



**HELLENIC REPUBLIC MINISTRY OF DEVELOPMENT  
AND INVESTMENTS**  
**General Secretariat for Public Investments & NSRF**  
**Special Service for EEA GRANTS**  
**National Focal Point**

**Interim evaluation of the Programmes:**

- i) Programme B - Roma Inclusion and Empowerment**
- ii) Programme F - Good Governance, Accountable Institutions,  
Transparency**

**EEA Grants - 2014-2021**

**DELIVERABLE 2:**

**FINAL REPORT OF THE INTERIM EVALUATION**

**VOLUME B**

**Programme F – Good Governance, Accountable Institutions, Transparency**

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### Table of Abbreviations

CSC(s)	Citizen Service Center(s)
DTB	Digital Transformation Bible
EEA	European Economic Area
ERDF	European Regional Development Fund
ESF	European Social Fund
FM	Financial Mechanism
FMO	Financial Mechanism Office
KEP	Citizen Service Center – CSC (“Kentro Exipiretisis Politon” - “KEP” in Greek)
M&IA ICT	Management & Implementation Authority for Information and Communication Technologies of the Ministry of Digital Governance
MIS	Monitoring Information System
MoU	Memorandum of Understanding
NFP	National Focal Point
NPAP	National Policy on Administrative Procedures
NRRP	National Recovery and Resilience Plan "Greece 2.0"
NACAP	National Anti-Corruption Action Plan 2022 - 2025
NSRF	National Strategic Reference Framework
OECD	Organisation for Economic Cooperation and Development
PDP	Pre-Defined Project
SP	Sub-Project
PIP	Public Investment Program

## Introduction

This Report is the **Volume B of the Deliverable 2: "Final Report of the Interim Evaluation of Programme F – Good Governance, Accountable Institutions, Transparency"** in the context of the Project "Interim Evaluation of Programmes: a) Social Integration and Empowerment of Roma- (Programme B- Roma Inclusion and Empowerment) and b) Good Governance, (Programme F – Good Governance, Accountable Institutions, Transparency) of the EEA Financial Mechanism 2014-2021.

According to the EEA 2014-2021 Regulation (Article 10.1 "Obligations of the Beneficiary States", par. 1), Greece has the obligation to carry out an **independent evaluation** of all the EEA Financial Mechanism Programmes.

The evaluation process is part of the management framework of the EEA grants and it is focused on the examination of achievement of results, as well as, on the assessment of the effects of each Programme and not solely on the recording of quantitative data that is linked to the implementation of the Programmes and the absorption of funds.

An important part of the management framework involves the definition of baseline values, indicators and targets on the basis of which the progress of Programmes is monitored in terms of the intended results. In this context, the evaluation also aims to provide qualitative information on the results and impacts of the Programmes with the use of available data and quantitative information on the progress of the implementation.

The **purposes of the evaluation** of the EEA Financial Mechanism Programmes 2014-2021 are the following:

1. The evaluation of the degree of the implementation of the Programmes, according to their original design and the achievement of the expected results;
2. The assessment of the effects and degree of sustainability of the given aid;
3. The production of the necessary knowledge, up to the evaluation period, of the results of the interventions that can contribute to providing appropriate corrective measures in the immediate future;
4. The assessment of ways in which the financial support framework complements or overlaps with other sources of funding (particularly from the EU).

In accordance with the Evaluation Guidelines of the EEA Financial Mechanism Programmes 2014-2021, the main **criteria of this evaluation** are the following:

1. Compatibility and complementarity of Programmes and projects with national and European policies;
2. The effectiveness in achieving set goals at the Project and Programme level;
3. The efficiency and proportionality of the resources used towards the achieved results;
4. The expected positive or negative, direct or indirect effects that Programmes and Projects can have on their thematic areas over time;

5. The duration and sustainability of the interventions and their results.

The evaluations of EEA Financial Mechanism Programmes are based on OECD<sup>1</sup> guidelines and adhere to the principles of neutrality, independence and promotion of functional operational recommendations. The evaluation findings aim to feed into management processes and decisions, as well as, to meaningfully contribute to outcomes, to inform the planning, budgeting and implementation processes of Programmes, as well as, to positively contribute to the entire reporting system.

The current interim evaluation project was assigned to SPEED Development Consultants S.A., on the basis of the contract of 1 November 2022 between the Special Service for Planning, Coordination and Monitoring of the Implementation of Financial Mechanism of the Economic Area (EEA) - National Focal Point and the company.

This Deliverable was prepared in compliance with the approved structure and contents and in application of the methodology that was presented in detail in “Deliverable 1” of the current ongoing evaluation project.








**Executive Summary in English / Επιτελική Σύνοψη στα Αγγλικά**

**EXECUTIVE SUMMARY OF THE INTERIM EVALUATION OF THE PROGRAMME:**

***Programme F “Good Governance, Accountable Institutions, Transparency”***

***(Πρόγραμμα F «Χρηστή Διακυβέρνηση, Θεσμοί και Διαφάνεια»)***

This Section sets out a summary and synthesis of the conclusions of the interim evaluation of the Programme as of 27/01/2023 (reference date of the report), on the basis of the findings of the analysis performed and the responses to the evaluation questions, and in particular the following criteria:

-  Evaluation of the appropriateness and appropriate timing of the Programme strategy, as well as the compatibility and complementarity of the interventions to national and European policies;
-  Evaluation of the progress and the possibility of achieving the financial goals of the Programme;
-  Evaluation of the system and assessment of the possibility of achieving the qualitative and quantitative goals of the Programme;
-  Evaluation of the effectiveness of the Programme and the efficiency of its resources;
-  Evaluation of the expected impacts and the sustainability of interventions;
-  Evaluation of the administrative capacity of Mechanisms and of the Programme implementation procedures;
-  Identification of critical issues and recommendations to address them.

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<sup>1</sup> 2014-2021: Evaluation Mandate and Policy for the EEA and Norway Grants (19/10/2021) (<https://eeagrants.org/sites/default/files/resources/FMO%20Evaluation%20Mandate%20and%20Policy.pdf>)

The “Good Governance, Accountable Institutions, Transparency” Programme co-funded by the EEA Grants 2014-2021 has a strong correlation with national policies on the enhancement of public administration such as the National Strategy for Administrative Reform 2017- 2019, the National Digital Strategy 2016- 2021, the Digital Transformation Bible 2020-2025, the National Policy on Administrative Procedures, the Action Plan for e-Governance 2014-2020, the National Anti-Corruption Action Plan 2022-2025 as well as the Disability Rights Strategy 2021-2030. To this date, the Programme continues to respond to the country's needs and priorities in relation to the enhancement of efficiency, integrity and accountability of the public administration system.

The aim of the Programme is to strengthen the transparency, efficiency and accountability mechanisms of the Greek public administration, through the digitization of its services, the provision of direct access to it by citizens, the acceleration of its technological modernisation process, the reduction of bureaucracy and the fight against corruption. Furthermore, actions of the Greek Ombudsman are financed through the Programme to deal with maladministration and to better manage problems faced by the public. The following actions are part of the Programme by design:

- Pre-Defined Project PDP1: Organisational Upgrade and Digital Transformation of Citizen Service Centers Network (KEP) and public services provided
- Pre-Defined Project PDP2: Strengthening of integrity, transparency and anti-corruption framework
- Pre-Defined Project PDP3: Greek Ombudsman actions for strengthening good governance, accountability and combating maladministration in the public sector
- Programme Management - Provision of Supporting Services.

### **Evaluation Conclusions**

The following conclusions are drawn by the Evaluator from the implementation of the Programme:

- ✚ The initial design, coordination and management of the Programme has faced challenges and setbacks as there are budget re-allocations, reductions in the physical object and two Sub-Projects<sup>2</sup> under PDP2 are completely opted-out and will be funded by alternative resources. As a result, the Programme is not implemented as designed.
- ✚ However, in terms of its existing implementation course, the Programme remains strategically relevant and in full alignment with national policies and strategies.
- ✚ The rate of contracting and hence of the absorption of resources is low, mainly due to the implicated complex administrative procedures
- ✚ In addition to delays in open tender procedures, implementation is challenged by the fact that the Management and Control System of the Programme is excessively complicated and “heavy” regarding the tendering procedures and the assignment of the contracts, especially for small sizes and low budget projects.
- ✚ In the absence of measurable data on the physical progress and to the extent that the approved Projects do not currently yield significant output and results, there are no measurable values of the pre-selected indicators. Thus, the evaluation of the effectiveness and the efficiency of the resources of the Programme cannot be assessed quantitatively at this time. Nevertheless, on the

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<sup>2</sup> A Sub-Project constitutes a module within a project that corresponds to a certain identifiable individual activity and is expected to be implemented through a respective procurement/legal commitment.

basis of the evidence and information provided to the evaluator, qualitative conclusions may be reached. More specifically, the effectiveness of the Programme is expected to be reduced by not absorbing its budget and not reaching its goals, taking in account the existing reductions in the physical object in PDP2 which directly negatively impact the Programme’s Basic Objective “Transparency and integrity in public institutions enhanced”. Further implementation issues are observed in all Projects, mainly because of the high risks of PDP1 and PDP3, the medium - high risk of PDP2, but also lower level risks in Programme Management activities. The evaluator has submitted recommendations to mitigate these risks.

- ✚ High Risk regarding PDP1: The timetable for completion of Sub-Projects 1 "Project Management", 2 "Dissemination - Communication", 4 "Improvement of services provided by CSCs" extends until the end of the eligibility period of the Programme with an increased risk for SP4 not to be completed on time. Similarly, the timetable for the implementation of SP6 "Implementation of electronic signatures in the CSC network" is very close to the final end date of eligibility due to delays in administrative procedures.
- ✚ Medium - high risk regarding PDP2: The assessment involves the reduced, as initially scheduled, physical object in the Project, since the SP2, SP3 are opted-out. As far as SP1 “Strengthening the National Framework for Integrity in the Public Sector” is concerned, the timeframes are reaching too close to a safe distance from the final end date of eligibility due to the delay of administrative tasks, creating risks for the effective and on time completion of the Project.
- ✚ High Risk regarding PDP3: The completion schedule of Sub-Projects 8 "Supply of IT equipment" and 9 "Upgrade of the Software" extends until the end of the eligibility period of the Programme while some of the remaining Sub-Projects risk not being completed. The implementation schedules of the Sub-Projects are very close to a safe distance from the final end date of eligibility due to the delay of administrative tasks in SP5 "Organisation of workshops, staff trainings, international conferences, travel expenses" and SP6 "Awareness campaign, development of educational material".
- ✚ Medium - low risk regarding Support actions of Programme Operator of "Good Governance, Accountable Institutions, Transparency", Sub-project 6: Staff training: The timetable for the conclusion of the implementation of sub-project close the end of eligibility period.
- ✚ The above risks can be mitigated by incorporating recommendations 1, 2, 3, 4, 6, 7, 8, 9 for (i) the close monitoring of the approved time schedule of PDP 1 (SP1, SP2, SP4, SP6), PDP 2 (SP1), PDP 3 (SP5, SP6), (ii) the speeding-up of both the tender processes and the finalization of all pending issues in the revised agreement with the OECD in PDP2, (iii) the elaboration of the necessary amendments in the Programme Management activities where appropriate, to avoid further delays in the above-mentioned sub-project assignment and its implementation.
- ✚ There is an identified common comprehension of the necessity to implement the Programme by all organisations involved.
- ✚ The operational capacity of the Project Promoters to complete the entire physical and financial object of the Programme, with the incorporation of the recommendations of the evaluator can be evaluated as satisfactory and it is expected to be further enhanced through the experience to be gained and lessons learned.
- ✚ As far as indirect impacts are concerned, it is expected that the implementation of the Programme will directly positively impact the operations of the Programme Operator, the Project



Partners and the Project Promoters. However, in terms of the National Transparency Authority these positive effects will be significantly lower than initially envisaged due to the large reductions in the physical object of PDP2.

- ✚ The required communications and reporting, both in English and Greek, are carried out not only under the established hierarchy of interactions among the relevant and implicated competent authorities, but also at a horizontal level, resulting in complex structures of communication and overlapping responsibilities with, consequently, significant management waste.
- ✚ All implicated bodies have reported an excellent collaboration between the Project Promoters, the Programme Operator, the NFP, the FMO and international partners, where applicable and as appropriate, and stress the importance to also strengthen the co-working links between the Beneficiary State and the Donor Countries.

### Recommendations

The following recommendations are drawn from the evaluation of the Projects’ and the Programme’s effectiveness, efficiency of resources, estimated effects, duration and sustainability of interventions and review of the Mechanism’s administrative capacity and the efficiency of the Programme’s implementation procedures. In this context, the analysis takes into account the time schedules of the projects and sub-projects, as well as, the submitted proposal of amendment for the overall Programme which includes the reductions in the physical and financial object, as set out in detail in the evaluation report.

- **Recommendation 1:** The evaluator recommends the close monitoring of the approved time schedule of PDP1, SP 1 and the speeding-up of the tender process in order to avoid further delays in the sub-project assignment and its implementation.
- **Recommendation 2:** The evaluator recommends the close monitoring of the approved time schedule of PDP1, SP 2 and the speeding-up of the tender process in order to avoid further delays in the sub-project assignment and its implementation.
- **Recommendation 3:** The evaluator recommends the close monitoring of the approved time schedule of PDP 1, SP 4 and the speeding-up of the tender process in order to avoid further potential delays in the sub-project assignment and its implementation.
- **Recommendation 4:** The evaluator recommends the close monitoring of the approved time schedule of PDP1, SP 6 and the speeding-up of the tender process in order to avoid further delays that could impact on its objectives and the sub-project’s implementation.
- **Recommendation 5:** The evaluator recommends the close monitoring of the approved time schedule of PDP1, SP8 and the speeding-up of the tender process in order to avoid further potential delays that could impact its objectives.
- **Recommendation 6:** The evaluator recommends the close monitoring of the approved time schedule of PDP2, SP1 and the speeding-up of the procedures for finalizing all pending issues in the revised agreement with the OECD in order to avoid further potential delays that could impact its objectives.

- **Recommendation 7:** The evaluator recommends the close monitoring of the approved time schedule of PDP3, SP5 and the speeding-up of the tender process in order to avoid further potential delays that could impact its objectives.
- **Recommendation 8:** The evaluator recommends the close monitoring of the approved time schedule of PDP3, SP6 and the speeding-up of the tender process in order to avoid further potential delays that could impact its objectives.
- **Recommendation 9:** The evaluator recommends the close monitoring of the progress of the physical object of all Predefined Projects and modify the physical object of the project “Support actions of Programme Operator of "Good Governance, Accountable Institutions, Transparency" as appropriate.
- **Recommendation 10:** Considering the opt-out of sub-projects 2 and 3 of PDP2, the evaluator recommends that the Project “Technical consultant support for the enhanced maturity and preparation of the Predefined Project “Strengthening of integrity, transparency and anti-corruption framework" should be removed from the Programme, as it is no longer relevant to its scope. The budget of the Project could be transferred to other technical support action to remain readily available to cover additional supporting needs.
- **Recommendation 11:** Upon completion of the approved Projects, measurable data should be appropriately selected and calculated for the purposes to enable the evaluation of the following parameters of the Projects and the Programme as a whole: (i) the effectiveness, (ii) the ability to achieve the set objectives, (iii) the efficiency, (iv) the impacts in the existing conditions in Greece in the areas of efficiency, integrity and accountability of the public administration system in the future.
- **Recommendation 12:** As the Management and Control System was reported to be excessively complicated and “heavy”, there is perhaps scope to introduce an increased degree of flexibility in cases of smaller budgeted projects.
- **Recommendation 13:** Simplifications in the adopted Management and Control System are recommended, especially for the decision-making processes during the implementation of Projects that have already been adopted in previous stages, such as in the Programme specialization and resources allocation process or for Projects that may be implemented by the Project Promoter’s own means. It is nevertheless important to reach an effective compromise between close collaboration and re-thinking the communication hierarchy of all relevant parties, in order ensure excellent collaboration terms, as reported to the evaluator by all implicated authorities from the part of the Beneficiary State.

## Executive Summary in Greek / Επιτελική Σύνοψη στα Ελληνικά

### ΕΠΙΤΕΛΙΚΗ ΣΥΝΟΨΗ ΤΗΣ ΕΝΔΙΑΜΕΣΗΣ ΑΞΙΟΛΟΓΗΣΗΣ ΤΟΥ ΠΡΟΓΡΑΜΜΑΤΟΣ

#### *Πρόγραμμα F «Χρηστή Διακυβέρνηση, Θεσμοί και Διαφάνεια»*

#### *(Programme F “Good Governance, Accountable Institutions, Transparency”)*

Στην Ενότητα αυτή γίνεται συνοπτική και συνθετική αποτύπωση των συμπερασμάτων της ενδιάμεσης αξιολόγησης του Προγράμματος με ημερομηνία αναφοράς την 01/02/2023, με βάση τα πορίσματα της ανάλυσης και της απάντησης των αξιολογικών ερωτημάτων ως εξής:

- ✚ Αξιολόγηση της καταλληλότητας / επικαιρότητας της στρατηγικής και της συμβατότητας και συμπληρωματικότητας των έργων του Προγράμματος με τις εθνικές και ευρωπαϊκές πολιτικές,
- ✚ Αποτίμηση της προόδου και εκτίμηση της δυνατότητας επίτευξης των χρηματοδοτικών στόχων του Προγράμματος,
- ✚ Αξιολόγηση του συστήματος και εκτίμηση της δυνατότητας επίτευξης των ποιοτικών και ποσοτικών στόχων του Προγράμματος,
- ✚ Αξιολόγηση της αποτελεσματικότητας του Προγράμματος και της αποδοτικότητας των πόρων,
- ✚ Εκτίμηση των προβλεπόμενων επιπτώσεων και της βιωσιμότητας των παρεμβάσεων,
- ✚ Εξέταση της διοικητικής ικανότητας του Μηχανισμού και των διαδικασιών εφαρμογής του Προγράμματος,
- ✚ Εντοπισμός κρίσιμων ζητημάτων και προτάσεις αντιμετώπισής τους.

Το Πρόγραμμα «Χρηστή Διακυβέρνηση, Θεσμοί και Διαφάνεια», που συγχρηματοδοτείται με πόρους του Χρηματοδοτικού Μηχανισμού Ευρωπαϊκού Οικονομικού Χώρου (ΧΜ ΕΟΧ) της περιόδου 2014-2021 και εθνικούς πόρους του Προγράμματος Δημοσίων Επενδύσεων (ΠΔΕ), έχει ισχυρή συσχέτιση με τις εθνικές πολιτικές για την ενίσχυση της δημόσιας διοίκησης όπως η Εθνική Στρατηγική Διοικητικής Μεταρρύθμισης 2017-2019, η Εθνική Ψηφιακή Στρατηγική 2016-2021, η Βίβλος Ψηφιακού Μετασχηματισμού 2020-2025, η Εθνική Πολιτική Διοικητικών Διαδικασιών, το Σχέδιο Δράσης για την Ηλεκτρονική Διακυβέρνηση 2014-2020, το Εθνικό Στρατηγικό Σχέδιο για την Καταπολέμηση της Διαφθοράς 2022-2025, καθώς και με τη Στρατηγική για τα δικαιώματα των ατόμων με αναπηρία 2021-2030. Μέχρι σήμερα, το Πρόγραμμα εξακολουθεί να ανταποκρίνεται στις ανάγκες και τις προτεραιότητες της χώρας σε σχέση με την ενίσχυση της αποτελεσματικότητας, της ακεραιότητας και της λογοδοσίας του συστήματος δημόσιας διοίκησης.

Στόχος του Προγράμματος είναι η ενίσχυση της διαφάνειας, της αποτελεσματικότητας και των μηχανισμών λογοδοσίας της ελληνικής δημόσιας διοίκησης, μέσω της ψηφιοποίησης των υπηρεσιών της, της άμεσης πρόσβασης των πολιτών σε αυτές, της επιτάχυνσης της διαδικασίας τεχνολογικού εκσυγχρονισμού της, της μείωσης της γραφειοκρατίας και της καταπολέμησης της διαφθοράς. Επιπλέον, μέσω του Προγράμματος χρηματοδοτούνται δράσεις του Συνηγόρου του Πολίτη για την αντιμετώπιση περιπτώσεων κακοδιοίκησης και την καλύτερη διαχείριση των προβλημάτων που αντιμετωπίζουν οι πολίτες το κοινό. Στο Πρόγραμμα περιλαμβάνονται οι ακόλουθες δράσεις:

- Προκαθορισμένη Πράξη PDP1: Οργανωτική Αναβάθμιση και Ψηφιακός Μετασχηματισμός του δικτύου Κέντρων Εξυπηρέτησης Πολιτών (ΚΕΠ) και των παρεχόμενων υπηρεσιών

- Προκαθορισμένη Πράξη PDP2: Ενίσχυση του πλαισίου για την ακεραιότητα, τη διαφάνεια και την καταπολέμηση της διαφθοράς
- Προκαθορισμένη Πράξη PDP3: Δράσεις του Συνηγόρου του Πολίτη για την ενίσχυση της καλής διακυβέρνησης, λογοδοσίας και καταπολέμησης της κακοδιοίκησης στον Δημόσιο Τομέα
- Διαχείριση Προγράμματος - Παροχή Υποστηρικτικών Υπηρεσιών.

### Συμπεράσματα της αξιολόγησης

Τα βασικά συμπεράσματα από την αξιολόγηση της εφαρμογής του Προγράμματος είναι τα ακόλουθα:

- ✚ Ο αρχικός σχεδιασμός, ο συντονισμός και η διαχείριση του προγράμματος αντιμετώπισαν προκλήσεις και καθυστερήσεις, καθώς υπήρξαν ανακατανομές του προϋπολογισμού, μειώσεις του φυσικού αντικειμένου και δύο υποέργα στο πλαίσιο του PDP2 έχουν εξαιρεθεί οριστικά από το Πρόγραμμα και πρόκειται να χρηματοδοτηθούν από εναλλακτικές χρηματοδοτικές πηγές. Κατά συνέπεια, το πρόγραμμα δεν εφαρμόζεται όπως έχει σχεδιαστεί.
- ✚ Ωστόσο, όσον αφορά την πορεία υλοποίησής του, το πρόγραμμα παραμένει στρατηγικά επίκαιρο και ευθυγραμμίζεται πλήρως με τις εθνικές πολιτικές και στρατηγικές,
- ✚ Ο βαθμός συμβασιοποίησης και κυρίως της απορρόφησης των πόρων είναι χαμηλά επίπεδα, κυρίως λόγω της πολυπλοκότητας των εφαρμοζόμενων διοικητικών διαδικασιών.
- ✚ Εκτός από τις καθυστερήσεις στις ανοικτές διαδικασίες διαγωνισμών, στη διαχείριση και την υλοποίηση των έργων επιδρά το ότι το Σύστημα Διαχείρισης και Ελέγχου του Προγράμματος είναι υπερβολικά περίπλοκο και «βαρύ» όσον αφορά τις διαδικασίες διαγωνισμών για την ανάθεση των συμβάσεων, ειδικά για έργα μικρού μεγέθους και χαμηλού προϋπολογισμού.
- ✚ Ελλείψει μετρήσιμων δεδομένων σχετικά με τη φυσική πρόοδο και στον βαθμό που τα εγκεκριμένα έργα δεν αποφέρουν επί του παρόντος σημαντικές εκροές και αποτελέσματα, δεν υπάρχουν μετρήσιμες τιμές των προεπιλεγμένων δεικτών. Ως εκ τούτου, η αξιολόγηση της αποτελεσματικότητας και της αποδοτικότητας των πόρων του προγράμματος δεν είναι δυνατόν να αξιολογηθεί ποσοτικά επί του παρόντος. Ωστόσο, βάσει των αποδεικτικών στοιχείων και των πληροφοριών που παρέχονται στον αξιολογητή, μπορούν να συναχθούν ποιοτικά συμπεράσματα. Πιο συγκεκριμένα, η αποτελεσματικότητα του Προγράμματος πιθανότατα θα μειωθεί από τη μη απορρόφηση του προϋπολογισμού του και τη μη επίτευξη των στόχων του, λαμβάνοντας υπόψη τις υφιστάμενες μειώσεις του φυσικού αντικειμένου στο PDP2 που επηρεάζουν άμεσα αρνητικά τον Βασικό Στόχο του Προγράμματος «Ενίσχυση της διαφάνειας και της ακεραιότητας στους δημόσιους θεσμούς». Περαιτέρω ζητήματα υλοποίησης παρατηρούνται σε όλα τα Έργα, κυρίως λόγω των υψηλών κινδύνων των PDP1 και PDP3, του μεσαίου - υψηλού κινδύνου του υπόλοιπου αντικειμένου του PDP2 μετά την εξαίρεση των δύο υποέργων, αλλά και των χαμηλότερων κινδύνων στις δραστηριότητες Διαχείρισης Προγραμμάτων. Ο αξιολογητής έχει υποβάλει συστάσεις για τον μετριασμό αυτών των κινδύνων.
- ✚ Υψηλή εκτίμηση κινδύνου για το PDP1: Το χρονοδιάγραμμα ολοκλήρωσης των υποέργων 1 «Διαχείριση έργου», 2 «Διάδοση - Επικοινωνία», 4 «Βελτίωση των υπηρεσιών που παρέχονται από τα ΚΕΠ» εκτείνεται μέχρι το τέλος της περιόδου επιλεξιμότητας του Προγράμματος, με αυξημένο κίνδυνο για το ΥΕ4 να μην ολοκληρωθεί έγκαιρα. Ομοίως, το χρονοδιάγραμμα υλοποίησης του ΥΕ6 "Εφαρμογή ηλεκτρονικών υπογραφών στο δίκτυο ΚΕΠ" πλησιάζει πολύ

κοντά στην τελική ημερομηνία λήξης της επιλεξιμότητας εξαιτίας καθυστερήσεων στις διοικητικές διαδικασίες.

- ✚ Μεσαία-Υψηλή εκτίμηση κινδύνου για το PDP2: Η αξιολόγηση περιλαμβάνει το μειωμένο φυσικό αντικείμενο στο Έργο μετά την εξαίρεση των δύο υποέργων 2 και 3. Όσον αφορά το SP1 «Ενίσχυση του Εθνικού Πλαισίου για την Ακεραιότητα στο Δημόσιο Τομέα», τα χρονοδιαγράμματα υλοποίησης πλησιάζουν πολύ το όριο ασφαλούς απόστασης από την τελική ημερομηνία λήξης της επιλεξιμότητας, λόγω της καθυστέρησης των διοικητικών και διαγωνιστικών διαδικασιών, θέτοντας σε κίνδυνο την έγκαιρη και πλήρη ολοκλήρωση του εντός του επιλέξιμου χρόνου που απομένει.
- ✚ Υψηλή εκτίμηση κινδύνου για το PDP3: Το χρονοδιάγραμμα ολοκλήρωσης των υποέργων 8 «Προμήθεια εξοπλισμού πληροφορικής» και 9 «Αναβάθμιση του λογισμικού» εκτείνεται μέχρι το τέλος της περιόδου επιλεξιμότητας του Προγράμματος, ενώ ορισμένα από τα υπόλοιπα υποέργα κινδυνεύουν να μην ολοκληρωθούν. Τα χρονοδιαγράμματα υλοποίησης των υποέργων πλησιάζουν πολύ κοντά σε μια ασφαλή απόσταση από την τελική ημερομηνία λήξης της επιλεξιμότητας λόγω της καθυστέρησης των διοικητικών καθηκόντων στο SP5 «Οργάνωση εργαστηρίων, εκπαιδεύσεων, προσωπικού, διεθνών συνεδρίων, έξοδα ταξιδιού» και 6 «Εκστρατεία ευαισθητοποίησης, ανάπτυξη εκπαιδευτικού υλικού».
- ✚ Μέτριος - χαμηλός κίνδυνος όσον αφορά τις δράσεις υποστήριξης του Διαχειριστή Προγράμματος «Χρηστή Διακυβέρνηση, Θεσμοί και Διαφάνεια», Υποέργο 6: «Εκπαίδευση προσωπικού»: Η ολοκλήρωση της υλοποίησης του υποέργου είναι κοντά στο τέλος της περιόδου επιλεξιμότητας.
- ✚ Οι ανωτέρω κίνδυνοι μπορούν να μετριαστούν με την ενσωμάτωση των συστάσεων 1, 2, 3, 4, 6, 7, 8, 9 για (α) τη στενή παρακολούθηση του εγκεκριμένου χρονοδιαγράμματος των προκαθορισμένων έργων, PDP 1 (SP1, SP2, SP4, SP6), PDP 2 (SP1), PDP 3 (SP5, SP6) (β) την επιτάχυνση των διαδικασιών ανάθεσης και την ολοκλήρωση όλων των εκκρεμών θεμάτων της αναθεωρημένης συμφωνίας με τον ΟΟΣΑ για το PDP2, (γ) την επεξεργασία αναγκαίων τροποποιήσεων στις εργασίες του Διαχειριστή του Προγράμματος, προκειμένου να αποφευχθούν περαιτέρω καθυστερήσεις στην εφαρμογή των δράσεων τεχνικής υποστήριξης.
- ✚ Υπάρχει μια εδραιωμένη κοινή αντίληψη της αναγκαιότητας εφαρμογής του Προγράμματος από όλους τους εμπλεκόμενους οργανισμούς.
- ✚ Η επιχειρησιακή ικανότητα των φορέων υλοποίησης έργων να ολοκληρώσουν ολόκληρο το φυσικό και οικονομικό αντικείμενο του προγράμματος, με την ενσωμάτωση των συστάσεων του αξιολογητή, μπορεί να αξιολογηθεί ως ικανοποιητική και αναμένεται να ενισχυθεί περαιτέρω μέσω της εμπειρίας που θα αποκτηθεί και των διδαγμάτων που θα αντληθούν.
- ✚ Όσον αφορά τις έμμεσες επιπτώσεις, αναμένεται ότι η υλοποίηση του προγράμματος θα επηρεάσει άμεσα θετικά τις δραστηριότητες του Διαχειριστή του Προγράμματος, των Εταίρων του Έργου και των Φορέων Υλοποίησης του Έργου. Ωστόσο, όσον αφορά την Εθνική Αρχή Διαφάνειας, αυτά τα θετικά αποτελέσματα θα είναι σημαντικά χαμηλότερα από ό,τι είχε αρχικά προβλεφθεί λόγω των μεγάλων μειώσεων στο φυσικό αντικείμενο του PDP2.
- ✚ Οι απαιτούμενες επικοινωνίες και αναφορές, τόσο στα αγγλικά όσο και στα ελληνικά, πραγματοποιούνται όχι μόνο στο πλαίσιο της καθιερωμένης ιεραρχίας των αλληλεπιδράσεων μεταξύ των σχετικών και εμπλεκόμενων αρμόδιων αρχών, αλλά και σε οριζόντιο επίπεδο, με

αποτελεσμα πολύπλοκες δομές επικοινωνίας και αλληλεπικαλυπτόμενες αρμοδιότητες με, κατά συνέπεια, σημαντικά αυξημένο κόστος διαχείρισης.

- ✚ Όλοι οι εμπλεκόμενοι φορείς ανέφεραν εξαιρετική συνεργασία μεταξύ των Φορέων Υλοποίησης, του Διαχειριστή του Προγράμματος, του Εθνικού Σημείου Επαφής, του Γραφείου του Χρηματοδοτικού Μηχανισμού και των Διεθνών Εταίρων, κατά περίπτωση, και τόνισαν τη σημασία της ενίσχυσης των δεσμών συνεργασίας μεταξύ του Δικαιούχου Κράτους και των Δοτριών Χωρών.

#### **Συστάσεις της αξιολόγησης:**

Οι ακόλουθες συστάσεις προκύπτουν από την αξιολόγηση της αποτελεσματικότητας των Έργων και του Προγράμματος, της αποδοτικότητας των πόρων, τις εκτιμώμενες επιπτώσεις, την εκτιμώμενη διάρκεια και βιωσιμότητα των παρεμβάσεων και την αξιολόγηση της διοικητικής ικανότητας του Μηχανισμού και της αποτελεσματικότητας των διαδικασιών υλοποίησης του Προγράμματος. Στο πλαίσιο αυτό, η ανάλυση λαμβάνει υπόψη τα χρονοδιαγράμματα έργων και υποέργων, καθώς και την υποβληθείσα πρόταση τροποποίησης του Προγράμματος που περιλαμβάνει μειώσεις στο φυσικό και οικονομικό αντικείμενο του Προγράμματος, όπως περιγράφεται αναλυτικά στην έκθεση αξιολόγησης.

- **Σύσταση 1:** Στενή παρακολούθηση του εγκεκριμένου χρονοδιαγράμματος του SP 1 του PDP1 και επιτάχυνση της διαδικασίας ανάθεσης, προκειμένου να αποφευχθούν περαιτέρω καθυστερήσεις στην υλοποίηση του υποέργου.
- **Σύσταση 2:** Στενή παρακολούθηση του εγκεκριμένου χρονοδιαγράμματος του SP 2 του PDP1 και επιτάχυνση της διαδικασίας ανάθεσης, προκειμένου να αποφευχθούν περαιτέρω καθυστερήσεις στην υλοποίηση του υποέργου.
- **Σύσταση 3:** Στενή παρακολούθηση του εγκεκριμένου χρονοδιαγράμματος του SP 4 του PDP1 και επιτάχυνση της διαδικασίας ανάθεσης, προκειμένου να αποφευχθούν περαιτέρω καθυστερήσεις στην υλοποίηση του υποέργου.
- **Σύσταση 4:** Στενή παρακολούθηση του εγκεκριμένου χρονοδιαγράμματος του SP 6 του PDP1 και επιτάχυνση της διαδικασίας ανάθεσης, προκειμένου να αποφευχθούν περαιτέρω καθυστερήσεις που θα μπορούσαν να επηρεάσουν την υλοποίηση και την επίτευξη των στόχων του υποέργου.
- **Σύσταση 5:** στενή παρακολούθηση του εγκεκριμένου χρονοδιαγράμματος του SP 8 του PDP1 και επιτάχυνση της διαδικασίας ανάθεσης, προκειμένου να αποφευχθούν περαιτέρω πιθανές καθυστερήσεις που θα μπορούσαν να επηρεάσουν τους στόχους του υποέργου.
- **Σύσταση 6:** Στενή παρακολούθηση του εγκεκριμένου χρονοδιαγράμματος του SP 1 του PDP2 και επιτάχυνση των διαδικασιών διευθέτησης των εκκρεμοτήτων που αφορούν στο φυσικό και οικονομικό αντικείμενο της συμφωνίας με τον ΟΟΣΑ, προκειμένου να αποφευχθούν περαιτέρω πιθανές καθυστερήσεις που θα μπορούσαν να επηρεάσουν την επίτευξη των στόχων της Πράξης.
- **Σύσταση 7:** Στενή παρακολούθηση του εγκεκριμένου χρονοδιαγράμματος του SP 5 του PDP3 και επιτάχυνση της διαδικασίας ανάθεσης, προκειμένου να αποφευχθούν περαιτέρω καθυστερήσεις στην υλοποίηση του υποέργου.

