Greece-OECD Project: Technical Support on Anti-Corruption

Mapping of Corruption Complaints Mechanisms in Greece
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About the Greece-OECD Project

The Greek government is prioritising the fight against corruption and bribery and, with the assistance of the European institutions, is committed to taking immediate action. Under the responsibility of the General Secretariat Against Corruption, Greece’s National Anti-Corruption Action Plan (NACAP) identifies key areas of reform and provides for a detailed action plan towards strengthening integrity and fighting corruption and bribery. The OECD, together with Greece and the European Commission, has developed support activities for implementing the NACAP. This project is scheduled for completion in 2018 and is co-funded by the European Commission and Greece. For further information, please see the project webpage.
Acknowledgements

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# Table of contents

1. Introduction: The value of complaints in a changing public sector .................. 7
2. Methodology ........................................................................................................ 13
3. Mapping .................................................................................................................. 15
   Corruption-related complaints .............................................................................. 15
   Recipients of corruption-related complaints ...................................................... 17
4. Key challenges ...................................................................................................... 37
   The corruption complaints system is confusing for citizens ............................ 37
   Lack of standardised procedures ........................................................................ 37
   Lack of good electronic data systems ................................................................. 37
   Deficient co-operation and overlapping among competent authorities .......... 38
   Lack of capacity and resources .......................................................................... 38
   Design reality gap ............................................................................................... 39
   Role of GSAC ....................................................................................................... 39
   Difficulty identifying the competent prosecutorial authority for referral .......... 39
   Absence of follow-up and tracking ................................................................... 40
   Weak whistle-blower protection ......................................................................... 40

Annex A. Mapping diagrams .................................................................................. 41
Annex B. Questionnaire distributed to Greek institutions responsible for managing complaints ................................................................. 59
1. Introduction:
The value of complaints in a changing public sector

Complaints are “expressions of dissatisfaction made to or about an organisation related to its products, services, procedures, or staff, and where a response or resolution is either legally required or explicitly or implicitly expected.”¹ Governments can receive many types of complaints from the public (whether individual citizens, firms or the media), including those concerning inappropriate or discourteous treatment, omissions, mistakes and faults, misleading guidance, unclear procedures, or even blatant biases and injustices.²

Often through the same channels, as they receive complaints, governments can also receive reports of potential corruption. That is allegations of a particular official’s or organisation’s abuse of power or authority. These corruption-related complaints can concern alleged bribery, embezzlement, fraud, extortion, nepotism, and other corruption offences as defined by a country’s legislation. A citizen or firm reporting corruption may have been a direct victim of the act; however, this may not necessarily be the case. Often, whistle-blowers who witness or strongly suspect corruption may also file a corruption report with government organisations.

These corruption-related complaints and the other types of grievances or maladministration complaints are often related. It can be true, for instance, that a corruption-related offence is not reported or filed formally, but is instead detected over the course of handling a separate complaint or series of complaints. In fact, poorly performing government organisations ridden with maladministration issues are often the optimal breeding grounds for fraud and corruption. Likewise, not all corruption reports materialise into disciplinary or criminal cases, with fair and effective preliminary investigations first needed to ascertain whether an offence has indeed taken place. Such corruption complaints may instead uncover more serious maladministration issues.

Unfortunately, both maladministration and corruption reports are often viewed by public sector managers as legal obligations, nuisances - or worse - as attacks on their professionalism, capacities or values. Certainly, such viewpoints can arise due to several reasons: not all complaints are valid or warranted, and some complainants may be unreasonable or even aggressive to public officials. Responding to such complaints takes precious time and resources away from organisations, which they should be devoting to

other objectives, or can adversely affect civil servants’ morale. Furthermore, not all complaints are made with the best intentions; some can unjustly tarnish reputations or be deliberately misused as a means of retribution or to make attacks on political opponents.

However, despite these challenges, getting complaints systems right is more important than ever for public sector organisations in today’s context. And they should instead be embraced, and regarded as invaluable inputs for preventing and detecting fraud; improving service delivery and overall government performance; as well as maintaining good relations with the general public. Indeed, there are several powerful trends that have increased the value, relevance and demand for effective complaints mechanisms.

First, stringent fiscal constraints in the majority of OECD member countries have led to immense pressure on governments to reduce costs. Yet governments struggle to achieve such cost reductions without sacrificing the quantity or quality of outputs and public services (i.e. in essence, the challenge of achieving greater efficiency and value for money). For example, outsourcing, privatisation and greater decentralisation/delegation of competencies have been the common responses adopted by governments. However - if not managed properly - these policies can also create greater opportunities for errors and declining quality in outputs and services. These three approaches often potentially weaken oversight mechanisms or apply an even greater strain on already limited state capacities (such is the common case of local governments who are tasked with delivering too much with too little). In the worst-case scenarios, they can also facilitate fraud and corruption, which are not only illegal but are a further drain on public resources. In this context of austerity, complaints systems should, therefore, be regarded as critical “early detection” mechanisms to identify integrity risks, avoid the waste of public resources, as well as to ensure that good performance and value for money are maintained in different service delivery models.

Second, governments are facing austerity and efficiency pressures simultaneously with changing citizen expectations. Increasing competition from the private sector and the use of new technologies in service delivery have raised the standards of service that citizens expect to experience when dealing with government entities. In this context, public sector complaints systems must be seen as a means of improving citizen satisfaction with government services. They can support this goal in several ways. For instance, complaints are an excellent way to stay in touch with the constantly changing landscape in which the organisation functions. Citizens’ needs are increasingly diverse and in flux, and complaints can help managers better understand client perspectives, segment their markets, reconcile differences between needs and services/products, and improve access channels to services or the policy-making process.3

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Furthermore, research shows that the manner in which complaints are handled and resolved is an important driving factor for satisfaction. Box 1.1 discusses in greater detail how the complaints systems themselves can influence citizens’ satisfaction with government entities. Indeed, complaints that are handled improperly (i.e. in a non-timely or discourteous way), or ineffectively, can backfire and worsen citizen satisfaction, since they re-affirm or confirm citizens’ already negative attitudes and views of the organisation in question.

**Box 1.1. How are complaints systems linked to achieving greater satisfaction with government services and organisations?**

Complaints systems have long been recognised by the private sector as a key driver of client satisfaction, with satisfaction in turn strongly linked to customer loyalty and retention over the longer-term. A great deal of theoretical and empirical research has been conducted to better understand the link between complaints systems and satisfaction, with much of it applying also to public sector organisations. In particular, the theory of justice has been successfully applied in better understanding the relationship. Those who file complaints do so out of a sense that injustice towards them has occurred. Using this framework, three components or drivers of satisfaction have been identified and tested:

- **Interactional justice:** This dimension refers to the perceived fairness of the interpersonal treatment. This concerns the perceived attitude, honesty, politeness, effort, and empathy displayed by the organisation to the complainant, including the delivery of an explanation. Citizens derive greater satisfaction from filing a complaint when they experience these qualities during the handling process.

- **Procedural justice:** This dimension concerns the ease (access and convenience) of filing complaints, the timeliness in response, the ongoing follow-up, whether the organisation shows or displays knowledge of the complaints process, and the flexibility displayed towards the complainant. A sense of procedural justice has proven to be a particularly important driver of satisfaction.

- **Distributive justice:** This dimension refers to the perceived fairness of the outcome or resolution of the complaint. These can include monetary or in-kind compensation, but also resolutions such as formal apologies and assurances. Citizens who perceive the resolution is adequate report higher levels of satisfaction.

All three components have been proven to drive satisfaction together in a cumulative fashion. Different sub-elements may be more or less important depending on the type of consumer and complaint. Other research has addressed an additional dimension that influences satisfaction from engaging in the complaints process, specifically: the complainants’ initial expectations. Complicating matters is the fact that expectations are in turn influenced by past experiences, cultural norms, the complainants’ own knowledge of the institution or procedures or laws, and other characteristics unique to the specific situation and individual(s) involved. Levels of satisfaction from filing a complaint are then a result of whether outcomes overall exceed,

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Third, declining levels of trust in public sector institutions, particularly following the economic and financial crisis, have made calls for greater transparency and accountability in OECD member countries all the louder. In Greece, in 2016, only 13% of citizens reported having confidence in their national government, compared to 42% in the OECD on average. In this reality of the post-crisis world, citizens are far more than just clients or consumers seeking better services. Likewise, governments are more than service providers operating in a competitive marketplace. Rather, trust is built when citizens perceive that government leaders and institutions are effective in defending the public interest and demonstrating they act with integrity.

In this context, citizens or firms who file complaints are therefore rightly exercising their duty to hold government officials and institutions to account for this responsibility. Complaints systems are therefore not only about improving performance and satisfaction; they are also about guaranteeing good governance by ensuring effective mechanisms exist to question government and to exercise their voices in government decision-making processes.

The effective management of corruption-related complaints specifically may be particularly important in restoring citizens’ trust in government. While there are many factors that contribute to citizens’ levels of trust, perceived levels of corruption are amongst the strongest factors (see Figure 1.1 on the relationship between perceived corruption and levels of trust in national government).

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To summarise, while governments may be legally required to respond to complaints from the general public, this narrow approach to complaints management fails to recognise the key trends that are moulding the future of the public sector, and severely limits the potential role that complaints systems can play in achieving several key government objectives:

- correcting mistakes and “righting wrongs” for the affected individuals or firms
- creating a deterrent effect against fraud and corruption
- identifying integrity risks and other organisational weaknesses in order to strengthen internal controls and improve government performance more broadly
- helping public organisations adapt to changing needs and demands, increasing user satisfaction
- helping government institutions be more transparent and accountable to the public, increasing trust and confidence in elected leaders and institutions.

With such important outcomes at stake, the Greek government has rightly prioritised the improvement of its public sector complaints systems (including corruption-related complaints) as a priority in its national reform agenda.

2. Methodology

In the development of this mapping report, the OECD undertook a comparative review of international good practices in the management of organisational complaints systems. Practices from both the private and public sectors were considered. Additionally, the OECD interviewed experts responsible for managing or instituting corruption complaints mechanisms in several international anti-corruption institutions, with a view to gaining further practical insights based on real practices and experiences. In selecting these institutions, the OECD considered not only their international reputation but also sought out a diverse geographic representation. These included interviews with representatives from:

- Serious Fraud Office (SFO), United Kingdom
- National Anti-Corruption Authority (ANAC), Italy
- Independent Commission against Corruption (ICAC), Hong Kong
- Business Keeper AG (German-based enterprise responsible for the IT complaints systems of Austria’s State Prosecutor on Economic Crime, Morocco’s Instance Centrale de Prevention de la Corruption, and various German states).

On the basis of this information, the OECD then established the criteria for conducting the mapping of the current Greek context. As inputs to the mapping, questionnaires were distributed to several Greek institutions responsible for processing complaints, including:

1. General Secretariat Against Corruption (GSAC)
2. Financial Police Division (FPD)
3. Hellenic Police, Directorate of Internal Affairs (DEY)
4. Hellenic Coast Guard, Internal Affairs Service (YEY)
5. Court of Audit
6. The Public Prosecutor against Crimes of Corruption (PPACC)
7. The General Accounting Office (GAO)
8. Independent Authority for Public Revenue (IAPR) Internal Affairs Unit
9. Health and Welfare Services Inspection Body (SEYYP)
10. Inspectorate body of the public administration (SEEDD)
11. Inspectorate body of public works (SEDE)
12. General Inspector for Public Administration (GEDD)
13. Special Secretariat of Financial and Economic Crime Unit (SDOE)
14. Ombudsman’s Office
15. Ministry of Environment, Energy and Climate Change
16. Ministry of State
17. The Municipality of Athens
18. The Municipality of Thessaloniki.

The OECD questionnaire, which benefitted from comments and feedback from GSAC prior to distribution, is available in Annex B of this report. After the receipt of the questionnaire responses, the OECD conducted follow-up interviews with each of the respondents.
3. Mapping

Corruption-related complaints

Before mapping the current venues that Greek citizens can use to report corruption-related complaints, it is required to define the meaning of a “corruption-related complaint” in Greece. A corruption-related complaint is made of four components: 1) a corrupt activity; 2) a complainant; 3) a target (i.e. the individual or individuals involved in the corrupt activity); and 4) a recipient of the complaint (i.e. the public authorities receiving the complaint). A brief analysis of these four elements from the Greek perspective follows.

The corrupt activity

Greek Domestic Law does not have a definition of corruption. Primary provisions related to this phenomenon are contained in the Criminal Code (CC). This includes Article 235, which punishes passive bribery; Article 237, which punishes passive bribery and active bribery involving members of the judiciary; Article 237A, which punishes trading in influence; and Article 159, which punishes passive bribery of political officers.\(^1\) Anti-bribery legislation does not apply to symbolic gifts or gifts of courtesy; these are determined primarily with regard to the scope of the gift and the openness with which it is given. However, the relevant corruption laws may still apply where such gifts (e.g. travel expenses, meals and entertainment) are used systematically in an attempt to influence public officials.\(^2\)


Law 3691/2008 addresses the prevention and suppression of money laundering and terrorism financing. Article 2 of said law defines the constitutive elements of money

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laundering and covers the conversion, transfer, concealment, disguise, acquisition, possession and use of property or products derived from crime.

