability of the Hellenic Postal Service’s lists of street names and numbers for free public use. The creation of this dataset had become possible due to the declaration of real property addresses in the HC.

The HC released this dataset as open data on 9 April 2025.⁴¹ While this work is commendable, the commitment is assessed as having no notable results in opening government at this stage as the dataset was released after the implementation period being assessed. Based on results in other countries such as New Zealand,⁴² this dataset of street addresses could become a core data source for setting electoral boundaries and for emergency services.

Commitment 13: Development of the country’s toponyms

- | | |
|---|---|
| <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • This commitment was clustered as: Open land administration data (Commitments 11–13 of the action plan) | <ul style="list-style-type: none"> • Completion: Complete • Early results: No Notable Results |
|---|---|

<ul style="list-style-type: none"> ● Potential for results: Substantial 	
<p>This commitment aimed to create a free and open geospatial dataset of the toponyms (geographical names) declared by property owners since 1996 in the Hellenic Cadastre (HC). Geospatial toponym data identifies the location of a phenomenon or an event, such as climate change events, fires, accidents in non-urban areas or in areas without postal addresses, or individual calls for emergency assistance. This data would be geolocated in the Hellenic Geodetic Reference System '87. It would become the basis for an official catalogue of the country's toponyms.</p> <p>This dataset was released as open data on 9 April 2025.⁴³ The HC notes on this website that it has been made publicly available in accordance with the decision no. 263/6/21.12.2023 of the Board of Directors of the Hellenic Cadastre, upon request of interested parties. It complements the official National Gazetteer of Geographical Names of Greece (90,593 records), compiled by the Army Geographical Service and the Navy Hydrographic Service and deposited with the United Nations.⁴⁴ As the HC's catalogue is more comprehensive, it is expected to complement this gazetteer.</p> <p>While this work is commendable, the commitment is assessed as having no notable results in opening government at this stage as the dataset was released in April 2025 after the implementation period being assessed.</p>	
<p>Commitment 14: Public database and special register of civil society organizations</p>	
<ul style="list-style-type: none"> ● Verifiable: Yes ● Does it have an open government lens? Yes ● Potential for results: Modest 	<ul style="list-style-type: none"> ● Completion: Complete ● Early results: No Notable Results
<p>Under this commitment, the Ministry of the Interior aimed to establish two platforms: a Public Database and a Special Register of civil society organizations (CSOs) for registering CSOs that wish to be supervised in order to receive state funding. These registers would replace the many registers and procedures across public administration. The difference between the Public Database and the Special Registry lay in the type and number of required supporting documents, the amount of potential state funding to which one is entitled to claim, and the scope of tax incentives from which registered organizations and bodies benefit.</p> <p>This work was completed with the release of the two databases in July and September 2023.⁴⁵ CSOs are defined as non-state, non-governmental, non-profit organizations established and operating in Greece based on private initiatives. The search functionality is comprehensive, and the Ministry of the Interior released a detailed FAQ to explain their operation.⁴⁶</p> <p>At this stage, the commitment is assessed as having no notable results in opening government, due to the low number of registered CSOs. In February 2025, there were only 1170 entries in the Public Database, out of an expert estimate of 60,000 CSOs in existence in the country.⁴⁷ Moving forward, the Ministry of the Interior could address recommendations by the European Commission and the Civic Space Report 2024 to conduct structured dialogue with CSOs to assess whether amendments to the registration framework are required.⁴⁸ It could also consider the Bodossaki Foundation Action Plan for Civil Society's recommendations to automatically register all certified CSOs in the public database and immediately</p>	

communicate all key CSO information, as well as strengthen incentives for organizations registered in the special registry.⁴⁹

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

- | | |
|---|--|
| <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Unclear | <ul style="list-style-type: none"> • Completion: Substantial • Early results: No Notable Results |
|---|--|

Under this commitment, the Ministry of the Interior aimed to create an online feedback mechanism for citizens to evaluate the quality of public services by the end of 2024. The first milestone, for the ministry to sign a programmatic agreement with the EU’s Just Transition Platform,⁵⁰ was completed. The second, the design of the platform, commenced on 1 May 2023.⁵¹ The platform was launched in May 2025. The first evaluation round collected feedback from 64.789 citizens in 327 municipalities.⁵² The Ministry of the Interior, the lead implementing body, published the results of the first round of evaluations online.⁵³ As the platform was launched after the implementation period of the action plan, which this report is assessing, the commitment is assessed as having no notable results in opening government.