- **Σύσταση 8:** Στενή παρακολούθηση του εγκεκριμένου χρονοδιαγράμματος του SP 6 του PDP3 και επιτάχυνση της διαδικασίας ανάθεσης, προκειμένου να αποφευχθούν περαιτέρω καθυστερήσεις στην υλοποίηση του υποέργου.
- **Σύσταση 9:** Στενή παρακολούθηση της προόδου του φυσικού αντικείμενου όλων των PDPs και προσαρμογή του φυσικού αντικείμενου του έργου “Ενέργειες στήριξης Διαχειριστή Προγράμματος «Χρηστή Διακυβέρνηση, Θεσμοί και Διαφάνεια»” κατά περίπτωση.
- **Σύσταση 10:** Ως απόρροια της προτεινόμενης απένταξης των υποέργων 2 και 3 του PDP2, προτείνεται και η απένταξη της Πράξης τεχνικής υποστήριξης υλοποίησης του PDP2, με τίτλο “Ενέργειες στήριξης της Εθνικής Αρχής Διαφάνειας κατά την έναρξη της υλοποίησης της Προκαθορισμένης Πράξης «Ενίσχυση του πλαισίου για την ακεραιότητα, τη διαφάνεια και την καταπολέμηση της διαφθοράς»”. Ο προϋπολογισμός του έργου θα μπορούσε να μεταφερθεί σε άλλες δράσεις τεχνικής υποστήριξης για να παραμείνει άμεσα διαθέσιμος για την κάλυψη πρόσθετων υποστηρικτικών αναγκών.
- **Σύσταση 11:** Με την ολοκλήρωση των εγκεκριμένων Έργων, θα πρέπει να επιλέγονται και να υπολογίζονται κατάλληλα μετρήσιμα δεδομένα που θα επιτρέπουν την αξιολόγηση των ακόλουθων παραμέτρων των Έργων και του Προγράμματος συνολικά: (i) την αποτελεσματικότητα, (ii) την ικανότητα επίτευξης των καθορισμένων στόχων, (iii) την αποδοτικότητα, (iv) τις επιπτώσεις στις υφιστάμενες συνθήκες στην Ελλάδα στους τομείς της αποδοτικότητας, ακεραιότητας και λογοδοσίας του συστήματος δημόσιας διοίκησης στο μέλλον.
- **Σύσταση 12:** Δεδομένης της διαπίστωσης ότι το σύστημα διαχείρισης και ελέγχου είναι υπερβολικά περίπλοκο και «βαρύ», θα πρέπει να αξιοποιηθούν ευέλικτες διαδικασίες για την έγκριση και συμβασιοποίηση έργων χαμηλού προϋπολογισμού.
- **Σύσταση 13:** Συνιστώνται απλουστεύσεις στο εγκεκριμένο σύστημα διαχείρισης και ελέγχου, ιδίως για τις διαδικασίες λήψης αποφάσεων κατά την υλοποίηση έργων που έχουν ήδη εγκριθεί σε προηγούμενα στάδια, όπως στη διαδικασία εξειδίκευσης και κατανομής πόρων του προγράμματος ή για έργα που μπορούν να υλοποιηθούν με ίδια μέσα του φορέα υλοποίησης του έργου. Ωστόσο, είναι σημαντικό να επιτευχθεί ένας αποτελεσματικός συμβιβασμός μεταξύ της στενής συνεργασίας και της επανεξέτασης της επικοινωνιακής ιεραρχίας όλων των σχετικών μερών, προκειμένου να εξασφαλίζονται άριστοι όροι συνεργασίας, όπως αναφέρθηκε από όλες τις εμπλεκόμενες αρχές από την πλευρά του δικαιούχου κράτους.
- **Σύσταση 12:** Δεδομένης της διαπίστωσης ότι το σύστημα διαχείρισης και ελέγχου είναι υπερβολικά περίπλοκο και «βαρύ», θα πρέπει να αξιοποιηθούν ευέλικτες διαδικασίες για την έγκριση και συμβασιοποίηση έργων χαμηλού προϋπολογισμού. Συμβασιοποίηση
- **Σύσταση 13:** Συνιστώνται απλουστεύσεις στο εγκεκριμένο σύστημα διαχείρισης και ελέγχου, ιδίως για τις διαδικασίες λήψης αποφάσεων κατά την υλοποίηση έργων που έχουν ήδη εγκριθεί σε προηγούμενα στάδια, όπως στη διαδικασία εξειδίκευσης και κατανομής πόρων του προγράμματος ή για έργα που μπορούν να υλοποιηθούν με ίδια μέσα του φορέα υλοποίησης του έργου. Ωστόσο, είναι σημαντικό να επιτευχθεί ένας αποτελεσματικός συμβιβασμός μεταξύ της στενής συνεργασίας και της επανεξέτασης της επικοινωνιακής ιεραρχίας όλων των σχετικών μερών, προκειμένου να αποφευχθεί ο συμβιβασμός των άριστων όρων συνεργασίας, όπως αναφέρθηκαν από όλες τις εμπλεκόμενες αρχές από την πλευρά του δικαιούχου κράτους.








## 1. Context of the Programme

### 1.1. The EEA Grants Financial Mechanism 2014- 2021

The **Financial Mechanism 2014–2021 of the European Economic Area (EEA Grants)**, established under the Protocol 38C of the Agreement on the European Economic Area, represents the commitment of the **Donor Countries (Iceland, Liechtenstein, Norway)** to contribute to the reduction of economic and social inequalities within the European Economic Area for the period 2014-2021. The EEA Grants provision has a dual objective; to contribute to a more equal Europe, both socially and economically, as well as, to strengthen relations between the Donor Countries and the 15 Beneficiary States.

The total funding budget for the **2014-2021 Financial Mechanism** that is expected to be granted by the Donor Countries is €2,803,159,190, of which €56,324,324.00 pertains to the Bilateral Relations Fund. The budget concerns the support of 97 Programmes (5,684 projects) within the 15 Beneficiary States: Bulgaria, Croatia, Cyprus, Czech Republic, Estonia, Greece, Hungary, Latvia, Lithuania, Malta, Poland, Portugal, Romania, Slovakia, and Slovenia.

The Financial Mechanism emphasizes the following Priority Areas:

-  Innovation, Research, Education and Competitiveness
-  Social Inclusion, Youth Employment and Poverty Reduction
-  Environment, Energy, Climate Change and low carbon economy
-  Culture, Civil Society, Good Governance and Fundamental Rights and Freedoms
-  Justice and Home Affairs
-  Fund for Regional Cooperation
-  Fund for Youth Employment.

The net allocations secured for the current EEA Grants Programming Period 2014-2021 per Priority Sector are as follows:

**Table 1: Net Allocations by Priority Sector**

Priority Sector	Net Allocations
Justice and Home Affairs	344,746,782.00 €
Innovation, Research, Education and Competitiveness	618,818,703.00 €
Social Inclusion, Youth Employment and Poverty Reduction	382,002,196.00 €
Environment, Energy, Climate Change and low carbon economy	419,964,000.00 €
Culture, Civil Society, Good Governance and Fundamental Rights and Freedoms	449,994,186.00 €
Fund for Regional Cooperation	31,889,375.00 €
Fund for Youth Employment	60,610,625.00 €
Allocation to Hungary	198,505,000.00 €
Other	86,391,385.00 €
<b>TOTAL</b>	<b>2,592,922,252.00 €</b>



## 1.2. The EEA Grants Financial Mechanism 2014–2021 in Greece

In terms of the Beneficiary State of Greece, on October 31, 2017, the Donor countries and Greece signed a **Memorandum of Understanding** (hereinafter referred to as “**MoU**”) for the EEA Financial Mechanism 2014-2021, which concerns the financing of nine (9) new Programmes, based on the country's needs and priorities.

The amount committed to Greece for the Programming Period 2014-2021 is:

- 107,947,500 Euros: EEA Grants (71.43%)
- 10,980,393 Euros: national contribution (28.57%)

As provided in the MoU, these amounts are distributed to **priority areas for Greece**, which are shown in Table 1, together with their net allocations (as revised and reallocated by the second amendment of the MoU).

**Table 2: Net Allocations by Priority Sector for Greece**

A/A	EEA Programmes in Greece 2014-2021	EEA Grants (€)	National Contribution (€)
1	Innovation and entrepreneurship	21,500,000	
2	Roma Inclusion and Empowerment	5,500,000	2,200,000
3	Local development and Fight Against Poverty	7,000,000	
4	Water management	5,200,000	1,300,000
5	Renewable energy sources and energy conservation	10,000,000	3,333,333
6	Good governance, accountable institutions, transparency	7,000,000	1,235,295
7	Strengthening national asylum and immigration systems	16,500,000	2,911,765
8	Asylum and immigration (urgent needs for the reception and identification of new arrivals and accommodation of vulnerable groups)	16,500,000	
9	Citizens society	13,446,115	
	<b>Other Allocations</b>		
	Technical assistance	1,750,500	
	Deposit (Article 1.11)		
	Deposit	1,216,885	
	Bilateral relations fund	2,334,000	
	<b>Net Total Allocations</b>	<b>107,947,500</b>	<b>10,980,393</b>

Under the Joint Ministerial Decision 13249/4-2-2020 (Official Gazette B’ 526), which incorporates the Regulation for the implementation of the Financial Mechanism (FM) of the EEA 2014-2021 (Article 3.2), the **National Focal Point** (“NFP”: National Focal Point) has the overall responsibility for the achievement of the objectives of the EEA 2014–2021 Framework, as well as, for the implementation of the MoU.

### 1.3. Brief Presentation of the Programme «Good Governance, Accountable Institutions, Transparency»

The “**Good Governance, Accountable Institutions, Transparency**” Programme is one of the previously-mentioned nine (9) Greek Programmes financed by the Financial Mechanism 2014–2021 of the European Economic Area (EEA Grants).

The implementation of the Programme is governed by the:

**Official Gazette B/5355/7.12.2020/ Ministerial Decision 124428**, entitled *“Co-financing of the Programme entitled: “ Good Governance, Accountable Institutions, Transparency” (Programme F - Good Governance, Accountable Institutions, Transparency), with acting Programme Operator the Management & Implementation Authority for Information and Communication Technologies (M&IA ICT) of the Ministry of Digital Governance, with co-funding resources from the Financial Mechanism of the European Economic Area (EEA) for the period 2014-2021 and national resources from the Public Investment Program - PDE”*.

This Ministerial Decision determines the financing of the Programme, the description of the institutional framework for its implementation, its eligibility period, etc. At the same time, it includes as an Annex, the **Programme Agreement** between the following parties:

- the EEA 2014-2021 Financial Mechanism Committee (hereinafter referred to as “FMC”); under Article 2.10 of the Programme Agreement, all relevant communication to the FMC is to be directed to the **Financial Mechanism Office**, hereinafter referred to as the “FMO”, which represents the FMC towards the National Focal Point and the Programme Operator in relation to the implementation of the Programme.
- the Hellenic Republic, as it represented by the Ministry of Development & Investments / General Secretariat for Public Investments & the NSRF / Special Service EEA, hereinafter referred to as the “**National Focal Point**”.

The **Organisation for Economic Cooperation and Development** (hereinafter referred to as “OECD”) acts as international partner to the Programme.

The **Programme Operator** under this Programme Agreement is the **Management & Implementation Authority for Information and Communication Technologies** of the Ministry of Digital Governance (hereinafter referred to as “M&IA ICT”).

The aim of the Programme is to strengthen the transparency, efficiency and accountability mechanisms of the Greek public administration, through the digitization of its services, the provision of direct access to it by citizens, the acceleration of its technological modernisation process, the reduction of bureaucracy and the fight against corruption. Furthermore, actions of the Ombudsman are financed through the Programme to deal with maladministration and to better manage problems faced by the public.

The proposed reform actions targeted to the reduction of bureaucracy and the enhancement of the technological modernisation of the public administration services are consistent with the actions of the Programme for integrity against corruption. Moreover, actions to reduce maladministration and

to enhance the efficiency of problem - solving public mechanisms will contribute to and strengthen the goals and results of the Programme.

The Programme promotes the following key areas of intervention to increase the efficiency and transparency of the Greek public sector:

- ❖ Measures contributing to the reform and digitization of the Greek public administration, including the increased provision of e-government services through the development of the Network of Citizen Service Centers (hereinafter referred to through the official Greek acronym as “KEPs”).
- ❖ Measures implemented by the National Transparency Authority (hereinafter referred to as “NTA”) in collaboration with the OECD, with the aim of monitoring the National Anti-Corruption Action Plan 2022 - 2025 (hereinafter to referred to as “NACAP”).
- ❖ Actions by the Ombudsman to strengthen good governance, accountability and the fight against maladministration in the public sector in collaboration with the EU Fundamental Rights Agency (hereinafter referred to as “EU FRA”).

The Programme's net budget amounts to 7,000,000.00€ (85%), with an additional €1,235,295.00 (15%) from National resources (Public Investment Programme/ “PDE”), while €100,000.00 have been allocated from the Programme to the Bilateral Relations Fund.

The main objectives of the Programme together with the corresponding predefined Projects are presented below:

- ❖ Strengthening transparency and integrity in public institutions, which is to be achieved by the predefined Project "**Strengthening of integrity, transparency and anti-corruption framework**".
- ❖ Reduction of maladministration in the public sector, which is to be achieved by the predefined Project "**Greek Ombudsman actions for strengthening good governance, accountability and combating maladministration in the public sector**".
- ❖ Improvement of the efficiency of the public administration, which is to be achieved by the predefined Project "**Organisational Upgrade and Digital Transformation of Citizen Service Centers Network (KEP) and public services provided**".

The predefined Projects chosen in the context of the Programme are specified as follows:

Interim Evaluation of the Programmes Roma Inclusion and Empowerment /  
 Good Governance, Accountable Institutions, Transparency  
 Deliverable 2, Volume B: Final Report - Programme F – “Good Governance, Accountable Institutions, Transparency”

**Table 2: Pre-defined Projects and management action of the Programme “Good Governance, Accountable Institutions, Transparency”**

Predefined Projects and management actions	Project Promoter	Other Partners	Maximum Eligible Costs	EEA 2014- 2021 Grants	National Funds
Programme Management	<i>The Programme Operator shall ensure that payments to projects are made in a timely manner<sup>3</sup></i>	-	823,529.00€	700,000.00€	123,529.00€
PDP1: Organisational Upgrade and Digital Transformation of Citizen Service Centers Network (KEP) and public services provided	General Secretariat of Digital Governance and Simplification of Procedures	<ul style="list-style-type: none"> <li>• Organisation for Economic Cooperation and Development</li> <li>• GRNET-GR</li> </ul>	3,401,765.00€	2,891,500.00€	510,265.00€
PDP2: Strengthening of integrity, transparency and anti-corruption framework	National Transparency Authority	<ul style="list-style-type: none"> <li>• Organisation for Economic Cooperation and Development</li> <li>• United nations Office on Drugs and Crime (UNODC)</li> <li>• Directorate General for the Prosecution of Economic Crimes (SDOE)</li> </ul>	2,000,000.00€	1,700,000.00€	300,000.00€
PDP3: Greek Ombudsman actions for strengthening good governance, accountability and combating maladministration in the public sector	The Greek Ombudsman	<ul style="list-style-type: none"> <li>• European Union Agency for Fundamental Rights (FRA)</li> </ul>	2,010,000.00€	1,708,500.00€	301,500.00€

<sup>3</sup> **Programme Agreement, Operational rules (Annex II) under Official Gazette B/5355/7.12.2020/ Ministerial Decision 124428**, "Co-financing of the Programme entitled: “ Good Governance, Accountable Institutions, Transparency” (Programme F - Good Governance, Accountable Institutions, Transparency), with acting Programme Operator the Management & Implementation Authority for Information and Communication Technologies (M&IA ICT) of the Ministry of Digital Governance, with co-funding resources from the Financial Mechanism of the European Economic Area (EEA) for the period 2014-2021 and national resources from the Public Investment Program - PDE”.

## 2. Programme coherence and compatibility with National and European policies

### 2.1. Evaluation of the continued relevance of the Programme strategy in meeting public sector needs in individual intervention areas

#### 2.1.1. National Strategy for Administrative Reform 2017- 2019

The National Strategy for Administrative Reform 2017-2019 highlights the weaknesses in the operation of the Greek administration that must be addressed in the context of a medium-long-term Action Plan. The inability to plan and implement public policies, the lack of coordination, the insufficient utilisation and irrational distribution of human resources, the problematic regulatory environment, the lag in e-government systems, the absence of modern methods, techniques and administration tools etc. are some of the main issues facing the public administration that need to be tackled.

The Strategy has the following main objectives:

- ✚ **Assessment procedures of Public Administration structures** with the aim of identifying measures expected to improve the quality of services provided or the efficiency and reliability of administrative structures, drawing up staffing plans for all agencies and establishing functional organisational charts.
- ✚ **Establishing legislation for the management and the simplification of administrative procedures**, as well as, providing the basic directions of the procedures to be followed by bodies and services, with the aim to simplify and redesign the relevant administrative procedures, with the use of the appropriate tools and techniques.
- ✚ **Serving citizens and businesses**, through actions such as the collection of measurements of the degree of digitalization of the services provided in Greece, with the cooperation of OECD for the digitization of files, the promotion of the electronic self-service search of supporting documents and the provision of online services, the expansion of the Citizens' Service Centers (CSCs/ "KEPs"), etc.
- ✚ **Transparency, accountability, and open governance**, with the aim to enhance citizen participation in decision-making processes through public consultation, evaluation tools and open data platforms
- ✚ **Combating Corruption**, through a number of actions including the mapping of competent bodies, the strengthening of the Ministries' Internal Audit Units, the reorganisation of Auditing Bodies, as well as, the design of specialised educational Programmes to combat corruption.

The strategy also seeks to implement a series of technical adjustments, in order to expand actions that are already implemented, with the aim of modernising public administration, accelerating the current vision, strengthening the achievements achieved so far and completing the required steps for a radical reform of the culture in the services provided to the public, businesses, etc. Beyond the administrative benefits for improving the operation of the public administration, the necessary interventions will push for further control of the cost of the services provided, improvement of the budgetary sizes, strengthening of the effectiveness and efficiency of public expenditure, as well as, a reduction of its bureaucratic burden.

The strategy is organized under the following Axes:

1. **Axis 1: Formulation and implementation of policies:** This axis includes a framework of actions aiming at strengthening the systems of formulation and implementation of public policies.
2. **Axis 2: Structures and Procedures:** This axis includes the fundamental interventions concerning the evaluation, redesign and improvement of the organisation’s structures and procedures. Areas of action in the context of analysis of the existing situation, but also of the development of strategic planning are identified as beneath:
  - ✚ Structures
  - ✚ Management and simplification of processes
  - ✚ Serving citizens and businesses
3. **Axis 3: Local Self-Government:** This axis includes planning and initiatives for the organisation and operation of Local Government, based on strengthening the responsibilities of local authorities, as well as, of the staff of central state structures.
4. **Axis 4: Human resources:** This axis includes all policies and interventions concerning the management, utilisation, service situation, evaluation and development of the human resources of the public sector. This is a particularly broad axis in the context of which the following special areas are included:
  - ✚ Recruitment planning
  - ✚ Employment status management and human resource mobility
  - ✚ Management of senior executives
  - ✚ Evaluation and development of human resources
5. **Axis 5: Regulatory Governance:** This axis includes the policies for the implementation of the Principles of Good Legislation, measures to deal with the maladministration, as well as, measures for the codification and citizens' access to legislation.
6. **Axis 6: Transparency, accountability and open governance:** This axis includes the policies and actions concerning the participation of citizens in the administrative process, as well as, access of citizens to data, elements and information of public services.
7. **Axis 7: Electronic Government Strategy:** The axis includes policies and individual strategies for the promotion of electronic government, on the basis of the national digital strategy prepared by the General Secretariat of Digital Policy.
8. **Axis 8: Combating corruption:** This axis describes the objectives and actions taken within the framework of the National Anti-Corruption Action Plan 2022 - 2025.

Interventions of the Programme F: “Good Governance, Accountable Institutions, Transparency” of the EEA Financial Mechanism 2014-2021, through its predefined projects, are all in relevance with the goals and forecasts of The National Strategy for Administrative Reform 2017-2019. In particular:

- ✚ the interventions of the Programme concerning the measures that contribute to the reform and digitisation of the Greek public administration, including the increased provision of e-government services through the development of the CSC Network (predefined Project: "Improving the efficiency of public services") are in absolute relation with the following Special Objectives of Action Sector C: Serving citizens and businesses of Axis 2: Structures and Procedures of the National Strategy:

- 2G.ES1: Development of alternative ways of processing citizens' requests
- 2C.ES2: Utilisation of new technologies and digitisation of processes, and
- 2G.ES3: Strengthening and upgrading of one-stop services.

The provisions of the National Strategy for Administrative Reform to upgrade the institution of the Citizen Service Centers (CSCs), to enrich the services provided and to digitize their operation are served by specific actions of the relevant predefined project.

✚ the interventions of the Programme that serve the objective "Strengthening transparency and integrity in public administration" (predefined Project: "Strengthening the framework of integrity, transparency and combating corruption") are in absolute relation with the following Objectives of Axis 8: Combating corruption of the National Strategy:

- 8.S1: Upgrading the role and capabilities of the control mechanisms and the merger of the main ones with the aim of the best and fastest results, the best organisation, as well as, the saving of financial resources
- 8.S2 Better coordination and exchange of information between control mechanisms
- 8.S3 Adoption of international auditing standards by auditing bodies and carrying out regular audits
- 8.S4 Introduction of information systems so that there is a real-time dissemination and management of information between the control mechanisms

✚ The interventions of the Programme to serve the objective of "Reducing maladministration in the public sector" (predefined Project: "Actions of the Greek Ombudsman to strengthen good governance, accountability and the fight against maladministration in the public sector") are indirectly related to the General Objective 6.GS2: "Strengthening the transparency and accountability of administrative action" of Axis 6: "Transparency, accountability and open governance of the National Strategy for Administrative Reform". This objective is served through strengthening the role, infrastructure and services of the Greek Ombudsman to enhance its contribution to good governance, accountability and the fight against maladministration in the public sector, as well as, better management of citizens' problems.

### **2.1.2. National Digital Strategy 2016- 2021**

According to the National Digital Strategy 2016-2021, although the global economy is rapidly evolving into a digital one, our country lags significantly behind in the degree of ICT penetration and expansion in the country. In particular:

- ✚ Regarding the digital skills of the human resources (Score: 0.432 – average EU 28: 0.591): the population group over 55 years old, which also constitutes the majority of the 30% of the population that has never used the internet, lags significantly behind the corresponding EU average in digital skills.
- ✚ Regarding the digital services of the Government (Score: 0.462 – average EU 28: 0.554): there is a lag in the provision of integrated services to citizens, businesses and other Government services.
- ✚ Regarding the Digital Readiness Index (Networked Readiness Index), Greece ranks 70th among 139 countries, according to "The Global Information Technology Report 2016" of the World Economic Forum.

To serve the goals of the National Digital Strategy and to improve the above indicators in a period of time when the available public intervention resources are limited, specific directions are recognised in which the effort should be focused, namely:

- ✚ The high availability and penetration of New Generation broadband services,
- ✚ The utilisation of ICT to support essential reform actions, both in the direction of providing integrated services to citizens and businesses with a focus on high-demand services, and of strengthening the efficiency of the Public Administration. An essential component of this effort is the radical change and modernisation of the way ICT projects are planned and procured by the State.
- ✚ Supporting the digital transformation of businesses in the sectors - pillars of the Greek economy. A key point in this direction is the coordination of actions so that they simultaneously aim at strengthening both supply (on the part of the ICT sector) and demand (on the part of companies in the other pillar sectors).
- ✚ The development of the ICT sector as an internationally competitive sector of the economy.

For ICT to be a driver of economic development strengthening of employment, especially in highly specialized sectors, a key factor for more effective and efficient Public Administration, as well as, the means for improving the quality of life of citizens and the strengthening of social cohesion<sup>4</sup> several areas of intervention are provided:

1. Radical Review of the way of providing Digital Public Services, where it is required to change the overall framework of planning and implementation of IT projects of the public, with a shift towards the adoption of flexible implementation methods, the holistic treatment of needs (from the phase of initial conception to the phase of definitive retirement of systems after the completion of their useful life cycle) and the adoption of standards and modern methods and procedures in all individual phases of their life cycle. These changes are estimated to contribute to the improvement and restructuring of the country's overall ICT ecosystem.

Its main priorities are the following:

- Priority 1: Unified design and effective implementation model for the new Projects
  - Priority 2: Utilisation of cloud infrastructures (Cloud)
  - Priority 3: Development of Structural elements of Public Digital Services
  - Priority 4: Enforcing Interoperability
  - Priority 5: Improving public registries and open data
  - Priority 6: Integrated services to citizens and businesses
  - Priority 7: Horizontal solutions for horizon problems
2. Strengthening the human potential with digital capabilities since the human factor is the driving force for the development of the digital economy and the integration and diffusion of its benefits in the Greek society and economy.

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<sup>4</sup> Page 4, “National Digital Strategy, 2016- 2021”, General Secretariat of Digital Policy, Ministry of Digital Policy, Telecommunications and Information (December 2016)



Its main priorities are the following:

- Priority 1: Support Research and development
- Priority 2: Strengthening digital skills in schools
- Priority 3: Emphasis on lifelong learning.

In the same context as the National Strategy for Administrative Reform, the National Digital Strategy covers horizontally all three predefined Projects of the Programme F: “Good Governance, Accountable Institutions, Transparency” of the EEA Financial Mechanism 2014-2021. The strengthening of the digital skills of the human resources of the public in general, and specifically among the projects’ beneficiaries, and the upgrading of their digital services, through modern ICT, significantly upgrades their role and their field of action, since it improves the level of their services and consequently their infrastructure and efficiency. Indicatively, the development of electronic applications at the Greek Ombudsman, and the Digital Transformation of the CSCs itself are main factors for the success of their projects, as long as the information provided to citizens is improved, while they gain better access to assert their rights. The technological modernisation of the public administration, through modern equipment and easy-to-use infrastructures, is a crucial factor for the provision of similar services to citizens.

In particular, there is a strong relevance and significant contribution to the Programme's interventions for the satisfaction of the radical revision’s goals of the way the Digital Public Strategy is provided:

- Priority 6: Integrated services to citizens and businesses
- Priority 3: Development of Structural elements of Public Digital Services
- Priority 4: Enforcing Interoperability

There is also an important contribution to meeting the goals for lifelong learning (Priority 3: Emphasis on lifelong learning of the Strategy through the support of digital abilities and skills of the beneficiaries of the Programme).

### **2.1.3. Digital Transformation Bible 2020- 2025**

The National Digital Strategy is reflected in the Digital Transformation Bible 2020-2025, the vision of which is for Greece to realise the necessity of its transition to a digital economy and society and to improve its position in all indicators of digital maturity. The Ministry of Digital Governance has drawn up and is implementing a national strategy for the digital transformation of the entire Greek society and economy with specific objectives and a structured action plan, which reflects the guiding principles, as well as, the necessary short-term and medium-term interventions that will successfully implement the Greek vision for Digital Greece. The new national strategy for digital transformation is summarised in seven objectives:

- ❖ Safe, fast and reliable internet access for everyone,
- ❖ A digital state that offers better digital services to citizens, in all events of their lives,
- ❖ Development of digital skills of all citizens,
- ❖ Facilitating the conversion of every Greek business into a digital business,

- ❖ Supporting and enhancing digital innovation,
- ❖ Productive use of Government data,
- ❖ Integration of modern technologies in all sectors of the economy.

An important dimension of the new strategy is the transformation of the state apparatus, with the aim of strengthening the supply of easy-to-use digital services oriented to the needs of citizens and businesses. To achieve this, the Public Administration places the citizen-user at the Center of the redesign and implementation of the new digital services, applying collaborative and flexible models for the design and implementation of the new digital solutions. At the same time, the modern Public Administration adopts a favorable culture in relation to the implementation of new digital tools and strengthens the digital training of its human resources.

The indicative interventions that are already implemented in the context of digital transformation to achieve the seven individual objectives that have been set are the following:

- ❖ That every citizen can work with speed, reliability, and security on the internet,
- ❖ Serving citizens' needs directly and efficiently through a digital state,
- ❖ Promoting the development of digital skills for all citizens,
- ❖ Help for every Greek Business to become a digital business,
- ❖ Supporting and enhancing digital innovation
- ❖ Release and utilisation of the productive value of public data
- ❖ Integration of modern technologies in all sectors of the economy.

Main guiding principles of digital transformation are the following:

- ❖ Services digital by definition "once only" principle
- ❖ Interoperable by definition
- ❖ Cross-channel digital services with a priority on service via new mobile devices
- ❖ Citizen-centric approach to digital service design for user-friendly services
- ❖ Reuse building blocks and solutions
- ❖ Adoption of open and participatory processes for evaluation and design of digital services
- ❖ De-blocking and universal accessibility
- ❖ Facilitating the cross-border service of citizens
- ❖ Reliability and trust
- ❖ Openness and strengthening of transparency.
- ❖ Developing secure software and systems by design
- ❖ Adoption of flexible models for the design, implementation and procurement of projects and services
- ❖ Simplification of Procedures

The horizontal interventions of the Digital Transformation Bible include digital transformation projects of the Public Administration, open and participatory governance, and the digital transformation of the sectors of the Greek economy in critical sectors (education, tourism, culture, environment and energy, internal and public administration, transport & infrastructures, etc.).

The objectives of all three pre-defined Projects of the Programme F: “Good Governance, Accountable Institutions, Transparency” of the EEA Financial Mechanism 2014-2021 are consistent with both individual objectives for a digital transformation of the state (digital state that offers better, digital services to citizens, development of digital skills of all citizens), main interventions (work of every citizen with security on the internet, development of digital skills, etc.) but also its basic guidelines (adopting open and participatory processes for the evaluation and planning of digital services, reliability and trust in the public administration, openness and strengthening of transparency, simplification of Procedures, etc.). Since the National Digital Strategy 2020-2025 aims towards a “digital leap” of Greece, the individual pre-defined Projects have incorporated activities that defend their goals in such a context.

#### **2.1.4. National Policy on Administrative Procedures (NPAP)**

The National Policy on Administrative Procedures (NPAP) constitutes the single framework for the continuous upgrading of the administrative procedures of the State and the fight against bureaucracy for the benefit of all. The goals of the NPAP are to improve the daily life of citizens and to support economic development without unnecessary administrative burdens for businesses.

The NPAP is based on the following three (3) interrelated pillars:

- ❖ The National Register of Administrative Procedures “Mitos”. Mitos is the national repository of the State's administrative procedures. It aims at standardizing procedures, strengthening transparency and legal security and improving valid and reliable information for citizens and enterprises, as well as, for public servants and officials.
- ❖ The National Programme for the Simplification of Procedures (“EPAD”). A more detailed description of the Programme is given below. The National Process Simplification Programme is the framework for the redesign and simplification of administrative processes. It aims at the continuous improvement of public services provided to citizens and businesses, through the fight against unnecessary bureaucracy.
- ❖ The Bureaucracy Observatory, which is the evaluation and documentation mechanism of the National Administrative Procedures Policy. It measures the impact of simplification actions on administrative burdens and red tape and to publish relevant reports.

The National Programme for the Simplification of Procedures (NPSP) is the framework for the redesign and simplification of administrative procedures, aiming to the continuous improvement of public services provided to citizens and businesses, through the fight against unnecessary bureaucracy. The NPSP is based on the following three (3) Pillars of Intervention:

**Table 4: Areas of interaction of PSP**

Simple and understandable procedures	Quality and friendly settings	Tell us your suggestions
<ul style="list-style-type: none"> <li>• Administrative redesign and simplification of procedures,</li> <li>• Digitization and upgrading of public services,</li> <li>• Strengthening of one-stop services.</li> </ul>	<ul style="list-style-type: none"> <li>• Improving the legislative and regulatory framework,</li> <li>• Administrative and legislative codification, Improving the regulatory function of the administration</li> </ul>	<ul style="list-style-type: none"> <li>• Improving the interaction between citizens and the State,</li> <li>• Highlighting areas of intervention and adopting proposals for the better functioning of the Public Administration.</li> </ul>

Today, the “EPAD” includes 152 actions in several policy areas, 29 of which concern citizens & everyday life, 12 of them concern the state, administration and organisation, and 4 of them concern business activity. At the same time, it includes projects related to administrative and legislative codification, as well as, the improvement of legislation and the law-preparatory process.






















The predefined Project PDP 1 "Organisational Upgrade and Digital Transformation of Citizen Service Centers Network (KEP) and public services provided" (MIS 5114175) of the Programme F: “Good Governance, Accountable Institutions, Transparency” of the EEA Financial Mechanism 2014-2021 is in synergy with the National Administrative Procedures Policy (National Registry of Administrative Procedures, National Process Simplification Programme), as CSCs operate as a single registry service "channel". At the same time, its primary aim is to reduce bureaucracy in citizens' dealings with the state and to simplify administrative procedures, in consistency with the main Pillars of the National Administrative Procedures Policy.