Greece’s legislation covers embezzlement (Article 375 CC). The “embezzlement” of immovable property is covered under related offences, including the broad infidelity offence (Articles 256 and 390 CC). Moreover, Articles 257 and 258 CC criminalise the exploitation of entrusted assets and embezzlement committed by public officials.

Article 259 CC criminalises abuse of official duty. It is considered a crime that a public officer intentionally violates his or her service obligations to obtain undue advantages for himself or others.

Greek legislation does not define illicit enrichment as a criminal offence. Nonetheless, Law 3213/2003, amended by Law 4281/2014, requires a fairly large category of persons to deliver complete annual declarations of their assets and income under penalty for non-declaration, false declaration, omission or negligence on such declaration. Article 375 CC criminalises the illegal appropriation of moveable assets.

Article 167 CC criminalises the use of violence or threat to force an authority or public official to execute an act within his or her capacities or to refrain from a legitimate act.

When defining corruption, it is important not to confuse it with cases of maladministration or other types of grievances. Corruption involves criminal conduct (e.g. the crimes described in the CC articles mentioned above), while maladministration relates to incompetent or negligent behaviour that results in an irregular and unauthorised use of public money, the substantial mismanagement of public resources, or the substantial mismanagement of official functions. However, the reality shows that in practice, these two concepts often overlap. For instance, a corruption-related offence might not be reported formally but detected over the course of handling a separate maladministration complaint. According to the Greek Ombudsman, this is the case in the 15% of maladministration complaints they handle. Likewise, not all corruption reports materialise into disciplinary or criminal cases, with fair and effective preliminary investigations first needed to ascertain whether an offence has indeed taken place. Such corruption complaints may instead uncover more serious maladministration issues.

**The complainant**

According to Article 40 of the Greek Criminal Procedure Code (CPC), if a citizen becomes aware of a crime that is prosecuted *ex officio* (e.g. bribery), he/she is obliged to report the matter to the public prosecutor or any law enforcement authority. However, the failure to fulfil this obligation is not sanctioned.³

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The targets

According to Law 4022/2011 (which established the Greek anti-corruption prosecutor), the targets of the anti-corruption legislation are “serious crimes (felonies) committed by ministers and deputy ministers, members of parliament, deputy officials, public servants and employees of state-controlled institutions.”

The recipient

The General Secretariat Against Corruption is enabled by Law 4446/2016 to receive, among other competent authorities, corruption-related complaints that involve the public and the private sector as well as transnational fraud in co-financed and other EU-funded programmes. As previously mentioned, Greek citizens can also report corruption before other competent law enforcement authorities, public prosecutors, the Financial Police Division or the General Inspector for Public Administration, among others. This mapping report provides a summary of the internal complaints management processes in 14 Greek public authorities. A more detailed description of these systems is provided in a diagram in Annex A.

<table>
<thead>
<tr>
<th>Box 3.1. Potential definition of a corruption-related complaint in Greece</th>
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<tbody>
<tr>
<td>The report made by a citizen before a competent authority of passive bribery, active bribery, money laundering, embezzlement, abuse of functions, illicit enrichment, trading influence or other serious crimes committed by ministers and deputy ministers, members of parliament, local government officials, public servants or employees of state-controlled institutions.</td>
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<table>
<thead>
<tr>
<th>Complainant</th>
<th>Subject</th>
<th>Targets</th>
<th>Recipient</th>
</tr>
</thead>
<tbody>
<tr>
<td>Any person who becomes aware of a corrupt act</td>
<td>Passive bribery, active bribery, money laundering, embezzlement, abuse of functions, illicit enrichment, trading influence or other serious crimes</td>
<td>Ministers and deputy ministers, members of parliament, local government officials, public servants and employees of state-controlled institutions</td>
<td>GSAC, FPD, GEDD, SEEDD, SEDE, SEYPP, SDOE, GAO, IAPR, Internal Affairs, etc.</td>
</tr>
</tbody>
</table>

Recipients of corruption-related complaints

Greece does not have a centralised corruption-related complaints system. As of today, a large number of administrative bodies may receive corruption complaints due to their varied nature and responsibilities. It may be the case that, depending on the type of issue to be addressed, there are a number of different inspection bodies (e.g. inter-ministerial, ministerial or sectoral) with jurisdiction over the same corruption complaint. In principle, having different ways and venues to report corruption is not a problem in itself, as long as good communication and co-operation mechanisms exist among these different services. In Greece, based on the feedback received, this does not appear to be the case. Most of these services operate in silos with little communication and information sharing, partly due to the lack of good administrative information-sharing systems within the Greek administration. This adds to the complexity facing citizens who want to report corruption.
In addition, because of the nature and subject matter of the various Greek law enforcement agencies and stakeholders in the fight against corruption, it is often difficult to follow standardised procedures that ensure that corruption allegations and/or corruption reports are assessed consistently and efficiently. The fight against corruption spans across a number of government stakeholders, including law enforcement authorities, tax and customs bodies, administrative authorities, internal affairs divisions, and independent administrative authorities. These entities follow distinct and unique procedures and frameworks when engaging in detection activities and conducting an initial assessment of corruption allegations. As a result, there is often confusion among the different stakeholders as to efforts being carried out by other entities and as to how to maximise efficiency and manage an overwhelming amount of case reports.

Having said the above, based on the research done for this report, as of today, most of these administrative bodies do not have a dedicated complaints management system in place, treating complaints as other incoming requests from the public. They have not developed proper policies, procedures or complaints manuals to guide their complaints-handling processes and most of them do not count with tailored electronic complaints management systems. The absence of proper timeframes for finalising the different stages of a complaint and the reported limited human and financial resources make these services beset with unresolved backlogs of cases. In addition, many of them have no proper mechanisms to seek enforcement of their decisions or recommendations and the lack of clear referral policies makes it difficult, if not impossible, to follow-up the fate of complaints.

The quality and the lack of human and economic resources also represent a challenge in the area of corruption complaints management in the public sector in Greece, which in some cases causes disbelief among citizens as to whether a complaint will be addressed in a timely and proper manner. In addition, low salaries might lead civil servants working with complaints to feelings of dissatisfaction or perceptions of unfairness at work.

According to respondents, many of these investigations are undertaken at the request of the ministers’ offices, prosecution offices, as well as other sources both internal and external to the public service, such as citizens. It should be noted, however, that in analysing this data, there are a number of measurement issues. Each organisation does not use the same definitions and reporting categories, making firm inter-organisational comparisons impossible. Given the sheer volume of complaints, it should be noted that in most of these bodies there is little to no risk-based assessment and investigation planning of the incoming complaints.

At the time of writing this report, GSAC is building its capacity to receive and analyse corruption-related complaints. By a decision of the GSAC’s Secretary General, a circular is to be issued, with which the procedure of receiving, registering, assessing, forwarding and monitoring the complaints received by GSAC will be established. In addition, a prosecutor is seconded to GSAC, after a decision of the High Judicial Council, who secures the legality of the operation of the office and will supervise the procedure of registering, processing and forwarding of the above-mentioned complaints to the competent bodies.
A summary of the internal complaints management systems of the Greek public authorities that provided feedback for this report follows. A more detailed description of these systems is provided in Annex A.

**General Secretariat Against Corruption (GSAC)**

In 2015, the government passed Law 4320/2015, which established the General Secretariat Against Corruption (GSAC) under the authority of a new Minister of State. Under Article 12 of the Law, this entity drafted a national anti-corruption strategy, with an emphasis on co-ordination between control, audit and anti-corruption bodies and agencies, including the Financial Police Division (FPD), the Financial and Economic Crime Unit (SDOE), the Ministries’ Internal Control Units, and the Inspectorate Body for Health and Welfare Services (SEYYP). Based on Law 4320/2015, two major control and anti-corruption bodies, the Inspectors-Controllers Body for Public Administration (SEEDD) and the Inspectors Body for Public Works (SEDE), were moved under the jurisdiction of GSAC.

Following the September 2015 national elections, the cabinet post of Minister of State for Combatting Corruption was abolished, and those duties were assigned to the Alternate Minister of the Ministry of Justice, Transparency, and Human Rights.

<table>
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<tr>
<th>Box 3.2. General Secretariat Against Corruption</th>
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<tr>
<td>According to Law 4320/2015 (as amended by v.4446/2016), the General Secretariat Against Corruption:</td>
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<tr>
<td>• Shall take the necessary initiatives and steps to ensure coherence and effectiveness of the national strategy, with a special focus on the <strong>co-ordination</strong> of inspection bodies and the effectiveness of their actions and provide instructions and recommendations.</td>
</tr>
<tr>
<td>• Co-operates with international organisations and the institutions and bodies of the European Union or other countries for the preparation and implementation of strategic plans, exchange of best practices and technical assistance for combating corruption and fraud.</td>
</tr>
<tr>
<td>• Removes conflicts and resolves matters of overlapping responsibilities between departments or agencies involved in the fight against corruption, by proposing appropriate solutions for the effective resolution of those matters.</td>
</tr>
<tr>
<td>• Receives complaints on cases of corruption in the public and the private sector, and cases of irregularities, and suspected fraud in EU structural funds.</td>
</tr>
<tr>
<td>• Proposes, develops and plans programmes and actions to be funded through EU funds and other, transnational programmes GSAC or the bodies supervised by it. (Article 53 of Law 4446/2016).</td>
</tr>
<tr>
<td>• Exercises operational control of the Financial Police, the Financial Crime Unit (SDOE), Internal Audit Services of the Ministries, and the Inspectorate of Health and Welfare Services (SEYYP).</td>
</tr>
</tbody>
</table>
Law 4446/2016, which amends GSAC’S founding Law 4320/2015, introduced the establishment of an office for corruption complaints within GSAC. According to Article 54(3) of the Law, the office of complaints receives complaints relating to two areas: 1) corruption cases in the public and private sectors; and, 2) fraud cases in co-financed, transnational and other programmes (including EU programme funds).

For corruption complaints regarding fraud cases in co-financed, transnational and other programmes (including EU programme funds), GSAC is the centralised authority since it has been nominated the competent anti-fraud co-ordination authority (AFCOS) in Greece. For complaints of corruption related to the private and public sector, GSAC is just another entry point.

GSAC is working closely with OECD experts in the framework of the current technical assistance in order to set up an effective complaints management function, to draft a complaints management regulation and to standardise the complaint management procedure. To supervise this function, a prosecutor is seconded to GSAC for a period of three years.

In the meantime, four officials have been entrusted with the management of incoming complaints. Individuals wanting to report a corruption-related complaint can file this in person or through GSAC’s website (www.gsac.gov.gr), which also allows for the submission of anonymous complaints. For cases of irregularities and suspected fraud in structural funds, complaints may also be submitted through the National Strategic Reference Framework (NSRF) website.

Each complaint received by GSAC is assigned a protocol number called a “complaint office reference number”.

When the complaint is credible and well substantiated, the practice is that GSAC forwards it to the competent authority to start an investigation. The whole procedure is under the supervision and the directions of the seconded public prosecutor in GSAC.

Complaints related to EU co-funding programmes are transmitted to European Commission’s OLAF for further examination and treatment according to EU law.

According to the GSAC annual report, in 2016 the service received a total of 751 complaints, of which 34 had to do with tax evasion, 46 with suspected fraud in EU structural funds, 178 with corruption-related complaints, 24 with maladministration, 23 relating to civil law conflicts between individuals related complaints and 446 were classified as “other” complaints.

Financial Police Division (FPD)

The Financial Police Division (FDP) was established in 2011 by Presidential Decree 09/2011. The Financial Police is part of the Hellenic Police Force and is competent for

5. See www.espa.gr/el/Pages/staticAntiFraud.aspx.
financial and economic crimes, including organised crime. The Financial Police’s mission is to prevent, investigate and suppress crimes committed against the interests of the public sector and the national economy as well as offences involving organised crime.

Officers of the Financial Police Division are considered “general investigative officers” in the sense of Article 33, para. 1, sections (b) and (c) of the CPP and are competent for investigating financial and economic crimes, including cases of corruption and foreign bribery. For this purpose, the service counts the reports of corruption it receives via a 24-hour hotline. They undertake preliminary assessments or inquiries of these reports and analyse data received through its information management system. The information collected is subsequently transmitted to the competent prosecutor for further action.

The Financial Police does not have the power to initiate investigations on its own and may only carry out investigative measures in the presence of a public prosecutor or with the prior authorisation of a judge or prosecutor.

The Financial Police’s Information Management and Strategic Planning Department is in charge of the evaluation and management of information and complaints as well as of the administration, development and maintenance of the Financial Police’s Information System.

The submission of corruption and other complaints can take place in person, by mail, phone, fax or e-mail. The reporting of a complaint does not require the payment of any fees.

According to the interview undertaken for this report, all complaints received are properly processed and assessed to determine whether they fall within the service’s competences and whether they merit a proper investigation. Otherwise, they are transferred for investigation to the competent authority.