Commitment 16: Platform and system for monitoring responsibilities between entities

- | | |
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| <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Modest | <ul style="list-style-type: none"> • Completion: Substantial • Early results: No Notable Results |
|--|--|

Under this commitment, the Ministry of the Interior aimed to create a centralized up-to-date register of all public bodies which describes their responsibilities and legal status. The register would cover the four levels of public administration (centralized, decentralized, regional, and local) and would provide users with consistent information about each public body and provide information about the public administration’s current institutional and regulatory frameworks.

The first three milestones to map the existing situation, study best practices, record responsibilities, and define a legislative framework were completed in the planned timelines. The final milestone, developing the information system, had two phases: creating a repository for recording responsibilities, due for completion on 31 December 2024, and a system for recording real estate, equipment and human resources, due for completion on 31 December 2025. According to the Ministry of the Interior, the first phase was completed in December 2024 and is in the process of being approved.⁵⁴ As the platform is not available to the public, the commitment is assessed as having no notable results in opening government at this stage.

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

- | | |
|--|--|
| <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes | <ul style="list-style-type: none"> • Completion: Limited • Early results: No Notable Results |
|--|--|

<ul style="list-style-type: none"> ● Potential for results: Modest 	
<p>Under this commitment, the Ministry of Migration and Asylum aimed to release open and anonymized migration and asylum datasets, following the digital transformation of the ministry. It continued the commitment on open immigration datasets in Greece’s fourth action plan.</p> <p>While there has been progress on six of the nine milestones, no milestones can be assessed as fully complete until the ministry’s digital transformation and information system is centralized. According to the ministry, most of the indicators included in this commitment are already published on the ministry’s website as tables of aggregated data and corresponding graphic visualisations.⁵⁵ The commitment is assessed as having no notable early results in opening government at this stage.</p>	
<p>Commitment 18: Community of good practice for digital skills</p>	
<ul style="list-style-type: none"> ● Verifiable: Yes ● Does it have an open government lens? Yes ● Potential for results: Unclear 	<ul style="list-style-type: none"> ● Completion: Complete ● Early results: No Notable Results
<p>Under this commitment, the Ministry of Digital Governance aimed to create an online space, through the Governance model of the National Alliance for Digital Skills and Employment, for public, private, and civil society sectors to discuss issues relating to the digital divide in Greece.</p> <p>This work was completed. A collaborative space, the Community of Good Practice (COP) for Digital Skills, was created on the Digital Skills and Jobs Coalition’s website in mid-2023.⁵⁶ It aims to exchange knowledge and good practices on strengthening digital skills in education, ICT professionals, targeted population groups, and citizens, and invites registration and new topics. As part of the COP, several technological skills trainings and webinars were organized.⁵⁷ While these are positive initiatives, it is unclear how civil society and other non-governmental stakeholders influenced decision-making in the COP. Based on the evidence reviewed by the IRM, the commitment is assessed as having no notable results in opening government at the time of assessment.</p>	
<p>Commitment 19: Community of good practice for the national interoperability framework</p>	
<ul style="list-style-type: none"> ● Verifiable: Yes ● Does it have an open government lens? Yes ● Potential for results: Unclear 	<ul style="list-style-type: none"> ● Completion: Substantial ● Early results: Moderate
<p>The commitment aimed to create a Community of Good Practice (COP) as a collaborative space between citizens, IT professionals, companies, public administration and ICT professionals to co-design a new National Interoperability Framework (NIF), to meet Greece’s obligations with the new European Interoperability Framework (EIF).⁵⁸ The new NIF would replace the 2012 NIF and formed part of Greece’s Digital Transformation Bible 2020–2025.⁵⁹</p> <p>Both the COP and NIF were created. The government consulted with 50 different private and</p>	

public stakeholders to create the draft NIP, using a range of offline and online approaches.⁶⁰ The milestones to train public administration executives to meet NIF requirements, and the guidance and support work to assist bodies implement the new NIF was not completed. They are foreseen to be completed during the implementation of the NIF. Moving forward, the Ministry of Digital Governance could make sure that all COP activities are publicized and that CSOs representing communities that do not have regular digital access to public services are regularly included in its processes.

¹ Editorial notes:

1. For commitments that are clustered, the assessment of potential for results and early results 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://opengovmonitor.gr/5o-esd/>, or https://www.opengovpartnership.org/wp-content/uploads/2023/01/Greece_Action-Plan_2022-2024_December_EN.pdf.
3. For more information on the assessment of the commitments' design, see Greece's Action Plan Review: https://www.opengovpartnership.org/wp-content/uploads/2023/11/Greece_Action-Plan-Review_2022-2024_EN.pdf.

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