**2.1.5. Action Plan for e-Governance 2014- 2020**

The "Action Plan for e-Governance 2014-2020" is thematically connected to the Programme under evaluation. This Plan promotes the modernisation of the state and the administration, the reconnection of the citizen with these structures, the promotion of electronic governance, etc., through the planning and achievement of a series of actions that are presented in the table below:

**Table 5: Targets of the Action Plan for e-Governance 2014- 2020**

Modernisation of the state and administration	
Objective 1: Simplifying Processes using ICT	<ul style="list-style-type: none"> <li>• Interoperability of information systems</li> <li>• Dissemination actions and mandatory implementation of the E-Government Service Provision Framework in all actions and projects of Public Administration bodies</li> <li>• Development of a system for measuring, evaluating and continuously improving the performance of electronic services</li> </ul>

Objective 2 Electronic Document Management – Digitilisation of Processes	<ul style="list-style-type: none"> <li> Open, transparent and secure circulation of public documents</li> <li> Computerisation of simplified operational procedures of Public Administration Agencies</li> </ul>
Objective 3: Unified Management of Public Administration Resources	<ul style="list-style-type: none"> <li> Creation of a single digital infrastructure for Human Capital Management (HRMS)</li> <li> Operation of a single financial and budgetary management system – ERP</li> <li> Preparation of an integrated policy for procurement, use and operation, management and maintenance of the basic information infrastructure and services of the Government</li> <li> Preparation of a strategy for the development of government cloud computing services (Greek Cloud Strategy) for the Public Administration</li> </ul>
<b>Reconnecting the Citizen with the State and Public Administration</b>	
Objective 4: Unified Management of State-Citizen-Business Relations	<ul style="list-style-type: none"> <li> Operation of a citizen relationship management service delivery system (CRMS)</li> <li> Operation of the National Electronic Public Procurement System</li> </ul>
Objective 5: Creation of a Single Point of Access to Public Sector Services	<ul style="list-style-type: none"> <li> Upgrading the Central Single Access Portal to Public Sector Services</li> </ul>
Objective 6: Citizen Authentication	<ul style="list-style-type: none"> <li> Finalisation of the citizen authentication method</li> <li> Establish appropriate authentication infrastructures</li> </ul>
Objective 7: Participatory Democracy	<ul style="list-style-type: none"> <li> Widening the application of systems that promote transparent procedures in Public Administration access and participation for all citizens</li> <li> Improving the legislative framework for citizens' access and participation</li> </ul>
Objective 8: Digital Inclusion and Digital Literacy	<ul style="list-style-type: none"> <li> Digital training of citizens</li> <li> Strengthening the digital training of ALL Public Administration executives</li> </ul>
<b>Coordination of Horizontal Policies in Public Administration</b>	
Objective 9: Interconnection of Basic Public Administration Registers	<ul style="list-style-type: none"> <li> Interconnection of key registers</li> <li> Interconnection of Commercial Registers</li> </ul>
Objective 10: Open Availability of Public Information	<ul style="list-style-type: none"> <li> Strengthening institutional framework and infrastructure for open public data</li> <li> Strategic alliance with Anti-Corruption Authorities and Services</li> </ul>
<b>Vertical Sectors of e-Government</b>	
Objective 11: E-Government Actions in the Vertical Sectors	<ul style="list-style-type: none"> <li> Actions for the Rational Utilisation of ICT for the implementation of Electronic Government</li> <li> Elimination of Overlaps / Repetitions in E-Government Actions</li> <li> Projects - Champions</li> </ul>

### **2.1.6. National Anti-Corruption Action Plan 2022-2025**

With the Official Gazette 138/13.07.2022/ Ministerial Decree A 12.07.2022, the **National Anti-Corruption Action Plan 2022-2025** (hereinafter referred to as “NACAP”) for the period 2022-2025 was approved. NACAP constitutes the national strategy for the comprehensive treatment of the

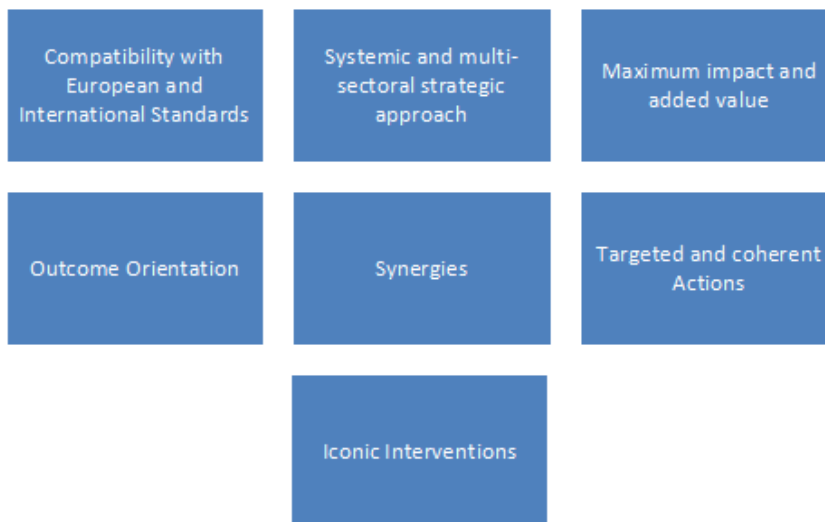
phenomenon corruption for the reference period and is a dynamic policy tool with a four-year horizon for the planning, implementation, monitoring and evaluation of horizontal and sectoral actions and an integrated mechanism for coordinating the action of public policy bodies in the context of which synergies are developed with the private sector and the civil society. It includes a coherent set of actions, interventions and projects that aim to prevent and deal with the phenomenon, to strengthen transparency, integrity and accountability and to systematically inform and raise awareness of society on issues of corruption.

Having as vision the consolidation and further deepening of the principles of Integrity, Accountability and Transparency in the operation of the state, society and the economy, the main objectives of the strategy are the following:

- ❖ Strengthening citizens' trust in democratic institutions,
- ❖ The systematic improvement of Greece's performance in international and European indicators and evaluations,
- ❖ The contribution to the steady improvement of the investment climate.

The fundamental planning principles of the NACAP are the following:

**Chart 1: Basic Planning Principles, 2022- 2025**



The achievement of the objectives of the NACAP 2022–2025 is sought through the implementation of one hundred and twenty-nine (129) actions, which were selected after extensive consultation and cooperation with twenty-four (24) competent policy bodies.

With the implementation of the actions of the NACAP, the aim is to:

- ❖ improve the effectiveness of control mechanisms,

- ❖ develop of a modern system of public integrity, leverage a digital infrastructure as a background for interoperability and the implementation of e-government in the field of preventing and fighting corruption, and
- ❖ strengthen inter-agency coordination and the development of synergies with the private sector and with civil society bodies.

According to the NACAP 2022-2025 Implementation progress Report 2nd Semester 2022, from the total of 129 actions of the NACAP, ten (10) actions have been completed, eighty-three (83) are in progress and thirty-six (36) actions have not yet started.

The NACAP shows particular coherence with the project "Strengthening the framework for Integrity, Transparency and the Fight against Corruption". The Project Promoter is the National Transparency Authority. Given that one of the goals of the NACAP is to monitor at national, European and international level the progress of the country in matters of prevention and combating corruption, this alone is a key political and strategic priority of the authorities.

As stated in the technical bulletin of the Project, in which the NACAP is explicitly referred to as its strategy framework, the objectives of its actions concern:

- a. the formation of an integrated framework for the promotion of integrity, the prevention of unethical behaviors and the promotion of good governance, as well as,
- b. the strengthening the framework and modernising mechanisms and tools for the recovery and management of assets, to improve coordination and cooperation between the competent authorities, to facilitate and speed up procedures, with the ultimate goal of rational, transparent and efficient use and management of national resources and public property, in the effort for sustainable economic development.

**Table 6: Implementation path per strategic objective**

	Upgrading the audit work to combat fraud and corruption phenomena	Strengthening integrity, accountability and transparency	Systematic information and public awareness	TOTAL
Completed	4	5	1	10
Ongoing	36	40	7	83
It hasn't been initiated	9	19	8	36
Total	49	64	16	129

**2.1.7. Disability Rights Strategy 2021- 2030**

This Strategy is an outgrowth of the European Pillar of Social Rights, which, since its 2017 proclamation by the European Parliament, the Council and the Commission, acts as a compass for employment and social policies.

In implementation of this strategy, Greece has adopted the National Action Plan for the rights of persons with disabilities (hereinafter referred to as “NAP”), a 'road map' that provides a clear,

coherent and systematic framework of action mainly for the period 2020-2023, which however, extends throughout the 2021-2027 Programming Period.

It is noted that all interventions of the Programme F: “Good Governance, Accountable Institutions, Transparency” of the EEA Financial Mechanism 2014-2021 concerning the upgrade of the EU-GO portal, as well as, the studies, proposals and systems developed are compatible with obligations deriving from EU Directives and Disability regulations, especially in relation to accessibility to infrastructure and public websites, to digital tools in the design of services, respecting the basic principle of the National Action Plan for universal accessibility (physical and digital) of persons with disabilities in services and infrastructure.

It is expected that through the implementation of the interventions of NAP the services provided by the KEPs to people with disabilities will be further upgraded (Objective 6 of the NAP). European policies also promote digital transformation and digital public services in an inclusive and accessible way for people with disabilities.

## **2.2. Examination of the complementarity of the Programme with other interventions with a similar objective**

### **2.2.1. Operational Programme "Public Sector Reform 2014- 2020"**

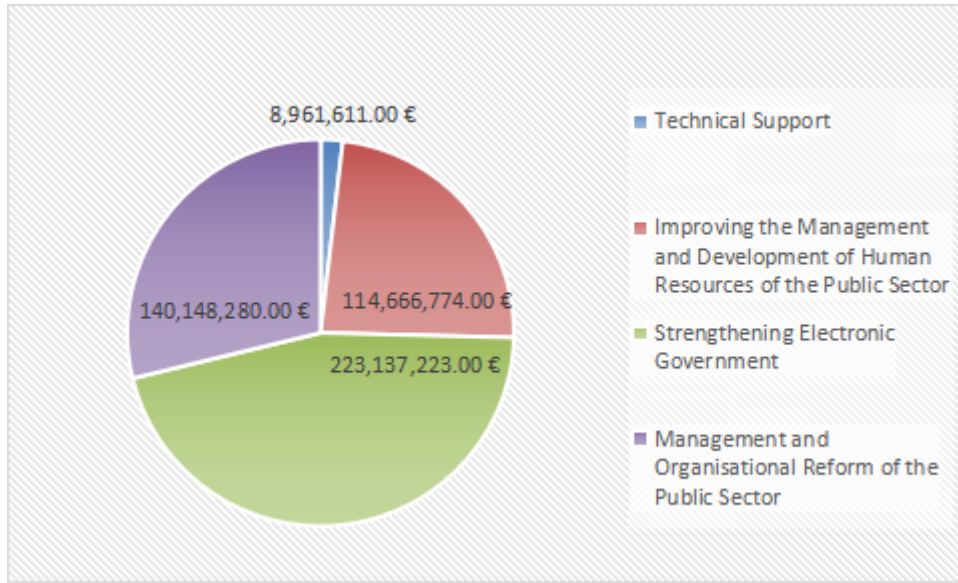
The Operational Programme "Public Sector Reform 2014-2020" is part of the country's overall development vision and strategic approach for the years 2014-2020 and aims at the efficient use of the Structural Funds, the ESF and the ERDF. It is one of the Operational Programmes of the NSRF 2014-2020.

The main objectives of the "Public Sector Reform" Operational Programme 2014-2020 that has a total budget of 486,913,888.00€, are the following:

- ❖ Strengthening the organisational, institutional, and operational capacity of Public Administration and local government through interventions that will change the structure, organisation and operation of services for the benefit of citizens and businesses.
- ❖ Promotion of electronic governance in the Public Sector which, combined with systemic actions and policies will be the main tools for transforming existing processes, improving the services provided and making the Administration more effective and efficient.
- ❖ Development of the human resources of the public sector, through the rational distribution of human resources, the better utilisation of management executives, as well as, the provision of upgraded training/education services, with the aim of the individual development of employees and their response to increased needs.



Chart 2: Thematic Axes of PP “Public Sector Reform”



All the predefined Projects of the Programme F: “Good Governance, Accountable Institutions, Transparency” of the EEA Financial Mechanism 2014-2021 are relevant and complementary to all three main objectives of the OP "Public Sector Reform". The National Transparency Authority acts as a Project Promoter in two successive projects, co-financed by the OP "Public Sector Reform" for strengthening its operational capacity.

Table 7: Projects of NTA under Operational Programme "Public Sector Reform"

MIS	Project Title	Project's Scope	Budget
5076394	Actions to promote the Organisational Change and to strengthen the Digital Transformation of the National Transparency Authority (NTA)	In the context of implementing a wider reform and achieving the strategic goal of the NTA for the effective management of organisational change, through the digital transformation of critical operational functions, the following actions are funded: <ul style="list-style-type: none"> <li>• Supply, installation and operation of an Enterprise Resource Management System,</li> <li>• Digitization, electronic filing and documentation of the file of audit and administrative-financial cases aims at the computerized organisation of the file of the NTA and</li> <li>• The development of a Transparency Register in the context of the implementation of legislative regulation of the activities of influence groups (lobbying), simultaneously strengthening the accountability of the country's institutions towards the citizens.</li> </ul>	239,733.33€
5060693	Technical Advisor for the National Transparency Authority (NTA)	The aim is to support the Directorate of Strategic Planning and Behavioral Analyses of the NTA with a Technical Advisor, to assist in its work, to mature and submit proposals for co-financing to the OP. "Public Sector Reform".	49,600.00€

		<p>These proposals constitute a coherent set of actions, with the aim of strengthening the operational capacity and upgrading the auditing work of the NTA with broad coordinating and auditing responsibilities and the required guarantees of independence and impartiality, which aims to strengthening:</p> <ul style="list-style-type: none"> <li>a) transparency, integrity and accountability,</li> <li>b) prevention, detection and treatment of corruption phenomena and</li> <li>c) awareness of common knowledge against corruption.</li> </ul>	
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**2.2.2. Recovery and Resilience Facility- National Recovery and Resilience Plan “Greece 2.0”**

The National Recovery and Resilience Plan "Greece 2.0" (hereinafter referred to as “NRRP”), aspires to trigger a fundamental change in the country's economic model towards a more extroverted, competitive and green development model, with a more efficient and digitized state, less bureaucratic, with a drastically reduced underground economy, with a tax development-friendly system with a quality and effective social protection network accessible to all.

There is a strong relevance of the Programme F: "Good Governance, Accountable Institutions and Transparency" of the EEA Financial Mechanism 2014-2021 to the objectives of Pillar 2: “Digital Transformation of the National Recovery” of the NRRP.

Pillar 2 reflects the specific goals and structured action plan of the national Digital Transformation Bible 2020-2025 (DTB). The DTB is closely aligned with the three key objectives of “Shaping Europe’s digital future” namely:

- a) Technology that works for people: the DTB prioritises interoperability in the design of public services for their seamless operation to the benefit of citizens and businesses.
- b) A fair and competitive economy: the DTB supports the digitization of the Greek economy by building up the aforementioned key digital enablers (i.e. digital skills, digital infrastructure, digital services).
- c) An open, democratic and sustainable society: the DTB’s Open Public Sector Information policy increases the availability of open data and facilitates their use with due regard for the rules on data protection. The DTB also envisages actions for transparency and open government.

The key challenges and objectives, as well as, the fundamental reforms and investments are grouped in the following three components that aim to improve digital performance, as measured by the various dimensions of the Digital Economy and Society Index (DESI).

1. Component 2.1 – Connect: The purpose of this component is to cover the distance in very-high-speed connectivity, achieve Greece’s gigabit society targets and improve its digital competitiveness.
2. Component 2.2 – Digital transformation of the state aims to modernise the public sector by improving its operating model and providing improved, quality services to citizens and businesses.

3. Component 2.3 – Digital transformation of businesses aims to strengthen the adoption of digital technologies by businesses, reducing the "digital divide" between Greek small and medium-sized enterprises (SMEs) in relation to their counterparts in the European average.

The following interventions of the Programme F: "Good Governance, Accountable Institutions and Transparency" of the EEA Financial Mechanism 2014-2021 are relevant to:

- a) the directions of the European Digital Strategy for "technology that supports people" and "open, democratic and sustainable society"
- b) the Axes 2.1 - Connectivity for citizens, businesses, the state and 2.2 - Digital transformation of the state of the NRRP.

Furthermore, the complementarity of the interventions of Programme F with the NRRP "Greece 2.0" Plan is noted in the part of the modernisation and upgrading of the infrastructure and services provided by the CSCs ("KEPs"). In particular, the Ministry of Digital Governance has already included it in the "Greece 2.0" Plan, and implements a Project entitled "Modernisation of the CSCs" that concerns the Citizen Service Centers of the entire country which includes:

1. Renovation of the building infrastructure of the CSCs (renovations of floors, lighting fixtures, installation of inscriptions, etc.),
2. Supply of tablets for the use of the gov.gr wallet application for the control of electronic documents submitted by citizens to the CSCs, and
3. Actions to modernise the information infrastructures of CSCs which include:
  - Supply of IT equipment (PCs, Printers, tablets for the use of the gov.gr wallet application) for the users of the CSC.
  - Implementation of a visitor's management system in 200 such Centers with the highest traffic.
  - Supply of tablets through which an application will be available for the signature of documents by the citizens, which will also serve as an evaluation application of the services to be used by the public.

### 3. Evaluation of the Programme’s effectiveness

#### 3.1. Presentation of Projects

This section presents the main characteristics of the approved projects of the Programme, as of **27 January 2023**, the output and outcome indicators and the expected results and benefits from the implementation of the projects and the Programme, as a whole.

#### 1 PDP1: Organisational Upgrade and Digital Transformation of Citizen Service Centers Network (KEP) and public services provided

##### General Information

###### Project Title

Organisational Upgrade and Digital Transformation of Citizen Service Centers Network (KEP) and public services provided

###### MIS

5114175

###### Project Promoter

General Secretariat for Digital Governance and Simplification of Procedures

###### Project Partners

- GRNET S.A. – National Infrastructures for Research and Technology
- Organisation for Economic Co-operation and Development – OECD

###### Budget at Project’s Funding Approval

- Total Public Expenditure: 3,400,000.00 €
- Co-Financing by EEA Grants 2014- 2021 (85%): 2,889,999.74 €

##### Physical Object

###### Activities

The predefined Project "Organisational Upgrade and Digital Transformation of Citizen Service Centers Network (CSC) and public services provided" focuses on improving the efficiency of the public sector, by strengthening the operation of CSCs. It includes the following main Work Packages (WPs):

1. Project Management and Governance Model (DE1)
2. Communication, mobilisation of citizens and stakeholders (DE2)
3. Network optimisation of CSCs, rationalisation of administrative procedures and services of CSCs (DE3)
4. Implementation of electronic signature in the CSC network (DE4)
5. CSC Information System: e-CSC and EU-GO portal (DE5)
6. Reinforcement of CSC employees (DE6)

The Project is analysed in the following Sub-projects:

✚ **SP 1 Project Management:** The Technical Support Consultant for the project assists the General Secretariat in the maturation of sub-projects and in the indicators and the Project’s management and monitoring.

✚ **SP 2: Dissemination-Communication:** Communication and informing public opinion about the actions of the CSCs organisational modernisation and digital transformation and the promotion of the critical role of the EEA tool and the donor countries in its successful implementation. Raising awareness, and employees in the CSCs’ information by highlighting the positive effects of the interventions in their

daily work. Dissemination of the positive results at every level, using every tool to increase the satisfaction of citizens and employees in CSCs.

- ✚ **SP 3 Lessons from comparison of good CSC practices in EU countries:** Study of good practices from other OECD member countries that have one-stop services, to better plan the reorganisation and digital transformation of CSCs. The study will be carried out by the OECD, an organisation with extensive experience in comparative analysis of administrative systems of its member countries.
- ✚ **SP 4 Improvement of the services provided by the CSCs:** Improving the method of evaluation, on a permanent and regular basis, of the services provided by the CSCs, to create a staff feedback mechanism between the Central Service and the individual CSCs and to upgrade the quality of the services provided. Evaluation of existing CSC services focusing on those that can be further simplified, as well as, their accessibility.
- ✚ **SP 5 Improving the organisational, functional and spatial structure of the CSCs:** Improving the organisation and operation of the CSCs through studies highlighting the way of spatial distribution, the basis of the country's geographical fabric and the way specific population groups interact with the CSCs. Highlighting the best way to organise and manage the human resources of CSCs.
- ✚ **SP 6 Implementation of electronic signatures in the CSC network:** According to Law 4821/2021, CSCs can use digitalised handwritten signatures in the transactions of natural persons with them. The sub-project aims to implement a relevant provision, with the supply of appropriate technological equipment and training of users in it.
- ✚ **SP 7 New CSC information system: CSC Back Office (support services and EU-GO portal):** Replacement of the old CSC information system with a new one). It will have the possibility of interoperability with other public systems or necessary registers, such as the National Register of Procedures-Bus, will update-improve the EU-GO portal.
- ✚ **SP 8 Empowering CSC employees:** Creation of supporting material to empower CSC employees, to respond to the administrative and digital transformation of the service.

The Deliverables of the Project are the following:

- D1.1 Administrative and financial management of the Project and ensuring of its quality,
- D1.2 Quarterly reports on the monitoring of the indicators related to the achievement of the project's outcome,
- D1.3 Final report on the monitoring of the indicators related to the achievement of the project's outcome,
- D2.1 Drafting of a communication strategy for the whole operation and promotion plan in the media, social media and the internet - media plan
- D2.2 Organisation of at least six workshops to raise the awareness of at least 700 CSC employees with a geographical distribution to be agreed with the Contracting Authority
- D2.3 Production of audiovisual and printed material to promote the campaign for the new CSC, as follows:
  - ✓ Two TV spots for the new CSC with different content - one for each year of implementation of the act - with two versions per spot - long and short duration
  - ✓ Selection, in agreement with the Contracting Authority, of eighteen services or actions, provided by the new CSCs - nine per year - and production for each service or action of a radio spot and content for use on the internet, social media and print type-national and/or local.
- D2.4 Presentation of the audio-visual material produced by the deliverable 2.3 in the appropriate media. Distribution of the printed material at selected points to be agreed with the Contracting Authority.
- D3.1 Study of Best Development Practices regarding the operation of CSCs in European countries and comparative analysis with the operation of Greek CSCs,
- D4.1 Creation of a permanent assessment mechanism-methodology of the services provided by the CSCs and redesign-simplification of the process of joining new ones or modifying existing ones,
- D4.2 Pilot application of the evaluation methodology to existing CSC services by policy sector (e.g. gov.gr sectors) to be agreed with the Contracting Authority,

- D4.3 Conduct of workshops for participatory planning of public services provided by the CSCs to at least two hundred citizens divided into interest groups (such as the disabled, elderly citizens, island residents, etc.) to be agreed with the Contracting Authority,
- D4.4 Proposals to improve-rationalise and redesign the existing services provided by the CSCs and highlight new services for inclusion in the CSCs and their integration process,
- D5.1 Two evaluation studies of the operation of the network a. of CSC and b. of CSC-EKE until today
- D5.2 Three Studies of regional planning and distribution of CSCs and CSC- EKE into account the geographical specificities of the country and possible thematic CSCs (Continental CSCs, Island CSCs, Thematic CSCs)
- D5.3 Study on the optimal organisational structure and the management and distribution of the human resources of the CSCs.
- D6.1 Biometric data certification and archiving systems for installed and integrated signatures in all CSC branches.
- D6.2 Installed and functional Computers (tablets) with signature pens
- D6.3 Training users in the system
- D7.1 System specifications regarding the new mode of operation of the new Information System
- D7.2 CSC-BO and EU-GO portal (CSC-CSC IS- Information System) in full working order
- D7.3 System control and acceptance, including the user helpdesk
- D7.4 Data Transfer Services
- D7.5 User training in CSC IS
- D8.1 Development of training material for three changes (back office, tablets and new procedures)
- D8.2 Drafting of the Code of Ethics for the employees of the CSCs

**Financial Object**

The final Project’s budget amounts to 3,400,000.00 € (EEA Grants 2014- 2021 co-funding: 2,889,999.74 €) and it is distributed per sub-project as following:

Sub-Projects (SP)	Budget (€)	Contract Inception Date	Contracts (€)	Payments to Project Promoters (€)	Expenditures under Administrative Verification (€)
SP1. Project Management	200,000.00	-	-	-	-
SP2. Dissemination and Communication	520,000.00	-	-	-	-
SP.3. Lessons from comparison of good CSC practices in EU countries	128,000.00	17/12/2021	128,000.00	-	-
SP 4. Improvement of the services provided by the CSCs	350,000.00	-	-	-	-
SP 5. Improving the organisational, functional and spatial structure of the CSCs	300,000.00	-	-	-	-
SP 6. Implementation of electronic signatures in the CSC network	492,000.00	-	-	-	-
SP 7. New CSC information system	1,350,000.00	01/11/2021	1,350,000.00	137,304.60	137,304.60
SP 8. Empowering CSC employees	60,000.00	-	-	-	-
SP9. Monitoring of Sub-project 3 grant transfer	0.00	01/11/2021	0.00	89,600.00	-
<b>TOTAL</b>	<b>3,400,000.00</b>		<b>1,478,000.00</b>	<b>226,904.60</b>	<b>137,304.60</b>

## Benefits

### Direct Benefits

Direct beneficiaries will be the entire population.

The predefined Project will significantly and directly contribute to the improvement of services from the public sector through CSCs to citizens / businesses and therefore to the efficiency of public administration.

The Project will improve the service offerings of the CSC network in a paperless, digital (supplementing gov.gr during citizen channel migration) standard service desk for all public services.

The upgraded network architecture will fully meet current and future social and economic needs.

### Contribution to Programme’s Indicators

#### OUTPUT INDICATORS

Indicator	Measurement unit	Target Value
Share of all CSC offices nationwide that are re-organised	Percentage (%)	100.00
Number of completed co-evaluations of CSC network operations	Number	2.00
Number of completed studies on CSC reorganisation	Percentage (%)	3.00
Share of all processes offered by CSC offices that are updated	Percentage (%)	100.00
Number of tablets installed in CSC front offices with embedded software for digitalisation of initials and signatures	Number	1,134.00
CSC information system developed	Number	1.00
Share of EU GO platform content updated	Percentage (%)	100.00
Share of data migrated into the integrated platform CSC-IS	Percentage (%)	100.00
Number of attendees in awareness raising workshops for employees	Number	664.00
Number of training modules for CSCs employees' training developed	Number	3.00
Code of ethics for CSC employees adopted	Yes (1)/ No(0)	1.00
Number of awareness raising workshops for employees organised	Number	6.00
Number of awareness raising campaigns for citizens organised	Number	30.00
Number of citizens engaged in service design workshops	Number	200.00

#### RESULTS INDICATORS

Indicator	Measurement unit	Target Value
Share of all public services that are provided via CSCs	Percentage (%)	50.00
Level of CSC employees' satisfaction of the functionality, usability and efficiency of CSCs	Scale 1- 10	9.00
Level of citizen's satisfaction of EUGO and of CSC offices	Scale 1- 10	9.00
Level of citizen's satisfaction of EUGO and of CSC offices	Scale 1- 10	9.00
Share of all citizens requests for public services to CSC offices that are delivered digitally	Percentage (%)	80.00
Share of all EU-GO service delivery requests that are delivered through CSCs	Percentage (%)	40.00

## 2 PDP2: Strengthening of integrity, transparency, and anti-corruption framework

### General Information

#### Project Title

Strengthening of integrity, transparency and anti-corruption framework

#### MIS

5109507

#### Project Promoter

National Transparency Authority (NTA)

#### Project Partners

- Organisation for Economic Co-operation and Development – OECD
- United Nations Office on Drugs and Crime (UNODC)

#### Budget at Project's Funding Approval

- Total Public Expenditure: 1,998,640.59 €
- Co-Financing by EEA Grants 2014- 2021 (85%): 1,698,844.50 €

### Physical Object

#### Activities

The Project aims to support the effective implementation of the priorities of the National Anti-Corruption Action Plan, which constitutes the national framework for planning and monitoring the implementation of policies and actions to prevent and combat corruption phenomena, as well as, a key tool for monitoring the country's compliance with the requirements of the European Semester and the binding recommendations of international organisations, aiming to promote integrity, transparency and accountability in public life.

Since August 2019, the preparation, monitoring, evaluation and redesign of the NACAP are the responsibility of the NTA, which is established with the provisions of articles 82 to 103 and 118- 119 of Law 4622/2019 "Staff State: organisation, operation and transparency of the Government, government bodies and the central public administration", as an Independent Authority with extensive responsibilities in anti-corruption matters and purpose:

- a) the strengthening of integrity, transparency and accountability in the action of public organisations
- b) the prevention, detection and treatment of acts of fraud and corruption in the actions of public and private bodies and organisations
- c) achieving measurable results in the fight against corruption
- d) the awareness of citizens in the fight against corruption.

Through the Predefined Project "Strengthening of integrity, transparency and anti-corruption framework", the NTA seeks a broad intervention in the field of transparency and integrity through: a) the introduction of a national framework for integrity in the public sector b) the modernisation of asset recovery and management procedures, as the main tools to prevent and fight organised economic crime and corruption.

The object of this predefined Project is:

- ✚ Strengthening of the National Framework for Integrity in the public sector (sub-project 1), through actions to support the implementation of the Memorandum of Cooperation between the Ministry of Interior and the NTA for the introduction of a National System of Public Integrity. The sub-project will be implemented in collaboration with the OECD. It includes actions to enrich and improve the



regulatory framework and to upgrade the tools for the effective implementation of the NACAP, in accordance with international standards.

- ✚ Improvement of the framework and procedures for asset recovery and management (sub-project 2) through the provision of regulatory and technical guidance to strengthen the institutional and operational framework for asset management and the organisation of actions to upgrade operational capacity and coordination of entities with responsibility for asset management. The sub-project is implemented in collaboration with the Ministry of Finance and the UN Office on Drugs and Crime (UNODC).
- ✚ The design and procurement of an Integrated Information System for the Management of Assets, which will meet the operational requirements of those responsible for the identification, recovery, collection, management and utilisation of assets derived from criminal activities, will strengthen the coordination of the agencies and speeds up management processes. The sub-project is implemented in collaboration with the Ministry of Finance.

### Deliverables

#### SUB-PROJECT 1

- D.1: One (1) Electronic Registry for the registration of representatives of interest and the monitoring of their activities (e-lobbying registry).
- D.2: One (1) Specialisation Report of the basic operating principles of the Registry.
- D.3: One (1) Information Package for Registry users (registered and prospective members) and the public.
- D.4: One (1) report documenting good practices - at national and international level - for identifying, disclosing, prevention and management of cases and risks of conflict of interest.
- D.5: One (1) Report with legislative proposals, good practices and tools for conflict-of-interest management.
- D.6: One (1) Report with directions for strengthening the integrity of elected officials in Municipalities, using behavioral analysis tools.
- D.7: Sixteen (16) video webinars for civil servants
- D.8: One (1) Review report of integrity violations and policies to deal with them in emergency/force majeure situations.
- D.9: One (1) handbook to enhance integrity in decision-making in emergency/force majeure situations.
- D.10: A survey (in two phases) to measure the impact of the implementation of the National Integrity System.

#### SUB-PROJECT 2

- D.1: One (1) Report with proposals for the improvement of policies for the management and disposal of confiscated, frozen and confiscated assets.
- D.2: One (1) Report for the presentation of good practices of EU member states/UNCAC member countries regarding the design and operation of information systems for asset management.
- D.3: One (1) Report for the presentation of regulatory interventions of EU member states/UNCAC member countries in the field of asset management
- D.4: One (1) Report with proposals for highlighting issues that can be improved, standardizing procedures and strengthening the organisational structure of the competent asset management service (AMO) for the effective exercise of its responsibilities.
- D.5: One (1) Report with proposals for the promotion and strengthening of coordination and cooperation.
- D.6: One (1) Asset Management Procedures Manual adapted to the national context.
- D.7: Two (2) educational actions (Organisation and conduct of workshop/training)

**SUB-PROJECT 3**

- D.1: Elaboration of a Specialisation Study of the technical specifications of the MIS
- D.2: Software development, installation and commissioning of the MIS
- D.3: Test and pilot operation services
- D.4: Production operation support, System maintenance and documentation
- D.5: Education, Promotion and Publicity Services

**Financial Object**

The final Project’s budget amount is 1,998,640.59€ (EEA Grants 2014- 2021 co-funding: 1,698,844.50 €) and is divided per sub-project as follows:

Sub-Projects (SP)	Budget (€)	Contract Inception Date	Contracts (€)	Payments to Project Promoters (€)	Expenditures under Administrative Verification (€)
SP 1. Strengthening the National Framework for Integrity in the Public Sector	700,000.56	-	484,037.00	-	-
SP 2. Improving the framework and processes for asset recovery and management	297,960.03	-	-	-	-
SP 3. Supply of an Integrated Asset Management Information System	1,000,680.00	-	-	-	-
SP 4. Grant Transfer	0.00	-	-	-	-
<b>TOTAL</b>	<b>1,998,640.59</b>		<b>484,037.00</b>	<b>0.00</b>	<b>0.00</b>

**Comments:**

Out of the total Project Budget (1,998,640.59€), only part of Sub-Project 1 has been contracted due to the reduction of Sub-Project 1 from 700.000€ to 484.037€ due to execution of deliverables by the Project Promoter. The other two sub-projects 2 and 3 will be transferred to the National Recovery and Resilience Plan "Greece 2.0" Recovery Fund.  
The contract of Sub-Project 1 has not yet been uploaded to the MIS.

**Benefits**

**Direct Benefits**

The Project seeks to support the effective implementation of the actions of the National Anti-Corruption Action Plan, to support the implementation of the National Integrity System and to improve the framework for asset recovery and management. Therefore, direct beneficiaries are:

- the NTA, as Project Promoter of the act and competent body for the planning, monitoring, and evaluation of the NACAP, but also as a co-competent body for the institutionalisation and monitoring of the implementation of the National Integrity System,
- the Ministry of the Interior, as also the co-competent body for the establishment and monitoring of the implementation of the National Integrity System,
- the Ministry of Finance, as the main beneficiary of sub-projects 2 and 3, namely the General Directorate of the Economic Crime Prosecution Service (ECPS, Asset Recovery Department), which has been designated as the National Office for the Management of Assets Derived from Criminal Activity, which will be managed by the MIS.

Indirect beneficiaries include:

- All Public Administration and Local Government bodies, as they will be equipped with the necessary tools for the prevention, timely detection and treatment of incidents and risks of corruption and breaches of integrity.

- All public services with responsibility for asset management, as it will ensure the rationalisation and acceleration of all management procedures, the implementation of standardised procedures and the strengthening of coordination and cooperation among them.
- Citizens and businesses and the whole of Civil Society, as the strengthening of transparency and integrity in the public space will significantly contribute to the restoration of their trust in the institutions.

Contribution to Programme’s Indicators

**OUTPUT INDICATORS**

Indicator	Measurement Unit	Target Value
Number of reports drafted (including mapping and survey reports) contributing to the establishment of the National Integrity System	Number	8.00
Number of e-learning courses concerning the national framework for integrity delivered	Number	1.00
Number of professional staff trained (public servants)	Number	100.00
Number of awareness raising conference conducted	Number	1.00
Number of web-based platforms developed	Number	1.00
Number of perception-based surveys conducted	Number	2.00
Number of handbooks created	Number	2.00
Number of professional staff trained	Number	12.00
Asset Management & Recovery Information System in operation	Yes (1) / No (0)	1.00
Number of Risk management manuals for corruption risks created	Number	1.00

**OUTCOME INDICATORS**

Indicator	Measurement Unit	Target Value
Perception of public servants for the empowerment of integrity safeguards	Percentage (%)	Not Defined
Number of national policies and laws influenced	Number	3.00
Average number of days to recover assets	Number	Not Defined
Share of assets managed at the end of the Programme implementation	Percentage (%)	Not Defined
Establishment of a National Integrity System	Yes (1) / No(0)	1.00

3

**PDP3: Programme - Good Governance, Accountable Institutions, Transparency<sup>5</sup>**

*General Information*

Project Title

Programme “Good Governance, Accountable Institutions, Transparency”

<sup>5</sup> Title of PDP3 as per the Project Contract. Note that this title does not match the predefined title of the Project under the Programme Agreement.

#### MIS

5093609

#### Project Promoter

The Greek Ombudsman

#### Project Partners

- Fundamental Rights Agency- FRA

#### Budget at Project’s Funding Approval

- Total Public Expenditure: 1,938,000.00 €
- Co-Financing by EEA Grants 2014- 2021 (85%): 1,647,300.00 €

#### *Physical Object*

The physical object of this project corresponds to the actions of PDP3: “Greek Ombudsman actions for strengthening good governance, accountability and combating maladministration in the public sector”.

#### Activities

The Project concerns the strengthening of the capacities of the Greek Ombudsman, both its human resources and its infrastructure, with the aim of better achieving the intended goals of combating maladministration, ensuring the observance of legality and promoting the principles of transparency, good governance and equal treatment.