Using an integrated information system called “Case Management App-Data Store for Multi-Source”, the Financial Police counts multi-source information handled, including corruption complaints from citizens as well as orders from the prosecutor, information from other police services and precautionary audits.  

The information concerning complaints is stored on an encrypted server and structured using the following fields:

- dates of issuing and completion of the case by the service
- case status (ongoing – closed)
- main offence (used for categorising the case) and other offences
- case description (free text - brief summary of the case including modus operandi and actors involved, places, etc.)
- district (city, county, periphery)

• persons (physical and legal entities) with their role in the case
• seizures (amount of cash, electronic devices, contraband cigarettes, counterfeit products, other items and goods)
• financial data (state revenue losses, administrative fines posed, and assets from money laundering).

In the case of a credible complaint within its remit, FPD starts a preliminary investigation for criminal offences, and the results are submitted to the competent public prosecutor.

If the complainant wants to challenge the outcome/decision on the complaint, it should be addressed to the competent public prosecutor’s office or agency respectively.

Only the authorised staff entrusted with the management of incoming complaints (20 persons) have access to the system. The officials responsible for the reception of complaints are regularly trained.

In 2016 they received 1,618 complaints, of which 40 had to do with corruption and 15 with money laundering.7

**Hellenic Police, Directorate of Internal Affairs (DEY)**

The Directorate of Internal Affairs (DEY) of the Hellenic Police was founded in 1999, to stamp out cases of corruption within Hellenic Police. It is located in Athens, and its responsibility extends throughout the entire Greek state. The service also has a branch office in Thessaloniki.

The Directorate operates under a special statutory framework (Law 2713/1999 and Law 2800/2000) and falls directly under the Chief of the Hellenic Police. Its investigation tasks are supervised by the Greek Public Prosecutor (Εισαγγελέα Εφετών) and reports annually through to the Parliamentary Committee on Institutions and Transparency. It also co-operates with the Group of European States against Corruption (GRECO).

Pursuant to Article 2 of Law 3103/2002, the Hellenic Police Internal Affairs Directorate also addresses the crimes of bribery involving employees and officials in the public sector as well as officials of international organisations.

Citizens can lodge corruption complaints to DEY in the following ways:

• in person at DEY’s headquarters
• by phone 24 hours a day: 210-8779700 and 10301 (hotline)
• by e-mail: dey1@otenet.gr, internalaffairs@astynomia.gr
• by fax: 210-6856508 and Y.E.Y.B.E: 2310-548690
• by post: 23 Kifissias Avenue, Maroussi, Attiki, PC: 15123./ Monastiriou 241 - Thessaloniki, Postal Code: 54628.

All complaints or information received by the DEY (including anonymous complaints) are evaluated and filed in DEY’s electronic system. Complaints referring to crimes of their competence (Article 1 paragraph 2 of Law 2713/99) are investigated or transmitted to another competent police service or public authority.

During a preliminary examination or investigation, tax secrecy is not applicable. The Directorate of Internal Affairs has access to the archives of all police services and other authorities or services of the wider public sector in the course of its mission. Where necessary, it is possible to remove confidentiality of communication, banking or stock exchange secrecy, in accordance with specific procedural procedures.

Exceptionally, the complaint may be terminated with the consent of the public prosecutor (Εισαγγελέα Εφετών) due to lack of relevance or lack of merit.

According to DEY’s website, citizens can contact the service to be informed of the progress of their case. For anonymous complaints, there is no such possibility.

As per training on corruption complaints management, according to the DEY 2016 Annual Report, due to the growing need for specific skills and expertise to support effective corruption complaints management, DEY promotes in-house training for staff members. At the same time, its personnel regularly participate in educational programmes and conferences. In 2016, 18 educational activities were attended in Greece and abroad, in which 36 officers took part.

In order to fulfil its mission, DEY co-operates harmoniously, at the national level, with other police and public organisations.

In 2016, FEY received 1,231 complaints/inquiries. Of this, 784 (64%) concerned police officers, 246 (20%) referred to complaints against civil servants, 110 (9%) concerned private individuals and 91 (7%) concerned complaints/information on crimes involving police officers and civil servants. Some 25% of the complaints received were anonymous.

**Hellenic Coast Guard, Internal Affairs Service (YΕY)**

The Internal Affairs Service (YΕY) is a special independent service within the Greek Coast Guard whose mission is the detection and investigation of corruption offences related to the Hellenic Coast Guard.

YΕY undertakes an investigation of alleged corruption offences under the supervision of the competent public prosecutor (Εισαγγελέα Πρωτοδικών).

When receiving a complaint that falls under its jurisdiction, the complaint is registered with a protocol number and assigned to an officer to conduct a preliminary investigation, which involves collecting and evaluating the relevant information. The preliminary investigation follows the rules and provisions of the Code of Criminal Procedure.

In the course of a preliminary investigation, tax secrecy is not applicable. Where necessary, it is possible to remove confidentiality of communication, banking or stock exchange secrecy, in accordance with specific procedural procedures. YΕY has unrestricted access to the archives of all public sector authorities or services, for matters
failing within its scope of activities and involving civil servants, as well as Hellenic Coast Guard personnel or officers of European Union or international organisations operating in the Greek territory.

Citizens can lodge complaints to the YEY by post, phone (call centre: 213 1371700), fax (210 4191561) or e-mail (contact@yna.gov.gr).

**Independent Authority of Public Revenues (IAPR), Internal Affairs Directorate**

In January 2017, the General Secretariat of Public Revenues was reformed into a new revenue agency named the Independent Authority for Public Revenue (IAPR). The newly established authority has the power to: interpret all relevant applicable tax laws; combat tax evasion, smuggling, illicit trade, tax fraud; and combat corruption, lack of transparency, inefficiency, low productivity and low-quality service provision encountered in the public revenue, customs, and other relevant services.

Within the IAPR, the Internal Affairs Directorate has per mandate the identification and investigation of corruption that involves IAPR officials and the verification of their assets. The Directorate is responsible for receiving internal and external complaints related to IAPR employees’ behaviour, which can constitute breaches of internal rules and policies, including corruption. The Directorate examines the complaints, undertakes disciplinary proceedings and imposes sanctions if necessary. However, as of today, the service does not function with proper policies, procedures or complaints manuals to guide their complaints-handling processes.

Complaints may be submitted in person, by mail, phone, fax or e-mail. Although anonymous complaints are allowed, there is no special mechanism protecting the identity of the complainant. Four officials are entrusted with the management of incoming complaints, which are handled in an ad hoc manner. Even if each complaint receives a protocol number for its identification, there is no mandatory or standard document for the lodging of the complaint. Based on the interviews held for this report, complaints are kept in a password-protected Windows folder, and only inspectors/investigators have access to the server. If IAPR is not competent to investigate the case, the complaint is transferred to the competent authority, and the complainant is informed.

Only relevant and substantiated complaints are fully investigated. If this is the case, a file is created and attributed to an inspector for analysis, synthesis, data evaluation, consultation and cross-referencing using available information technology (IT) systems, from existing sources or the Internet. The authorised inspectors forward the results of the evaluation to the Head of Directorate.

IAPR does not have clear mechanisms to monitor complaints. The complainant is only informed about the result of the investigation and when the complaint is transferred to another department.

In terms of co-operation and co-ordination, the IAPR does not function with an information-sharing system. Whenever there is the need to communicate internally or externally, this is done verbally or in writing.
The service does not provide specific training to the responsible officers receiving complaints. However, in the context of the internal functioning of the Directorate, this training shall take place at regular intervals and includes addressing the complaints management within the unit.

According to IAPR, the main challenges in dealing with corruption complaints are the lack of capacity and resources, the absence of a proper IT system, the large number of anonymous complaints, not timely feedback to the complainants, low level of cooperation with other units and no access to the final result of the investigation, when the case is rendered to the court. All these factors lead to disbelief as to whether a complaint will be addressed in a timely and effective manner.

In 2016, the Internal Affairs Unit received 424 complaints. The service could not provide a sub-classification of these complaints by type.

**Public Prosecutor Against Crimes of Corruption (PPACC)**

A Prosecutor for Combating Corruption was established in 2011 (Law 4022/2011). The position is awarded to a higher ranking Court of Appeal Prosecutor who is responsible for co-ordinating and initiating investigations in respect to acts of corruption. The prosecutor is supported by special investigating agencies (such as the Financial and Economic Crime Unit and the Financial Police). The Prosecutor for Combating Corruption has extensive powers, may request any information from any authority and has access to privileged information (bank accounts, tax records, etc.).

Following a further specialisation in 2013 (Law 4139/2013), the PPACC now has offices in Athens and Thessaloniki, the jurisdictions with the highest number of complex corruption cases. These offices are tasked with supervising and co-ordinating corruption investigations. The offices became operational in May 2013.

The Public Prosecutor against Corruption can start an investigation *ex officio* or by request of another public prosecutor, public services and the Hellenic Police. Citizens are also allowed to lodge complaints, even anonymously.

Complaints can be submitted by letter and are filed in physical folders. PPACC does not function with a case management system and has limited ability to track the status of a complaint in real time.

If there are indications of corruption, the prosecutor assigns the case to one of the six deputy prosecutors who start an investigation. In the course of the investigation, the PPACC has been given the power to access all information required for the performance of its duties. According to Article 2 para. 5 of Law 4022/2011, tax and banking secrecy can be lifted for a one-month period, which is renewable. PPACC works closely with the Hellenic Financial Intelligence Unit (FIU) and SDOE.

Currently, the office functions with 30 civil servants. Six of them are deputy prosecutors, scientific experts seconded from the Ministry of Finance, the Ministry of Health, control and audit organisations and administrative staff.
Court of Audit

According to Article 98 of the Greek Constitution, the main competence of the Court of Audit pertains to auditing the expenditure of the state and local agencies. Although in principle, citizens are also allowed to submit a corruption-related complaint to the Court of Audit, there is no formal mechanism through which the public can report instances of suspected wrongdoing for the Court of Audit to investigate. Complaints are submitted in writing using mail, fax or e-mail. The Court of Auditors’ website does not include specific information or FAQs for citizens willing to denounce acts of corruption.

After receiving a complaint, a desk officer assigns it a protocol number and registers it in an Excel format database. The complaint is then analysed to determine whether or not it merits a formal investigation. When examining the complaint, the Court may decide that it is:

- Vague and unsubstantiated.
- Outside the competence of the Court of Audit, in which case it informs the citizen of its referral to the responsible authority (e.g. the General Inspector for Public Administration).
- Incomplete. If this is the case, the Court communicates with the complainant to obtain more information.
- Complete and substantiated.

If a complaint is found credible, the Court starts a preliminary investigation. Due to lack of available resources and information, complaints falling under the Court’s jurisdiction are prioritised based on significance and internal resources. The Court of Audit evaluates the information received with the complaint and tips relating to potential violations of the law.

In terms of co-ordination and communication, Law 4129/13, Article 42, provides for the transmission of inspection findings as well as relevant data from other control mechanisms to the Court of Audit. According to the Court, this procedure is done either by e-mail or mail.

The majority of complaints received by the Court relate to irregular procurement, public works or illegal recruitment. The Court compiles and analyses the information received from complaints as part of the annual audit planning.

Ministry of Finance, General Accounting Office (GAO), Directorate of Special and Extraordinary Audits

The State General Accounting Office (GAO) is part of the Ministry of Finance and is the government agency responsible for proper, lawful, efficient financial management of the Greek State. GAO also plays a role in Greece’s internal control framework by

8. For more information, see the Greek Court of Audit website at www.elsyn.gr/en.
providing financial policy direction and oversight, including the provision of direct audit services and oversight of the newly formed ministerial internal audit units.

Citizens can submit corruption-related complaints to the GAO’s Directorate of Special and Extraordinary Audits on line, by e-mail, mail or fax. However, there is no a formal system for receiving and managing these complaints. Based on the information gathered for this report, complaints are treated as other incoming documents; they are assigned a protocol number, and the basic information is registered in an Excel file. Encryption of the submitted complaints file is not available at the moment nor are they stored on secure servers. GAO does not function with staff exclusively dedicated to complaints management.

If GAO is not the competent authority to deal with the complaint, the complainant is properly informed about alternative venues and referred to the General Secretariat Against Corruption (GSAC) for further information.

If the complaint falls within GAO’s jurisdiction, the information received is evaluated to determine potential violations of the law. If a complaint is found credible and substantiated, GAO starts a preliminary investigation.

GAO does not have statistical data about complaints, including the number of complaints received by the service.

**Inspectorate Body of Health and Welfare Services (SEYYP)**

The Inspectorate Body of Health and Welfare Services (SEYYP) was established under Law 2920/2001 and reports directly to the minister. The SEYYP performs controls following a request from the Minister for Health, the Deputy Minister for Justice, Transparency and Human Rights, the Minister for Labour, Social Security and Social Solidarity (for matters within the remit of the General Secretariat for Welfare Services), the General Inspector of Public Administration, the Public Prosecutor and the Ombudsman. It also carries out controls following complaints by citizens or *ex officio*.

Based on the information gathered for this report, as of today, the SEYYP does not function with a corruption-related complaints management system or with proper policies, procedures or complaints manuals to guide their complaints-handling processes. Complaints are handled in ad hoc manner and treated similarly to other incoming documents. Citizens can submit a complaint by e-mail, fax, post or in person with no standardised document for the lodging of the complaint. The incoming complaints receive a protocol number and are recorded in a handwritten register. If they fall under SEYYP’s jurisdiction and are well substantiated, they are assigned to an inspector of the relevant thematic control area for a preliminary investigation. The work of the inspector is evaluated and monitored by the heads of the respective department.

According to the questionnaire received from SEYYP, during the ongoing audit process, SEYYP does not provide information to the complainant. Once the inspection is complete, the inspector submits his/her findings in writing to the audited service, and the process ends with a written report, which must be submitted to the Head of SEYYP. The relevant audit report is shared with the complainant upon request.

No statistical data about corruption-related complaints have been provided by SEYYP.
Inspectors Controllers Body of Public Administration (SEEDD)

The Inspectors-Controllers Body for Public Administration, known by its Greek acronym SEEDD was established by Law 2477/1997 and started its operation at the beginning of 1998.9 It succeeded the Controllers Body for Public Administration, created in 1987 within the Ministry of the Presidency of the Government (now the Ministry of Administrative Reform). Based on Law 4320/2015, SEEDD was moved under the jurisdiction of GSAC.

Law 3074/02 provides that SEEDD shall exercise its powers in order to contribute to the efficient and effective operation of public administration and especially to step up the fight against corruption, maladministration, ineffectiveness, low productivity and low quality of services rendered by the public organisations. To fulfil this mandate, SEEDD:

- Conducts inspections, controls and investigations.
- Collects evidence for the prosecution of potential criminal offences committed by civil servants (e.g. forgery, bribery, violation of the confidentiality obligation, negligence of duty, theft, blackmail, fraud, etc.).
- Conducts inquiries/preliminary examinations after a mandate by the competent public prosecutor. Public prosecutors also have to inform SEEDD of any prosecution against public officials or public servants.
- Reviews the assets of public officials.

SEEDD may start an investigation ex officio or upon request from the Alternate Minister of Justice, Transparency and Human Rights, another Minister or Secretary-General of a Decentralized Administration, the General Inspector of Public Administration and the Greek Ombudsman.

Extraordinary inspections, controls or investigations may also be prompted by requests from citizens, press announcements or reports in the mass media that have aroused the public interest. In the past years, internal organisational reforms have contributed to the acceleration of audit work and investigations of a large number of complaints addressed to SEEDD by citizens. In this regard, according to SEEDD’s annual report, 2,370 complaints from citizens were examined in 2016.10 This shows an increase from the 1,800 examined in 2015.

Statistics about specific corruption complaints have not been provided by SEEDD since the agency does not refer to corruption cases per se. Complaints are treated generically as maladministration and categorised per subject (e.g. urban planning; healthcare, security and employment; local government), in total numbers and rates. The average rate of illegal behaviour for the period 2006 through 2009 was 15.13, meaning that approximately 15 of 100 cases examined annually by SEEDD were found to in fact refer

to officials or governing bodies participating in illegal activities, justifying SEEDD’s proposal for disciplinary (335 audits) and/or criminal prosecution (120 audits).\textsuperscript{11}

SEEDD collects complaints centrally, but there is not a proper management system, making it necessary to deal with them in a rather ad hoc manner. SEEDD does not function with proper policies, procedures or complaints manuals to guide its complaints-handling processes either. Citizens can submit complaints via e-mail or by the online complaint submission form. The online platform gives citizens the opportunity to submit anonymous complaints, but there is no special mechanism protecting the identity of the complainant.

The incoming complaints are handled by four officials from the Directorate for Administrative Support, who assign them a protocol number and then register them including the complainant details, the public organisation concerned and the submission channel. If SEEDD is not competent, the complaint is transferred to the competent authority/service with a copy, for information, to the complainant. When SEEDD is competent, and the complaint is considered credible, the Special Secretary of SEEDD assigns it to an inspector to undertake a preliminary investigation and find linkages to other outstanding complaints. If misconduct is found, constituting a disciplinary offence, it is recorded in a special chapter of the report with a proposal for disciplinary proceedings. The report shall also contain a description of the case, the data submitted or used, the procedures by which the case was investigated, the findings, conclusions and recommendations. All complaints and documents relating to the investigation and the final result are stored in a secured server in pdf format.

The complainant is informed in writing about the result of the investigation and also when the complaint is transferred to another department.

Within the SEEDD, there is no IT system of communication and co-ordination with other stakeholders.

\textit{Inspectorate Body for Public Works (SEDE)}

The Body of Inspectors of Public Works was established by Article 22 of Law N.1418/1984 and is attached to the Ministry of the Environment, Regional Planning and Public Works.

In accordance with Article 179 of Law 4412/2016, the Body of Inspectors of Public Works (ETS), it is part of the Secretariat General Against Corruption (GSAC) in the Ministry of Justice, Transparency and Human Rights.

The role of the office is to undertake periodic or extraordinary inspection of projects carried out by public sector bodies.

According to the feedback provided for this report, citizens can also submit corruption-related complaints to SEDE in person, by mail, fax or e-mail. Complaints can also be

\textsuperscript{11.} University of Amsterdam (2012), \textit{Myths and Realities About Corruption in Public Administration and its Discourse in Greece}, p. 9.
lodged anonymously. However, due to lack of capacity and resources, SEDE does not function with a corruption complaints management system or personnel exclusively dedicated to this task. SEDE does not have proper policies, procedures or complaints manuals to guide their complaints handling processes either. Complaints are processed the same way as other incoming documents. Three front desk officers are in charge of receiving and registering the complaints in a handwritten register by assigning them a protocol number. Complaints are then archived in a physical folder. There is no mandatory document for the lodging of the complaint and no means to encrypt submitted complaints.

If the complaint does not fall under SEDE’s jurisdiction, it is transferred to the competent service, informing the complainant. If the complaint falls under SEDE’s jurisdiction and it is substantiated, it is assigned to one of the ten inspectors dedicated to conducting investigations.

All reports are communicated to the competent prosecuting authorities and disciplinary heads of the audited services for their own actions. The outcome of the investigation can be communicated to the complainant, upon a prosecutor’s order subject to the provisions on the protection of personal data.

Complainants do not receive information during the investigation of a complaint. The complaint reports are confidential. The outcome of the audit shall be communicated to the citizen concerned, upon a prosecutor’s order, subject to provisions on the protection of personal data.

According to SEDE, in 2016 they handled 39 cases, 19 of which were corruption and maladministration-related complaints. Information was not made available regarding the remaining cases.

**General Inspector of Public Administration (GEDD)**

The General Inspector of Public Administration (GEDD) promotes the values of legality, integrity, transparency and accountability in Greek public administration. Its mandate is to co-ordinate and monitor the work of the inspection and control bodies and services, as well as safeguard the proper and effective operation of public administration by identifying incidences of corruption and mismanagement. It also examines the annual asset declarations of all members of the other control bodies and annual reports on their activities. Its scope of investigative authority includes the state, legal persons under public and private law, local self-government entities, as well as regional and decentralised authorities and state-owned enterprises.

The General Inspector of Public Administration is selected by the Council of Ministers on the recommendation of the Minister for Administrative Reform and enjoys personal and operational independence in the exercise of his/her powers. The Inspector General of Public Administration is not subject to control by any government or public authority, with the exception of appointment, and removal, by the Council of Ministers.

The General Inspector has the authority to undertake inspection, give the mandate to a more appropriate investigation body, or create joint teams made up of investigators from various bodies. Complaints can be made by e-mail, phone, fax or in person. GEDD’s website also allows for the submission of complaints on line. The incoming complaints
receive a protocol number and are registered using the following parameters: complainant details (name, e-mail, address and other relevant information), reported organisation or civil servant and a summary of the complaint.

If the complaint is credible, it is assigned to an inspector for investigation. The final investigation report is submitted to the Inspector General with the conclusions and proposals for remedy.

**Special Secretariat of Financial and Economic Crime Unit (SDOE)**

The mandate of the Greek Special Secretariat of Financial and Economic Crime Unit (SDOE) includes the detection and investigation of all types of financial and economic crimes against the European Union and the Greek State, fraud, smuggling and other irregularities and illegal acts, including cases of corruption and foreign bribery. SDOE is not an independent authority and is required under its founding statute to report to the Minister of Finance.

Under Greek law, SDOE does not have the power to initiate investigations on its own but may initiate inquiries based on information received or as a result of data analysis. However, SDOE officials must resort to the public prosecutor if they determine that a criminal offence has been committed (pursuant to Article 37 CPP). In this regard, PD 111/2014 gives competence to SDOE to carry out criminal investigations under the supervision of a public prosecutor.

SDOE and the Financial Police Division of the Hellenic Police often have concurrent jurisdiction over corruption cases. This is partly because the current legislation does not specify which body is responsible for specific types of corruption investigations.

As of today, SDOE does not function with proper policies, procedures or complaints manuals to guide their complaints-handling processes. Complaints may be submitted either in writing or verbally, with or without the name of the complainant or using the online form available on their website. Reports can also be made through the SDOE Hotline for Financial Crimes (1517). Citizens can also submit complaints anonymously.

If the complaint falls under the jurisdiction of another agency, then the information is transferred to the respective authority. If the complaint falls under the SDOE’s jurisdiction, it is analysed to assess its credibility. No further information has been received in relation to the details of the internal complaints management process and attributes.

Complaints are received by one of the three staff working within the complaints office, who assigns them a protocol number. Registration is done under the SDOE’s electronic system “ISIS”, which allows up to 23 different data entry points.

The complaint is then referred to the committee for complaints where its members, directors of SDOE working in different departments analyse them and decide whether they fall within SDOE’s jurisdiction. If it falls under its jurisdiction, the complaint is submitted to both the Prosecutor for Financial Crimes for monitoring and to a competent SDOE inspector for a formal investigation.

During the on-site visit, SDOE indicated that it is currently composed of 300 investigators. SDOE’s staff has considerably decreased from 1 207 in 2006 to 744 in
2014, to 120 in 2017. This is partly due to the newly established Independent Authority of Public Revenues (IAPR), which now has jurisdiction over tax and customs.

In order to fulfil its mission, SDOE staff and managers have a broad range of competencies, including the right to access any information or data necessary to carry out their duties. This includes the right to lift bank and tax secrecy. Furthermore, SDOE staff can seize assets, property or means used in connection with crime in order to safeguard the interest of the public or in cases of financial crime; they may freeze bank accounts and assets by written order from the head of SDOE with the obligation to inform the competent prosecutor within 24 hours of this action.

The service receives around 17,000 complaints (60% from other agencies and 40% from citizens). Some 30% of them are treated as credible complaints.

**Greek Ombudsman**

The Greek Ombudsman is an independent authority that mediates between citizens and the public administration in cases related to maladministration (e.g. delays, incorrect action or failure to take any action, failure to follow procedures, abuse of power, failure to provide information, inadequate recordkeeping, failure to reply, misleading or inaccurate statements etc.). The overall mission of the authority is essentially to mediate between a citizen and a public service to seek the resolution of an administrative dispute. As a mediator, the Ombudsman does not impose sanctions or annul actions of public administration but makes recommendations and proposals to public organisations.

The current legislative framework, while it renders the Ombudsman correspondent in the effort to fight corruption, does not entrust the authority a specific role in detecting and tracking this phenomenon. However, even if maladministration and corruption in public administration are not identical concepts, they can be inextricably linked. According to the information provided by the Greek Ombudsman for this report, around 15% of the maladministration complaints received overlap with potential corruption behaviour (e.g. a civil servant asking for an undue fee to get a permit). In 2016 the Ombudsman received 11,915 complaints from citizens, which means that around 1,800 complaints could involve, to some extent, corruption behaviour. In these cases, the Ombudsman mediates between the citizen and the public service concerned and/or transfers the complaint to the competent control or investigation body and makes organisational and legislative proposals so as to simplify procedures and to achieve transparency in the operations of the administration.

The Greek Ombudsman does not intervene until the deadline foreseen by law for an answer by the administration has lapsed (normally, if no different deadlines have been specified, the time period entailed is 50 days, as stipulated by Article 4, Law 2690/1999 “Code of Administrative Procedure”).

The complainants are required to submit their complaints within six months after they became aware of the alleged illegality or failure of a public authority or entity. The complaint must be made in writing by the concerned person and cannot be anonymous. This can either be sent online or by fax, by post or delivered in person to a specific office. Once the complaints are received, these are entered in an electronic protocol to
allow easy tracking of each case and to ensure a good level of control and transparency of the whole process. The complaint should contain an outline of the problem, the public service involved, the actions already carried out, the outcome of these actions, any evidence or information that may assist in the investigation of the matter. Every complaint submitted to the Ombudsman receives a reference number. After that, the complaint follows the below four stages:

- It is assigned to an investigator (Stage 1).
- It is examined to determine whether it falls within the authority’s mandate (Stage 2).
- During the investigation of the complaint, the views of all parties involved in the dispute are sought (Stage 3).
- The Greek Ombudsman mediates in every appropriate manner to resolve the citizen’s problem (Stage 4).