The Project foresees the following activities:

- Operation of the Office of the Greek Ombudsman in Thessaloniki
- Visits of the Greek Ombudsman’s staff throughout the territory and organisation of working meetings
- Strengthening the material and technical infrastructure of the Authority (IT Infrastructure)
- Training of the Authority’s staff through the organisation of trainings and work meetings with European, international organisations, counterpart institutions (with the participation of the FRA as well)
- Awareness raising activities

#### Deliverables

- Installation and operating services of the Thessaloniki Office (equipment and operating costs),
- Staff visits to the Prefecture of Thessaloniki (70), visits to the rest of the region (40),
- Organisation of 50 workshops/meetings/trainings/workshops (22 visits/workshops with agencies, 12 awareness-raising workshops, 6 trainings for staff, 10 meetings with international agencies), educational material for 22 workshops, development of one (1) working tool for effective complaint handling) and two (2) international conferences,
- Analysis of IT equipment needs (Need Analysis),
- IT equipment (hardware and software, webtools, two (2) awareness applications),
- Carrying out an awareness raising campaign, developing educational material (6 brochures, 5 manuals) in the context of awareness and information,
- Implementation of the annual conference of the Greek Ombudsman in Athens,
- Actions to raise the awareness of journalists, local communities, TV spot, podcast, publications of information leaflets.

#### *Financial Object*

The final Project’s budget amounts to 1,938,000.00 € (EEA Grants 2014- 2021 co-funding: 1,647,300.00 €) and it is composed by sub-project as follows:

Sub-Projects (SP)	Budget (€)	Contract Inception Date	Contracts (€)	Payments to Project Promoters (€)	Expenditures under Administrative Verification (€)
SP 1. Project Management Support Services	120,000.00		105,400.00	-	-
SP 2. Installation costs of the Thessaloniki Office	170,000.00		-	-	-
SP 3. Monthly Operating Expenses of the Thessaloniki Office	48,000.00		37,200.00	-	-
SP4. Participation of FRA (Partner) in visits to the Prefecture, training activities, communication tools	294,028.00	24/11/2021	294,028.00	97,029 .00	-
SP 5. Organisation of Workshops, Trainings, Staff, International Conferences, travel expenses	495,972.00		-	-	-
SP 6. Awareness Campaign, Development of Educational Material	200,800.00		-	-	-
SP 7. Cost of IT Equipment Needs Assessment - Need Analysis	20,000.00	12/01/2022	20,000.00	20,000.00	20,000.00
SP 8. Supply of Information Technology Equipment	405,000.00		-	-	-
SP 9. Upgrade of the Software	147,000.00		-	-	-
SP 10. Monitoring of Grant Transfer for Sub-project 4	0.00	24/11/2021	0.00	88,208.40	88,208.40
SP 11. Organisation of an International Conference	37,200.00	20/05/2022	30,000.00	-	-
<b>TOTAL</b>	<b>1,938,000.00</b>		<b>486,628.00</b>	<b>205,237.40</b>	<b>108,208.40</b>

**Comments**

- 1) Sub-project 1: Based on the Project Promoter’s declaration, costs of €26,350.00 have been submitted to the MIS, but they have not yet been approved and their payment has not been made.
- 2) The contract for SP3 has been signed (€37,200.00), but it has not yet been uploaded to the MIS.
- 3) FRA has already received an advance payment (€97,029 - 33%). The second installment has been disbursed.
- 4) Sub-project 4: Based on the Project Promoter’s statement, the costs amount to a total of €298,788.00. FRA and Consultant costs have been incurred recently, but agencies have been asked to submit their deliverables to be paid as well.
- 5) Sub-project 5: the Implementation Decision by the same means has been sent to Unit B for pre-approval.

**Project’s Benefits**

Project’s Direct Benefits

- Strengthening the accessibility of citizens, especially vulnerable groups, to the services of the Greek Ombudsman. Acquaintance of citizens with the operation and the mediating role of the Greek Ombudsman, in continuous and timely information on all matters of his competence.
- Development of partnerships and networks with public bodies (awareness, development of know-how, consolidation of the perception of respect for fundamental rights) for the improvement of the provided public services, the modernisation of institutional legislation and the action framework of the public administration.
- Strengthening of the Authority's staff:

- a) through lifelong training and skill development in modern intervention/mediation tools and in the protection of fundamental rights in modern conditions (techniques for resolving disputes, supporting vulnerable social groups of the population and through interventions in critical fields of administrative action where "systemic malfunctions" occur),
- b) through the improvement of the logistical infrastructure of the Authority to make the work of the staff more efficient and to enhance the accessibility of the citizens.

Project’s contribution to the Programme’s Initiatives

**OUTPUT INDICATORS**

Indicator	Measurement Unit	Target Value
<b>Ombudsman office in Thessaloniki is operational</b>	Yes (1)/ No(0)	Yes
<b>Number of Ombudsman visits in the regions</b>	Number	110.00
<b>Number of cooperation relationships (MoUs / synergies) and networks established between the Ombudsman and public administration, civil society and trade unions</b>	Number	15.00
<b>Number of training materials developed</b>	Number	22.00
<b>Number of working meetings organised between the Ombudsman and public administration, civil society and trade unions</b>	Number	22.00
<b>Number of civil servants and civil society staff trained in good governance principles and practices, human rights, vulnerable groups' rights, equal treatment etc</b>	Number	1,000.00
<b>Number of IT infrastructure, information platforms (website, eforums) and mobile applications developed</b>	Number	4.00
<b>Number of professional staff from the Ombudsman trained</b>	Number	150.00
<b>Number of best practice exchange meetings/workshops with international/EU institutions</b>	Number	10.00
<b>Number of working tools developed (legal tools, platforms etc.)</b>	Number	1.00
<b>Number of awareness raising campaigns (awareness days, press events, special conferences) organised at local communities and local authorities</b>	Number	26.00
<b>Number of publications / manuals / information leaflets, training material, communication tools developed</b>	Number	11.00

**OUTCOME INDICATORS**

Indicator	Measurement Unit	Target Value
Share of public servants that selfreport improved cooperation with the Greek Ombudsman (sample survey)	Percentage (%)	80.00%
Share of respondents that are aware of the role of the ombudsman in combating maladministration	Percentage (%)	Not defined
Share of respondents that are aware of the role of the Ombudsman in combating maladministration	Percentage (%)	Not defined

## 4 Support actions of Programme Operator of "Good Governance, Accountable Institutions, Transparency"

### General Information

#### Project Title

Support actions of Programme Operator of "Good Governance, Accountable Institutions, Transparency"

#### MIS

5087289

#### Project Promoter

Management & Implementation Authority for Information and Communication Technologies of the Ministry of Digital Governance (M&IA ICT)

#### Budget at Project's Funding Approval

- Total Public Expenditure: 659,629.00 €
- Co-Financing by EEA Grants 2014- 2021 (85%): 560,599.66 €

### Physical Object

#### Activities

The Project's physical object concerns actions necessary for the supporting Programme Operator for the most effective management of the Programme and it includes, among others, the following:

- ✚ Specialisation of the Management and Control System designed at the Programme's level,
- ✚ Preparation and implementation of a Communication Strategy and its annual update including the creation and maintenance of the site, development of the identity (branding) of the Programme, logos for all media, posts on social media in collaboration with the National Focal Point and the FMO,
- ✚ Implementation of publicity, promotion and information actions in Greek, English, e.g. press releases, announcements, coverage of events, promotional actions etc. according to the communication strategy,
- ✚ Creation of an EEA "team office" where modern methods will be applied to support Programme management (of the 3 projects and the bilateral projects), the monitoring of the projects especially in terms of milestones, deadlines, risks, timely escalation and ways of dealing, the achievement of the Results Framework, the writing of guides, templates and other tools, the communication of critical decisions, the feeding of core publicity content,
- ✚ Support for the good functioning of committees and other governing bodies of the Programme such as the Cooperation Committee (coordination, minutes, meetings etc.),
- ✚ Consulting support in all phases of the Programme implementation,
- ✚ Support in all actions and in the reporting process, e.g. progress reports, reports resulting from the Regulation and the EEA Guidelines with any required interpretation and translation into English,
- ✚ Planning, organisation, implementation of meetings, information days, workshops, etc. for the assessment and strengthening of the impact of the Programme inside/outside Greece including interpretation and translation, travel, the necessary hospitality services, covering the costs of participation, travel and internal-external hospitality both for executives of the Board and executives of third-party entities,
- ✚ Organisation of conferences, information days, travel, in general support for the implementation of the needs of optimal and orderly management of the implementation of the Programme,
- ✚ Covering the costs of participation, travel, internal-external accommodation for IB executives and executives of third parties invited by the IB to participate in meetings, work visits, trainings, etc.

- ✚ Preparation of draft declarations for the implementation of necessary actions to support the IB
- ✚ Expertise on special issues arising from the implementation of the EEA Guidelines and the implementation of the Programme,
- ✚ Elaboration of surveys, studies, expert meetings for measurement and organisation (database) of result indicators and other issues resulting from monitoring, as well as, proposals to improve collection, data processing and report generation,
- ✚ Support in monitoring operations and conducting audits, e.g., creating an audit plan and sampling method,
- ✚ Support in finding, communicating, consulting, and establishing bilateral cooperation with partners from the Donor countries for the IP and for the Implementing Agencies including travel and accommodation costs for working visits, exchanges, trainings etc. in the countries of origin of the bodies or in Greece,
- ✚ Support in the translation of the texts required in English, e.g., minutes of meetings of the Cooperation Committees,
- ✚ Technical support for the operation of the "EEA team office" e.g. H/W, S/W, subscription services, stationery, costs of sending documents, etc.
- ✚ Other actions to support the Board in any needs for the optimal and orderly management of the implementation of the Programme.

Deliverables

The deliverables of the act include studies and expertise, supplies, communication strategy, organisation of events, certificates of attendance, certificates of training, etc.

**Financial Object**

The final Project’s budget rises to 659,629.00 € (EEA Grants 2014- 2021 co-funding: 560,599.66 €) and it is composed by sub-project as follows:

Sub-Projects (SP)	Budget (€)	Contract Inception Date	Contracts (€)	Payments to Project Promoters (€)	Expenditures under Administrative Verification (€)
SP1. Programme Manager Support Consultant	290,000.00		-	-	-
SP2. Publicity Consultant	150,000.00		-	-	-
SP3. Initial Phase Services Consultant	24,800.00	01/09/2022	24,800.00	-	-
SP4. Initial stage publicity services	24,800.00	17/05/2022	24,800.00	9,920.00	-
SP5. General operating expenses	68,500.00	08/09/2022	68,500.00	12,417.37	12,417.37
SP6. Personnel training	25,000.00		-	-	-
SP7. Events Organisation	45,000.00	30/11/2021	45,000.00	3,715.00	3,715.00
SP8. Domestic and international travel expenses	30,000.00	30/05/2022	30,000.00	2,205.38	339.00
SP9. Bank account charges	1,429.00		-	-	-
<b>TOTAL</b>	<b>659,529.00</b>		<b>193,100.00</b>	<b>28,257.75</b>	<b>16,471.37</b>

**Benefits**

Project’s Direct Benefits

The Project is expected to contribute to the improvement of the administrative capacity and operation of the Programme Operator, within the framework of the regulations of the EEA Grants 2014-2021 and in accordance with its obligations, as derived from the relevant signed Programme agreement.

Contribution to Programme’s Indicators



The Act does not contribute to the Programme's indicators.

## 5 Technical consultant support for the enhanced maturity and preparation of the Predefined Project “Strengthening integrity, transparency and anti-corruption framework”

### General Information

#### Project Title

Technical Consultant support for the enhanced maturity and preparation of the Predefined Project “Strengthening of integrity, transparency and anti-corruption framework”

#### MIS

5092232

#### Project Promoter

National Transparency Authority

#### Budget at Project’s Funding Approval

- Total Public Expenditure: 15,500.00 €
- Co-Financing by EEA Grants 2014- 2021 (85%): 13,175.00€

### Physical Object

#### Activities

The NTA is one of the beneficiaries of the "Good Governance, Accountable Institutions, Transparency" Programme, in which it participates with the Predefined Project "Strengthening the framework for integrity, transparency and the fight against corruption" aiming to support the effective implementation of the priorities of the National Anti-Corruption Action Plan, that is the national framework for planning and monitoring the implementation of policies and actions to prevent and combat corruption and also a key tool for monitoring the country's compliance with requirements of the European Semester and the binding recommendations of international organisations, aiming to promote integrity, transparency and accountability in public life.

The object of the Technical Consultant is the support of the NTA at the start of the implementation of the predefined project "Strengthening the framework for integrity, transparency and the fight against corruption", through the provision of specialized technical support services for:

1. The preparation of a communication plan, which will include detailed directions and instructions and will specify the steps and required actions for the promotion of the Predefined project and its results, in accordance with the requirements of the EEA and the provisions of Annex 3 of the Regulation and the Communication Strategy of the FMO of EEA Grants in Greece. The minimum content of the communication plan includes:
  - a) the communication objectives of the Act,
  - b) the target group,
  - c) the communication tools and promotion actions, including the channels that will be used (e.g. websites, microsites, social media, etc.), as well as, the timetable for their implementation,
  - d) the contact person,
  - e) the way of measuring the results of the Action and the achievement of its objectives.
2. The preparation of a study of the existing situation regarding the management of frozen and confiscated assets to determine the operational needs that will be covered by MIS for the management of the assets and the analysis of the project requirements.
3. The preparation of a draft Call for the conclusion of a contract for the implementation of sub-project 3 "Design and procurement of MIS for the Management of Assets" of the predefined Project.

The Deliverables include:

1. PA1: One (1) Communication plan
2. PA2: One (1) Existing Situation Study
3. PA3: One (1) Draft Declaration

#### Financial Object

The final Project’s budget rises to 15,500.00 € (EEA Grants 2014- 2021 co-funding:13,175.00€) and it is analysed per sub-project as follows:

Sub-Projects (SP)	Budget (€)	Contract Inception Date	Contracts (€)	Payments to Project Promoters (€)	Expenditures under Administrative Verification (€)
SP1. Actions to support the National Transparency Authority at the start of the implementation of the Predefined project " Strengthening of integrity, transparency and anti-corruption framework "	15,500.00	-	-	-	-
<b>TOTAL</b>	<b>15,500.00</b>			<b>0.00</b>	<b>0.00</b>

#### Benefits

##### Project’s Direct Benefits

NTA is the direct beneficiary, as is the Project Promoter.

The indirect beneficiaries include all the beneficiaries of the Predefined project "Strengthening the framework for integrity, transparency and the fight against corruption" - the effective implementation of which the present aims at - namely:

- all Public Administration and Local Government bodies, as they will be equipped with the necessary tools to prevent, detect and deal with corruption incidents,
- Citizens, businesses and the whole of Civil Society, as the strengthening of transparency and integrity in the public space will significantly contribute to the restoration of citizens' trust in the institutions.

##### Contribution to Programme’s Indicators

The Project does not contribute to the Programme’s indicators.

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## Actions to support Implementing Bodies at the start of implementation of their predefined acts and the Programme Operator ‘Good Governance, Institutions and Transparency’ of the EEA Financial Area 2014-2021

### General Information

#### Project Title

Actions to support Implementing Bodies at the start of implementation of their predefined projects and the Programme Operator ‘Good Governance, Institutions and Transparency’ of the EEA Financial Area 2014-2021

#### MIS

5087316

#### Project Promoter

The Greek Ombudsman

#### Budget at Project’s Funding Approval

- Total Public Expenditure: 37,200.00 €
- Co-Financing by EEA Grants 2014- 2021 (85%): 31,620.00 €

### Physical Object

#### Activities

The scope of this project consists in the provision of technical support services to the Independent Authority "The Greek Ombudsman", as Project Promoter, in matters of preparation for the implementation of the predefined project in accordance with the Management and Control System.

The actions concern:

1. Drafting of a Call for the selection of a contractor for the sub-project “Personnel travel costs / Support during the evaluation of the operation's schedule and the documentation of its rationalisation”.
2. Support for the drafting of a partnership agreement with the project partner EU Agency for Fundamental Rights – Technical and legal processing in English.
3. Support during the planning, specialisation, consultation and drafting of final tender plans for the sub-projects that will be implemented through competitive procedures (such as market research, maturation of tenders with drafting of specifications).
4. Support at all stages of data registration in the management information systems (e-PDE, MIS EEA, etc.).
5. Integrated management of the support project

The project’s deliverables include:

- ✚ Final Draft of Invitation - Call for the selection of a contractor for staff movements, the organisation of meetings, staff trainings, international conferences and the organisation of 22 workshops.
- ✚ Final Plan of Invitation-Declaration, for the foreseen tender process for selecting a Project Coordinator for the implementation of the Predefined project and support at all stages of the tender process until the final award.
- ✚ Final Draft Invitation - Declaration, for the selection of a contractor for the intended "Awareness Raising Campaign" action.
- ✚ Final Draft Invitation - Announcement, for the selection of a contractor for the assignment of a Needs Analysis for the information system.
- ✚ Final Draft Invitation - Announcement, for the selection of a contractor for the supply of equipment - software (Hardware)
- ✚ Final Plan of Invitation - Announcement, for the selection of a contractor for the upgrade of the Software.

### Financial Object

The final Project’s budget rises to 37,200.00 € (EEA Grants 2014- 2021 co-funding: 31,620.00 €) and it is distributed per project as following:

Sub-Projects (SP)	Budget (€)	Contract Inception Date	Contracts (€)	Payments to Project Promoters (€)	Expenditures under Administrative Verification (€)
<b>SP1. Support of the Potential Implementation Body</b>	37,200.00	12/10/2021	37,200.00	37,200.00	0.00
<b>TOTAL</b>	<b>37,200.00</b>		<b>37,200.00</b>	<b>37,200.00</b>	<b>0.00</b>

### Benefits

#### Direct Benefits

The expected benefits will be:

- Facilitating the executives of the Organisation and the Project Team that will be set up for the implementation of the predefined operation in recording and documenting the actions that will be recorded in the Technical Operation Bulletin. The best planning of the projects/actions, the shortening and observance of their estimated implementation times, the most accurate cost budget.
- The clear strengthening and upgrading of the management competence and efficiency of the Organisation to respond to the needs of project implementation.

The beneficiaries of Predefined project 3 will be:

- All the staff of the Independent Authority,
- All of those referred to the Ombudsman and civil society, public services from the most effective and efficient implementation of the project.

#### Contribution to Programme’s Indicators

The Project does not contribute to the Programme’s indicators.

## 7 Technical and Legal Assistance for the support of the General Secretariat for Digital Governance and Simplification of Procedures regarding preparation activities of the PDP1: “Organisational Upgrade and Digital Transformation of Citizen Service Centers Network (CSC) and public services provided”

### General Information

#### Project Title

Technical and Legal Assistance for the support of the General Secretariat for Digital Governance and Simplification of Procedures regarding preparation activities of the PDP1: “Organisational Upgrade and Digital Transformation of Citizen Service Centers Network (CSC) and public services provided”

#### Project MIS

5093107

#### Project Promoter

General Secretariat for Digital Governance and Simplification of Procedures

#### Budget at Project’s Funding Approval

- Total Public Expenditure: 59,618.00 €
- Co-Financing by EEA Grants 2014- 2021(85%): 50,675.30 €

### Physical Object

#### Activities

The project’s aim is to provide technical, administrative, legal and scientific support services to the General Secretariat for Digital Governance and Simplification of Procedures for the preparation of starting the implementation of the predefined project PDP1: "Organisational Upgrade and Digital Transformation of the Citizen Service Centers network (CSC) and the services provided", as stipulated in the framework of the signing of the Programme Agreement between Greece and the Donor Countries for the implementation of Programme F "Good Governance, Accountable Institutions, Transparency" and following the signing of the Implementation Agreement of the same Programme.

The scope of the project includes actions / activities to support the General Secretariat’s role, to strengthen its technical and administrative competence, with an emphasis on the preparation of the implementation of the above predefined project (PDP1), in accordance with the Management and Control System (MSC) of the Financial Mechanism of EEA Grants 2014- 2021.

In summary, the actions include:

- The drafting of Technical Bulletins and Cost Analysis Forms for all the sub-projects of the PDP1 Project,
- The drafting of Tender Documents for all the sub-projects of the PDP1 Project

This act is divided into 2 Sub-projects, namely:

1. Sub-project 1: Technical Consultancy for the Support of the General Secretariat of Digital Governance and Process Simplification for the preparation of the implementation of the predefined project PDP1: "Organisational Upgrade and Digital Transformation of the Citizen Service Centers (CSC) network and the services provided"
2. Sub-project 2: Legal Advice to Support the General Secretariat of Digital Governance and Process Simplification for the preparation of the implementation of the predefined project PDP1: "Organisational Upgrade and Digital Transformation of the Citizen Service Centers (CSC) network and the services provided"

The deliverables of the Consultant's work are defined as follows:

1. Sub-project 1: Technical Consultant
  - ✚ P1.1: Technical Fact Sheet AND Cost Analysis Form
  - ✚ P1.2: Drawings of detailed technical specifications
  - ✚ P1.3: Final detailed technical specifications
  - ✚ P1.4: Final project report (Project Book)
2. Sub-project 2: Legal Adviser
  - ✚ P2.1: Drafts of Tender Documents
  - ✚ P2.2: Final Tender Issues
  - ✚ P2.3: Final project report (Project Book)

### Project’s Budget

The final Project’s budget amounts to 59,618.00 € (EEA Grants 2014- 2021 co-funding: 50,675.30 € and it is distributed per sub-project as follows:

Sub-Projects (SP)	Budget (€)	Contract Inception Date	Contracts (€)	Payments to Project Promoters (€)	Expenditures under Administrative Verification (€)
SP1. Technical Consultant for the Support of the General Secretariat for Digital Governance and Simplification of Procedures for the preparation of the	39,618.00	29/09/2021	39,618.00	39,618.00	0.00

implementation of the predefined project PDP1: "Organisational Upgrade and Digital Transformation of the Citizen Service Centers (CSC) network and the services provided"					
SP2. Legal Adviser to Support the General Secretariat for Digital Governance and Simplification of Procedures for the preparation of the implementation of the predefined project PDP1: "Organisational Upgrade and Digital Transformation of the Citizen Service Centers (CSC) network and the services provided"	20,000.00	27/09/2021	20,000.00	19,999.99	0.00
<b>TOTAL</b>	<b>59,618.00</b>		<b>59,618.00</b>	<b>59,617.99</b>	<b>0.00</b>

**Benefits**

Project's Direct Benefits

Given that the ultimate goal of the project is the best possible and highest quality preparation / maturation of the predefined project PDP1: "Organisational Upgrade and Digital Transformation of the Citizen Service Centers (CSC) network and the services provided", the results of project are for the benefit of the entire population of the country, apart from the correct preparation and planning of the PDP1 action by the General Secretariat for Digital Governance and Simplification of Procedures .

Contribution to Programme's Indicators

The project does not contribute to the Programme's indicators.

**3.2. Implementation progress of the financial object of the Projects and the Programme**

Within the framework of the "Good Governance, Accountable Institutions, Transparency" Programme, three (3) Calls for Proposals have been issued:

- **"Implementation of the "Good Governance, Accountable Institutions, Transparency" Programme of the EEA 2014-2021 through the Predefined Projects of the Programme Agreement"** (MIS number: 4813, budget: 7,411,765.00€)
- **"Actions to support the Implementation Bodies at the beginning of the implementation of their predefined projects, as well as, the Programme Operator of the Programme "Good Governance, Institutions, Transparency" of the EEA 2014-2021"** (MIS number: 4719, budget: 823,529.00 €),
- **"Invitation for the submission of funding proposals, through the Bilateral Relations Fund, within the framework of the Good Governance, Accountable Institutions, Transparency Programme"** (MIS number: 5641, budget: 100,000.00€). In the context of this Call, no Projects have yet been chosen.

With respect to the above mentioned Calls for Proposals, the following Projects have been contracted in the Programme F: "Good Governance, Accountable Institutions, Transparency":

**Table 7: Approved Projects, under Programme “Good Governance, Accountable Institutions, Transparency”**

MIS	PROJECT TITLE	CALL FOR PROPOSAL	Project Promoter	Total Budget	EEA Grants 2014- 2021	National Funds
5114175	PDP1: Organisational Upgrade and Digital Transformation of Citizen Service Centers Network (KEP) and public services provided	4813	General Secretariat of Digital Governance and Simplification of Procedures	3,400,000.00€	2,889,999.74€	510,000.26€
5109507	PDP2: Strengthening of integrity, transparency and anti-corruption framework	4813	National Transparency Authority	1,998,640.59€	1,698,844.50€	299,796.09€
5093609	PDP3: Programme “Good Governance, Accountable Institutions, Transparency”	4813	The Greek Ombudsman	1,938,000.00€	1,647,300.00€	297,700.00€
5087289	Support actions of Programme Operator "Good Governance, Accountable Institutions, Transparency"	4719	Management & Implementation Authority for Information and Communication Technologies of the Ministry of Digital Governance	659,529.00€	560,599.66€	98,929.34€
5092232	Technical consultant support for the enhanced maturity and preparation of the Predefined Project “Strengthening integrity, transparency and anti-corruption framework”	4719	National Transparency Authority	15,500.00€	13,175.00€	2,325.00€
5087316	Actions to support Implementing Bodies at the start of implementation of their predefined acts and the Programme Manager ‘Good Governance, Institutions and Transparency’ of the Financial Mechanism of EEA Grants 2014-2021	4719	The Greek Ombudsman	37,200.00€	31,620.00€	5,580.00€
5093107	Technical and Legal Assistance for the support of the General Secretariat of Digital Convergence and Simplification of Procedures regarding preparation activities of the PDP1: “Organisational Upgrade and Digital Transformation of Citizen Service Centers Network (KEP) and public services provided” project	4719	General Secretariat of Digital Governance and Simplification of Procedures	59,618.00€	50,675.30€	8,942.70€

As of the reference date of this deliverable (27/01/2023), all the Programme’s resources have been activated through the Calls for Proposals, while, with the exception of the resources of the Bilateral Relations Fund, all the Predefined Projects and the Programme Management actions are under contract. More specifically, the status per Call for proposals is as follows:

- ✚ In the framework of the Call entitled "Actions to support the Implementation Bodies at the beginning of the implementation of their predefined projects, as well as, the Programme Operator of the Programme " Good Governance, Institutions, Transparency" of the EEA Grants 2014-2021" (prot. number 148/03.02.2021 and MIS: 4719, budget: €823,529.00), with the aim of integrating and implementing projects for the support of both the Programme Operator (for the entire life-cycle of the Programme) and the Project Promoters (for their preparation to start implementing predefined projects) in the context of the Programme’s administrative costs, the included projects are the following:

**Table 8: Projects under the Call “Actions to support the Implementation Bodies at the beginning of the implementation of their predefined projects, as well as, the Programme Operator of the Programme "Good Governance, Institutions, Transparency" of the EEA Grants 2014-2021" of EEA Grants 2014-2021”**

PROJECT TITLE	PROJECT PROMOTERS	PROJECT CONTRACT
Actions to support the National Transparency Authority at the start of the implementation of the Predefined project " Strengthening of integrity, transparency and anti-corruption framework "	National Transparency Authority	15,500.00
Support actions of Programme Operator "Good Governance, Accountable Institutions, Transparency"	Management & Implementation Authority for Information and Communication Technologies of the Ministry of Digital Governance (M&IA ICT)	659,529.00
Technical and Legal Assistance for the support of the General Secretariat for Digital Governance and Simplification of Procedures regarding preparation activities of the PDP1: “Organisational Upgrade and Digital Transformation of Citizen Service Centers Network (CSC) and public services provided”	General Secretariat of Digital Governance and Simplification of Procedures	59,618.00
Actions to support Implementing Bodies at the start of implementation of their predefined projects and the Programme Operator ‘Good Governance, Institutions and Transparency’ of the EEA Financial Area 2014-2021	The Greek Ombudsman	37,200.00
	<b>Total Budget</b>	<b>771,847.00</b>

- ✚ In the framework of the Call entitled "**Implementation of the "Good Governance, Accountable Institutions, Transparency" Programme of the EEA Grants 2014-2021 through the Predefined Projects of the Programme Agreement** " (Ref. Number 460/23.03.2021 and MIS: 4813, budget: 7,411,765.00€), the three (3) implementing bodies which are included in the Memorandum of

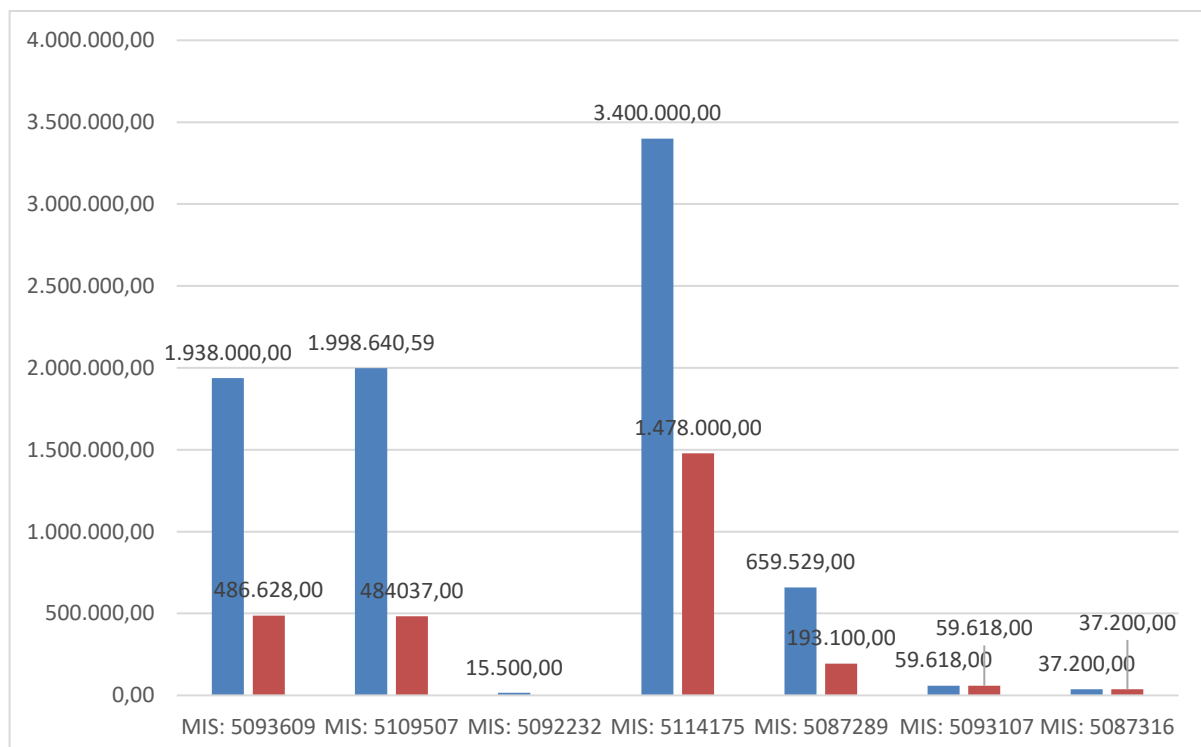


Understanding (MoU) dated 31.10.2017 between the Donor Countries and the Hellenic Republic, submitted funding proposals for the following Predefined Projects:

**Table 9: Projects under the Call "Implementation of the "Good Governance, Accountable Institutions, Transparency" Programme of the EEA Grants 2014-2021 through the Predefined Projects of the Programme Agreement"**

PROJECT TITLE	PROJECT PROMOTERS	PROJECT CONTRACT	BUDGET APPROVED
Organisational Upgrade and Digital Transformation of Citizen Service Centers Network (CSC) and public services provided	General Secretariat of Digital Governance and Simplification of Procedures	3,401,765.00	3,400,000.00
Strengthening of integrity, transparency and anti-corruption framework	National Transparency Authority	2,000,000.00	1,998,640.59
Greek Ombudsman actions for strengthening good governance, accountability and combating maladministration in the public sector	The Greek Ombudsman	2,010,000.00	1,938,000.00
<b>Total Budget</b>		<b>7,411,765.00</b>	<b>7,336,640.59</b>

**Chart 3: Total contracts per sub-project**



In the context of the Programme, a third Call has been published, entitled "Invitation for the submission of financing proposals, through the Bilateral Relations Fund, in the context of the Good

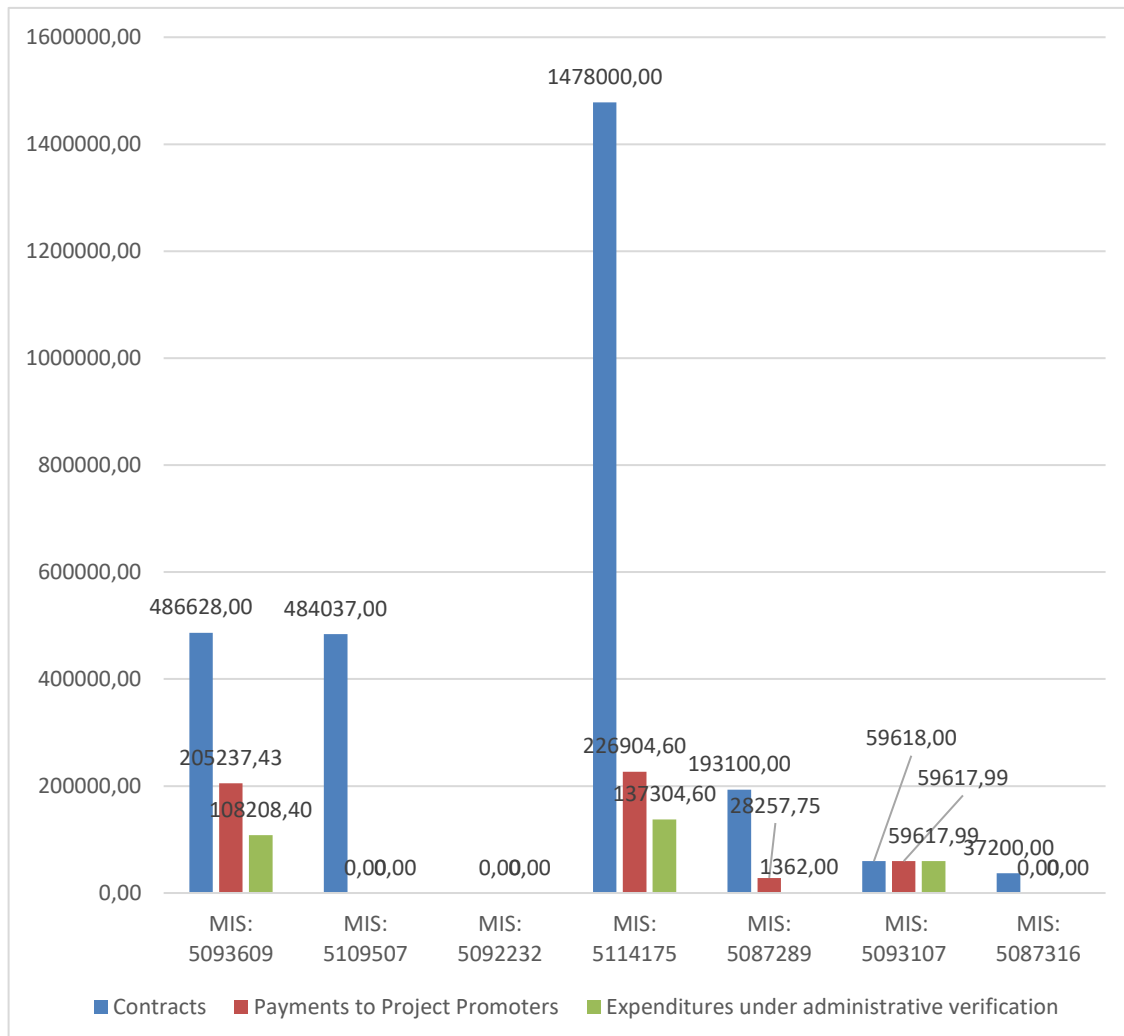
Governance, Institutions, Transparency Programme" (Ref. Number 832/26.05.2022 and MIS number 5641, Budget: 100,000.00€), in the context of which no projects have been contracted yet.