In order to guide citizens on how to present a complaint, the Ombudsman works with a “Citizen’s Reception and Information Bureau”. Its main purpose is to provide information about how the Ombudsman operates, the progress of citizens’ complaints and, whenever possible, to provide information concerning the appropriate agencies to handle cases outside the Ombudsman’s mandate. The Bureau also assists in the writing of complaints, so that citizens’ requests will be formulated clearly. This helps the investigators who will handle the complaints, and ensures that citizens are promptly served.

In all the stages of the process, the complainant is informed about the status of his/her case. If the complaint does not fall under the Ombudsman’s jurisdiction, a letter is sent to the complainant informing him/her of the responsible authorities to handle the case and what procedure needs to be followed. If the case falls under the Ombudsman’s jurisdiction, the investigator will identify and examine the relevant legislation (possibly in collaboration with other authorities) and will request all relevant information from the public authority concerned. If necessary, the investigator might ask the complainant to provide additional information relevant to her case. The investigator might also interview individuals, carry out on-site investigations, or set up a team of experts.

All collected evidence and relevant information are examined, and if no illegality or maladministration is identified, the complainant is informed, and the file of the complaint is archived. If this is not the case, the investigator makes recommendations to the concerned public authority. If these recommendations are not taken into account at a satisfactory level, the Ombudsman prepares a report with recommendations, which is submitted to the responsible minister. This report might also include deadlines by which the recommendations need to be adopted. The Ombudsman might also decide to make this illegality or maladministration public. In addition, if the public authority refuses to collaborate during the procedure or if there is sufficient evidence of criminal acts, the Ombudsman refers the case to the prosecutor.
Ministry of Environment, Energy and Climate Change

Within the Ministry, the Inspectorate Body of Environment, Construction, Energy and Mining receives complaints from citizens. However, each unit within the Inspectorate (i.e. Environment, Construction, Energy and Mining) has its own system to deal with complaints. None of these units functions with a dedicated complaints management system or protocols to handle complaints in a systemic manner.

The environment unit was interviewed for this report. According to their feedback, citizens can submit complaints. Once a complaint is received (by letter, e-mail or fax), it is assigned a protocol number and is registered in an electronic folder. The complaint is then submitted to the Director of the Unit who does the first assessment and assigns it to an inspector to archive it and undertake a preliminary check. The communication with the complainant is limited due to the confidentiality of the inspection.

Citizens are allowed to submit anonymous complaints. According to the information gathered from the unit, 83% of the anonymous complaints were investigated in 2016.

The environment unit has eight inspectors in Athens and four in Thessaloniki. In total, the service encompasses 30 civil servants. In 2016, this unit received 40 complaints, 10 of which were complaints made by citizens.

Ministry of the State

Among other functions, the Ministry of State assists the Prime Minister in co-ordinating actions and taking initiatives to improve the quality of life of Greek citizens. To this end, the new portal www.kathimerinotita.gov.gr has been created. Citizens can use the portal to communicate directly with the ministry regarding different public concerns they might encounter in their daily life. According to the information available on the website, as well as the questionnaire completed for this report, questions about maladministration and corruption are also accepted. However it is not clear whether they will deal internally with this type of concern, as in their FAQs section, it is stated that for corruption complaints, citizens need to communicate with the General Secretariat Against Corruption (GSAC).

Citizens willing to submit a concern are required to fill in an online form that requires name, e-mail, phone, as well as a description of the concern and the ministry or government body affected. The form also allows for the uploading of up to six files related to the concern.

A team of operators communicate with citizens, mainly via emails, to further investigate the provision of additional information.

Municipality of Athens

Within the Municipality of Athens, the Citizens Helpline “1595” receives citizens’ requests and grievances and provides information on services, procedures, documentation and events organised by the municipality. It also offers information on matters of general interest (national and local government elections, dealing with extreme weather conditions, etc.).

The Everyday Problems Management Organisation (OAKP) is responsible for co-ordinating and resolving these requests. Once the complaints are received, they are entered into an electronic protocol and receive a reference number to allow for easy tracking of each case. The complaint should contain an outline of the problem and the municipality service unit where the complaint was transferred. OAKP then forwards the complaint directly to the relevant city department.

OAKP monitors the progress of each request and ultimately provides a reply to citizens. OAKP is developing a digital map that illustrates the geographical location and nature of everyday problems in an effort to manage them more effectively.

Once the complaint is addressed, the service unit informs the complaints management centre, which in turn informs the citizen. If the complaint involves potential corruption, it is transferred to the Internal Audit Unit within the municipality. If this is not the competent authority, the complainant is informed about the competent authority to report it.

According to the interview held with the service, as of today, 20 persons work at the call centre. The office does not produce official statistics; however, the estimation is around 200 complaints per day.

Municipality of Thessaloniki

The Municipality of Thessaloniki allows citizens to submit complaints through an online form available on their website. The electronic system automatically forwards the complaint to the respective department for further analysis. After receiving a complaint, the head of each department assigns each case to a civil servant, who conducts an analysis and proposes a solution.

If a complaint is corruption related, it is referred to Internal Audit Department, which determines whether the complaint is well substantiated. If this is the case, it starts an investigation, keeping the citizen informed.
4. Key challenges

The corruption complaints system is confusing for citizens

The mapping shows that there are different ways and venues to report corruption in Greece. While this is not a problem in itself, it adds to the complexity facing citizens who want to report corruption in the public sector and do not know where to do it. According to an OECD survey on anti-corruption in Greece, the majority of Greek citizens (55%) have difficulties finding where to report a potential case of corruption in the public sector. The responses also showed that the visibility of GSAC (almost 1.5 years after its creation) could be increased, as only 35% of Greeks know the service. Of these, eight in ten (80%) know that they can lodge complaints there.

Lack of standardised procedures

In Greece, due to the nature and subject matter of the various law enforcement agencies and stakeholders in the fight against corruption, it is often difficult to follow standardised procedures to ensure that corruption reports are assessed consistently and efficiently. As mentioned before, the fight against corruption involves a number of government stakeholders, from law enforcement authorities to tax and customs bodies, administrative authorities, internal affairs divisions or independent administrative authorities. Each of these entities follows their own internal procedures when dealing with corruption complaints. As a result, there is often confusion among the different stakeholders as to efforts being carried out by other entities and as to how to maximise efficiency and manage an overwhelming amount of case reports.

Achieving procedural quickness and efficiency requires establishing clear guidelines and standardising practices for referring justified case reports to prosecutorial authorities, as well as strong co-ordination among detection and reporting mechanisms in order to minimise overlapping or parallel efforts.

Lack of good electronic data systems

The information gathered through the questionnaires confirmed the lack of good electronic data systems through which statistical data can be retrieved based on reported cases of corruption. Electronic data management systems are critical to an organisation’s ability to process and share information quickly and make decisions faster. They are also relevant for allowing employees working on complaints management to instantly access documents anywhere at any time; implementing an electronic workflow; and document search and retrieval capabilities. Further, these
systems can also be further integrated with other core institution applications to drive efficiency and manage IT costs.

**Deficient co-operation and overlapping among competent authorities**

In Greece, there are different levels of inspection bodies (inter-ministerial, sectoral and ministerial) with overlapping jurisdictions. This affects the effectiveness of complaints management functions, as different bodies may be dealing with the same complaint at the same time. According to a 2017 OECD report,¹ services like the Special Secretariat of Financial and Economic Crime Unit, and the Financial Police Division of Hellenic Police often have concurrent jurisdiction over corruption cases. This is partly because the current legislation does not specify which body is responsible for specific types of corruption investigations.

In principle, this should not be a problem if these overlapping services had good co-operation and information-sharing systems. However, this is not the case at the moment. To address this challenge, the Greek government needs to increase co-operation across the various authorities involved in corruption complaints management. Firstly because improving co-ordination is an important way to reduce overlap (e.g. two authorities investigating the same complaint), and increase efficiency. Secondly, when facing resource constraints, increasing standardisation of procedures helps to achieve efficiency gains. For example, setting up an anti-corruption knowledge management system across the different authorities involved in corruption complaints management would help collect and disseminate relevant data as well as good practices.

According to the OECD Technical Report about the Internal Audit System in Greek Public Administration,² a complaints management system to ensure co-ordination between investigation bodies is viewed by Greek stakeholders as a way to improve service delivery to citizens by promoting more rapid response and expedition of complaints. Such a system was also viewed as a potential tool for resource saving since it would enable high-risk complaints to be directed towards highly qualified investigators, while complaints of a procedural or administrative nature could be dealt with through an administrative complaints response.

**Lack of capacity and resources**

The quality and the lack of human and economic resources represent two of the main challenges Greece faces in the area of corruption complaints management in the public sector. The existing model might lead to disbelief among citizens as to whether a complaint will be addressed in a timely and proper manner.

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2. Ibid.
According to the interviews held for this mapping report, a lack of resources is often a key reason for the slow, or non-implementation of particular complaints management systems. In addition, low salaries might lead civil servants working with complaints to feelings of dissatisfaction at work.

Further, Greek anti-corruption stakeholders in the field of anti-corruption need to build their anti-corruption skills and knowledge to ensure the credibility of their efforts as well as maximise the impact of their anti-corruption operations, including their management of corruption-related complaints.

Design reality gap

Following the argument above, one common mistake of anti-corruption initiatives such as implementing corruption complaints management systems within control, investigation and audit organisations is to assume that they will function with good management structures, IT, well-established processes, adequate staffing, and financial resources when in reality, such resources are often lacking. Experience underlines the importance of avoiding these “design-reality gaps”; that is, in establishing the objectives these kind of anti-corruption interventions designers need to match expectations with the implementation capacity, the time needed and available resources. It is better to consider modest objectives that can be realistically achieved in the short and medium terms. Possible criteria in setting priorities are: budget; availability of human resources; the likelihood of quick results; likelihood of addressing the most harmful forms of corruption.

Role of GSAC

In its current form, Article 54(3) of Law 4446/2016, it is not clear regarding the types of individuals and entities that may submit reports of corruption to the newly established Office of Complaints within GSAC. The current language simply states that “the Office of Complaints shall receive complaints about corruption cases in the public and private sectors”, without further guidance or definition. Further, the specific role of the public prosecutor appointed to oversee the Office of Complaints is not clearly articulated, which may result in confusion regarding the division of responsibilities, specific issues relating to mandate and organisation, and so on. In addition GSAC will need to take decisions on issues such as the stages of the complaints-handling process which the office will apply, how far GSAC will engage in pre-investigation work (such as due-diligence checks) before referring citizen reports of corruption to other competent bodies or how the office will seek to assess risk from incoming complaints.

Difficulty identifying the competent prosecutorial authority for referral

The challenge of identifying the competent prosecutorial authority for referral also arose during the interviews. Nearly all stakeholders responsible for assessing corruption
allegations and reports demonstrated confusion regarding the competence of each prosecutor’s office with respect to different types of allegations. This problem poses an unnecessary burden on prosecutorial authorities, requiring them to co-ordinate amongst themselves and wasting valuable time and resources.

**Absence of follow-up and tracking**

Respondents to the questionnaires distributed for this report noted their desire to know about the final outcome of a complaint report after having been referred to the prosecutor or another competent authority. They stressed the need for a complaint tracking system so that opportunities for improvement could be identified for future investigations.

A robust follow-up system could contribute a number of benefits: first, the ability to better measure the performance of investigation work in terms of outcomes produced; second, one could identify incidences where investigation work was not successful in supporting prosecutorial actions and therefore support future improvements in quality. That being said, a rigorous approach to follow-up would reveal indicators of which cases should be actively investigated and prosecuted versus those with little chance of success. This could provide valuable information for improved resource allocation. Finally, a third reason is to promote accountability. Greek citizens place a significant amount of resources into the investigations and complaints management processes, and reporting on the nature and success rates of these complaints would promote accountability for resources used.

**Weak whistle-blower protection**

As of today, there are not yet strong provisions protecting Greek whistle-blowers in relation to acts of corruption in the public or private sector. According to the relevant law, whistle-blowers may be considered as witnesses of public interest, which results in protection from retaliation and reprisals. However, this falls short of the law in many other jurisdictions, where whistle-blowers enjoy legal protections if they disclose misconduct that is related to any breach of laws, including sometimes internal policies such as codes of conduct. This absence of a strong whistle-blower protection framework may lead potential corruption complainants to remain silent.

# Annex A. Mapping diagrams

## Mapping diagram (Part I)

<table>
<thead>
<tr>
<th></th>
<th>General Secretariat for Anti-Corruption (GSAC)</th>
<th>Financial Police Division (FPD)</th>
<th>Independent Authority for Public Revenues (IAPR), Internal Affairs Directorate</th>
<th>Court of Audit</th>
<th>General Accounting Office (GAO)</th>
<th>Health and Welfare Services Inspection Body (SEYYP)</th>
<th>Inspectors Controllers Body of Public Administration (SEEDD)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Can citizens submit complaints?</strong></td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td><strong>Scope</strong></td>
<td>Corruption cases in the public and private sectors; and fraud cases in co-financed, transnational and other programmes (including EU programme funds)</td>
<td>Corruption, fraud, tax evasion, money laundering, smuggling, counterfeit, etc.</td>
<td>Internal affairs, misconduct of IAPR employees</td>
<td>Irregular procurement, public works, illegal recruitment, public finance mismanagement and harmful behaviour towards the public interest caused by civil servants</td>
<td>National budget formulation and execution</td>
<td>Health and welfare.</td>
<td>Corruption, maladministration, non-transparent proceedings, inefficiency, low productivity and low quality of services provided in the public administration. Only inspectorate body assigned to undertake horizontal audit and investigations across all public sectors in Greece.</td>
</tr>
<tr>
<td><strong>Do dedicated complaints mechanisms exist?</strong></td>
<td>Yes. The Department of Information Management and Strategic Planning is in charge of the evaluation and management of information and complaints and the administration, development and maintenance of.</td>
<td>Yes. The Department of IT Systems Management has an office in charge of receiving complaints.</td>
<td>No. No. The Directorate of Special and Extraordinary Audits is in charge of handling incoming complaints. However, they do not count with a specific.</td>
<td>No. The Department of Information Management and Strategic Planning is in charge of the evaluation and management of information and complaints and the administration, development and maintenance of.</td>
<td>No. The Department of Information Management and Strategic Planning is in charge of the evaluation and management of information and complaints and the administration, development and maintenance of.</td>
<td>No. The Department of Information Management and Strategic Planning is in charge of the evaluation and management of information and complaints and the administration, development and maintenance of.</td>
<td>No. The SEEDD Directorate of Administrative Support collects complaints, but there is not a proper system to handle complaints.</td>
</tr>
<tr>
<td><strong>Do dedicated complaints mechanisms exist for corruption?</strong></td>
<td>Under construction</td>
<td>No. Corruption complaints are handled through the generic complaints management system.</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
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<tr>
<td><strong>Do proper policies, procedures or complaints manuals to guide their complaints handling processes exist?</strong></td>
<td>No (in process)</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td><strong>Does an IT system exist to manage complaints?</strong></td>
<td>Under construction</td>
<td>Yes</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td><strong>Does a hotline exist to report complaints?</strong></td>
<td>No. Currently, complaints can be sent using an online form. No dedicated phone number exists.</td>
<td>Yes. The telephone number is 11012.</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td><strong>Are there instructions for clear and comprehensive reporting?</strong></td>
<td>Yes. On the FAQs of GSAC’s website, “How can I submit my complaint?”</td>
<td>Yes</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td><strong>Reception of complaints</strong></td>
<td>In person, by e-mail, fax or through GSAC’s website. No fees required.</td>
<td>In person, by mail, phone, fax or e-mail. No fees required.</td>
<td>In person, by mail, phone, fax or e-mail. No fees</td>
<td>Complaints are submitted in writing using mail,</td>
<td>Citizens can submit complaints on</td>
<td>Complaints are submitted via e-mail, fax, post or in</td>
<td>Citizens can submit complaints in person or on line, by</td>
</tr>
</tbody>
</table>

**MAPPING OF CORRUPTION COMPLAINTS MECHANISMS IN GREECE**
<table>
<thead>
<tr>
<th>General Secretariat for Anti-Corruption (GSAC)</th>
<th>Financial Police Division (FPD)</th>
<th>Independent Authority for Public Revenues (IAPR), Internal Affairs Directorate</th>
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<th>General Accounting Office (GAO)</th>
<th>Health and Welfare Services Inspection Body (SEYYP)</th>
<th>Inspectors Controllers Body of Public Administration (SEEDD)</th>
</tr>
</thead>
<tbody>
<tr>
<td>There is no mandatory document for the lodging of the complaint.</td>
<td>required. There is no mandatory document for the lodging of a complaint.</td>
<td>fax or e-mail. There is no mandatory document for the lodging of the complaint. No fees required.</td>
<td>line, by e-mail or by mail or fax. There is no mandatory document for the lodging of the complaint. No fees required.</td>
<td>person. There is no mandatory document for the lodging of the complaint. No fees required.</td>
<td>e-mail or by mail or fax. There is no mandatory document for the lodging of the complaint. No fees required.</td>
<td>Are anonymous complaints accepted?</td>
</tr>
<tr>
<td>Yes. Complaints can be lodged anonymously.</td>
<td>Yes. Complaints can be lodged anonymously, but if the complaint is not lodged anonymously there is no special mechanism protecting the identity of the complainant.</td>
<td>Yes. Complaints can be lodged anonymously, but if the complaint is not lodged anonymously, there is no special mechanism protecting the identity of the complainant.</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>Yes. Also, when complaints come directly from the Minister’s Office, GSAC or the Inspectors of Public Administration, the body is obliged to research the cases further, even if the initial complaint is anonymous.</td>
</tr>
<tr>
<td>Registration of complaints</td>
<td>Each complaint entering GSAC receives a protocol number called a Complaint Office Reference Number. The following fields are entered in the system: complainant, the name of the person against whom the complaint is made, other services involved and summary of the complaint. Supporting documents are scanned and entered into the electronic complaint registry. FDP uses an integrated information system called “Case Management App-Data Store for Multi-Source” Information. Structured information is kept inside fields and content is also stored as attached files in each case.</td>
<td>Complaints receive a protocol number and are registered in a Windows folder.</td>
<td>Complaints receive a protocol number and are registered in an Excel format database.</td>
<td>GAO does not have a proper recording of incoming complaints. Complaints, like other documents, are entered into an Excel file.</td>
<td>The incoming complaints receive a protocol number and are recorded in a handwritten register, charged by the General Inspector of the Competent Control Department, evaluated and monitored by heads of sectors and stored in</td>
<td>The incoming complaints receive a protocol number and are recorded including the complainant details, the public body concerned and the submission channel.</td>
</tr>
<tr>
<td>Encryption of complaints</td>
<td>Processing of complaints</td>
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<tr>
<td>Yes. Only authorised staff can access the electronic files (username, password are required).</td>
<td>Copies of complaints related to EU co-funding programmes are transmitted to the European Commission’s OLAF agency for further examination.</td>
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<tr>
<td>Yes. Only authorised staff can access the system (username, password are required).</td>
<td>Complaints are properly processed and assessed to determine whether they are included in FPD’s jurisdiction. Otherwise, transmitted for investigation to the competent — where appropriate — police or other authority.</td>
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<tr>
<td>Complaints electronic folders are password protected. Only financial auditors have access to the server.</td>
<td>If a complaint is credible, a file is created and attributed to an inspector for analysis, synthesis, data evaluation, consultation and cross-referencing using the available IT system. The authorised inspectors forward the results of the evaluation to the Head of Directorate.</td>
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<tr>
<td>Accessibility to the complaints is limited to the inspectors.</td>
<td>Due to limited resources, the Court of Audit is unable to accept complaints that are not specific in nature or that are not well supported by credible evidence.</td>
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<tr>
<td>Encryption of complaints’ files is not available at the moment nor are they stored on secure servers.</td>
<td>If the complaint concerns the GAO the information received is evaluated to determine potential violations of the laws. If a complaint is found credible, the GAO starts an investigation.</td>
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<tr>
<td>No</td>
<td>All complaints and all the documents relating to the investigation and the final result are stored on a secured server. Documents stored in the information system are in pdf format.</td>
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</table>

The Special Secretary of the SEEDD allocates the instruction to inspectors to investigate the complaint, finds linkages to other outstanding complaints. If misconduct is found to constitute a disciplinary offence, these are recorded in a special chapter of the report with a proposal for disciplinary proceedings.
## Annex A. Mapping Diagrams

### MAPPING OF CORRUPTION COMPLAINTS MECHANISMS IN GREECE

<table>
<thead>
<tr>
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<tbody>
<tr>
<td><strong>Investigation of complaints</strong></td>
<td>No</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td><strong>Monitoring of complaints</strong></td>
<td>N/A</td>
<td>Yes. The IT system includes monitoring.</td>
<td>No clear mechanism to monitor complaints.</td>
<td>No clear mechanism to monitor complaints.</td>
<td>No clear mechanism to monitor complaints.</td>
<td>No. Lack of capacity.</td>
<td>After the completion of an inspection, the competent Inspectors Controllers and Assistant Inspectors Controllers draw up a documented report and submit it to the Special Secretary. The report shall contain a description of the case, a depiction of the current situation, the data submitted or used, the procedures by which the case was investigated, the findings, conclusions and recommendations.</td>
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<tr>
<td><strong>Communication with complainant</strong></td>
<td>Yes</td>
<td>The complainant is informed in writing about the result of the investigation</td>
<td>Yes</td>
<td>No clear mechanism to communicate with</td>
<td>During the ongoing audit process, does not provide information. After</td>
<td>The complainant is informed in writing about the result of the investigation</td>
<td></td>
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<tr>
<td>General Secretariat for Anti-Corruption (GSAC)</td>
<td>Financial Police Division (FPD)</td>
<td>Independent Authority for Public Revenues (IAPR), Internal Affairs Directorate</td>
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<td>Inspectors Controllers Body of Public Administration (SEEDD)</td>
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<td>and also when the complaint is transferred to another department.</td>
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<tr>
<td>complainants.</td>
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<tr>
<td>GSAC is in charge of the co-ordination of inspection bodies.</td>
<td>Elenxis information system administered by Services of Ministry of Finance. Bank Accounts and Payments Accounts Registers System (Article 62 L.4170/2013).</td>
<td>IAPR have not yet set up structured information communication systems with other departments of the IAPR or other public administration bodies. They</td>
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<tr>
<td>No. There is no such procedure</td>
<td>Law 4129/13, Article 42, provides for the transmission of inspection findings as well as relevant data from other control mechanisms to the Court of Audit.</td>
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<tr>
<td>Is there co-ordination with other public authorities?</td>
<td>GSAC is in charge of the co-ordination of inspection bodies.</td>
<td>IAPR have not yet set up structured information communication systems with other departments of the IAPR or other public administration bodies. They</td>
<td></td>
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<tr>
<td>N/A</td>
<td>N/A</td>
<td>No. There is no such procedure</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>Appeal</td>
<td>N/A</td>
<td>N/A</td>
<td>No. There is no such procedure</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>N/A</td>
<td>N/A</td>
<td>No. There is no IT system of communication and co-ordination with stakeholders.</td>
<td>The co-ordination of audit bodies is done by GSAC (Law 4320/2015).</td>
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</tr>
<tr>
<td>General Secretariat for Anti-Corruption (GSAC)</td>
<td>Financial Police Division (FPD)</td>
<td>Independent Authority for Public Revenues (IAPR), Internal Affairs Directorate</td>
<td>Court of Audit</td>
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<tr>
<td>the competent investigative authority (e.g. the Economic Police, the Internal Affairs Service of the Police, SDOE, SEEDD, SEYYP, SEDE, Customs, IAPR-Internal Affairs).</td>
<td>GSAC has operational control of FPD.</td>
<td>communicate verbally or in writing.</td>
<td></td>
<td>anti-corruption bodies including the Health and Welfare Services’ Inspection Body (Law 4320/2015).</td>
<td>SEEDD co-operates with municipalities, hospitals and environment agencies.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Referral of complaints</strong></td>
<td>Competent authority or public prosecutor</td>
<td>Competent authority or public prosecutor</td>
<td>If IAPR is not competent, the complaint is sent to the competent authority/service with a copy, for information, to the complainant.</td>
<td>Competent authority, GSAC or public prosecutor</td>
<td>If at the end of the audit process a criminal offence is established, the audit report is sent to the competent prosecuting authorities.</td>
<td>If SEEDD is not competent, the complaint is sent to the competent authority/service with a copy, for information, to the complainant.</td>
<td></td>
</tr>
<tr>
<td><strong>Is there any risk analysis of the complaints received?</strong></td>
<td>No. GSAC is trying to build up this capacity.</td>
<td>No</td>
<td>Yes, as part of the annual programming.</td>
<td>No</td>
<td>There is no assessment/review process for the complaints system.</td>
<td>SEEDD analyses the complaints received to plan future targeted controls.</td>
<td></td>
</tr>
<tr>
<td><strong>People involved</strong></td>
<td>Four officials entrusted with the management of incoming complaints.</td>
<td>Around 20 people from the staff of the Agency is entrusted with the management of incoming complaints.</td>
<td>Four officials entrusted with the management of incoming complaints.</td>
<td>N/A</td>
<td>GAO does not count with staff exclusively dedicated to complaints management.</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td><strong>Does a training programme exist?</strong></td>
<td>No</td>
<td>Yes. Ad hoc basis. Newcomers are trained by the members in charge of the system.</td>
<td>There is no training of responsible officers receiving complaints. However, in the context of the internal functioning of the Directorate,</td>
<td>No</td>
<td>No</td>
<td>No</td>
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</tbody>
</table>