Although the Projects have already been contracted, there is a delay in the process of contracting the individual Sub-Projects, as can be seen in the Chart above. As it can be seen in the same Chart, only two Projects have been fully contracted (MIS 5093107, MIS 5087316), and one has not been contracted at all (MIS 5092232). The remaining four projects are partially contracted (MIS 5093609 at 23.19%, MIS 5109507 at 24.22% MIS 5114175 at 43.47% and MIS 5087289 at 29.28%).

In this context, expenditures that have been completed and registered in the MIS for each Project are even lower, either due to delays in the contracting of the individual Sub-Projects, or due to the delays of the competent bodies in declaring them to the MIS.

The degree of absorption of the Programme’s projects is as follows:

**Chart 4: Expenditure of the Programme by Project**



As shown in the charts above, contracts raising up to 2,738,583€ (32.86%) have been signed, out of the total budget of the projects contracted in the Programme (8,335,295.00€), with the payments to

Project Promoters amounting to as low as 557,217.77€ (6.69% of the total budget of the Projects, and 20.35% out of the contracted sub-projects).

**Table 10: Project Promoters' Expenditures - Acceptable Management per Action in relation to the total Programme budget as included in the PDE and the Contracts**

Axis/ Programme's Thematic Area	Thematic Area Budget	Calls for Proposals	Project Contracts	Budget Approved	Payments to Project Promoters
1. Improving the efficiency of public administration	3,401,765.00	3,401,765.00	3,400,000.00	1,478,000.00	226,904.60
2. Strengthening transparency and integrity in public administration	2,000,000.00	2,000,000.00	1,998,640.59	484,037.00	0.00
3. Reducing mismanagement in the public sector	2,010,000.00	2,010,000.00	1,938,000.00	486,628.00	205,237.43
Programme Management	823,529.00	823,529.00	771,847.00	289,918.00	125,075.74
Bilateral Fun	100,000.00	100,000.00	0.00	0.00	0.00
<b>Total</b>	<b>8,335,295.00</b>	<b>8,335,295.00</b>	<b>8,108,487.59</b>	<b>2,738,583.00</b>	<b>557,217.77</b>
<b>% of the Programme's Management</b>		<b>100.00%</b>	<b>97.28%</b>	<b>32.86%</b>	<b>6.69%</b>
		<b>% of Calls for Proposals</b>	<b>97.28%</b>	<b>32.86%</b>	<b>6.69%</b>
			<b>% of Projects</b>	<b>33.77%</b>	<b>6.87%</b>
				<b>% of Contracts</b>	<b>20.35%</b>

The following conclusions can be drawn from the course of implementation of the financial object of the Programme's interventions:

- ❖ All the financial resources of the Programme have been activated (100% activation), providing the possibility of their full utilisation for the benefit of the beneficiaries and the projects' users
- ❖ The activation rate of project inclusions is high (commitment of 97.28% of the Programme's resources), providing the possibility of developing all the planned actions and achieving the quantitative and qualitative goals of the Programme,
- ❖ The rate of contracting of the integrated Projects and their Sub-projects remains low (32.86% of the Programme's budget or 33.77% of the projects' budget), due to a number of factors such as changes in the project implementation environment that led to the delay in the announcement of the Calls for Proposals, delays in the completion of technical support contracts for the predefined projects, the declaration of certain tender procedures as infertile etc. All agencies involved in the implementation of the Programme have successfully dealt with the above difficulties and an improved rate of contracting is expected within the first half of 2023.
- ❖ According to the available data, the rate of absorption of the available resources remains low (6.69% of the Programme budget, or 6.87% of the projects' budget).

This is due to, first of all, the delays and difficulties in the contracting of the Projects and their Sub-projects, as analysed above, as well as, to specific difficulties in accounting for the costs of the international partners. This situation, after dealing with the difficulties of contracting the projects and solving the eligibility problems of international partners' expenses, is expected to improve significantly within the first half of 2023 and to gradually normalise in the remaining period of the Programme's implementation.

In addition, the following table shows the proposed budget revision as it is incorporated into the submitted proposal of amendment for the overall Programme.

As it is clear from the data, there is a net surplus of 490,235.00€ for Outcome 1 (transferred from Outcome 2 which faces a budget reduction of 1,515,962.00€). The overall budget of Outcome 1 thus increases from 3,401,765.00€ to 3,892,000.00€.

As far as Outcome 2 is concerned, there is a reduction of about 75% of the approved budget (1,515,962.00€ out of 2,000,000.00€).

Outcome 3 has a small reduction of budget (72,000.00€, or 3.58%).

The overall decrease of the Programme's budget amounts to 1,097,727.00€ in relation to the initially approved 8,335,295.00€. As a result, the proposed Programme budget amounts to 7,237,567.00€

**Table 3: Proposed Budget Revision per Outcome**

Budget Heading	Current MoU Distribution	Proposed Budget Revision			+/- Differences
	Initial Eligible Expenditure	Programme co-financing	EEA Grants	Programme Revised Eligible Expenditure	
Programme management	823,529.00 €	123,529.00 €	700,000.00 €	823,529.00 €	0.00 €
Outcome 1 (EEA Grants)	3,401,765.00 €	583,800.00 €	3,308,200.00 €	3,892,000.00 €	490,235.00 €
Outcome 2 (EEA Grants)	2,000,000.00 €	72,606.00 €	411,432.00 €	484,038.00 €	-1,515,962.00 €
Outcome 3 (EEA Grants)	2,000,000.00 €	290,700.00 €	1,647,300.00 €	1,938,000.00 €	-72,000.00 €
Bilateral Relations Fund	100,000.00 €			100,000.00 €	0.00 €
	<b>8,335,295.00 €</b>	<b>1,070,635.00 €</b>	<b>6,066,932.00 €</b>	<b>7,237,567.00 €</b>	<b>-1,097,727.00 €</b>

Budgetary changes that are shown in Table 12 illustrate large changes in the physical object as well:

- The transfer of an amount (490,235.00€) from Outcome 2 to Outcome 1 (Project "Organisational Upgrade and Digital Transformation of the Network of Citizen Service Centers and Public Service Services") serves the need to strengthen the administrative function of the Network of CSCs ("KEPs") and to improve the efficiency and effectiveness of the services provided. The increase in the Project's budget is expected to cover the increases in its physical object and in particular the number of functional computers (tablets) with signature styles to serve the transactions of the KEP staff with the citizens.

- Sub-Projects 2 and 3 of the predetermined Project "Strengthening the integrity, transparency and anti-corruption framework" (MIS: 5109507) are transferred to the National Recovery and Resilience Plan "Greece 2.0") with the corresponding reduction of their budget.

### **3.3. Implementation progress of the physical object of the Projects and the Programme**

This section analyses the implementation progress of the physical object of the Projects and the Programme F as a whole. This information is derived from data from the Programme Operator and the Project Promoters' integrated MIS, as well as, Progress Reports and Reports on achievement of objectives that are shared with the evaluator.

In the context of this report, the evaluator has also performed interviews with representatives of the Programme Operator, as well as, the Project Promoters with the aim to collect the views of the key partners, parties and stakeholders that are involved in the implementation process and hence, reach fair and accurate, as possible, conclusions in terms of the set evaluation criteria. The details of these interviews (dates, venues, participants) are included in Paragraph 9.

The result of the analysis performed on all the above-mentioned available evidence will reach a comparison of the available evidence to the corresponding programmatic elements per Project, as reflected in the relevant Approval Decisions. As a result of this process, the evaluator will also seek to estimate the level of achievement of the objectives of each Project and the Programme as a whole.

In consistency with the analysis elaborated in Paragraph 3.2 and the data used in Tables 11 and 12, the analysis and assessment of the physical object of the Projects and the Programme herein will take into account any information that has been made available to the evaluator **as of 27/01/2023**.

The objective of this section is to use all available qualitative and quantitative information provided to the evaluator by the competent authorities in order to answer the following questions in a fair and reliable manner:

- What is the degree of achievement of the objectives of the Programme (output indicators, results, etc.)?
- What is the estimated degree of achievement of the Programme objectives at the end of the programming period?

Through the process of the analysis of outputs and results of the approved Projects, the degree of contribution of each Project to the achievement of the set goals of the Programme will be determined.

Accordingly, to assess the degree of achievement of the overall objectives of the Programme, the current indicator values will be added and the degree of achievement of the intended result of the Programme will be determined, on the basis of the pre-selected indicators for the Main Objective of the Programme, under the Programme Agreement.

For each Project, the evaluator will also perform a **time schedule feasibility analysis** on the basis of the data that has been made available up to the reference date of the evaluation study, which is the

27/01/2023 and interlink this with a **risk assessment and mitigation analysis** and subsequently submit **Recommendations** whenever it is deemed necessary and appropriate.

For the purposes of the risk assessment and mitigation analysis in specific, the following tools and resources / information will be used:

- EEA Grants: Programme Operators - Risk assessment and mitigation analysis template, Publication Date: 20 Nov 2020<sup>6</sup>
- Strategic Report of the EEA Grants 2014-2021 (Reporting period: November 2021 to October 2022)
- Annual Programme Report, FM 14-21, GR-Good Governance, Accountable Institutions, Transparency 2022.

Subsequently, all information on the risk assessment and mitigation analysis performed will be collectively presented to address the Programme as a whole and to reach a conclusion on the overall time schedule feasibility and risk level of the Programme. This will be performed in Paragraph 3.4.

### **3.3.1. PDP1: Organisational Upgrade and Digital Transformation of Citizen Service Centers Network (KEP) and public services provided**

The Project in question (MIS: 5114175) has the General Secretariat of Digital Governance and Simplification of Procedures as Project Promoter and the National Network of Infrastructure, Technology and Research SA, as well as, the Organisation for Economic Cooperation and Development (OECD) as partners. The project has a total budget of 3,400,000.00€ and focuses on improving efficiency in the public sector and more specifically in the operation of the CSC (“KEP”). With the aim of planning, developing and providing targeted digital and intangible interventions in a short period of time, with high added value for the political-centric / data-centric digital transformation of the public administration, the project consists of the following sub-projects:

#### **1. Sub-project 1: Project Management**

The aim of the sub-project is to assist the General Secretariat for Digital Governance and Simplification of Procedures in the maturation of sub-projects, as well as, in the management and monitoring of the indicators and the project as a whole.

The tender process has been delayed, but completed as of the reference date for this report which is the 27/1/2023. The final decision for awarding the contract took place on 24/01/2023 and the signing of the contract is pending.

#### **Time schedule feasibility - Risk assessment and mitigation analysis:**

Given the existing 20-month contract duration and the signing of the contract still pending as of 27/1/2023, it is the evaluator’s view that the implementation course of SP1 is linked to delays and the subsequent risks of non absorption of the entirety of the initially foreseen budget are as follows:

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<sup>6</sup> <https://eeagrants.org/resources/programme-operators-risk-assessment-and-mitigation-analysis-template> (last accessed: 03.04.2023)

Risk description	Likelihood	Consequence	Risk score	Description of response
The timetable for the conclusion of the implementation of sub-projects (and thus PDPs as a whole) close the end of eligibility period or some sub-projects do not get completed	4	4	4.00	<ul style="list-style-type: none"> <li>• Close monitoring of a detailed implementation time schedule.</li> <li>• Effective engagement of foreseen project consulting services at project level.</li> <li>• Estimation of impact to results and consultation with NFP/FMO for potential remedies.</li> <li>• Justify scope of modification and take appropriate actions with cautiousness to the public procurement legal implications vis. a vis. the impact on results expected</li> </ul>
Public procurement processes are cumbersome and reach estimated timeframes due to lack of experience or resources allocation or quality of descriptions, or market failure or legal impediments	3	4	3.46	<ul style="list-style-type: none"> <li>• The pre-approval process of the draft tenders by the PO verifies technical and legal details of the public tenders submitted by the promoters providing advice to increase quality and robustness of the process so the process may not end with objections, delays, or unintended consequences.</li> <li>• Assign experienced staff in procurement processes from the beginning.</li> <li>• The PO monitors the completion of the tendering procedures</li> </ul>

**Recommendation 1:**

*The evaluator recommends the close monitoring of the approved time schedule of SP 1 and the speeding-up of the tender process in order to avoid further delays in the sub-project assignment and its implementation.*

2. **Sub-project 2: "Dissemination-Communication"**, with the aim of communicating and informing the public opinion about the actions of organisational modernisation and digital transformation of the KEPs, the promotion of the critical role of the EEA tool and the donor countries in its successful implementation, the raising of awareness and informing employees of KEPs by projecting the positive effects of the interventions on their daily work and the diffusion of positive results at every level, using every tool to increase the citizens and CSC employees' satisfaction. There has not been a contract signed yet and the Project Promoter is expected to proceed with the re-announcement of the tender.

**Time schedule feasibility - Risk assessment and mitigation analysis:**

According to the Project Promoter, it is envisaged that the time schedule will be shortened from 12 months to 9 months without any impairment of either the physical object or the approved budget.

However, the Evaluator considers that there is still a high risk for the physical object to not be fully completed on time. Due to the lack of measurable data on the Project’s indicators it is not possible to measure the probability of such a shrinkage, however, a quantified assessment of the risks incurred are presented in the table below (Risk Score: 3.46-4.00). The subsequent risks of non absorption of the entirety of the initially foreseen budget are as follows.

Risk description	Likelihood	Consequence	Risk score	Description of response
The timetable for the conclusion of the implementation of sub-projects (and thus PDPs as a whole) close the end of eligibility period or some sub-projects do not get completed.	4	4	4.00	<ul style="list-style-type: none"> <li>• Close monitoring of a detailed implementation time schedule.</li> <li>• Effective engagement of foreseen project consulting services at project level.</li> <li>• Estimation of impact to results and consultation with NFP/FMO for potential remedies.</li> <li>• Justify scope of modification and take appropriate actions with cautiousness to the public procurement legal implications vis. a vis. the impact on results expected</li> </ul>
Capacity of PPs to execute procurement or administrative tasks is not effective and on time to secure the full completion of tenders within eligible time left	3	4	3.46	<ul style="list-style-type: none"> <li>• Set clear agenda of milestones of PDPs</li> <li>• Share results of closure exercise and engage PPs to commit and tender to actions to mitigate recognised bottlenecks</li> <li>• Ensure risk is owned by those who can take early actions to mitigate, first</li> <li>• Use effectively the support from the project manager (consultant) contracted by the PP</li> <li>• Prioritise resources to tackle bottlenecks</li> <li>• Repeat follow-up workshop, on-the-job, on public procurement guidance.</li> </ul>

**Recommendation 2:**

*The evaluator recommends the close monitoring of the approved time schedule of SP 2 and the speeding-up of the tender process in order to avoid further delays in the sub-project assignment and its implementation.*

- Sub-project 3 "Lessons from comparison of good CSC practices in EU countries"**, with OECD as partner. The objective of this sub-project is the study of good practices in other OECD member countries that have one-stop services, in order to gain experience and knowledge for the best possible planning of the reorganisation and digital transformation of CSCs in Greece. The study was carried out by the OECD that has extensive experience in the comparative analysis of administrative systems of its member countries. As of the reference date of this report (27/1/2023) the physical object is completed.

**Time schedule feasibility - Risk assessment and mitigation analysis:**



As the physical object is fully completed there are no risks in terms of the time schedule.

4. **Sub-project 4: "Improvement of the services provided by CSCs"** with the aim of improving the evaluation method, on a permanent and regular basis, of the services provided by the CSCs, and the creation of a staff feedback mechanism between the Central Service and the individual CSCs in order to upgrade the services provided to the public with a focus on those that can be simplified and made more accessible.

As of 27/1/2023 the tender process has not been completed due to the submission of objections on behalf of candidates. The handling of objections was examined on 20/01/2023 and the issuing of the relevant decision is pending.

**Time schedule feasibility - Risk assessment and mitigation analysis:**

Due to the nature of the physical object, it is possible for the designed services to be installed, configured and put into practice in a shorter period of time than originally planned. However, considering the initial 16-month duration of the sub-project, the evaluator considers that the delays in the sub-project implementation progress are now severe and the subsequent risks of non absorption of the entirety of the initially foreseen budget are as follows:

Risk description	Likelihood	Consequence	Risk score	Description of response
The timetable for the conclusion of the implementation of sub-projects (and thus PDPs as a whole) close the end of eligibility period or some sub-projects do not get completed.	4	4	4.00	<ul style="list-style-type: none"> <li>• Close monitoring of a detailed implementation time schedule.</li> <li>• Effective engagement of foreseen project consulting services at project level.</li> <li>• Estimation of impact to results and consultation with NFP/FMO for potential remedies.</li> <li>• Justify scope of modification and take appropriate actions with cautiousness to the public procurement legal implications vis. a vis. the impact on results expected</li> </ul>
Capacity of PPs to execute procurement or administrative tasks is not effective and on time to secure the full completion of tenders within eligible time left	3	4	3.46	<ul style="list-style-type: none"> <li>• Set clear agenda of milestones of PDPs</li> <li>• Share results of closure exercise and engage PPs to commit and tender to actions to mitigate recognised bottlenecks</li> <li>• Ensure risk is owned by those who can take early actions to mitigate, first</li> <li>• Use effectively the support from the project manager (consultant) contracted by the PP</li> <li>• Prioritise resources to tackle bottlenecks</li> <li>• Repeat follow-up workshop, on-the-job, on public procurement guidance.</li> </ul>

**Recommendation 3:**

*The evaluator recommends the close monitoring of the approved time schedule of SP 4 and the speeding-up of the tender process in order to avoid further potential delays in the sub-project assignment and its implementation.*

5. **Sub-project 5: "Improvement of the organisational, functional and spatial structure of the CSCs"** with the aim of to improve the CSCs’ organisation and operation through the conduction of studies highlighting the spatial distribution, based on the geographical fabric of the country and the way specific population groups interact with the CSCs and to highlight the best way to organise and manage the human resources of CSCs.

**Time schedule feasibility - Risk assessment and mitigation analysis:**

On the basis of information provided by the Project Promoter, the implementation of the SP is in progress with no delays and it is expected to be completed within the originally planned schedule. The contract was signed in November 2022 and the expected duration is up to 12 months, hence it is the evaluator’s view that the subsequent risks of non absorption of the entirety of the initially foreseen budget are minimal.

6. **Sub-project 6: "Implementation of electronic signatures in the CSC network"**

According to Law 4821/2021, CSCs can make use of digitized handwritten signatures in the transactions with citizens. This sub-project aims to implement this provision, by both the supply of the appropriate technological equipment and by training personnel in the process.

Although the required pre-authorisation has been provided since summer 2022, the tender was not successful and it is expected to be re-launched in the near future with the necessary adjustments and an additional expenditure that will result in a near doubling of the initial SP budget. This additional expenditure will be covered by the transfer of resources from Outcome 2 to Outcome 1.

**Time schedule feasibility - Risk assessment and mitigation analysis:**

Despite the delay observed in the procedures for completing the tender (the estimated contract signing date was 30/09/2022 and the contract was not signed as of 27 January 2023) for the relevant procurement, there is still sufficient time for the completion of the physical object of the sub-project within the implementation period of the Programme, subject to the Project Promoter undertaking initiatives to speed up the relevant procedures. However, given the contract duration of 12 months, it is the evaluator’s view that the implementation course of SP6 is now linked to delays and the subsequent risks of non absorption of the entirety of the initially foreseen budget are as follows:

Risk description	Likelihood	Consequence	Risk score	Description of response
PDPs nominal implementation	3	3	3.00	<ul style="list-style-type: none"> <li>• More emphasis on active risk management at PDP level.</li> <li>•</li> </ul>

timeframes are reaching too close to a safe distance from final end date of eligibility due to the delay of administrative tasks ie. procurement or acceptance (damaging the contracts’ potential to full, successful implementation)				Escalate issues with FMO and NFP and make the political & physical leadership of Project Promoters aware of the stakes involved. • Set condition in Project Contract about the eligibility of all PDP activities. • Knowledge of how the Greek state plans to financially treat non-completed projects • Opinion by the PO regarding source of finance and exit provisions in contracts about to be signed in the context of MCS
Capacity of PPs to execute procurement or administrative tasks is not effective and on time to secure the full completion of tenders within eligible time left	3	4	3.46	<ul style="list-style-type: none"> <li>• Set clear agenda of milestones of PDPs</li> <li>• Share results of closure exercise and engage PPs to commit and tender to actions to mitigate recognised bottlenecks</li> <li>• Ensure risk is owned by those who can take early actions to mitigate, first</li> <li>• Use effectively the support from the project manager (consultant) contracted by the PP</li> <li>• Prioritise resources to tackle bottlenecks</li> <li>• Repeat follow-up workshop, on-the-job, on public procurement guidance.</li> </ul>

**Recommendation 4:**

*The evaluator recommends the close monitoring of the approved time schedule of SP 6 and the speeding-up of the tender process in order to avoid further delays that could impact its objectives and the sub-project’s implementation.*

**7. Sub-project 7 "New CSC information system: CSC Back Office (support services EU-GO curve)"**

The aim of the sub-project is to replace the old CSC information system with a new one, with the capability of interoperability mechanisms with other public systems or necessary registers, such as the National Services Registry “Diavlos”. The new system intends to update/ enhance the EU-GO portal.

The sub-project is already being implemented with the National Technology and Research Infrastructure Network as contractor (contract duration: 11/2021 - 12/2023). As far as the physical object implementation course is concerned, the first presentation of the platform software has already taken place. The analysis phase has also been completed and it is under constant monitoring and evaluation for improvements. The development phase of the system is at an advanced stage with expected Deliverables by the end of March 2023.

**Time schedule feasibility - Risk assessment and mitigation analysis:**

There are no changes to the individual activities. Through a separate tender due in February 2023, a small part of the sub-project will be implemented by an external contractor with no expected impact on the sub-project’s physical and/or financial object. It is the evaluator’s view that the subsequent risks of non absorption of the entirety of the initially foreseen budget are minimal.

8. **Sub-contract 8: "Empowering CSC employees"** with the aim of creating supporting material to empower the CSCs employees to respond to the administrative and digital transformation of the service.

The Call for Proposals for this sub-project has not been published as of 27/1/2023, with an expected date of notice from late February 2023 to early March 2023.

**Time schedule feasibility - Risk assessment and mitigation analysis:**

Despite the above-mentioned delays in the implementation of the physical object, the duration of this SP is limited to 5 months, therefore it is possible for the physical object to be completed within the approved time schedule. It is the evaluator’s view that the subsequent risks of non absorption of the entirety of the initially foreseen budget are as follows

Risk description	Likelihood	Consequence	Risk score	Description of response
PDPs nominal implementation timeframes are reaching too close to a safe distance from final end date of eligibility due to the delay of administrative tasks ie. procurement or acceptance (damaging the contracts’ potential to full, successful implementation)	2	2	2.00	<ul style="list-style-type: none"> <li>• More emphasis on active risk management at PDP level.</li> <li>• Escalate issues with FMO and NFP and make the political &amp; physical leadership of Project Promoters aware of the stakes involved.</li> <li>• Set condition in Project Contract about the eligibility of all PDP activities.</li> <li>• Knowledge of how the Greek state plans to financially treat non-completed projects</li> <li>• Opinion by the PO regarding source of finance and exit provisions in contracts about to be signed in the context of MCS</li> </ul>
Capacity of PPs to execute procurement or administrative tasks is not effective and on time to secure the full completion of tenders within eligible time left	2	2	2.00	<ul style="list-style-type: none"> <li>• Set clear agenda of milestones of PDPs</li> <li>• Share results of closure exercise and engage PPs to commit and tender to actions to mitigate recognised bottlenecks</li> <li>• Ensure risk is owned by those who can take early actions to mitigate, first</li> <li>• Use effectively the support from the project manager (consultant) contracted by the PP</li> <li>• Prioritise resources to tackle bottlenecks</li> <li>• Repeat follow-up workshop, on-the-job, on public procurement guidance.</li> </ul>

**Recommendation 5:**

*The evaluator recommends the close monitoring of the approved time schedule of SP8 and the speeding-up of the tender process in order to avoid further potential delays that could impact its objectives*

**3.3.2. PDP2: Strengthening of integrity, transparency and anti-corruption framework**

The Project in question (MIS: 5109507) has the NTA as Project Promoter and the Organisation for Economic Cooperation and Development (OECD), as well as, the Office of the Organisation United Nations on Drugs and Crime as partners. The approved budget of the Project amounts to 1,998,640.59€.

The project’s aim is to support the effective implementation of the priorities of the NACAP, which as also previously mentioned constitutes the national framework for policies and actions to prevent and combat corruption phenomena, as well as, to work as a key tool to monitor compliance of the Greek state with the requirements of the European Semester and the binding recommendations of international organisations, aiming to promote integrity, transparency and accountability in public life.

The Project’s physical object is subdivided into the following sub-projects:

1. **Sub-project 1: "Strengthening the National Framework for Integrity in the Public Sector"**, the purpose of which is to support the effective implementation of the NACAP, through proposals, good practices and tools for the regulation of lobbying, phenomena of conflict of interest and strengthening integrity of public officials. The sub-project had an initial budget of 700,000.00€ and the OECD as predetermined partner.

Although the sub-project was planned since 2016, amendments that took place in 2019 resulted in the following activities that had originally be foreseen to be implemented by OECD under the EEA Grants to be assigned to the NTA through alternative sources of funding.

- a. PA.1: One (1) Electronic Registry for the registration of interest representatives and the monitoring of their activities (e-lobbying registry).
- b. PA.2: Specialisation Report on the basic operating principles of the Registry.
- c. PA.3: One (1) Information Package for the users of the Registry (registered and prospective members) and the public.
- d. PA.4: One (1) Report with directions for strengthening the integrity of elected officials of OTAs A' grade, with the use of behavioral analysis tools.
- e. PA.5: One (1) Review report of integrity violations and policies to deal with them in emergency/force majeure situations.
- f. PA.6: One (1) handbook to enhance integrity in decision-making in emergency/ force majeure situations.

Of the above mentioned Deliverables, PA.1, PA.2, PA.3, PA.4 have been implemented. PA.5 and PA.6 are pending.

The Deliverables expected by the OECD are the following and none of these has been implemented as of 27/1/2023:

- a. PA.1: One (1) report mapping national and international practices for the prevention, detection, disclosure and management of risks and/or conflict of interest situations.
- b. PA.2: One (1) Report with legislative proposals, good practices and tools for the prevention and management of conflict-of-interest situations.
- c. PA.3: Sixteen (16) video webinars for civil servants.
- d. PA.4: One (1) survey to measure the implementation and impact of integrity policies.
- e. PA.5: One (1) Conference to present the results of the Project.

For the implementation of the above, a Cooperation Agreement between the NTA and the OECD was signed on 17/12/2022 and it resulted in an amended financial objective of the Sub-Project that amounts to 484,037.00€. The approval of this budget and the completion of all relevant administration procedures are pending, but the evaluator notes that for the purposes of this evaluation report this procedure should be taken for a fact.

**Time schedule feasibility - Risk assessment and mitigation analysis**

The evaluator notes that there is already a reduction of physical object (as described above) and a shrinkage of the budget of the SP by 30.86% (from 700,000.56€ to 483,981.56€).

The budget shrinkage at the Project level is 10.81% (from 1,998,640.59 € to 1,782,621.59€)

The budget shrinkage at the Programme level as a whole is 2.59% (from 8,335,295.00€ to 8,119,276.00€).

In terms of the part of the SP that remains within the implementation scope of the Programme, given the contract duration of 12 months and the existing delays as described above, it is the evaluator’s view that the subsequent risks of non absorption of the entirety of the initially foreseen budget are as follows:

Risk description	Likelihood	Consequence	Risk score	Description of response
PDPs nominal implementation timeframes are reaching too close to a safe distance from final end date of eligibility due to the delay of administrative tasks ie. procurement or acceptance (damaging the contracts’ potential to full, successful implementation)	<b>3</b>	<b>3</b>	<b>3.00</b>	<ul style="list-style-type: none"> <li>• More emphasis on active risk management at PDP level.</li> <li>• Escalate issues with FMO and NFP and make the political &amp; physical leadership of Project Promoters aware of the stakes involved.</li> <li>• Set condition in Project Contract about the eligibility of all PDP activities.</li> <li>• Knowledge of how the Greek state plans to financially treat non-completed projects</li> <li>• Opinion by the PO regarding source of finance and exit provisions in contracts about to be signed in the context of MCS</li> </ul>
Capacity of PPs to execute procurement or administrative tasks is not effective and on time to secure the full completion	<b>3</b>	<b>4</b>	<b>3.46</b>	<ul style="list-style-type: none"> <li>• Set clear agenda of milestones of PDPs</li> <li>• Share results of closure exercise and engage PPs to commit and tender to actions to mitigate recognised bottlenecks</li> <li>• Ensure risk is owned</li> </ul>

of tenders within eligible time left				by those who can take early actions to mitigate, first <ul style="list-style-type: none"> <li>• Use effectively the support from the project manager (consultant) contracted by the PP</li> <li>• Prioritise resources to tackle bottlenecks</li> <li>• Repeat follow-up workshop, on-the-job, on public procurement guidance.</li> </ul>
(International) Project Partners internal processes affect timely execution of PDPs	2	3	2.45	<ul style="list-style-type: none"> <li>• Early estimation of impact to the overall schedule of deliverables</li> <li>• Update of Partnership Agreement to reflect internal shifts or modification in case the physical object is essentially affected with assessment of the effect on results.</li> <li>• Escalation of probabilities from Partner to PP to PO to NFP to FMO</li> </ul>

**Recommendation 6:**

*The evaluator recommends the close monitoring of the approved time schedule of PDP2, SP1 and the speeding-up of the procedures for finalizing all pending issues in the revised agreement with the OECD in order to avoid further potential delays that could impact its objectives.*

2. **Sub-project 2: "Improving the framework and procedures for the asset recovery and management"**, which includes actions for institutional and operational upgrading of the system for managing assets derived from criminal activity and specifically the development of proposals and tools for the improvement of political management, the preparation of a manual of procedures and the organisation of training activities.

The implementation of its physical object is dependent upon legal provisions that are not expected to be fulfilled within the eligible time frame of the Programme. As a result, the entire physical object of this sub-project is planned to be financed with resources of the National Recovery and Resilience Plan "Greece 2.0" in order to secure that the Law is published. The entire SP is therefore expected to be removed from the Programme.

The budget shrinkage at the Project level is 14.91% (from 1,998,640.59 to 1,700,680.56€)

The budget shrinkage at the Programme level as a whole is 3.57% (from 8,335,295.00€ to 8,037,334.97€).

3. **Sub-project 3 "Design of an integrated Asset Management Information System and procurement of MIS for Asset Management"**, the physical object of which is the development of an Integrated Information System.

The sub-project in question has not been activated to date, due to the delay in the adoption of the necessary institutional framework for its implementation (publication of the relevant Law on

confiscated assets). Due to the risk of its non-timely implementation, it was decided to transfer this SP to the National Recovery and Resilience Plan "Greece 2.0" 22/12/2022).

The budget shrinkage at the Project level is 50.07% (from 1,998,640.59 to 997,960.59€)

The budget shrinkage at the Programme level as a whole is 12.01% (from 8,335,295.00€ to 7,334,615.00€).

### **3.3.3. PDP3: Programme “Good Governance, Accountable Institutions, Transparency”**

The Project entitled "Programme “Good Governance, Accountable Institutions, Transparency” (MIS: 5093609) has an initial budget of 1,938,000.00€ with the Greek Ombudsman as Project Promoter and the EU Fundamental Rights Agency as partner. Through this Project, the installation of a dedicated Office is provided.

On the basis of information provided to the evaluator by the Project Promoter, the course of implementation of the physical object of the individual Sub-Projects is as follows:

1. **Sub-project 1 "Project Management Support Services"**: The implementation of the sub-project was launched on 14/07/2022, which is the date of contract signing the contract with the Contractor. The physical object is being implemented as expected, with no problems or delays.
2. **Sub-project 2 “Installation Costs of the Thessaloniki Office”**. The SP concerns the operational costs of the Thessaloniki office (supply of equipment and furniture). As of 27/1/2023, the relevant tender has been launched, the awarding decision has already been signed and therefore, the signing of the contract is imminent. The implementation is due in March 2023 and the expected duration of the project is 10 months.

#### **Time schedule feasibility - Risk assessment and mitigation analysis**

Given the deadline for the eligibility period of 04/2024, it is the evaluator’s view that the subsequent risks of non absorption of the entirety of the initially foreseen budget are minimal.

3. **Sub-project 3 “Monthly operating Expenses of the Thessaloniki Office”**. The SP concerns the monthly operating expenses of the above - mentioned dedicated Office which is provided through this Project.

#### **Time schedule feasibility - Risk assessment and mitigation analysis**

As of 27/1/2023, the relevant contract with HELEXPO has been signed, with an expected budget of 37,200.00€ and a 12-month duration. The physical object of the sub-project is already under implementation with no reported problems or delays. It is the evaluator’s view that the subsequent risks of non absorption of the entirety of the initially foreseen budget are minimal.

4. **Sub-Project 4 “Participation of FRA partner in visits to the Region, training activities, communication tools”** (EU Fundamental Rights Organisation)



**Time schedule feasibility - Risk assessment and mitigation analysis**

As of 27/1/2023, the contract with FRA has been signed, with the physical object being implemented. FRA's participation concerns 20 of the 22 designed workshops with distinct topics selected by the Greek Ombudsman. A total of 5 studies (3 in English and 2 in translation) as educational material on human rights have been delivered. There are no observed delays or problems and the physical object is expected to be fully implemented within the approved time schedule.

5. **Sub-Project 5 “Organisation of workshops, staff trainings, international conferences, travel expenses”** (The Greek Ombudsman). The implementation has not commenced yet, as there is no operational office of The Greek Ombudsman in Thessaloniki. The delay in the implementation is due to changes in the legal framework governing the contracting process.

**Time schedule feasibility - Risk assessment and mitigation analysis**

There is a severe delay in the implementation of the SP. It is the evaluator’s view that the subsequent risks of non absorption of the entirety of the initially foreseen budget are as follows:

Risk description	Likelihood	Consequence	Risk score	Description of response
PDPs nominal implementation timeframes are reaching too close to a safe distance from final end date of eligibility due to the delay of administrative tasks ie. procurement or acceptance (damaging the contracts’ potential to full, successful implementation)	4	4	4.00	<ul style="list-style-type: none"> <li>• More emphasis on active risk management at PDP level.</li> <li>• escalate issues with FMO and NFP and make the political &amp; physical leadership of Project Promoters aware of the stakes involved.</li> <li>• Set condition in Project Contract about the eligibility of all PDP activities.</li> <li>• Knowledge of how the Greek state plans to financially treat non-completed projects</li> <li>• Opinion by the PO regarding source of finance and exit provisions in contracts about to be signed in the context of MCS</li> </ul>
The PO is unable to enforce art. 8.13.4 to “ensure funds are made available to complete projects in a timely manner” due to the delay of clarity on non-completed co-funded projects by EEA Grants at National Level which relate with the operation of PIP	4	4	4.00	<ul style="list-style-type: none"> <li>• Notify FMO and Competent National Authorities like the NFP and CA and raise awareness on the discrepancy /impacts</li> <li>• Issue “in a timely manner” a circular=how to financially treat non-completed projects at National Level with examples</li> <li>• Delivery of a workshop on closure in early May with all stakeholders by the NFP &amp; FMO with clear examples</li> <li>• Contracts about to be signed get written clear directions on how to handle closure of contracts if funds are not warranted after the end of the eligibility period</li> </ul>

**Recommendation 7:**

*The evaluator recommends the close monitoring of the approved time schedule of SP5 and the speeding-up of the tender process in order to avoid further potential delays that could impact its objectives*

6. **Sub-project 6 "Awareness campaign, Development of educational material"**. The implementation has not commenced yet. According to the Project Promoter, the SP is expected to be completed on time, as the expected contract duration is 12 months.

**Time schedule feasibility - Risk assessment and mitigation analysis**

There is a severe delay in the implementation of the SP. It is the evaluator’s view that the subsequent risks of non absorption of the entirety of the initially foreseen budget are as follows:

Risk description	Likelihood	Consequence	Risk score	Description of response
PDPs nominal implementation timeframes are reaching too close to a safe distance from final end date of eligibility due to the delay of administrative tasks ie. procurement or acceptance (damaging the contracts’ potential to full, successful implementation)	4	4	4.00	<ul style="list-style-type: none"> <li>• More emphasis on active risk management at PDP level.</li> <li>• escalate issues with FMO and NFP and make the political &amp; physical leadership of Project Promoters aware of the stakes involved.</li> <li>• Set condition in Project Contract about the eligibility of all PDP activities.</li> <li>• Knowledge of how the Greek state plans to financially treat non-completed projects</li> <li>• Opinion by the PO regarding source of finance and exit provisions in contracts about to be signed in the context of MCS</li> </ul>
The PO is unable to enforce art. 8.13.4 to “ensure funds are made available to complete projects in a timely manner” due to the delay of clarity on non-completed co-funded projects by EEA Grants at National Level which relate with the operation of PIP	4	4	4.00	<ul style="list-style-type: none"> <li>• Notify FMO and Competent National Authorities like the NFP and CA and raise awareness on the discrepancy /impacts</li> <li>• Issue “in a timely manner” a circular=how to financially treat non-completed projects at National Level with examples</li> <li>• Delivery of a workshop on closure in early May with all stakeholders by the NFP &amp; FMO with clear examples</li> <li>• Contracts about to be signed get written clear directions on how to handle closure of contracts if funds are not warranted after the end of the eligibility period</li> </ul>

**Recommendation 8:**

*The evaluator recommends the close monitoring of the approved time schedule of SP6 and the speeding-up of the tender process in order to avoid further potential delays that could impact its objectives*

7. **Sub-project 7 "Cost of IT Equipment Needs Assessment - Need Analysis".**

**Time schedule feasibility - Risk assessment and mitigation analysis**

The physical and financial budget of the SP has been completed as of 27/1/2023.

8. **Sub-Project 8 "Supply of IT equipment".** The tender process is ongoing, with bids expected to be examined in February 2023.

**Time schedule feasibility - Risk assessment and mitigation analysis**

Considering the existing delays in the tender process, it is the evaluator’s view that the subsequent risks of non absorption of the entirety of the initially foreseen budget are as follows:

Risk description	Likelihood	Consequence	Risk score	Description of response
The timetable for the conclusion of the implementation of sub-projects (and thus PDPs as a whole) close the end of eligibility period or some sub-projects do not get completed.	3	3	3.00	<ul style="list-style-type: none"> <li>• Close monitoring of a detailed implementation time schedule.</li> <li>• Effective engagement of foreseen project consulting services at project level.</li> <li>• Estimation of impact to results and consultation with NFP/FMO for potential remedies.</li> <li>• Justify scope of modification and take appropriate actions with cautiousness to the public procurement legal implications vis. a vis. the impact on results expected</li> </ul>
Capacity of PPs to execute procurement or administrative tasks is not effective and on time to secure the full completion of tenders within eligible time left	3	4	3.46	<ul style="list-style-type: none"> <li>• Set clear agenda of milestones of PDPs</li> <li>• Share results of closure exercise and engage PPs to commit and tender to actions to mitigate recognised bottlenecks</li> <li>• Ensure risk is owned by those who can take early actions to mitigate, first</li> <li>• Use effectively the support from the project manager (consultant) contracted by the PP</li> <li>• Prioritise resources to tackle bottlenecks</li> <li>• Repeat follow-up workshop, on-the-job, on public procurement guidance.</li> </ul>

9. **Sub-Project 9 "Upgrade of the Software".** The tender process is ongoing, with bids expected to be examined in February 2023.

**Time schedule feasibility - Risk assessment and mitigation analysis**

Considering the existing delays in the tender process, it is the evaluator’s view that the subsequent risks of non absorption of the entirety of the initially foreseen budget are as follows:

Risk description	Likelihood	Consequence	Risk score	Description of response
The timetable for the conclusion of the implementation of sub-projects (and thus PDPs as a whole) close the end of eligibility period or some sub-projects do not get completed.	3	3	3.00	<ul style="list-style-type: none"> <li>• Close monitoring of a detailed implementation time schedule.</li> <li>• Effective engagement of foreseen project consulting services at project level.</li> <li>• Estimation of impact to results and consultation with NFP/FMO for potential remedies.</li> <li>• Justify scope of modification and take appropriate actions with cautiousness to the public procurement legal implications vis. a vis. the impact on results expected</li> </ul>
Capacity of PPs to execute procurement or administrative tasks is not effective and on time to secure the full completion of tenders within eligible time left	3	4	3.46	<ul style="list-style-type: none"> <li>• Set clear agenda of milestones of PDPs</li> <li>• Share results of closure exercise and engage PPs to commit and tender to actions to mitigate recognised bottlenecks</li> <li>• Ensure risk is owned by those who can take early actions to mitigate, first</li> <li>• Use effectively the support from the project manager (consultant) contracted by the PP</li> <li>• Prioritise resources to tackle bottlenecks</li> <li>• Repeat follow-up workshop, on-the-job, on public procurement guidance.</li> </ul>

## 10. Sub-project 10 "Conducting a Conference".

### Time schedule feasibility - Risk assessment and mitigation analysis

The physical and financial budget of the SP has been completed as of 27/1/2023.

#### 3.3.4. Support actions of Programme Operator of "Good Governance, Accountable Institutions, Transparency" (MIS 5087289)

The action concerns activities to support the Management & Implementation Authority for Information and Communication Technologies of the Ministry of Digital Governance (M&IA ICT), so that it can meet its responsibilities and duties as Programme Operator of the "Good Governance, Institutions and Transparency" Programme throughout the programming period of the European Economic Area Financial Mechanism (EEA FM) 2014-2021.

The course of implementation of the physical object per Sub-Project is as follows:

##### 1. Sub-project 1: Programme Operator’s Technical Support Assistant

The sub-project concerns the provision of management support consulting services to M&IA ICT within the framework of its responsibilities as Programme Operator of the Programme "Good

Governance, Institutions and Transparency” of the Financial Mechanism of the European Economic Area 2014-2021.

The public consultation decision on the draft tender for the conclusion of a contract was issued in June 2022, the results of which were approved by a decision in August of the same year.

As of the reference date of this evaluation (27/1/2023), the procedures for approving the tendering of the relevant tender have not been completed.

**Time schedule feasibility - Risk assessment and mitigation analysis:**

Despite the delay in activating technical assistance for the Programme Operator, the sub-project may still be completed within the eligibility period of the programme, however a medium - high risk in further delays occurring is still a possibility and it is noted below.

Risk description	Likelihood	Consequence	Risk score	Description of response
Programme Management - Provision of Supporting Services: Probable delays and non-absorption of the foreseen budget, as a result of risks incurred in the other Projects of the Programme	2	2	2.00	Close monitoring of approved time schedule

**2. Sub-project 2: Publicity Consultant**

The sub-project concerns the implementation of publicity, promotion and information actions in Greek and English e.g., press releases, announcements, event coverage, promotions etc., in accordance with the communication strategy and communication plan prepared in the framework of Sub-project 4: Initial Phase Publicity Services.

By the reference date of this evaluation (27/1/2023), the maturation procedures of the implementation procedures of the Sub-project have not been completed.

**Time schedule feasibility - Risk assessment and mitigation analysis:**

Despite the delay in activating technical assistance for the Programme Operator, the sub-project may still be completed within the eligibility period of the Programme, however a low level risk in further delays occurring is still a possibility and it is noted below.

Risk description	Likelihood	Consequence	Risk score	Description of response
Programme Management - Provision of Supporting Services: Probable delays and non-absorption of the foreseen budget, as a	2	2	2.00	Close monitoring of approved time schedule

result of risks incurred in the other Projects of the Programme				
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**3. Sub-project 3: Initial Phase Services Consultant**

The purpose of Sub-project 3 is to support the Programme Operator of Programme "Good Governance, Institutions and Transparency" to meet short-term needs for the smoother execution of management activities in the early stages of the implementation of the Programme.

**Time schedule feasibility - Risk assessment and mitigation analysis:**

The relevant contract was signed in September 2022 and has an implementation duration of 7 months. The physical object is expected to be completed within the contractual time. The evaluator does not identify any risks that could impact its implementation course.

**4. Sub-project 4: Initial stage publicity services**

The purpose of the Subproject is to support the planning and management of communication, promotion and publicity of the Programme in the immediate and medium term (mainly 2022).

The relevant contract for the implementation of the Subproject signed in May 2022, has an implementation duration of 8 months and is expected to be completed with a reduced physical object due to the objective impossibility of finding intermediate results that produce media value, as a consequence of the time slippage of the implementation of the predefined projects.

Due to the lack of measurable data, it is not possible to quantify the reduction of the physical object. However, the equivalent reduction in terms of shrinkage of the budget is 46.71% at the Sub-Project level (from 24,800.00 € to 13,217.00 €).

The budget shrinkage at the Project level is 1.76% (from 659,529.00 € to 647,946.00€)

The budget shrinkage at the Programme level as a whole is 0.14% from (8,335,295.00€ to 8,323,712.00€)

The project deliverables include a creative Briefing, media and publicity use plan, as well as, the Communication Plan which is an input for Sub-Project 2.

**5. Sub-project 5: General operating expenses**

The objective of this sub-project is to cover general operational costs that may be required to support the role of the Programme Operator in the effective management of the Programme (translation services, logistical support for the operation of the "EEA Group Office", other actions to support the operator in any needs for the optimal and smooth management of the implementation of the Programme, etc.). This type of sub-project does not adhere to predefined technical specifications and it is implemented according to needs. As a result, a risk assessment and mitigation analysis is not deemed necessary for SP5.

The evaluator notes that as of 27/1/2023, there has been only a limited use of available resources to procure necessary electronic equipment and receive translation services with no implementation issues reported.

**6. Sub-project 6: Staff training**

The evaluator notes that the physical object of the Sub-project has not been specified (the project contract does not analyze the physical object of the SP), and has not been activated yet.

**Time schedule feasibility - Risk assessment and mitigation analysis:**

On the basis of the above, the SP is now linked to delays. However, at the initiative of the Programme Operator, information and training actions have been implemented for the staff of the Project Promoters of the Programme on the fields of programme management and the resolution of implementation issues.

Despite the above-mentioned delays, given the nature of the SP and the initiative action by the Programme Operator, it is the evaluator’s view that this sub-project may still be completed within the eligibility period of the Programme. The subsequent risk of non absorption of the entirety of the initially foreseen budget is the following:

Risk description	Likelihood	Consequence	Risk score	Description of response
The timetable for the conclusion of the implementation of sub-projects (and thus PDPs as a whole) close the end of eligibility period or some sub-projects do not get completed.	3	3	3.00	<ul style="list-style-type: none"> <li>• Close monitoring of a detailed implementation time schedule.</li> <li>• Effective engagement of foreseen project consulting services at project level.</li> <li>• Estimation of impact to results and consultation with NFP/FMO for potential remedies.</li> <li>• Justify scope of modification and take appropriate actions with cautiousness to the public procurement legal implications vis. a vis. the impact on results expected</li> </ul>

**7. Sub-project 7: Events organising**

The objective of this sub-project is to cover the design, organising and implementation of meetings, information events, workshops, etc. in order to evaluate and enhance the impact of the Programme within and outside Greece including interpretation and translation, transportation, necessary hospitality services, coverage of participation costs, travel and hospitality domestic-abroad for both the Programme Operator executives and executives of third parties etc. This type of sub-project does not adhere to predefined technical specifications and it is implemented according to needs. As a result, a risk assessment and mitigation analysis is not deemed necessary for SP7.

The evaluator notes that as of 27/1/2023, there has been only a limited use of available resources under this sub-project. Activities were developed to support the 2nd Cooperation Committee Meeting of the Programme "Good Governance, Accountable Institutions Transparency" (10 December 2021), the 3rd Cooperation Committee (23/6/2002) of the Programme, the 1st communication workshop with project promoters, NFP and representative of the Norwegian Embassy on 19/5/2022 and for the 2nd day on 24/6/2022 of the 3rd Cooperation Committee of the Programme.

#### **8. Sub-project 8: Domestic and international travel expenses**

The objective of this sub-project is to cover domestic and international travel needs for Programme Operator’s executives and executives of third parties invited by the PO to participate in meetings, work visits, training, etc. This type of sub-project does not adhere to predefined technical specifications and it is implemented according to needs. As a result, a risk assessment and mitigation analysis are not deemed necessary for SP8.

The evaluator notes that as of 27/1/2023, there has been only a limited use of available resources under this sub-project with the aim to cover the movement of executives in Cyprus for the participation in the workshop "RESULTS & EVALUATION NETWORK WORKSHOP FOR PROGRAMME/ FUND OPERATORS" (October 2022).

#### **9. Sub-project 9: Bank account charges**

This is a small-budget sub-project that does not affect the implementation of the financial and physical object of the Programme and therefore, a risk assessment and mitigation analysis is not deemed necessary for SP9. No issues have been reported under this sub-project as of 27/1/2023.

#### *Recommendation 9:*

*The evaluator recommends the close monitoring of the progress of the physical object of all Predefined Projects and to modify the physical object of the project “Support actions of Programme Operator of “Good Governance, Accountable Institutions, Transparency” as appropriate.*

#### **3.3.5. Technical consultant support for the enhanced maturity and preparation of the Predefined Project “Strengthening of integrity, transparency and anti-corruption framework” (MIS 5092232)**

This project includes the elaboration of the communication plan of the PDP2, the analysis of the existing situation of the asset recovery and management and the drafting of the tender for SP3 under PDP2.

Due to the opt-out of sub-projects 2 and 3 of PDP2, and the nature of the remaining sub-project of this project, the need for the implementation of the above actions is not relevant anymore.

Therefore, it is the evaluator’s view that the necessity of the Project should be re-examined for removal from the Programme. The budget of the Project could be transferred to other technical support action to remain readily available to cover additional supporting needs.

Due to the lack of measurable data, it is not possible to quantify the reduction of the physical object. However, the equivalent reduction in terms of shrinkage of the budget would be 100% at the Project level (complete removal of the Project).

The budget shrinkage at the Programme level as a whole would be 0.19% (from 8,335,295.00€ to 8,319,795.00€).



**Recommendation 10:**

*Considering the opt-out of sub-projects 2 and 3 of PDP2, the evaluator recommends that the Project “Technical consultant support for the enhanced maturity and preparation of the Predefined Project “Strengthening of integrity, transparency and anti-corruption framework” should be removed from the Programme, as it is no longer relevant to its scope. The budget of the Project could be transferred to other technical support action to remain readily available to cover additional supporting needs.*

**3.3.6. Actions to support Project Promoters at the start of implementation of their predefined acts and the Programme Operator of ‘Good Governance, Institutions and Transparency’ of the EEA Financial Area 2014-2021 (MIS 5087316)**

The project’s aim is to provide technical support services to the Independent Authority "The Greek Ombudsman", the Project Promoter of PDP3, in matters of preparation for the implementation of the project in accordance with the approved Management and Control System.

The project consists of one sub-project:

1. Sub-project 1: Support to the potential project promoter. The actions concern:
  - a. Drafting of a Call for the selection of a contractor for the sub-project “Personnel travel costs/ Support during the evaluation of the operation's schedule and the documentation of its rationalisation”.
  - b. Support for the drafting of a partnership agreement with the project partner EU Agency For Fundamental Rights.
  - c. Support during the planning, specialisation, consultation and drafting of final tender plans for the sub-projects.
  - d. Support at all stages of data registration in the management information systems.
  - e. Integrated management of the support project

**Time schedule feasibility - Risk assessment and mitigation analysis:**

As of 27/1/2023, the physical object of this sub-project is complete with only the verification of eligible expenditures pending. There are no risks associated with this Project.

**3.3.7. Technical and Legal Assistance for the support of the General Secretariat for Digital Governance and Simplification of Procedures regarding preparation activities of PDP1: “Organizational Upgrade and Digital Transformation of Citizen Service Centers Network (KEP) and public services provided” (MIS 5093107)**

The project’s aim is to provide technical, administrative, legal and scientific support services to the General Secretariat for Digital Governance and Simplification of Procedures for the launching of the implementation of PDP1: "Organisational Upgrade and Digital Transformation of the Citizen Service Centers network (CSC) and the services provided", as stipulated in the Programme Agreement. The project consists of two subprojects:

1. Sub-project 1: Technical Consultant for the Support of the General Secretariat for Digital Governance and Simplification of Procedures for the preparation of the implementation of

PDP1: "Organisational Upgrade and Digital Transformation of the Citizen Service Centers (CSC) network and the services provided".

The project provides technical support to the General Secretariat for the preparation of the technical sheets, the cost analysis forms for the sub-projects and their detailed technical specifications.

**Time schedule feasibility - Risk assessment and mitigation analysis:**

As of 27/1/2023, the physical object of this sub-project is complete with no associated risks identified.

2. Sub-project 2: Legal Adviser to Support the General Secretariat for Digital Governance and Simplification of Procedures for the preparation of the implementation of PDP1: "Organisational Upgrade and Digital Transformation of the Citizen Service Centers (CSC) network and the services provided".

The project includes the legal support to the General Secretariat for the preparation of drafts and the final tender of the sub-projects under PDP1.

**Time schedule feasibility - Risk assessment and mitigation analysis:**

As of 27/1/2023, the physical object of this sub-project is complete with no associated risks identified.

In terms of the current Indicator values of the Programme in relation to the Target Values of the pre-selected indicators for the Main Objectives of the Programme under the Programme Agreement, these will be dealt with separately in Paragraph 3.6.

**3.4. Time schedule feasibility - Risk assessment and mitigation analysis of the Programme**

On the basis of the work performed in paragraphs 3.2 and 3.3, the evaluator has already identified a number of risks that emerge from the existing and/ or further expected and time constraints under the approved technical specifications and time schedule of each Project.

In this paragraph, the evaluator will combine the above mentioned information with a number of additional risks of horizontal nature, that may incur to all approved Projects as a result of the complexity, the administrative challenges and resources limits that are an integral part of these types of projects. The evaluator will then estimate the level of risk of the Programme as a whole.

Furthermore, a breakdown and synthesis of risks by Project will also provide an estimate of the level of risk of each Project. Projects for which no risks have been identified in Paragraph 3.4 will not be featured in this Paragraph.

The results of this analysis are presented in the Tables below:

**Table 4: Time schedule feasibility - Risk assessment and mitigation analysis of the Programme**

#	Risk description	Likelihood	Risk description	Likelihood	Risk description
1	PDP1, SP1, SP2, SP4: The timetable for the conclusion of the	4	4	4.00	<ul style="list-style-type: none"> <li>• Close monitoring of a detailed implementation time schedule.</li> <li>• Effective engagement of foreseen</li> </ul>

#	Risk description	Likelihood	Risk description	Likelihood	Risk description
	implementation of sub-projects (and thus PDPs as a whole) close the end of eligibility period or some sub-projects do not get completed				project consulting services at project level. • Estimation of impact to results and consultation with NFP/FMO for potential remedies. • Justify scope of modification and take appropriate actions with cautiousness to the public procurement legal implications vis. a vis. the impact on results expected
2	PDP3, SP8, SP9, Support actions of Programme Operator <sup>7</sup> , SP6: The timetable for the conclusion of the implementation of sub-projects (and thus PDPs as a whole) close the end of eligibility period or some sub-projects do not get completed	3	3	3.00	<ul style="list-style-type: none"> <li>• Close monitoring of a detailed implementation time schedule.</li> <li>• Effective engagement of foreseen project consulting services at project level.</li> <li>• Estimation of impact to results and consultation with NFP/FMO for potential remedies.</li> <li>• Justify scope of modification and take appropriate actions with cautiousness to the public procurement legal implications vis. a vis. the impact on results expected</li> </ul>
3	PDP1, SP1: Public procurement processes are cumbersome and reach estimated timeframes due to lack of experience or resources allocation or quality of descriptions, or market failure or legal impediments	3	4	3.46	<ul style="list-style-type: none"> <li>• The pre-approval process of the draft tenders by the PO verifies technical and legal details of the public tenders submitted by the promoters providing advice to increase quality and robustness of the process so the process may not end with objections, delays, or unintended consequences.</li> <li>• Assign experienced staff in procurement processes from the beginning.</li> <li>• The PO monitors the completion of the tendering procedures</li> </ul>
4	PDP1, SP2, SP4, SP6, PDP2, SP1. PDP3, SP8, SP9: Capacity of PPs to execute procurement or administrative tasks is not effective and on time to secure the full completion of tenders within eligible time left	3	4	3.46	<ul style="list-style-type: none"> <li>• Set clear agenda of milestones of PDPs</li> <li>• Share results of closure exercise and engage PPs to commit and tender to actions to mitigate recognised bottlenecks</li> <li>• Ensure risk is owned by those who can take early actions to mitigate, first</li> <li>• Use effectively the support from the project manager (consultant) contracted by the PP</li> <li>• Prioritise resources to tackle bottlenecks</li> <li>• Repeat follow-up</li> </ul>

<sup>7</sup> Risk in reference to Project with MIS 5087289. See also Paragraph 3.3.4.

#	Risk description	Likelihood	Risk description	Likelihood	Risk description
					workshop, on-the-job, on public procurement guidance.
5	PDP1, SP8: Capacity of PPs to execute procurement or administrative tasks is not effective and on time to secure the full completion of tenders within eligible time left	2	2	2.00	<ul style="list-style-type: none"> <li>• Set clear agenda of milestones of PDPs</li> <li>• Share results of closure exercise and engage PPs to commit and tender to actions to mitigate recognised bottlenecks</li> <li>• Ensure risk is owned by those who can take early actions to mitigate, first</li> <li>• Use effectively the support from the project manager (consultant) contracted by the PP</li> <li>• Prioritise resources to tackle bottlenecks</li> <li>• Repeat follow-up workshop, on-the-job, on public procurement guidance.</li> </ul>
6	PDP1, SP6, PDP2, SP1: PDPs nominal implementation timeframes are reaching too close to a safe distance from final end date of eligibility due to the delay of administrative tasks ie. procurement or acceptance (damaging the contracts’ potential to full, successful implementation)	3	3	3.00	<ul style="list-style-type: none"> <li>• More emphasis on active risk management at PDP level.</li> <li>• Escalate issues with FMO and NFP and make the political &amp; physical leadership of Project Promoters aware of the stakes involved.</li> <li>• Set condition in Project Contract about the eligibility of all PDP activities.</li> <li>• Knowledge of how the Greek state plans to financially treat non-completed projects</li> <li>• Opinion by the PO regarding source of finance and exit provisions in contracts about to be signed in the context of MCS</li> </ul>
7	PDP1, SP8: PDPs nominal implementation timeframes are reaching too close to a safe distance from final end date of eligibility due to the delay of administrative tasks ie. procurement or acceptance (damaging the contracts’ potential to full, successful implementation)	2	2	2.00	<ul style="list-style-type: none"> <li>• More emphasis on active risk management at PDP level.</li> <li>• Escalate issues with FMO and NFP and make the political &amp; physical leadership of Project Promoters aware of the stakes involved.</li> <li>• Set condition in Project Contract about the eligibility of all PDP activities.</li> <li>• Knowledge of how the Greek state plans to financially treat non-completed projects</li> <li>• Opinion by the PO regarding source of finance and exit provisions in contracts about to be signed in the context of MCS</li> </ul>
8	PDP2, SP1: (International) Project Partners internal processes affect timely execution of PDPs	2	3	2.45	<ul style="list-style-type: none"> <li>• Early estimation of impact to the overall schedule of deliverables</li> <li>• Update of Partnership Agreement to reflect internal shifts or modification in case the physical object is essentially affected with assessment of the effect on</li> </ul>

#	Risk description	Likelihood	Risk description	Likelihood	Risk description
					results. • Escalation of probabilities from Partner to PP to PO to NFP to FMO
9	PDP3, SP5, SP6: PDPs nominal implementation time-frames are reaching too close to a safe distance from final end date of eligibility due to the delay of administrative tasks ie. procurement or acceptance (damaging the contracts’ potential to full, successful implementation)	4	4	4.00	<ul style="list-style-type: none"> <li>• More emphasis on active risk management at PDP level.</li> <li>• Escalate issues with FMO and NFP and make the political &amp; physical leadership of Project Promoters aware of the stakes involved.</li> <li>• Set condition in Project Contract about the eligibility of all PDP activities.</li> <li>• Knowledge of how the Greek state plans to financially treat non-completed projects</li> <li>• Opinion by the PO regarding source of finance and exit provisions in contracts about to be signed in the context of MCS</li> </ul>
10	PDP3, SP5, SP6: The PO is unable to enforce art. 8.13.4 to “ensure funds are made available to complete projects in a timely manner” due to the delay of clarity on non-completed co-funded projects by EEA Grants at National Level which relate with the operation of PIP	4	4	4.00	<ul style="list-style-type: none"> <li>• Notify FMO and Competent National Authorities like the NFP and CA and raise awareness on the discrepancy /impacts</li> <li>• Issue “in a timely manner” a circular=how to financially treat non-completed projects at National Level with examples</li> <li>• Delivery of a workshop on closure in early May with all stakeholders by the NFP &amp; FMO with clear examples</li> <li>• Contracts about to be signed get written clear directions on how to handle closure of contracts if funds are not warranted after the end of the eligibility period</li> </ul>
11	Support actions of Programme Operator <sup>8</sup> , SP1, SP2: Programme Management - Provision of Supporting Services: Probable delays and non-absorption of the foreseen budget, as a result of risks incurred in the other Projects of the Programme	2	2	2.00	Close monitoring of approved time schedule
12	All Actions: Payments to PPS and declaration of eligible expenditures affects smooth rate of absorption.	2	2	2.00	Share results of closure exercise and engage PPs to commit and tender to actions to mitigate recognised bottlenecks • Ensure risk is owned by those who can take early actions to mitigate, first

<sup>8</sup> Risk in reference to Project with MIS 5087289. See also Paragraph 3.3.4.

#	Risk description	Likelihood	Risk description	Likelihood	Risk description
					<ul style="list-style-type: none"> <li>• Use effectively the support from the project manager (consultant) contracted by the PP</li> <li>• Prioritise resources to tackle bottlenecks</li> <li>• Repeat follow-up workshop, on-the-job, on public procurement guidance.</li> </ul>
13	All Actions: Late or inaccurate reporting on Results from PPs	2	2	2.00	<ul style="list-style-type: none"> <li>• Timely training of how to manage the results framework end-to-end (defining</li> <li>• Awareness of time sensitive results.</li> <li>• Use management cost to support results data collection, monitoring and reporting (where deemed necessary).</li> <li>• Reduce indicators in the modified PA to well defined ones, connected =having an impact on outcomes, easy to measure</li> </ul>
14	All Actions: The cycle from payments from EEA to PIP to PPs to Contactors and the verification of the declared as actually incurred, eligible expenditures affects smooth rate of absorption of EEA Grants	2	2	2.00	<ul style="list-style-type: none"> <li>• Close monitoring of the financial flow by PO and PP, justified likely payments and proposed expenditure in IFR, shared responsibility not to create backlogs</li> <li>• Clear guidelines from PO to PPs as to how to declare the expenditures right the first time with the right documentation</li> <li>• Focused on-the-job training regarding managing the flow of money to not create asymmetries from estimates, to real financing needs to verification of eligible expenditures</li> </ul>
<b>OVERALL RISK OF THE PROGRAMME (not an average of the above - manually scored)</b>		<b>Likelihood</b>	<b>Consequence</b>	<b>Risk score</b>	
		<b>4</b>	<b>3</b>	<b>3.46</b>	

Table 5: Time schedule feasibility - Risk assessment and mitigation analysis of PDP1

#	Risk description	Likelihood	Risk description	Likelihood	Risk description
1	PDP1, SP1, SP2, SP4: The timetable for the conclusion of the implementation of sub-	4	4	4.00	<ul style="list-style-type: none"> <li>• Close monitoring of a detailed implementation time schedule.</li> <li>• Effective engagement of foreseen project consulting services at</li> </ul>

#	Risk description	Likelihood	Risk description	Likelihood	Risk description
	projects (and thus PDPs as a whole) close the end of eligibility period or some sub-projects do not get completed				project level. • Estimation of impact to results and consultation with NFP/FMO for potential remedies. • Justify scope of modification and take appropriate actions with cautiousness to the public procurement legal implications vis. a vis. the impact on results expected
2	PDP1, SP1: Public procurement processes are cumbersome and reach estimated timeframes due to lack of experience or resources allocation or quality of descriptions, or market failure or legal impediments	3	4	3.46	<ul style="list-style-type: none"> <li>The pre-approval process of the draft tenders by the PO verifies technical and legal details of the public tenders submitted by the promoters providing advice to increase quality and robustness of the process so the process may not end with objections, delays, or unintended consequences.</li> <li>Assign experienced staff in procurement processes from the beginning.</li> <li>The PO monitors the completion of the tendering procedures</li> </ul>
3	PDP1, SP2, SP4, SP6: Capacity of PPs to execute procurement or administrative tasks is not effective and on time to secure the full completion of tenders within eligible time left	3	4	3.46	<ul style="list-style-type: none"> <li>Set clear agenda of milestones of PDPs</li> <li>Share results of closure exercise and engage PPs to commit and tender to actions to mitigate recognised bottlenecks</li> <li>Ensure risk is owned by those who can take early actions to mitigate, first</li> <li>Use effectively the support from the project manager (consultant) contracted by the PP</li> <li>Prioritise resources to tackle bottlenecks</li> <li>Repeat follow-up workshop, on-the-job, on public procurement guidance.</li> </ul>
4	PDP1, SP8: Capacity of PPs to execute procurement or administrative tasks is not effective and on time to secure the full completion of tenders within eligible time left	2	2	2.00	<ul style="list-style-type: none"> <li>Set clear agenda of milestones of PDPs</li> <li>Share results of closure exercise and engage PPs to commit and tender to actions to mitigate recognised bottlenecks</li> <li>Ensure risk is owned by those who can take early actions to mitigate, first</li> <li>Use effectively the support from the project manager (consultant) contracted by the PP</li> <li>Prioritise resources to tackle bottlenecks</li> <li>Repeat follow-up workshop, on-the-job, on public procurement guidance.</li> </ul>
5	PDP1, SP6: PDPs nominal implementation	3	3	3.00	<ul style="list-style-type: none"> <li>More emphasis on active risk management at PDP level.</li> </ul>

#	Risk description	Likelihood	Risk description	Likelihood	Risk description
	timeframes are reaching too close to a safe distance from final end date of eligibility due to the delay of administrative tasks ie. procurement or acceptance (damaging the contracts’ potential to full, successful implementation)				Escalate issues with FMO and NFP and make the political & physical leadership of Project Promoters aware of the stakes involved. • Set condition in Project Contract about the eligibility of all PDP activities. • Knowledge of how the Greek state plans to financially treat non-completed projects • Opinion by the PO regarding source of finance and exit provisions in contracts about to be signed in the context of MCS
6	PDP1, SP8: PDPs nominal implementation timeframes are reaching too close to a safe distance from final end date of eligibility due to the delay of administrative tasks ie. procurement or acceptance (damaging the contracts’ potential to full, successful implementation)	2	2	2.00	<ul style="list-style-type: none"> <li>• More emphasis on active risk management at PDP level.</li> <li>• Escalate issues with FMO and NFP and make the political &amp; physical leadership of Project Promoters aware of the stakes involved.</li> <li>• Set condition in Project Contract about the eligibility of all PDP activities.</li> <li>• Knowledge of how the Greek state plans to financially treat non-completed projects</li> <li>• Opinion by the PO regarding source of finance and exit provisions in contracts about to be signed in the context of MCS</li> </ul>
7	All Actions: Payments to PPS and declaration of eligible expenditures affects smooth rate of absorption.	2	2	2.00	<ul style="list-style-type: none"> <li>Share results of closure exercise and engage PPs to commit and tender to actions to mitigate recognised bottlenecks</li> <li>• Ensure risk is owned by those who can take early actions to mitigate, first</li> <li>• Use effectively the support from the project manager (consultant) contracted by the PP</li> <li>• Prioritise resources to tackle bottlenecks</li> <li>• Repeat follow-up workshop, on-the-job, on public procurement guidance.</li> </ul>
8	All Actions: Late or inaccurate reporting on Results from PPs	2	2	2.00	<ul style="list-style-type: none"> <li>• Timely training of how to manage the results framework end-to-end (defining</li> <li>• Awareness of time sensitive results.</li> <li>• Use management cost to support results data collection, monitoring and reporting (where deemed necessary).</li> <li>• Reduce indicators in the modified PA to well defined ones, connected =having an impact on outcomes, easy to measure</li> </ul>



#	Risk description	Likelihood	Risk description	Likelihood	Risk description
9	All Actions: The cycle from payments from EEA to PIP to PPs to Contactors and the verification of the declared as actually incurred, eligible expenditures affects smooth rate of absorption of EEA Grants	2	2	2.00	<ul style="list-style-type: none"> <li>• Close monitoring of the financial flow by PO and PP, justified likely payments and proposed expenditure in IFR, shared responsibility not to create backlogs</li> <li>• Clear guidelines from PO to PPs as to how to declare the expenditures right the first time with the right documentation</li> <li>• Focused on-the-job training regarding managing the flow of money to not create asymmetries from estimates, to real financing needs to verification of eligible expenditures</li> </ul>
<b>OVERALL RISK OF THE PROJECT</b> <i>(not an average of the above - manually scored)</i>		Likelihood	Consequence	Risk score	
		3	4	3.46	

Table 6: Time schedule feasibility - Risk assessment and mitigation analysis of PDP2