**MAPPING OF CORRUPTION COMPLAINTS MECHANISMS IN GREECE**
<table>
<thead>
<tr>
<th>Number of complaints received in 2016</th>
<th>General Secretariat for Anti-Corruption (GSAC)</th>
<th>Financial Police Division (FPD)</th>
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<th>Inspectors Controllers Body of Public Administration (SEEDD)</th>
</tr>
</thead>
<tbody>
<tr>
<td>543 (178 of which were corruption complaints)</td>
<td>1 618 (around 40 were corruption complaints)</td>
<td>424</td>
<td>No statistical data are available.</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Is there an audit or independent evaluation of the complaints system?</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>What are the key challenges?</td>
<td>Lack of capacity and resources. More information about the functioning of the complaints mechanisms and greater publicity are also needed. Low level of co-operation among agencies and</td>
<td>Lack of capacity and resources. Lack of a clear direction due to the existence of too many co-ordinators (GSAC, Head of Hellenic Police, The Prosecutor, the</td>
<td>Lack of capacity and resources. Overlapping with the work of other authorities. Need for an internal system to exchange information.</td>
<td>Overlapping with the work of other authorities. Need for an internal system to exchange information.</td>
<td>Lack of capacity and resources. Poor co-ordination. No standardisation</td>
<td>Lack of capacity and resources. Low level of co-operation between agencies and understaffing in many agencies lead to disbelief as to whether a</td>
<td>Deficient communication and co-ordination with other competent authorities. It is only during a later stage of the procedure that inter-agency circulation of information takes</td>
</tr>
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<tr>
<td><strong>General Secretariat for Anti-Corruption (GSAC)</strong></td>
<td><strong>Financial Police Division (FPD)</strong></td>
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<td><strong>Inspectors Controllers Body of Public Administration (SEEDD)</strong></td>
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<tr>
<td>understaffing in many agencies lead to disbelief as to whether a complaint will be addressed in a timely manner.</td>
<td>No feedback from the prosecutor.</td>
<td>No standard communication process established by law.</td>
<td>Better definition of GSAC’s role on corruption complaints management needed.</td>
<td>Alternate Ministry of Justice).</td>
<td>No timely feedback to the complainants.</td>
<td>GSAC’s new role of receiving complaints adds confusion.</td>
<td></td>
</tr>
<tr>
<td>complaint will be addressed in a timely manner.</td>
<td></td>
<td>Low level of co-operation between agencies and understaffing in many agencies lead to disbelief as to whether a complaint will be addressed in a timely manner.</td>
<td></td>
<td></td>
<td>Low level of co-operation between agencies and understaffing lead to disbelief as to whether a complaint will be addressed in a timely manner.</td>
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<td>Not timely feedback to the complainants.</td>
<td>place.</td>
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<td></td>
<td>Low level of co-operation between agencies and understaffing lead to disbelief as to whether a complaint will be addressed in a timely manner.</td>
<td>GSAC’s new role of receiving complaints adds confusion.</td>
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<td></td>
<td>No stability within the Administration. Organigram and public bodies are in constant change.</td>
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</tbody>
</table>
## Mapping diagram (Part II)

<table>
<thead>
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<tbody>
<tr>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
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### Scope

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<tr>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
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### Do dedicated complaints mechanisms exist?

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<tr>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
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<td>Yes</td>
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</table>

### Do dedicated complaints mechanisms exist for corruption?

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<tr>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
</tbody>
</table>

### Do proper policies, procedures or complaints manuals to guide their complaints-handling processes exist?

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<tbody>
<tr>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
</tbody>
</table>

### Does an IT system exist to manage complaints?

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</thead>
<tbody>
<tr>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes (ISIS)</td>
</tr>
</tbody>
</table>

### Does a hotline to report complaints exist?

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<tr>
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</thead>
<tbody>
<tr>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes. Hotline for Financial Crimes: 1517.</td>
</tr>
</tbody>
</table>

### Are there instructions for clear and comprehensive reporting?

<table>
<thead>
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</thead>
<tbody>
<tr>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>A few basic instructions about how to file a complaint are available on line.</td>
</tr>
</tbody>
</table>

### Reception of complaints

<table>
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</thead>
<tbody>
<tr>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes. Hotline for Financial Crimes: 1517.</td>
</tr>
</tbody>
</table>
### MAPPING OF CORRUPTION COMPLAINTS MECHANISMS IN GREECE

<table>
<thead>
<tr>
<th>Inspectorate Body for Public Works (SEDE)</th>
<th>General Inspector for Public Administration (GEDD)</th>
<th>The Ombudsman</th>
<th>City of Athens</th>
<th>Special Secretariat of Financial and Economic Crime Unit (SDOE)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>complaint. Complaints are lodged in a physical folder. Three secretaries are in charge of the front desk. No fees required.</strong></td>
<td></td>
<td></td>
<td></td>
<td>in person, by post, by e-mail, over the phone, by fax or by using the online form.</td>
</tr>
<tr>
<td><strong>Are anonymous complaints accepted?</strong></td>
<td><strong>Yes. Complaints can be lodged anonymously, but if the complaint is not lodged anonymously, there is no special mechanism protecting the identity of the complainant.</strong></td>
<td><strong>Yes. If the investigation/mediation is not possible without the use of the personal data of the citizen, the latter shall be informed thereof and requested for authorisation or consent.</strong></td>
<td>No</td>
<td><strong>Yes. 65% of total complaints are anonymous.</strong></td>
</tr>
<tr>
<td><strong>Archival of complaints</strong></td>
<td>The incoming complaints receive a protocol number and are recorded in a handwritten register.</td>
<td>Once the complaints are received, they are entered into an electronic protocol to allow for easy tracking of each case. The complaint should contain an outline of the problem, the public service involved, the actions already carried out, the outcome of these actions, any evidence or information that may assist in the investigation of the matter.</td>
<td>Once the complaints are received, they are entered into an electronic protocol to allow for easy tracking of each case. The complaint is archived with an outline of the problem and the municipality service unit where the complaint was transferred.</td>
<td>Yes. Electronically, through the ISIS system.</td>
</tr>
<tr>
<td><strong>Encryption of complaints</strong></td>
<td>There is no possibility to encrypt submitted complaints. Data obtained during the investigation of a case and sent electronically to any recorded by inspectors, inspecting the file, the files are kept in the service. Only inspectors have access.</td>
<td>All the complaints received are scanned and saved on a safe server. Access to the server is granted to its certified managers. In addition, the Ombudsman’s staff have access to part of the data based on their competencies by using a personal security password.</td>
<td>N/A</td>
<td>Yes</td>
</tr>
<tr>
<td><strong>Processing of complaints</strong></td>
<td>Once the complaint has been filed, it is submitted to the head of the unit for an initial investigation. After the review,</td>
<td>Every complaint submitted to the Ombudsman receives a reference number. After that the complaint follows the</td>
<td>Every complaint submitted to the service receives a reference number. After that, it is</td>
<td>All complaints, both named and anonymous, are evaluated (by the same criteria) by the Competent Committee, in order to assess their</td>
</tr>
<tr>
<td>Inspectorate Body for Public Works (SED)</td>
<td>General Inspector for Public Administration (GEDD)</td>
<td>The Ombudsman</td>
<td>City of Athens</td>
<td>Special Secretariat of Financial and Economic Crime Unit (SDOE)</td>
</tr>
<tr>
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</tr>
<tr>
<td>an official order to examine the case is sent to GSAC. The order is also shared with the General Inspector.</td>
<td>below four stages: - It is assigned to an Investigator (Stage 1). - It is examined to determine whether it falls within the mandate (Stage 2). During the investigation of the complaint, the views of all parties involved in the dispute are sought (Stage 3). The Greek Ombudsman mediates in every appropriate manner to resolve the citizen’s problem (Stage 4).</td>
<td>transferred to the competent municipality service unit. Once the complaint is addressed, the service unit informs the complaints’ management centre, which informs the citizen. If the complaint involves potential corruption, it is transferred to the Internal Audit Unit within the municipality. If this is not competent, the citizen is informed about alternative venues to report it.</td>
<td>importance and the degree of priority for their investigation. Work of this committee is to examine the content of any information and evaluate the information. If a case falls under the jurisdiction of another agency, then the information is sent to the respective agency.</td>
<td></td>
</tr>
<tr>
<td><strong>Investigation of complaints</strong></td>
<td>Yes</td>
<td>Yes</td>
<td>Mediation</td>
<td>No. If the complaints require an investigation, it is submitted to the municipality Internal Audit Unit.</td>
</tr>
<tr>
<td><strong>Monitoring of complaints</strong></td>
<td>The supervision and administration of complaints made by the co-ordinator of the service, in collaboration with the Secretary-General for Anti-Corruption.</td>
<td>N/A</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td><strong>Communication with complainant</strong></td>
<td>The outcome of the audit shall be communicated to the citizen concerned, upon a prosecutor’s order subject to the provisions on the protection of personal data.</td>
<td>N/A</td>
<td>In all the stages of the process, the complainant is informed about the status of his/her complaint in all stages of the procedure. In addition, the investigation is recorded and classified to speed up the procedure and to allow for the development of statistical</td>
<td>Once the complaint is addressed, the service unit informs the complaints management centre, which informs the citizen.</td>
</tr>
<tr>
<td>Is there co-ordination with other public authorities?</td>
<td>Inspectorate Body for Public Works (SEDE)</td>
<td>General Inspector for Public Administration (GEDD)</td>
<td>The Ombudsman</td>
<td>City of Athens</td>
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<tr>
<td>----------------------------------------------------</td>
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</tr>
<tr>
<td>GSAC co-ordinates anti-corruption bodies including SEDE (Law 4320).</td>
<td>Common working environment (CIRCA application) with the Inspecting Controlling Bodies/Units, which provides instant information concerning the course of the ongoing inspections, direct communication and minimisation of paperwork.</td>
<td>Submit the data related to corruption to the competent minister and if possible to contact the competent prosecutor. This step is difficult to accomplish.</td>
<td>N/A</td>
<td>N/A</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Referral of complaints</th>
<th>Inspectorate Body for Public Works (SEDE)</th>
<th>General Inspector for Public Administration (GEDD)</th>
<th>The Ombudsman</th>
<th>City of Athens</th>
<th>Special Secretariat of Financial and Economic Crime Unit (SDOE)</th>
</tr>
</thead>
<tbody>
<tr>
<td>All reports shall be communicated to the competent prosecuting authorities and disciplinary heads of the audited services for their own actions.</td>
<td>Competent authority or prosecutor</td>
<td>The complaints concerning direct denunciation of corruption are referred to the competent controlling mechanisms or to the competent prosecuting authorities.</td>
<td>If the municipality is not competent the complaint is referred to the relevant authority.</td>
<td>N/A</td>
<td>Yes, to competent authority or prosecutor.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Is there any risk analysis of the complaints received?</th>
<th>Inspectorate Body for Public Works (SEDE)</th>
<th>General Inspector for Public Administration (GEDD)</th>
<th>The Ombudsman</th>
<th>City of Athens</th>
<th>Special Secretariat of Financial and Economic Crime Unit (SDOE)</th>
</tr>
</thead>
<tbody>
<tr>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>N/A</td>
<td>Yes. The committee assigns each complaint with a score (0, 1, 2, 3 or 4) to evaluate its risk.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Personnel involved</th>
<th>Inspectorate Body for Public Works (SEDE)</th>
<th>General Inspector for Public Administration (GEDD)</th>
<th>The Ombudsman</th>
<th>City of Athens</th>
<th>Special Secretariat of Financial and Economic Crime Unit (SDOE)</th>
</tr>
</thead>
<tbody>
<tr>
<td>No dedicated staff for complaints handling due to lack of capacity. All inspectors shall be competent for the handling of incoming complaints. Ten inspectors.</td>
<td>N/A</td>
<td>190 people (2016)</td>
<td>20</td>
<td>Three staff entrusted with receiving and archiving complaints. 120 inspectors.</td>
<td></td>
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<table>
<thead>
<tr>
<th>Is there a training programme?</th>
<th>Inspectorate Body for Public Works (SEDE)</th>
<th>General Inspector for Public Administration (GEDD)</th>
<th>The Ombudsman</th>
<th>City of Athens</th>
<th>Special Secretariat of Financial and Economic Crime Unit (SDOE)</th>
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<tbody>
<tr>
<td>No</td>
<td>No</td>
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<td>No</td>
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<td>No</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Number of complaints received in 2016</th>
<th>Inspectorate Body for Public Works (SEDE)</th>
<th>General Inspector for Public Administration (GEDD)</th>
<th>The Ombudsman</th>
<th>City of Athens</th>
<th>Special Secretariat of Financial and Economic Crime Unit (SDOE)</th>
</tr>
</thead>
<tbody>
<tr>
<td>During the year 2016, 39 cases were assigned to the Inspectorate Body of Public Works, 19 of which concerned complaints. Most complaints came from citizens.</td>
<td>N/A</td>
<td>11 915 (15% involved some level of corruption in addition to maladministration).</td>
<td>No official data. 200 complaints (approx.) according to the head of the service.</td>
<td>The service receives around 17 000 complaints (60% from other agencies and 40% from citizens). Some 30% of them are treated as credible complaints.</td>
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<table>
<thead>
<tr>
<th>Is there an audit or independent evaluation of the</th>
<th>Inspectorate Body for Public Works (SEDE)</th>
<th>General Inspector for Public Administration (GEDD)</th>
<th>The Ombudsman</th>
<th>City of Athens</th>
<th>Special Secretariat of Financial and Economic Crime Unit (SDOE)</th>
</tr>
</thead>
<tbody>
<tr>
<td>No</td>
<td>N/A</td>
<td>The Ombudsman is a constitutionally independent authority; it cannot be</td>
<td>No</td>
<td>N/A</td>
<td>No</td>
</tr>
</tbody>
</table>
### Inspectorate Body for Public Works (SEDE)

- Lack of capacity
- Lack of resources
- Low salaries
- No IT system
- Poor co-ordination
- No standardisation
- Not timely feedback to the complainants.