#	Risk description	Likelihood	Risk description	Likelihood	Risk description
1	PDP2, SP1: Capacity of PPs to execute procurement or administrative tasks is not effective and on time to secure the full completion of tenders within eligible time left	3	4	3.46	<ul style="list-style-type: none"> <li>• Set clear agenda of milestones of PDPs</li> <li>• Share results of closure exercise and engage PPs to commit and tender to actions to mitigate recognised bottlenecks</li> <li>• Ensure risk is owned by those who can take early actions to mitigate, first</li> <li>• Use effectively the support from the project manager (consultant) contracted by the PP</li> <li>• Prioritise resources to tackle bottlenecks</li> <li>• Repeat follow-up workshop, on-the-job, on public procurement guidance.</li> </ul>
2	PDP2, SP1: PDPs nominal implementation timeframes are reaching too close to a safe distance from final end date of eligibility due to the delay of administrative tasks ie. procurement or acceptance (damaging the contracts' potential	3	3	3.00	<ul style="list-style-type: none"> <li>• More emphasis on active risk management at PDP level.</li> <li>• Escalate issues with FMO and NFP and make the political &amp; physical leadership of Project Promoters aware of the stakes involved.</li> <li>• Set condition in Project Contract about the eligibility of all PDP activities.</li> <li>• Knowledge of how the Greek state plans to financially treat non-completed projects</li> </ul>

#	Risk description	Likelihood	Risk description	Likelihood	Risk description
	to full, successful implementation)				Opinion by the PO regarding source of finance and exit provisions in contracts about to be signed in the context of MCS
3	PDP2, SP1: (International) Project Partners internal processes affect timely execution of PDPs	2	3	2.45	<ul style="list-style-type: none"> <li>• Early estimation of impact to the overall schedule of deliverables</li> <li>• Update of Partnership Agreement to reflect internal shifts or modification in case the physical object is essentially affected with assessment of the effect on results.</li> <li>• Escalation of probabilities from Partner to PP to PO to NFP to FMO</li> </ul>
4	All Actions: Payments to PPS and declaration of eligible expenditures affects smooth rate of absorption.	2	2	2.00	<ul style="list-style-type: none"> <li>• Share results of closure exercise and engage PPs to commit and tender to actions to mitigate recognised bottlenecks</li> <li>• Ensure risk is owned by those who can take early actions to mitigate, first</li> <li>• Use effectively the support from the project manager (consultant) contracted by the PP</li> <li>• Prioritise resources to tackle bottlenecks</li> <li>• Repeat follow-up workshop, on-the-job, on public procurement guidance.</li> </ul>
5	All Actions: Late or inaccurate reporting on Results from PPs	2	2	2.00	<ul style="list-style-type: none"> <li>• Timely training of how to manage the results framework end-to-end (defining</li> <li>• Awareness of time sensitive results.</li> <li>• Use management cost to support results data collection, monitoring and reporting (where deemed necessary).</li> <li>• Reduce indicators in the modified PA to well defined ones, connected =having an impact on outcomes, easy to measure</li> </ul>
6	All Actions: The cycle from payments from EEA to PIP to PPs to Contactors and the verification of the declared as actually incurred, eligible expenditures affects smooth rate of absorption of EEA Grants	2	2	2.00	<ul style="list-style-type: none"> <li>• Close monitoring of the financial flow by PO and PP, justified likely payments and proposed expenditure in IFR, shared responsibility not to create backlogs</li> <li>• Clear guidelines from PO to PPs as to how to declare the expenditures right the first time with the right documentation</li> <li>• Focused on-the-job training regarding managing the flow of money to not create asymmetries from estimates, to real financing</li> </ul>

#	Risk description	Likelihood	Risk description	Likelihood	Risk description
					needs to verification of eligible expenditures
<b>OVERALL RISK OF THE PROJECT</b> <i>(not an average of the above - manually scored)</i>		<b>Likelihood</b>	<b>Consequence</b>	<b>Risk score</b>	
		<b>3</b>	<b>3</b>	<b>3.00</b>	

**Table 7: Time schedule feasibility - Risk assessment and mitigation analysis of PDP3**

#	Risk description	Likelihood	Risk description	Likelihood	Risk description
1	PDP3, SP8, SP9: The timetable for the conclusion of the implementation of sub-projects (and thus PDPs as a whole) close the end of eligibility period or some sub-projects do not get completed	3	3	3.00	<ul style="list-style-type: none"> <li>• Close monitoring of a detailed implementation time schedule.</li> <li>• Effective engagement of foreseen project consulting services at project level.</li> <li>• Estimation of impact to results and consultation with NFP/FMO for potential remedies.</li> <li>• Justify scope of modification and take appropriate actions with cautiousness to the public procurement legal implications vis. a vis. the impact on results expected</li> </ul>
2	PDP3, SP8, SP9: Capacity of PPs to execute procurement or administrative tasks is not effective and on time to secure the full completion of tenders within eligible time left	3	4	3.46	<ul style="list-style-type: none"> <li>• Set clear agenda of milestones of PDPs</li> <li>• Share results of closure exercise and engage PPs to commit and tender to actions to mitigate recognised bottlenecks</li> <li>• Ensure risk is owned by those who can take early actions to mitigate, first</li> <li>• Use effectively the support from the project manager (consultant) contracted by the PP</li> <li>• Prioritise resources to tackle bottlenecks</li> <li>• Repeat follow-up workshop, on-the-job, on public procurement guidance.</li> </ul>
3	PDP3, SP5, SP6: PDPs nominal implementation time-frames are reaching too close to a safe distance from final end date of eligibility due to the delay of administrative tasks ie. procurement or acceptance (damaging	4	4	4.00	<ul style="list-style-type: none"> <li>• More emphasis on active risk management at PDP level.</li> <li>• Escalate issues with FMO and NFP and make the political &amp; physical leadership of Project Promoters aware of the stakes involved.</li> <li>• Set condition in Project Contract about the eligibility of all PDP activities.</li> <li>• Knowledge of how the Greek state plans to financially</li> </ul>

#	Risk description	Likelihood	Risk description	Likelihood	Risk description
	the contracts’ potential to full, successful implementation)				treat non-completed projects • Opinion by the PO regarding source of finance and exit provisions in contracts about to be signed in the context of MCS
4	PDP3, SP5, SP6: The PO is unable to enforce art. 8.13.4 to “ensure funds are made available to complete projects in a timely manner” due to the delay of clarity on non-completed co-funded projects by EEA Grants at National Level which relate with the operation of PIP	4	4	4.00	<ul style="list-style-type: none"> <li>Notify FMO and Competent National Authorities like the NFP and CA and raise awareness on the discrepancy /impacts</li> <li>Issue “in a timely manner” a circular=how to financially treat non-completed projects at National Level with examples</li> <li>Delivery of a workshop on closure in early May with all stakeholders by the NFP &amp; FMO with clear examples</li> <li>Contracts about to be signed get written clear directions on how to handle closure of contracts if funds are not warranted after the end of the eligibility period</li> </ul>
5	All Actions: Payments to PPS and declaration of eligible expenditures affects smooth rate of absorption.	2	2	2.00	<ul style="list-style-type: none"> <li>Share results of closure exercise and engage PPs to commit and tender to actions to mitigate recognised bottlenecks</li> <li>Ensure risk is owned by those who can take early actions to mitigate, first</li> <li>Use effectively the support from the project manager (consultant) contracted by the PP</li> <li>Prioritise resources to tackle bottlenecks</li> <li>Repeat follow-up workshop, on-the-job, on public procurement guidance.</li> </ul>
6	All Actions: Late or inaccurate reporting on Results from PPs	2	2	2.00	<ul style="list-style-type: none"> <li>Timely training of how to manage the results framework end-to-end (defining</li> <li>Awareness of time sensitive results.</li> <li>Use management cost to support results data collection, monitoring and reporting (where deemed necessary).</li> <li>Reduce indicators in the modified PA to well defined ones, connected =having an impact on outcomes, easy to measure</li> </ul>
7	All Actions: The cycle from payments from EEA to PIP to PPs to Contactors and the verification of the declared as actually incurred, eligible	2	2	2.00	<ul style="list-style-type: none"> <li>Close monitoring of the financial flow by PO and PP, justified likely payments and proposed expenditure in IFR, shared responsibility not to create backlogs</li> <li>Clear guidelines from PO to PPs as to how to declare the</li> </ul>

#	Risk description	Likelihood	Risk description	Likelihood	Risk description
	expenditures affects smooth rate of absorption of EEA Grants				expenditures right the first time with the right documentation • Focused on-the-job training regarding managing the flow of money to not create asymmetries from estimates, to real financing needs to verification of eligible expenditures
<b>OVERALL RISK OF THE PROJECT (not an average of the above - manually scored)</b>		Likelihood	Consequence	Risk score	
		3	4	3.46	

**Table 17: Time schedule feasibility - Risk assessment and mitigation analysis of Support actions of Programme Operator of "Good Governance, Accountable Institutions, Transparency" (MIS 5087289)**

#	Risk description	Likelihood	Risk description	Likelihood	Risk description
1	Support actions of Programme Operator <sup>9</sup> , SP6: The timetable for the conclusion of the implementation of sub-projects (and thus PDPs as a whole) close the end of eligibility period or some sub-projects do not get completed	3	3	3.00	<ul style="list-style-type: none"> <li>• Close monitoring of a detailed implementation time schedule.</li> <li>• Effective engagement of foreseen project consulting services at project level.</li> <li>• Estimation of impact to results and consultation with NFP/FMO for potential remedies.</li> <li>• Justify scope of modification and take appropriate actions with cautiousness to the public procurement legal implications vis. a vis. the impact on results expected</li> </ul>
2	Support actions of Programme Operator <sup>10</sup> , SP1, SP2: Programme Management - Provision of Supporting Services: Probable delays and non-absorption of the foreseen budget, as a result of risks incurred in the other Projects of the Programme	2	2	2.00	Close monitoring of approved time schedule

<sup>9</sup> Risk in reference to Project with MIS 5087289. See also Paragraph 3.3.4.

<sup>10</sup> Risk in reference to Project with MIS 5087289. See also Paragraph 3.3.4.

#	Risk description	Likelihood	Risk description	Likelihood	Risk description
3	All Actions: Payments to PPS and declaration of eligible expenditures affects smooth rate of absorption.	2	2	2.00	Share results of closure exercise and engage PPs to commit and tender to actions to mitigate recognised bottlenecks • Ensure risk is owned by those who can take early actions to mitigate, first • Use effectively the support from the project manager (consultant) contracted by the PP • Prioritise resources to tackle bottlenecks • Repeat follow-up workshop, on-the-job, on public procurement guidance.
4	All Actions: Late or inaccurate reporting on Results from PPs	2	2	2.00	• Timely training of how to manage the results framework end-to-end (defining • Awareness of time sensitive results. • Use management cost to support results data collection, monitoring and reporting (where deemed necessary). • Reduce indicators in the modified PA to well defined ones, connected =having an impact on outcomes, easy to measure
5	All Actions: The cycle from payments from EEA to PIP to PPs to Contactors and the verification of the declared as actually incurred, eligible expenditures affects smooth rate of absorption of EEA Grants	2	2	2.00	• Close monitoring of the financial flow by PO and PP, justified likely payments and proposed expenditure in IFR, shared responsibility not to create backlogs • Clear guidelines from PO to PPs as to how to declare the expenditures right the first time with the right documentation • Focused on-the-job training regarding managing the flow of money to not create asymmetries from estimates, to real financing needs to verification of eligible expenditures
<b>OVERALL RISK OF THE PROJECT</b> <i>(not an average of the above - manually scored)</i>		<b>Likelihood</b>	<b>Consequence</b>	<b>Risk score</b>	
		<b>3</b>	<b>2</b>	<b>2.45</b>	

### 3.5. Evaluation of the effectiveness of the Programme

To evaluate the effectiveness of the Programme on the basis of the methodology submitted together with the Draft Evaluation Report of Programme B (Deliverable 1), the application of a bottom-up reduction approach from the Project level to the Programme level is recommended.

The methodology involves measuring the physical object (outputs) of each Project and reducing it with weighting to the upper level of the Programme, hence through the **effectiveness indicator** which expresses the progress of the physical implementation of the Project at each of its individual levels and is calculated from the quotient of the realized physical object at the stage of completion of the Project, in relation to the originally planned physical object, based on the following formula:

In.Effect= Physical Implementation / Physical Target

The evaluation of the effectiveness of the Programme is achieved by the method of financial weighting, that is, using the financial weight of each Project in the Programme, with the following formula:

$(\text{In.Effect})_{\text{Prog}} = \sum (\text{In.Effect})_{\text{Proj}} (\text{GF})_{\text{Proj}}$

where:

In.Effect = Physical Implementation Effectiveness Index

GF = Gravity Factor

Proj = Project

Prog = Programme

Due to the low degree of absorption of resources and delivery of the outputs of the Projects, together with a limited availability of the measured current values of the pre-selected Indicators of the Projects as will also be demonstrated in Paragraphs 3.6.1, 3.6.2 and 3.6.3, it is not possible to evaluate the effectiveness of the approved Projects or of the Programme as a whole.

Through the provision of qualitative data and detailed information on the course of the tender procedures per Project / Sub-Project, the Sub-Projects that have been activated and in progress, as well as, any administrative or other issues / difficulties faced, **the Programme Operator and Project Promoters certify the course of implementation for the interventions that directly contribute to all Outcomes / Outputs and the expected results of the Programme, although not fully.**

In specific, considering the time schedule feasibility and risk assessment and mitigation analysis performed above, the evaluator notes that there are direct positive changes but also significant reductions of the physical object of the Programme in a number of Projects. These will be analyzed in detail in Paragraph 4.

In addition, the risks in time schedule delays identified in other parts of Projects may also negatively partly impact the fulfillment of the remaining Outputs and expected results of the Programme.

Nevertheless, the type of data provided to the evaluator by the Programme Operator and Project Promoters cannot be translated to measurable indicators to evaluate the course of the implementation on the basis of the specifications and procedures set by the Programme. Such

specifications and procedures constitute the result and output indicators of each Project, the course of implementation of the activities and the budget, any deviations during the course of their implementation, etc.

It is only with the reports through MIS that a measurable verification of the course of implementation of the foreseen activities by the competent authorities based on the inclusion criteria, can be achieved.

It is important to stress that the information and estimates provided by the competent authorities are not disputed, but they can only be taken into account as a robust indication of the implementation progress of the Projects and the Programme as a whole, without further certification of the required means (results, indicators) and steps for their successful completion.

Given that the effectiveness of the Programme in terms of achieving the goals that were set, is based on a series of criteria, such as the following:

- Absorption rate of the evaluated Projects and the Programme as a whole,
- Degree of achievement of the objectives of the Programme (output indicators, results produced, etc.),
- Estimated degree of absorption of Programme resources at the end of the Programming Period,
- Estimated degree of financial integration and prospects of achieving the objectives of the Programme, at the end of the Programming Period,

**The above information should be certified with measurable data for the evaluation of the effectiveness of the Projects and Programme as a whole to be made possible.**

Despite the lack of the availability of measurable data, qualitative observations / conclusions may be drawn from the use of the evidence and information provided to the evaluator by the Programme Operator and Project Promoters of the Programme, as analytically laid out in Paragraphs 3.2, 3.3, 3.4.

More specifically, it has been shown that the effectiveness of the Programme may be reduced by the implicated risks in not absorbing the Programme budget and the Programme not reaching its goals which are connected to implementation issues in a number Projects. At this point, the evaluator notes that due to the lack of measurable data on the Project's indicators it is not possible to measure the probability of a potential shrinkage of budget or of the Programme not reaching its goals. However, a quantified assessment of the risks incurred has already been elaborated in Paragraph 3.4 and the evaluator shall make use of the information and calculations performed in that part of the report to reflect the level of risks that could impact the effectiveness of the Projects and the Programme as a whole.

In particular, on the basis of the evidence and data provided, the evaluator estimates that the following risks with a score of “Medium - Low”, “Medium - High”, or “High” (thus ignoring risks with a score of “Low”), herein organized and presented by Project, might negatively impact partly the effectiveness of the Programme:

- PDP1: The timetable for the conclusion of the implementation of SP 1, 2, 4 close the end of eligibility period or some sub-projects do not get completed. Public procurement processes in



SP1 are cumbersome and reach estimated timeframes due to lack of experience or resources allocation or quality of descriptions, or market failure or legal impediments. The capacity of PPs to execute procurement or administrative tasks is not effective and on time to secure the full completion of tenders within eligible time left in SP1, 2, 4, 6. Nominal implementation timeframes in SP6 are reaching too close to a safe distance from final end date of eligibility due to the delay of administrative tasks. Risk Score: 3.46;

- PDP2, SP1: Capacity of PPs to execute procurement or administrative tasks is not effective and on time to secure the full completion of tenders within eligible time left. PDPs nominal implementation timeframes are reaching too close to a safe distance from final end date of eligibility due to the delay of administrative tasks. (International) Project Partners internal processes affect timely execution of PDPs. Risk Score: 3.00;
- PDP3: The timetable for the conclusion of the implementation of SP 8, 9 close the end of eligibility period or some sub-projects do not get completed. Capacity of PPs to execute procurement or administrative tasks is not effective and on time to secure the full completion of tenders within eligible time left in SP 8, 9. PDPs nominal implementation time-frames are reaching too close to a safe distance from final end date of eligibility due to the delay of administrative tasks in SP 5, 6. The PO is unable to enforce art. 8.13.4 to “ensure funds are made available to complete projects in a timely manner” due to the delay of clarity on non-completed co-funded projects by EEA Grants at National Level which relate with the operation of PIP in SP 5, 6. Risk Score: 3.46.
- Support actions of Programme Operator of "Good Governance, Accountable Institutions, Transparency", Sub-project 6: Staff training: The timetable for the conclusion of the implementation of sub-project close the end of eligibility period. Risk Score: 2.45.

**Therefore, to avoid further reductions in the effectiveness of the Programme, the evaluator recommends:**

- ❖ **the incorporation of evidence - driven Recommendations 1, 2, 3, 4, 6, 7, 8 for (i) the close monitoring of the approved time schedule of PDP 1 (SP1, SP2, SP4, SP6), PDP 2 (SP1), PDP 3 (SP5, SP6), (ii) the speeding-up of both the tender processes and the finalization of all pending issues in the revised agreement with the OECD in PDP2, in order to avoid further delays in the above-mentioned sub-project assignment and its implementation.**
- ❖ **the incorporation of evidence - driven Recommendation 9 for the close monitoring of the progress of the physical object of all Predefined Projects in order to modify the physical object of the project “Support actions of Programme Operator of "Good Governance, Accountable Institutions, Transparency" as appropriate.**
- ❖ **The incorporation of evidence - driven Recommendation 10 to remove the Project “Technical consultant support for the enhanced maturity and preparation of the Predefined Project “Strengthening of integrity, transparency and anti-corruption framework" as it is no longer relevant to its scope. The budget of the Project could be transferred to other technical support actions to remain readily available to cover additional supporting needs.**

### **3.6. Ability to achieve the goals of the Programme**

The assessment of the degree of achievement of the Programme’s goals at the end of the Programme’s implementation period per predefined project is based on the following parameters and assumptions:

- the target value of the output and result indicators of the Projects and their contribution to the achievement of the Programme objectives
- the ability of individual Sub-Projects and their contracts to deliver Programme objective values (outputs and outcomes)
- the assessment of the possibility of timely contracting and implementation of the Sub-Projects (timing of contracts and possibility of implementing the Sub-Projects within the Programme implementation period)
- reasonable assumptions such as those expressed by the Project Promoters regarding the course of implementation of the Projects and the achievement of their objectives.

The following Tables present the planned and subsequently implemented and realised physical object (Deliverables), as well as the expected results per basic objective of the Programme (including the interventions of the Bilateral Relations Fund), through the system of quantified objectives - output and results indicators of the Programme.

The reflection of both the objective of the projects and the implementation values of the indicators have been based on data reflected in the MIS. It is noted that despite the progress of the implementation of the Programme and to the extent that the Pre-Defined Projects do not currently yield measurable values of output indicators and results, the progress in achieving the objectives appears to be minimal as of 27/1/2023.

The following Tables also incorporate the indicators that are scheduled to be deleted in the context of the forthcoming revision of the Programme. These indicators are shown with a strikethrough mark and are organized by Basic Objective of the Programme.

#### **3.6.1. Effectiveness of Public Administration improved**

The physical object of PDP 1 “Organisational Upgrade and Digital Transformation of Citizen Service Centers Network (KEP) and public services provided” (MIS 5114175) under Basic Objective “Effectiveness of Public Administration improved” fully feeds in the programme outcome and output indicators as originally designed. The indicators are presented in the following table.

**Table 83: Outcome and Output Indicators of PDP 1 “Organisational Upgrade and Digital Transformation of Citizen Service Centers Network (KEP) and public services provided” (MIS 5114175)**

Expected Programme's results	Indicator Type	Indicator Code	Indicator	Unit of measurement	Baseline Value	Baseline year	Target Value	Target Value/ Projec	% Implementation	Assessment of Achievement
	EOX_R130	Outcome	<del>Share of all public services that are provided via CSCs</del>	<del>Percentage(%)</del>	<del>30%</del>	<del>2020</del>	50%	50%	0%	-
	EOX_R131	Outcome	Level of CSC employees' satisfaction of the functionality, usability and efficiency of CSCs	Scale 1- 10	6	2020	9.00	9.00	0%	9.00
	EOX_R132a	Outcome	Level of citizen's satisfaction of EUGO and of CSC offices	Scale 1- 10	6	2020	9.00	9.00	0%	9.00
	EOX_R132b	Outcome	Level of citizen's satisfaction of EUGO and of CSC offices	Scale 1- 10	6	2020	9.00	9.00	0%	9.00
	EOX_R133	Outcome	Share of all citizens requests for public services to CSC offices that are delivered digitally	Percentage(%)	0%	N/A	80%	80%	0%	80%
	EOX_R134	Outcome	<del>Share of all EU-GO service delivery requests that are delivered through CSCs</del>	<del>Percentage(%)</del>	<del>10%</del>	<del>2020</del>	40%	40%	0%	-
CSC's network re-organised according to the principles of proximity, subsidiarity, efficiency and effectiveness	EOX_0142	Output	Share of all CSC offices nationwide that are re-organised	Percentage	0%	N/A	100%	100%	0%	100%
	EOX_0143	Output	Number of completed co-evaluations of CSC network operations	Number	0	N/A	2	2	0%	2
	EOX_0144	Output	Number of completed studies on CSC reorganisation	Number	0	N/A	3	3	0%	3

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Expected Programme's results	Indicator Type	Indicator Code	Indicator	Unit of measurement	Baseline Value	Baseline year	Target Value	Target Value/ Projec	% Implementation	Assessment of Achievement
Repository of administrative processes is updated and their integration into the CSC IS completed	EOX_0145	Output	Share of all processes offered by CSC offices that are updated	Percentage	0%	N/A	100%	100%	0%	-
Infrastructure for digitalisation of initials and signatures at CSCs physical offices in operation	EOX_0146	Output	Number of tablets installed in CSC front offices with embedded software for digitalisation of initials and signatures	Number	0	N/A	1,134	1,134	0%	2,200
Integrated platform CSC IS is functional (EU-GO and CSC-BO)	EOX_0147	Output	CSC information system developed	Number binary	0	N/A	1 Yes	1 Yes	0%	Yes
	EOX_0148	Output	Share of EU-GO platform content updated	Percentage	20%	2020	100%	100%	0%	-
	EOX_0149	Output	Share of data migrated into the integrated platform CSC-IS	Percentage	0%	2020	100%	100%	0%	-
Conditions to enhance the administrative and digital skills of CSC employees created	EOX_0150	Output	Number of attendees in awareness raising workshops for employees	Number	0	N/A	664	664	0%	664
	EOX_0144	Output	Number of training modules for CSCs employees' training developed	Number	0	N/A	3	3	0%	3
	EOX_0151	Output	Code of ethics for CSC employees adopted	Binary	No	N/A	Yes	1	0%	Yes

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Expected Programme's results	Indicator Type	Indicator Code	Indicator	Unit of measurement	Baseline Value	Baseline year	Target Value	Target Value/ Projec	% Implementation	Assessment of Achievement
	EOX_O153	Output	Number of awareness raising workshops for employees organised	Number	0	N/A	6	6	0%	6
Citizens informed about the new services and engaged in designing the services	EOX_O154	Output	Number of awareness raising campaigns for citizens organised	Number	0	N/A	20	20	0%	20
	EOX_O155	Output	Number of citizens engaged in service design workshops	Number	0	N/A	200	200	0%	200

As of 27/1/2023, there is a lack of measurable data on the Project’s indicators, therefore it is not possible to estimate the extent to which the target values are expected to be satisfied. At the same time, there are no projects financed by the Bilateral Relations Fund that serve the Basic Objective of the Programme.

However, the following should be noted:

- As also previously mentioned, PDP1, Sub-Project 6: "Implementation of electronic signatures in the CSC network" will be enhanced in order to strengthen the administrative function of the Network of CSCs (“KEPs”) and services provided, through a surplus expenditure of 14.41% that is expected to be covered from the transfer of resources from Outcome 2 to Outcome 1. This is expected to positively impact output indicator “EOX\_0146 Number of tablets installed in KEP front offices with embedded software for digitalisation of initials and signatures”, with an expected higher value than the target value by design.

On the other hand, the following risks may also impact the extent to which indicator requirements can be met and therefore the ability for the Project to reach its goals under this Basic Objective:

- PDP1: The timetable for the conclusion of the implementation of SP 1, 2, 4 close the end of eligibility period or some sub-projects do not get completed. Public procurement processes in SP1 are cumbersome and reach estimated timeframes due to lack of experience or resources allocation or quality of descriptions, or market failure or legal impediments. The capacity of PPs to execute procurement or administrative tasks is not effective and on time to secure the full completion of tenders within eligible time left in SP1, 2, 4, 6. Nominal implementation timeframes in SP6 are reaching too close to a safe distance from final end date of eligibility due to the delay of administrative tasks. Risk Score: 3.46;

**Therefore, to avoid further risks of reductions in the ability to achieve the objectives of the Programme under this Basic Objective, the evaluator recommends:**

- ❖ **the incorporation of evidence - driven Recommendations 1, 2, 3, 4 for the close monitoring of the approved time schedule of PDP 1 (SP1, SP2, SP4, SP6) and the speeding-up of the tender process in order to avoid further delays in the above-mentioned sub-project assignment and its implementation.**
- ❖ **the incorporation of evidence - driven Recommendation 9 for the close monitoring of the progress of the physical object of all Predefined Projects in order to modify the physical object of the project “Support actions of Programme Operator of "Good Governance, Accountable Institutions, Transparency" as appropriate.**

### **3.6.2. Transparency and integrity in public institutions enhanced**

Due to the significant reduction of the physical object of PDP 2 “Strengthening of integrity, transparency and anti-corruption framework” (MIS: 5109507) and more specifically the removal of:

- Sub-Project 2: "Improving the framework and procedures for the asset recovery and management";

- Sub-Project 3: "Design of an integrated Asset Management Information System and procurement of MIS for Asset Management"

under Basic Objective “Transparency and integrity in public institutions enhanced”, the outcome and output indicators are not fed in as originally designed. The indicators together with the scheduled deletions are presented in the following table.

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**Table 14: Outcome and Output Indicators of PDP 2 “Strengthening of integrity, transparency and anti-corruption framework” (MIS: 5109507)**

Expected Programme’s results	Indicator Type	Indicator Code	Indicator	Unit of measurement	Baseline Value	Baseline year	Target Value	Target Value/ Projec	% Implementation	Assessment of Achievement
Transparency and integrity in public institutions enhanced	Outcome	EOX_R082	Awareness of public servants for the empowerment of integrity safeguards	Percentage	TBD	TBD	(+20%)	-	0%	-
	Outcome	EOX_R083	Number of national policies and laws influenced	Number	0	N/A	3	3	0%	1
	Outcome	EOX_R084	Average number of days to recover assets	Number	TBD	TBD	(-20%)	-	0%	-
	Outcome	EOX_R085	Share of assets managed at the end of the programme implementation	Percentage	TBD	TBD	(+15%)	-	0%	-
	Outcome	EOX_R086	Establishment of a National Integrity System	Binary	No	N/A	Yes	1	0%	Yes
National framework for Integrity strengthened	Output	EOX_O156	Number of reports drafted (including mapping and survey reports) contributing to the establishment of the National Integrity System	Number	0	N/A	8	8	0%	2
	Output	EOX_O157	Number of e-learning courses concerning the national framework for integrity delivered	Number	0	N/A	1	1	0%	1
	Output	EOX_O158	Number of professional staff trained (public servants)	Number	0	N/A	100	100%	0%	100



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Expected Programme's results	Indicator Type	Indicator Code	Indicator	Unit of measurement	Baseline Value	Baseline year	Target Value	Target Value/ Projec	% Implementation	Assessment of Achievement
	Output		Number of codes of conduct for elected officials created	Number	0	N/A	1	-	0%	
	Output	EOX_O180	Number of Risk management manuals for corruption risks created	Number	0	N/A	1	1	0%	-
	Output		Number of public organisations conducting a full risk management exercise at the entity level	Number	0	N/A	2	-	0%	
	Output		Establishment of a National Integrity Award	Binary	No	N/A	Yes	-	0%	
	Output	EOX_O161	Number of awareness raising conferences conducted	Number	0	N/A	1	1	0%	1
	Output	EOX_O162	Number of web-based platforms developed	Number	0	N/A	1	1	0%	
	Output	EOX_O163	Number of perception-based surveys conducted	Number	0	N/A	2	2	0%	1
Measures taken to improve the framework and procedures of asset recovery and asset management	Output	EOX_O164	Number of handbooks created	Number	0	N/A	1	2	0%	-
	Output	EOX_O165	Number of professional staff trained	Number	0	N/A	12	12	0%	-
	Output	EOX_O166	Asset Management & Recovery Information System in operation	Binary	No	N/A	Yes	1	0%	-

As of 27/1/2023, there is a lack of measurable data on the Project’s indicators, therefore it is not possible to estimate the extent to which the target values are expected to be satisfied.

However, the reduction of physical object in PDP2, Sub-Project 1: "Strengthening the National Framework for Integrity in the Public Sector" corresponds to a shrinkage of budget by 30.86% (10.81% at Project level and 2.59% at Programme level). The complete removals of Sub-Project 2: “Improving the framework and procedures for the asset recovery and management” and Sub-Project 3 “Supply of an Integrated Asset Management Information System” correspond to shrinkages of budget of the Project by 14.91% and 50.07% respectively (3.57% and 12.01% respectively at the Programme level).

Reductions in the physical object are also observed in the actions under the Programme Management activities, as expected.

Even though the Programme Management actions are not connected to outcome and output indicators, the evaluator would also like to note the reduction of the physical object of “Support actions of Programme Operator of "Good Governance, Accountable Institutions, Transparency" (MIS 5087289)”, Sub-project 4: “Initial stage publicity services”, which corresponds at a budget shrinkage of 46.71% (1.76% at the Project level and 0.14% at the Programme level).

Furthermore, the evaluator notes that the following risks may impact the extent to which indicator requirements can be met and therefore the ability for the Project to reach its goals under this Basic Objective:

- PDP2, SP1: Capacity of PPs to execute procurement or administrative tasks is not effective and on time to secure the full completion of tenders within eligible time left. PDPs nominal implementation timeframes are reaching too close to a safe distance from final end date of eligibility due to the delay of administrative tasks. (International) Project Partners internal processes affect timely execution of PDPs. Risk Score: 3.00;

**Therefore, to avoid further reductions in the ability to achieve the objectives of the Programme under this Basic Objective, the evaluator recommends:**

- ❖ **the incorporation of evidence - driven Recommendation 6 for the close monitoring of the approved time schedule of PDP2, SP1 and the speeding-up of the procedures for finalizing all pending issues in the revised agreement with the OECD in order to avoid further potential delays that could impact its objectives.**
- ❖ **the incorporation of evidence - driven Recommendation 9 for the close monitoring of the progress of the physical object of all Predefined Projects in order to modify the physical object of the project “Support actions of Programme Operator of "Good Governance, Accountable Institutions, Transparency" as appropriate.**
- ❖ **the incorporation of evidence - driven Recommendation 10 to remove the Project “Technical consultant support for the enhanced maturity and preparation of the Predefined Project “Strengthening of integrity, transparency and anti-corruption framework" as it is no longer relevant to its scope. The budget of the Project could be transferred to other technical support actions to remain readily available to cover additional supporting needs.**

### **3.6.3. Maladministration in the public sector decreased.**

The physical object of PDP 3 “Programme - Good Governance, Accountable Institutions, Transparency” (MIS 5093609) under Basic Objective “Maladministration in the public sector decreased” has a low implementation progress due to delays, as previously discussed. The indicators are presented in the following table.

**Table 15: Outcome and Output Indicators of PDP 3 “Programme - Good Governance, Accountable Institutions, Transparency” (MIS: 5093609)**

Expected Programme’s results	Είδος Δείκτη	Indicator Code	Indicator	Unit of measurement	Baseline Value	Baseline year	Target Value	Target Value/ Projec	% Implementation	Assessment of Achievement
Maladministration in the public sector decreased			Share of citizens having access to the Greek Ombudsman services	Percentage	TBD	TBD	(+50%)	-	0.00%	
			Number of valid cases investigated/ mediated	Number	TBD	TBD	(+50%)	-	0.00%	-
		EOX_R111	Share of public servants that self-report improved cooperation with the Greek Ombudsman	Percentage	n/a	n/a	80%	80%	0.00%	80%
		EOX_R112a	Share of respondents that are aware of the role of the Ombudsman in combatting maladministration	Percentage	n/a	n/a	80%	Not defined	0.00%	-
		EOX_R112a	Share of respondents that are aware of the role of the Ombudsman in combatting maladministration	Percentage	n/a	n/a	80%	Not defined	0.00%	-
Greek Ombudsman presence in the regions supported		CO113	Ombudsman office in Thessaloniki is operational	Binary	Ναι	1	N/A	Yes	0.00%	Yes
		CO114	Number of Ombudsman visits in the regions	Number	110	110	N/A	110	0.00%	110

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Expected Programme's results	Είδος Δείκτη	Indicator Code	Indicator	Unit of measurement	Baseline Value	Baseline year	Target Value	Target Value/ Projec	% Implementation	Assessment of Achievement
Cooperation of the Greek Ombudsman with public services and civil society supported		CO115	Number of cooperation relationships (MoUs/ synergies) and networks established between the Ombudsman and public administration, civil society and trade unions	Number	15	15	N/A	15	0.00%	-
		CO116	Number of training materials developed	Number	22	22	N/A	22	0.00%	22
		CO117	Number of <del>working meetings</del> awareness workshops organized between the Ombudsman and public administration, civil society and trade unions	Number	22	22	N/A	22	0.00%	22
		CO118	Number of civil servants and civil society staff trained in good governance principles and practices, human rights, vulnerable groups' rights, equal treatment etc.	Number	1000	1,000.00	N/A	1	0.00%	1,000.00
Access to Ombudsman documents and information increased		CO119	Number of IT infrastructure, <del>is developed, including web information</del>	Αριθμός	4	4	N/A	4	0.00%	

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Expected Programme's results	Είδος Δείκτη	Indicator Code	Indicator	Unit of measurement	Baseline Value	Baseline year	Target Value	Target Value/ Projec	% Implementation	Assessment of Achievement
			platforms (website, e-forums) and mobile applications developed							
Capacity building of Ombudsman personnel provided		CO_120	Number of professional staff from the Ombudsman trained	Αριθμός	150	150	N/A	150	0.00%	150
		EOX121	Number of best practice exchange meetings/ workshops with international/ EU institutions	Αριθμός	10	10	N/A	10	0.00%	10
		EOX_122	Number of working tools developed (legal tools, platforms etc.)	Αριθμός	1	1	N/A	1	0.00%	-
Awareness about the preventive role of the Ombudsman on combating exclusion supported		EOX123	Number of awareness raising campaigns (awareness days, press events, special conferences) organized at local communities and local authorities	Αριθμός	26	26	N/A	26	0.00%	26
		EOX_123	Number of publications/ manuals/ information leaflets, training material, communication tools developed	Αριθμός	11	11	N/A	11	0.00%	11

As of 27/1/2023, there is a lack of measurable data on the Project’s indicators, therefore it is not possible to estimate the extent to which the target values are expected to be satisfied.