### General Inspector for Public Administration (GEDD)

- Lack of co-ordination among the inspection mechanisms, which can lead to overlaps.

### The Ombudsman

- Lack of co-ordination
- Lack of feedback
- Overlapping

### City of Athens

- N/A

### Special Secretariat of Financial and Economic Crime Unit (SDOE)

- Lack of resources. SDOE is currently composed of 300 investigators. SDOE’s staff have considerably decreased from 1,207 in 2006 to 744 in 2014 to 120 in 2017.
- Too many agencies leading with complaints. Information can get lost due to overlapping and bad co-ordination.
- Lack of expertise (no training).
- Too many laws and regulations.
### Mapping diagram (Part III)

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<tr>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
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</tbody>
</table>

#### Scope
- Co-ordinating and initiating investigations in respect to acts of corruption.
- Environmental protection.
- Crimes of bribery that employees and officials in the public sector commit or participate in as well as officials of international organisations.
- Corruption offences related to the Hellenic Coast Guard service.
- Quality of life of Greek citizens.

#### Do dedicated complaints mechanisms exist?
- Although PPACC receives complaints, a formal protocol needs to be issued to detail further the procedures for receiving, registering, forwarding and monitoring complaints.
- Within GSI the Inspectorate Body of Environment, Construction, Energy and Mining receives complaints from citizens. However, each unit within the Inspectorate (i.e., Environment, Construction, Energy and Mining) has its own system to deal with complaints.
- Yes
- N/A
- Yes

#### Do dedicated complaints mechanisms exist for corruption?
- Same as above
- No
- Yes
- N/A
- No

#### Do proper policies, procedures or complaints manuals to guide their complaints-handling processes exist?
- No (in process)
- No
- Yes
- N/A
- N/A

#### Does an IT system exist to manage complaints?
- No
- No. Complaints are handled manually.
- Yes
- N/A
- N/A

#### Does a hotline to report complaints exist?
- No
- No
- Yes, 24 hours a day: 10301. Also: 210-8779700.
- No
- No
### ANNEX A. MAPPING DIAGRAMS

#### MAPPING OF CORRUPTION COMPLAINTS MECHANISMS IN GREECE

<table>
<thead>
<tr>
<th><strong>Exist?</strong></th>
<th><strong>Are there instructions for clear and comprehensive reporting?</strong></th>
<th><strong>Reception of complaints</strong></th>
<th><strong>Are anonymous complaints accepted?</strong></th>
<th><strong>Archival of complaints</strong></th>
<th><strong>Encryption of complaints</strong></th>
<th><strong>Processing of complaints</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>By formal letter addressed to the public prosecutor.</td>
<td>Yes. Complaints can be lodged anonymously.</td>
<td>Each complaint entering PPACC receives a protocol number. Complaints are archived in physical folders. PPACC does not count with a case management system and has limited ability to track the status of a complaint in real time.</td>
<td>Yes. Only authorised staff can access the electronic files (username, password are required).</td>
<td>Complaints are cross-checked with other complaints already existing in the registry. Then a <em>prima facie</em> analysis is undertaken by the prosecutor, and if the complaint is credible, it is forwarded to one of the Public Prosecutor against Crimes of Corruption (PPACC) (against the public prosecutor), Ministry of Environment, Energy and Climate Change, Inspectorate Body, Hellenic Police, Directorate of Internal Affairs (DEY), The Hellenic Coast Guard Internal Affairs Service (YEY), or Ministry of State.</td>
</tr>
<tr>
<td></td>
<td>No</td>
<td>No</td>
<td>N/A</td>
<td>No</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td>Yes</td>
<td>No</td>
<td>N/A</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>No</td>
<td>No</td>
<td>N/A</td>
<td>Yes</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td>Yes</td>
<td>In person, by letter, e-mail, phone or fax.</td>
<td>In person, by letter, e-mail, phone or fax.</td>
<td>Each complaint is assigned a protocol number and archived in an electronic folder.</td>
<td>The complaint is submitted to the Director of the Unit who does the first assessment and: 1) assigns it to an inspector; 2) archives it; 3) undertakes a preliminary check; or 4) refers it to another unit.</td>
<td>Credible complaints are assigned to an inspector to undertake a preliminary investigation.</td>
</tr>
<tr>
<td></td>
<td>No</td>
<td>Yes</td>
<td>Yes</td>
<td>N/A</td>
<td>N/A</td>
<td>No</td>
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<td></td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>Yes</td>
<td>No</td>
<td>No</td>
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</tbody>
</table>

**Notes:**
- Citizens willing to submit a concern are required to fill in an online form that requires name, e-mail, phone, as well as a description of the concern and the ministry or government body affected. The form also allows for the uploading of up to six files related to the concern. See www.kathimerinotita.gov.gr.
<table>
<thead>
<tr>
<th>The Public Prosecutor against Crimes of Corruption (PPACC)</th>
<th>Ministry of Environment, Energy and Climate Change, Inspectorate Body</th>
<th>Hellenic Police, Directorate of Internal Affairs (DEY)</th>
<th>The Hellenic Coast Guard Internal Affairs Service (YEY)</th>
<th>Ministry of State</th>
</tr>
</thead>
<tbody>
<tr>
<td>Investigation of complaints</td>
<td>Yes</td>
<td>Yes (83% of the anonymous complaints were investigated).</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Monitoring of complaints</td>
<td>Not clear</td>
<td>No</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>Communication with complainant</td>
<td>PPACC do not have a formal protocol on communication with the complainant. The communication is limited due to the confidentiality of the investigations.</td>
<td>No. Due to confidentiality.</td>
<td>Citizens can contact the service to be informed of the progress of the case. For anonymous complaints, there is no such possibility.</td>
<td>Citizens can contact the service to be informed of the progress of the case. For anonymous complaints, there is no such possibility.</td>
</tr>
<tr>
<td>Appeal</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>Is there co-ordination with other public authorities?</td>
<td>Yes, with SDOE and the Financial Police Division (FIU).</td>
<td>Yes, on an ad hoc basis. Prosecutor, SDOE, etc.</td>
<td>Yes, at national and international level.</td>
<td>Yes, at national and international level.</td>
</tr>
<tr>
<td>Referral of complaints</td>
<td>Competent judge</td>
<td>Competent public body or prosecutor in cases of corruption crimes.</td>
<td>Competent public body or prosecutor in cases of corruption crimes.</td>
<td>Competent public body or prosecutor in cases of corruption crimes.</td>
</tr>
<tr>
<td>Is there any risk analysis of the complaints received?</td>
<td>No</td>
<td>Yes. The unit undertakes a risk analysis annually.</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>People involved</td>
<td>6 deputy prosecutors, 2 scientific experts and 20 support staff.</td>
<td>8 inspectors in Athens and 4 in Thessaloniki. In total, the service encompasses 30 civil servants.</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>Does a training programme exist?</td>
<td>No</td>
<td>No</td>
<td>Yes. In 2016, 18 educational activities were attended in Greece and abroad, in which 36 officers took part.</td>
<td>N/A</td>
</tr>
<tr>
<td>Number of complaints received in 2016</td>
<td>No statistical data</td>
<td>40 (10 approx. from citizens)</td>
<td>1 231 complaints/inquiries</td>
<td>N/A</td>
</tr>
<tr>
<td>Is there an audit or independent evaluation of the complaints system?</td>
<td>N/A</td>
<td>No</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>What are the key challenges?</td>
<td>The Public Prosecutor against Crimes of Corruption (PPACC)</td>
<td>Ministry of Environment, Energy and Climate Change, Inspectorate Body</td>
<td>Hellenic Police, Directorate of Internal Affairs (DEY)</td>
<td>The Hellenic Coast Guard Internal Affairs Service (YEY)</td>
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</tr>
<tr>
<td></td>
<td>Lack of capacity and resources.</td>
<td>Lack of resources.</td>
<td>Lack of resources.</td>
<td>Lack of resources.</td>
</tr>
<tr>
<td></td>
<td>PPACC does not count with a case management system and has limited ability to track the status of a complaint in real time.</td>
<td>No specialised training for inspectors.</td>
<td></td>
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</tr>
<tr>
<td></td>
<td>Low level of co-operation among agencies and understaffing in many agencies lead to disbelief as to whether a complaint will be addressed in a timely manner.</td>
<td>Changing legislation.</td>
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<td></td>
<td>Difficulty to find evidence of corruption crimes.</td>
<td></td>
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<td></td>
<td>Better security.</td>
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<td></td>
<td>Political pressures.</td>
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</tbody>
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Annex B

Questionnaire distributed to Greek institutions responsible for managing complaints

Availability and accessibility of complaints channels

1. What complaints channels does your institution have to receive corruption complaints and other grievances? (Channels can include, in person, online portal, e-mail, phone, text, letter, fax, etc.)

2. Are there restrictions on how can submit complaints? Are there fees or any other administrative burdens for those filing a complaint?

3. Does your institution keep statistics on how many complaints are received (ideally disaggregated by type of channel used, type of complaint, etc.)? If so, please send data/reports to <govintegrity@oecd.org>. If not, please specify “no centralised information available for my institution”.

Communications with citizens/firms/general public on complaints system

4. Does your institution provide instructions or information on what complaints can be submitted, how complaints can be submitted, and communication of rights (anonymity, if requested, etc.)?

5. Is training provided to front-office staff receiving complaints about courtesy, confidentiality, the complaints process, etc.?

6. Generally speaking, are messages confirming receipt of the complaint sent to citizens/firms, etc. who file a complaint?

7. If a complaint is found to be outside the scope of your institution (i.e. not in the mandate/remit), what is the policy to provide information to the complainant in terms of alternatives to where they could submit their complaint?

8. Generally speaking, once a complaint is received, how are individuals kept informed about the status of their complaint processing throughout the audit/investigation process, including the resolution?
Integrity of the complaints systems

9. Within your institution, are complaints centralised into a single database? If not, please describe how complaints are stored and tracked within your organisation.

10. Generally speaking, are complaints and case information encrypted and stored on secure servers during the auditing/investigations process? Are there standard policies or rules on who can access the institution’s complaints system?

11. Please describe how auditors/investigators are assigned to specific complaints in your institution.

12. In your institution, who has access to the complaints system and are there special clearances that are necessary? What guidance is provided to those dealing with complaints? (in terms of protecting anonymity, integrity of factual information, etc.)

13. Is there any auditing or independent review of how your institutions are managing complaints? If so, by whom? Please provide previous report(s) to <govintegrity@oecd.org>.

14. If citizens/firms wish to appeal the resolution of the decision concerning their complaint, does your institution have standard procedures/guidelines for such proceedings? Please describe.

Effectiveness of the complaints systems

15a. What is your institution’s policy for filtering complaints received? What are the specific criteria and policies concerning:
   i) immediately closing a complaint file (i.e. deemed outside of the scope of your institution or not worthy of investigation/audit);
   ii) referring a complaint to another institution (including to prosecutors or law enforcement in the case of a potential criminal violation);
   iii) classifying a complaint as “pending” (i.e. requiring further information before a decision can be made on whether to take complaint forward);
   iv) carrying forward a complaint for audit or investigation within your same institution.

If your institution uses a different classification or way or filtering, please describe this system in detail.

15b. For complaints concerning potentially criminal matters (option ii above), please describe if there are any special procedures or policies concerning the handling of information/evidence and dealing with law enforcement or justice officials.

15c. For complaints related to potential corruption, however, are deemed not to be criminal matters, please describe if there are any special procedures related to administrative disciplinary action.

16. Please describe if there is any prioritisation of complaints in your institution, for example, based on (i) pre-determined risks to the organisation; (ii) the economic
value/damage in question to the organisation; (iii) any other criteria unique to your organisation.

17. For complaints that have been referred to other institutions, or those that have been referred to your institutions from others, how does communication between entities occur to track processing and resolution of the complaint? Please describe any challenges related to the interoperability of systems and/or other communications between institutions.

18. Once resolutions are reached, what monitoring mechanisms are in place to ensure the resolution or corrective action is implemented? (whether a sanction or reform, etc.) How are institutions kept informed of the resolution of administrative/disciplinary and criminal/civil cases, if applicable?

19. Generally speaking, how many staff are dedicated to receiving and managing complaints in your institution? Generally speaking, what budget is dedicated to receiving and managing complaints?

20. How is information from the reviews/evaluation of the complaints system used by the organisation for purposes of: (i) risk analysis; (ii) future audit planning; and (iii) the organisation of its resources?