However, the following risks may impact the extent to which indicator requirements can be met and therefore the ability for the Project to reach its goals under this Basic Objective:

- PDP3: The timetable for the conclusion of the implementation of SP 8, 9 close the end of eligibility period or some sub-projects do not get completed. Capacity of PPs to execute procurement or administrative tasks is not effective and on time to secure the full completion of tenders within eligible time left in SP 8, 9. PDPs nominal implementation time-frames are reaching too close to a safe distance from final end date of eligibility due to the delay of administrative tasks in SP 5, 6. The PO is unable to enforce art. 8.13.4 to “ensure funds are made available to complete projects in a timely manner” due to the delay of clarity on non-completed co-funded projects by EEA Grants at National Level which relate with the operation of PIP in SP 5, 6. Risk Score: 3.46.

**Therefore, to avoid further risks of reductions in the ability to achieve the objectives of the Programme under this Basic Objective, the evaluator recommends:**

- ❖ **the incorporation of evidence - driven Recommendations 7, 8 for the close monitoring of the approved time schedule of PDP 3 (SP5, SP6) and the speeding-up of the tender process in order to avoid further delays in the above-mentioned sub-project assignment and its implementation**
- ❖ **the incorporation of evidence - driven Recommendation 9 for the close monitoring of the progress of the physical object of all Predefined Projects in order to modify the physical object of the project “Support actions of Programme Operator of "Good Governance, Accountable Institutions, Transparency" as appropriate.**

#### **4. Evaluation of the efficiency of the resources of the Projects and Programme**

To evaluate the efficiency of resources of the Projects and the Programme as a whole, on the basis of the methodology submitted together with the Draft Evaluation Report of Programme F (Deliverable 1), the application of a bottom-up reduction approach from the Project level to the Programme level is recommended.

The evaluation of the efficiency of a Project is hence done through the joint consideration of elements of the projects’ physical and financial progress and then of the Programme as a whole. It consists of the process of monitoring the evolution of the unit cost of the physical object of the projects at the time of their completion, in relation to the unit cost that was initially planned. This analysis may lead to useful conclusions regarding the "economics" of the implementation of the approved interventions in the context of the Programme.

The measurement of project efficiency is expressed by the ratio of the physical in relation to the financial integration and therefore the efficiency indicator of a project is calculated from the following formula:

In.Effic= In.Effect / Absorption (Financial Integration Index)

The evaluation of the efficiency of the Programme is achieved by a similar procedure to the one that was described in the context of calculating the effectiveness indicators. More specifically, the efficiency index of each Project is multiplied by its weighting factor in the total expenditure of the Programme. The Programme efficiency index is a result of the sum of the weighted indices of each individual Project with the use of the following formula:

$$(\text{In. Effic})_{\text{Prog}} = \sum (\text{In. Effic})_{\text{Proj}} (\text{GF})_{\text{Proj}}$$

where:

In. Effic = Efficiency Index

GF = Gravity Factor

Proj = Project

Prog = Programme

In terms of the procedure of producing weighted data, the following criteria should be taken into account:

- Weighting based on the Weight of the projects in the Achieved Outputs of the Program
- Weighting based on the Financial Weight of each Project
- Comparison of Programme Efficiency Index by Weighting Approach

**At this stage it can be verified that the initial allocation of financial resources is confirmed on the basis of the planned budgets through the Calls for Proposals procedures, as well as, through the cost of the approved Projects to the extent that such Projects are activated and subject to the incorporation of the scheduled revisions in the Programme as currently planned (as of 27/1/2023).**

However, as also shown in Paragraph 3.6, there is very limited availability of the measured current values of the pre-selected Indicators of the Projects. In the absence of the completion of this data and to the extent that the approved Projects do not currently yield measurable values of output indicators and results, it is not possible to evaluate the efficiency of the approved Projects or of the Programme as a whole.

Upon completion of the approved Projects, measurable data should be appropriately selected and calculated for the purposes to enable the evaluation of the efficiency of the Projects and Programme as a whole.

Similarly to what is stated in Paragraphs 3.4, 3.5, 3.6, despite the lack of the availability of measurable data, qualitative observations / conclusions may be drawn from the use of the evidence and information provided to the evaluator by the Programme Operator and Project Promoters, as analytically laid out in Paragraphs 3.2, 3.3, 3.4.

More specifically, it has been shown that the efficiency of the resources of the Projects and the Programme as a whole is already impacted by implementation issues, that have resulted in some direct positive changes but also more significant reductions of the physical object of the Programme in the following cases:



PDP1, Sub-Project 6: "Implementation of electronic signatures in the CSC network" will be enhanced in order to strengthen the administrative function of the Network of CSCs (“KEPs”) and services provided, through a **surplus expenditure of almost 100% (99.6%)** that is expected to be covered from the transfer of resources from Outcome 2 to Outcome 1. However, this is only relevant to PDP 1 as this transfer of funds is internal to Programme F and therefore it does not affect the total budget of the Programme.

Furthermore, there is a reduction of physical object in PDP2, Sub-Project 1: "Strengthening the National Framework for Integrity in the Public Sector", with a **shrinkage of budget by 30.86%** (10.81% at Project level and 2.59% at Programme level), as well as, in Sub-Project 2: “Improving the framework and procedures for the asset recovery and management” and Sub-Project 3”, the latter being both completely removed from the Programme, with **shrinking of budget of the Project by 14.91% and 50.07% respectively** (3.57% and 12.01% respectively at the Programme level).

Reductions in the physical object are also observed in the actions under the Programme Management activities, as expected.

More specifically, “Support actions of Programme Operator of "Good Governance, Accountable Institutions, Transparency" (MIS 5087289)”, Sub-project 4: “Initial stage publicity services” faces reduction in the physical object that would correspond to a **shrinkage of budget by 46.71%** (1.76% at the Project level and 0.14% at the Programme level).

Furthermore, due to the opt-out of sub-projects 2 and 3 of PDP2, and the nature of the remaining sub-project, the need for the implementation of the action “Technical consultant support for the enhanced maturity and preparation of the Predefined Project “Strengthening of integrity, transparency and anti-corruption framework" (MIS 5092232) is not relevant anymore. The reduction in the physical object would correspond to a **budget shrinkage of 46.71%** and of 0.19% of the Programme. However, it is suggested that the Project should be removed from the Programme and the budget could be transferred to other technical support action to remain readily available to cover additional supporting needs.

As a conclusion of the above, the efficiency of the resources of the Projects and the Programme as a whole is already impacted by the following existing increases / reductions in the financial object:

- An increase in the budget of PDP 1 by 14.4%.
- A decrease in the budget of PDP 2 by 75.8%.
- A decrease in the budget of Project “Support actions of Programme Operator of "Good Governance, Accountable Institutions, Transparency" (MIS 5087289)” by 1.8%.
- A decrease in the budget of Project “Technical consultant support for the enhanced maturity and preparation of the Predefined Project “Strengthening of integrity, transparency and anti-corruption framework" (MIS 5092232)” by 100%.

As a result, there is a decrease of the Programme budget as a whole by 18.5%.

Furthermore, the evaluator notes the following risks with a score of “Medium - Low”, “Medium - High”, or “High” (thus ignoring risks with a score of “Low”), herein organized and presented by Project that might negatively impact the efficiency of resources of the Programme:

- PDP1: The timetable for the conclusion of the implementation of SP 1, 2, 4 close the end of eligibility period or some sub-projects do not get completed. Public procurement processes in SP1 are cumbersome and reach estimated timeframes due to lack of experience or resources allocation or quality of descriptions, or market failure or legal impediments. Capacity of PPs to execute procurement or administrative tasks is not effective and on time to secure the full completion of tenders within eligible time left in SP1, 2, 4, 6. Nominal implementation timeframes in SP6 are reaching too close to a safe distance from final end date of eligibility due to the delay of administrative tasks. Risk Score: 3.46;
- PDP2, SP1: The assessment involves the reduced physical object in the Project. Capacity of PPs to execute procurement or administrative tasks is not effective and on time to secure the full completion of tenders within eligible time left. PDPs nominal implementation timeframes are reaching too close to a safe distance from final end date of eligibility due to the delay of administrative tasks. (International) Project Partners internal processes affect timely execution of PDPs. Risk Score: 3.00;
- PDP3: The timetable for the conclusion of the implementation of SP 8, 9 close the end of eligibility period or some sub-projects do not get completed. Capacity of PPs to execute procurement or administrative tasks is not effective and on time to secure the full completion of tenders within eligible time left in SP 8, 9. PDPs nominal implementation time-frames are reaching too close to a safe distance from final end date of eligibility due to the delay of administrative tasks in SP 5, 6. The PO is unable to enforce art. 8.13.4 to “ensure funds are made available to complete projects in a timely manner” due to the delay of clarity on non-completed co-funded projects by EEA Grants at National Level which relate with the operation of PIP in SP 5, 6. Risk Score: 3.46.
- Support actions of Programme Operator of "Good Governance, Accountable Institutions, Transparency", Sub-project 6: Staff training: The timetable for the conclusion of the implementation of sub-project close the end of eligibility period. Risk Score: 2.45.

**Therefore, to avoid further reductions in the effectiveness of the Programme, the evaluator recommends:**

- ❖ **the incorporation of evidence - driven Recommendations 1, 2, 3, 4, 6, 7, 8 for (i) the close monitoring of the approved time schedule of PDP 1 (SP1, SP2, SP4, SP6), PDP 2 (SP1), PDP 3 (SP5, SP6), (ii) the speeding-up of both the tender processes and the finalization of all pending issues in the revised agreement with the OECD in PDP2, in order to avoid further delays in the above-mentioned sub-project assignment and its implementation.**
- ❖ **the incorporation of evidence - driven Recommendation 9 for the close monitoring of the progress of the physical object of all Predefined Projects in order to modify the physical object of the project “Support actions of Programme Operator of "Good Governance, Accountable Institutions, Transparency" as appropriate.**

## 5. Estimated effects from the implementation of the Programme’s projects

### 5.1. Assessment of the effects of the Programme on the efficiency, integrity and accountability of the public administration

As mentioned above, the Programme’s direct objectives are:

- ✚ the creation of digital services in public administration,
- ✚ the acceleration of its technological modernisation,
- ✚ the reduction of bureaucracy,
- ✚ the fight against corruption,
- ✚ dealing with maladministration and better management of citizens' problems.

Through the interventions of the Programme that serve these objectives, it is expected that the transparency, efficiency and accountability of the public administration system, as well as, the citizens' direct access to the provided services will be strengthened.

Other expected positive effects are the upgrading and strengthening of the technological modernisation of the public administration, the reduction of bureaucracy, the strengthening and upgrading of the e-government services provided through the development of the CSCs, the development of operational capacity to monitor the implementation of the NACAP, as well as the strengthening of good governance, accountability and the dealing with maladministration issues in the public sector.

However, to the extent that the completion of the physical object of the Projects is not at an advanced phase, there is very limited availability of the measured current values of the pre-selected indicators of the Projects. Thus, as previously analyzed, it is not possible to evaluate in a specific quantitative manner the final results and impacts of the Programme or the effects on the efficiency, integrity and accountability of the public administration.

Despite this, the foreseen smooth implementation and completion of most of the interventions of the Programme creates reasonable conditions for the creation of significant positive effects on the efficiency, integrity and accountability of the Public Administration. In particular:

- ✚ **PDP 1 “Organisational Upgrade and Digital Transformation of Citizen Service Centers Network (KEP) and public services provided” (MIS 5114175)** focuses on improving efficiency in the public sector, primarily aiming to improve the effectiveness of the operation of CSCs, through strengthening the ability of their human resources to provide integrated services to citizens and businesses and overall the improvement of the quality, reliability of the service and information services provided by the CSCs. The interventions developed and co-financed by the Programme are expected to have direct influence and effects:
  - at the technological level of Public Administration (technological modernisation of public administration),
  - facilitating the access of citizens and other users to public administration (reduction of service time and immediate access to public services and information),
  - improving the quality and reliability of the services provided (use of valid electronic databases and services),


- reducing maladministration and bureaucracy (automation/ digitization and simplification of procedures),
- reducing the cost and time of access to reliable public services, benefiting both citizens and businesses, as well as, the public services themselves.

Sub-Project 6: "Implementation of electronic signatures in the CSC network" will be enhanced in order to strengthen the administrative function of the Network of CSCs (“KEPs”) and services provided, through a surplus expenditure of almost 100% (99.6%) that is expected to be covered from the transfer of resources from Outcome 2 to Outcome 1.

However, the implementation course of PDP 1 is also linked to the following risks:

- The timetable for the conclusion of the implementation of SP 1, 2, 4 close the end of eligibility period or some sub-projects do not get completed. Public procurement processes in SP1 are cumbersome and reach estimated timeframes due to lack of experience or resources allocation or quality of descriptions, or market failure or legal impediments. Capacity of PPs to execute procurement or administrative tasks is not effective and on time to secure the full completion of tenders within eligible time left in SP1, 2, 4, 6. Nominal implementation timeframes in SP6 are reaching too close to a safe distance from final end date of eligibility due to the delay of administrative tasks. Risk Score: 3.46.

The evaluator has already noted the importance to incorporate Recommendations 1, 2, 3, 4 for the close monitoring of the approved time schedule of PDP 1 (SP1, SP2, SP4, SP6) and the speeding-up of the tender process in order to avoid further delays in the above-mentioned sub-project assignment and its implementation.

 **PDP 2 “Strengthening of integrity, transparency and anti-corruption framework” (MIS: 5109507)** aims at the specialisation and the effective implementation of the Projects of the NACAP, through which national targets in matters of prevention and fight against corruption are monitored. The project’s main objectives are the following:

- Creating a framework for promoting integrity, preventing unethical and unethical behaviors and promoting good governance, through new functions and the use of modern methods and business tools.
- Strengthening of the framework and the modernisation of the mechanisms and tools for the recovery and management of assets, to improve the coordination and cooperation between the competent authorities,
- Facilitation and acceleration of procedures, with the goal of the rational, transparent and efficient use and management of national resources and public property, and in the effort for a sustainable economic and financial development.

The Project implements a broad intervention in the area of transparency and integrity, by the support of the effective implementation of the national framework for public integrity and the modernisation of asset recovery and management procedures, as the main tools to prevent and combat organised crime, economic crime and the phenomena of corruption, with the ultimate goals of restoring citizens' trust in the institutions and upgrading the capacity of the institutions

to protect the fundamental rights and satisfy the needs of the citizens, goals, which are identified with the goals of the Programme “Good Governance, Accountable Institutions, Transparency”.

It is noted that the initially expected effects from the implementation of the Project concerning the strengthening of the national framework for integrity in the public sector will be lower than initially designed due to reductions in the physical object of Sub-Project 1. Furthermore, with the removals of Sub-Project 2 and Sub-Project 3, the expected effects on


- Improving the framework and processes for asset recovery and management
- Supply of an Integrated Asset Management Information System

are not expected to be met through the Programme.

The implementation course of PDP2 is also linked to the following risks:

- The assessment involves the reduced physical object in the Project: Capacity of PPs to execute procurement or administrative tasks is not effective and on time to secure the full completion of tenders within eligible time left in SP1. PDPs nominal implementation timeframes are reaching too close to a safe distance from final end date of eligibility due to the delay of administrative tasks. (International) Project Partners internal processes affect timely execution of PDPs. Risk Score: 3.00

The evaluator has already noted the importance to incorporate Recommendation 6 for the close monitoring of the approved time schedule of PDP2, SP1 and the speeding-up of the procedures for finalizing all pending issues in the revised agreement with the OECD in order to avoid further potential delays that could impact its objectives.

 Through **PDP 3 “Programme “Good Governance, Accountable Institutions, Transparency” (MIS: 5093609)**, the Office of the Greek Ombudsman in Thessaloniki will act as a hub for cooperation with the Regions of Northern Greece, due to the vital problems faced by the citizens. The presence of the Greek Ombudsman will facilitate the development of partnerships and networks with local self-government bodies, while it will be a source of information and service for the wider problems of the institution of local self-government.

The main expected effect from the project’s implementation of the project is the successful response to the growing needs of electronic processing of citizens' requests, remote work by staff using ICT, secure electronic circulation of documents, information and data with public sector bodies, etc.

However, the implementation course of PDP3 is also linked to the following risks:

- The timetable for the conclusion of the implementation of SP 8, 9 close the end of eligibility period or some sub-projects do not get completed. Capacity of PPs to execute procurement or administrative tasks is not effective and on time to secure the full completion of tenders within eligible time left in SP 8, 9. PDPs nominal implementation time-frames are reaching too close to a safe distance from final end date of eligibility due to the delay of administrative tasks in SP 5, 6. The PO is unable to enforce art. 8.13.4 to “ensure funds are made available to complete projects in a timely manner” due to the delay of clarity on non-completed co-funded projects by EEA Grants at National Level which relate with the operation of PIP in SP 5, 6. Risk Score: 3.46.

The evaluator has already noted the importance to incorporate Recommendations 7, 8 for the close monitoring of the approved time schedule of PDP 3 (SP5, SP6) and the speeding-up of the tender process in order to avoid further delays in the above-mentioned sub-project assignment and its implementation.

## 5.2. Assessment of the effects on the Implementing Agencies

The mere fact that the specific implementing bodies were chosen to be the Beneficiaries and Implementation Bodies of the specific Projects, indicates not only the trust in them, but also the degree of their competence for the Projects’ planning and implementation, as well as, their potential to design the corresponding policy measures:

- ✚ The anticipated success of the CSC upgrade, as specified and implemented in the context of PDP1 is summarised in the organisational upgrade and digital transformation of the CSC network. The relevant actions are focused not only on upgrading their services and improving their efficiency, but also on further specialising and improving their executive potential. Given that the Project includes and implements targeted actions in this direction, it is obvious that the **General Secretariat for Digital Governance and Simplification of Procedures**, as Project Promoter benefits significantly from the implementation of this project. The served citizens are expected to perceive and understand phenomena of improvement of their transaction procedures with the public, the more immediate settlement of their problems or requests to the public, and the improvement of the quality of public administration, with the corresponding recognition of the body that has the final authority responsibility and the competence of the actions in this direction.
- ✚ As Project Promoter of PDP2 the **National Transparency Authority** is expected to strengthen its position as the responsible body for planning, monitoring and the evaluation of the NACAP but also as a co-competent body for the institutionalisation and monitoring of the implementation of the National Integrity System. At the same time, its operational capacity is strengthened and expanded in the specialisation and implementation of similar Projects, as well as, the planning and implementation of policies to reduce accountability and fight corruption, as provided for in the predetermined Project under a similar institutional framework, priorities and targeting of the Programme under evaluation. **However, these positive effects are expected to be significantly lower than initially envisaged due to the large reductions in the physical object of this project.**
- ✚ Through the implementation of the Project "Programme “Good Governance, Accountable Institutions, Transparency” (MIS: 5093609), the role and mission of the **Greek Ombudsman** is strengthened. In addition to being an Institution with audit responsibilities, and tasked with protecting citizens' rights, fighting maladministration and upholding the rule of law, it emerges as a mediator for the restoration of legitimacy and the consolidation of the rule of law, with experience in the adoption of similar interventions and initiatives, such as those included in the Programme.

Given the identified risks in all above Projects, the aforementioned effects are all subject to the incorporation of the evaluator’s Recommendations herein in order for all sub-projects to be implemented in accordance with the approved technical specifications of the physical and financial

objects and the set time schedules. This is also a crucial factor for the preservation of the Project Promoters’ credibility, also as policy design and decision-making institutions.

### 5.3. Assessment of the indirect effects of the Programme's projects

Following interviews with representatives of the Programme Operator and the predefined projects’ Project Promoters, as well as, from desktop research of available material, the following indirect positive effects of the Projects of the Programme under evaluation are anticipated:

#### **PDP 1 “Organisational Upgrade and Digital Transformation of Citizen Service Centers Network (KEP) and public services provided” (MIS 5114175)**

- The improvement of services to citizens / businesses from the public sector through the CSCs and Single Contact Points, which will contribute to the improvement of the overall efficiency of public administration.
- The improvement of the CSC network services to a paperless, digital service desk model for all public services will contribute to a faster and more comprehensive service to the citizen and it will promote "green growth".
- The upgraded network architecture will fully respond to the satisfaction and processing of current and future social and economic needs.

#### **PDP 2 “Strengthening of integrity, transparency and anti-corruption framework” (MIS: 5109507)**

- The quality upgrade and improvement of the efficiency of the Public Administration and Local Government bodies, as they will be equipped with the necessary tools for the prevention, timely detection and treatment of incidents and risks of corruption and violations of integrity
- The qualitative upgrade and improvement of all services with responsibility for asset management, as it will ensure the rationalisation and acceleration of all management procedures, the implementation of standardised procedures and the strengthening of coordination and cooperation between them.
- Protection of citizens, businesses and the whole of Civil Society, as the strengthening of transparency and integrity in the public space will significantly contribute to the restoration of their trust towards public institutions.
- **The above mentioned effects will be significantly lower than initially envisaged due to the large reductions in the physical object of this project**

#### **PDP 3 "Programme “Good Governance, Accountable Institutions, Transparency” (MIS: 5093609)**

- Strengthening the accessibility of citizens, especially vulnerable groups, to the services of the Greek Ombudsman will promote citizens' familiarity with the operation of the Authority and its mediating role, as long as it will provide them with continuous and timely information on all matters of its competence.
- The development of partnerships and networks with public bodies (awareness, development of know-how, consolidation of the perception of respect for fundamental rights) will contribute to the improvement of the provided public services, the modernisation of institutional legislation and the framework of action of the public administration.

- Strengthening of the Authority's staff on the one hand through lifelong training and skill development in modern intervention/mediation tools and in the protection of fundamental rights in modern conditions (techniques for resolving disputes, supporting vulnerable social groups of the population and through interventions in critical fields of administrative action where "systemic malfunctions" occur).

Given the identified risks in all above Projects, the aforementioned effects are all subject to the incorporation of the evaluator's Recommendations herein in order for all sub-projects to be implemented in accordance with the approved technical specifications of the physical and financial objects and the set time schedules.



## 6. Duration and Sustainability of the Programme’s interventions

This section evaluates the assessment of the expected duration and sustainability of the interventions implemented in the context of the Programme "Good Governance, Accountable Institutions, Transparency".

It is pointed out as a general principle that among the basic obligations of the Project Promoters/Implementing Agencies after the completion of their co-financed projects ensuring the operational result of the Projects, taking all the necessary measures for this purpose is included.

It is noted that the relevant Calls for Proposals for the selection of the Programme’s predefined projects and in particular the attached form "Methodology and Criteria for the Selection of Projects concerning the Predetermined Projects (PDPs) of the "Good Governance, Accountable Institutions and Transparency" Programme do not include sustainability criteria of the co-financed interventions. However, the following obligations of the Project Promoters are included in the Programme’s Calls for Proposals related to the eligibility rules for the equipment costs of the co-financed operations:

- ✚ Retain the equipment in their possession for a period of at least five years after the completion of the Project and continue to use such equipment for the benefit of the general objectives of the project for the same period,
- ✚ Keep the equipment properly insured to cover losses such as fire, theft and other naturally insurable incidents both during the implementation of the Project and for at least five years after its completion, and
- ✚ Have the appropriate resources for the maintenance of the equipment for at least five years after the Project’s completion.

Regarding the above obligations, it is estimated that these are checked during the process of selecting the Project, approving the Sub-Project Technical Bulletins and certifying the eligible costs.

The following factors are expected to ensure the sustainability of the results and the functionality of the Programme interventions:

### ✚ Ensuring maintenance of the Project

All Project Promoters of the predefined Projects are experienced public sector bodies that have appropriately organised Operational Units to support the maintenance of the equipment and systems acquired through the Programme and in particular:

- a. The **General Secretariat of Digital Convergence and Simplification of Procedures** has appropriate experienced Units, such as the Directorate of Electronic Services and the other Departments of the Ministry of Digital Governance for the maintenance and operation of the information systems and the equipment acquired through the Programme,
- b. The **Greek Ombudsman** possesses appropriate administrative services, such as the Financial Management and Computerisation Departments and the Procurement Office, in order to deal with possible problems related to the smooth sustainable operation of IT equipment and IT applications acquired with the support of the EEA Financial Mechanism (management and renewal of fixed assets, ensuring the proper operation of the IT system, maintenance of the IT

and network equipment and the general support of the information and telecommunications system, etc.)

- c. The **National Transparency Authority** has appropriate scientific potential and services to exploit the results of the predetermined PDP3 Act to enrich and improve the regulatory framework and upgrade the tools for the effective implementation of the National Public Integrity System (NSS).

#### **Utilisation of the results of the Projects**

All the Beneficiaries of the predefined Projects are experienced public sector bodies that have appropriately organised Operational Units for exploiting the projects' results and in particular:

- a. The General Secretariat of Digital Convergence and Simplification of Procedures possesses appropriate experienced services, such as the Directorate of Electronic Services and the other Departments of the Ministry of Digital Governance for:
  - the utilisation of the results of the predetermined PDP1 project concerning the best practices for the development of digital public services, in methodologies for evaluation, redesign, rationalisation and development of new digital services, etc.
  - the utilisation of proposals for the implementation of measures of organisational structure, management and distribution of the human resources of CSC etc.
  - the dissemination of the results of the Action through the information and awareness of the users of the services provided by the CSCs and the Information Systems that are developed (part of these results are also produced with the support of the financial mechanism)
- b. The Greek Ombudsman is adequately supported by the Programme itself for:
  - the training of its staff in matters of dispute resolution and for the exchange of know-how and the improvement of the effectiveness / efficiency of operations,
  - the strengthening of communication with public services and local bodies and the creation of cooperation networks,
  - conducting information and public awareness campaigns (strengthening citizens' understanding of the value of mediation),

As for the duration of the Programme's interventions, these have timeless long-term benefits in terms of the staff's new skills and the acquired know-how for the provision of improved services, as well as, the creation of modern digital systems to support the provision of these services. Accordingly, short-term benefits are created by the acquisition of new electronic equipment and other applications (e.g. hardware and software, webtools, tablets, etc.) that extend over the years of their normal use before their functional and operational obsolescence.

## **7. Review of the Mechanism's administrative capacity and the efficiency of the Programme's implementation procedures**

### **7.1. Examination of the Programme's management and implementation framework in terms of achieving its development strategy**

Each beneficiary State has agreed to follow and comply with the specific regulatory framework of EEA 2014-2021 for the management and control of the implementation which is depicted in the document: “Regulation on the implementation of the European Economic Area Financial Mechanism 2014-2021”. This Regulation is related to the “Protocol 38c of the EEA Agreement for the EEA Agreement” 2014-2021 the “EEA FM Financial Guidance” and the “Memorandum of Understanding (MoU)” which refers to the general framework of the cooperation between the Donor Countries and the Hellenic Republic for the implementation of the EEA Agreement of this period.

This framework also includes management and control rules for the implementation of the Bilateral Relations Fund, in connection with the Implementation Agreement for the Bilateral Fund, the Action Plan for the Bilateral Relations and the relevant Fund Financing Memorandum.

From the national perspective, the following Ministerial Decrees have been issued:

- *"Management and Control System for the implementation of the Financial Mechanism of the European Economic Area (EEA) for the period 2014-2021 - Allocation of Resources"* which transposes the Regulation for the EEA FM 2014-2021;
- *"Composition, role and operation of the Joint Committee for Bilateral Funds - JCBF - between of the Donor countries and Greece, which was adopted by the Joint Committee for the Bilateral Relations Fund"*.

In compliance with the EEA Grants 2014-2021 Regulation, the first stage of undertaking a legal commitment to materialize an action is the selection of a potential implementing body/ contractor. The initial step, as foreseen in the approved Management and Control Manual, is the issuing of an Open Call for Proposals by the Project Promoter.

Prior to the publication of the Call, the Project Operator must have completed a series of preparatory actions, which concern the following:

- ✚ Specialization of the categories of actions, according to the Programme Agreement.
- ✚ Determination of the amount of the co-financed public expenditure available for the scope of work in the context of the invitation.
- ✚ Definition of the methodology and selection criteria of the actions, while taking into account the special requirements of the announced actions.
- ✚ Communication with FRA, OECD, UNODC which act as international partners to the Programme providing advisory support and consultation to the national competent authorities.
- ✚ Approval of the open call document by the competent authority.
- ✚ Sending the draft Invitation to the NFP in order for the latter to verify that it fully complies with the institutional framework of the EEA Grants 2014-2021, as defined in Article 1.5 of the EEA Grants 2014-2021 Regulation, as well as, in the relevant national legal and administrative documentation.

- ✚ Notifying the EEA FM Committee of the Call by sending an English translation of the Call at least two weeks prior to the publication of each Call.
- ✚ Publishing the Call as widely as possible, in Greek and English, in order to ensure that all potential contractors are given sufficiently early knowledge of its existence and content.

The Programme Operator provides all the necessary translation support both to the Programme Partner from Donor countries and to the international organizations that participate in the implementation of the Programme.

During Stage B, all applications that have been found to be successful under Stage A are assessed/evaluated by at least two evaluators, one of which at minimum should be independent in order to ensure transparency in the selection process. The FMO and FRA partners are invited to participate, if they desire, in the selection committee meetings, as observers.

The invitation, selection, integration and implementation processes of the small grant Projects are carried out by the Project Operator in accordance with the above mentioned Regulations, but in the context of the implementation of the Programme, parts of them may be assigned to other public or private bodies.

In any case, the specialization of the organization and procedures for the implementation of the Small Grant Schemes, within the framework of the common Management and Control System, is done in accordance with the procedures provided for in the management and control system at the Programme level, on the basis of the existing Regulations.

Technical Assistance projects are implemented in accordance with the provisions of the Management and Control - Procedures Manual. The National Focal Point proceeds to the publishing of the Invitation, which concerns the entire Technical Assistance, as specified in the technical assistance agreement for the entire eligible implementation period.

### **Evaluation conclusions**

It should be noted that the establishment of the Management and Control System resulted in noticeable difficulties and delays, as reported to the evaluator mainly by the Programme Operator and, in some cases, by the Project Promoters, as well. More specifically, it has been proved that the Management and Control System is excessively complicated and “heavy”, in terms of the followed procedures and administrative burden, even for tenders and the assignment of Contracts for outsourcing services and works of modest sizes and low budget. There is perhaps a need to introduce an increased degree of flexibility in cases of smaller budgeted projects.

Furthermore, the required communications are carried out not only under the established hierarchy of interactions among the relevant and implicated competent authorities, but also at a horizontal level, resulting in complex structures of communication and overlapping responsibilities with, consequently, significant management waste. A notable example of this is the necessity for the Programme Operator to interact not only with the NFP, but also directly with the FMO and in many cases this is on the same subject matter and notwithstanding the required communications between the NFP and the FMO. It is also observed that communications with the NFP and, more rarely, even directly with the FMO are requested by the Project Promoters notwithstanding their close collaboration with the Programme Operator.

Reporting needs also appear to be excessive and relatively time consuming considering the sizes of projects and the fact that a number of reports need to be produced in both English and Greek.

Therefore, simplifications in the adopted Management and Control System are needed, especially for the decision-making processes during the implementation of Projects that have already been adopted in previous stages, such as in the Programme specialization and resources allocation process or for Projects that are implemented by the Project Promoter’s own means.

On the other hand, all implicated bodies have reported an excellent collaboration between the Project Promoters, the Programme Operator, the NFP, the FMO and the international partners, where applicable and as appropriate, and stress the importance to also strengthen the co-working links between the Beneficiary State and the Donor Countries.

An effective compromise between close collaboration and re-thinking the communication hierarchy of all relevant parties could be sought.

For the purposes of better demonstrating the legal, regulatory, implementation and administrative framework governing the Programme “Good Governance, Accountable Institutions, Transparency”, it is important to stress the Strengths, Weaknesses, Opportunities and Threats of the Programme.

For this purpose, the evaluator will also take into account the Time schedule feasibility - Risk assessment and mitigation analysis of the Programme performed in Paragraph 3.4. The SWOT analysis incorporates all identified risks with a Risk Score of “Medium - Low”, “Medium - High”, or “High”. Thus, any identified risks with a Risk Score of “Low” are not included in the analysis.

These, are all presented in the **SWOT Analysis** below:

### **Strengths**

- Strong political will for the completion of the Programme, based on the goals and policies that have been set.
- Common comprehension of the necessity to implement the Programme by all the organisations involved.
- Availability of existing CSC network with qualified staff, on which the further organisational upgrade and digital transformation will be based.
- Involvement in the Programme of proactive national and international partners; Targeted interventions by international partners at key points where additional know-how may be needed.
- Operational capacity of the Project Promoters to complete the entire physical and financial object of the Programme, with the incorporation of the recommendations of the evaluator.

### **Weaknesses**

- Complex and bureaucratic Management and Control System.
- Too many interconnections and overlapping responsibilities among competent authorities and excessive reporting needs in both Greek and English.
- Delays by competent bodies in declaration expenses do not allow a robust quantification of the implementation progress.

- Delays in the issuance of relevant legislation and the implementation process have resulted in reductions of the physical object of the Programme with a respective shrinkage of budget and the need for the readjustment of indicators.
- All Predefined Projects are linked to delays and identified risks in not fully absorbing the foreseen budgets; lower level risks are also identified in the Project “Support actions of Programme Operator of "Good Governance, Accountable Institutions, Transparency"”.

### **Opportunities**

- Development of new technologies that may enhance the quality of services provided.
- Strengthening of human resources with a resulting more qualified staff that will be able to offer more direct and targeted services to citizens.
- Provision of new unimpeachable framework for dealing with phenomena of corruption and maladministration, with specific focus on the needs of public administration.
- Development of new partnerships and lessons learned from international know-how, which are targeted at specific issues where the public administration is lagging behind.
- Development of partnerships, synergies and networking at the international, national and regional level.

### **Threats**

- External and also potentially internal reasons causing delays in promoting appropriate preparatory actions, approvals and state permits to reach in the required maturity, award and successful implementation of the projects.
- Changes in public procurement procedures affecting the time schedules.
- Shortened eligibility duration due to existing delays in the approved time schedules
- High Risk regarding PDP1: The timetable for completion of Sub-Projects 1 "Project Management", 2 "Dissemination - Communication", 4 "Improvement of services provided by CSCs" extends until the end of the eligibility period of the Programme with an increased risk for SP4 not to be completed on time. Similarly, the timetable for the implementation of SP6 "Implementation of electronic signatures in the CSC network" is very close to the final end date of eligibility due to delays in administrative procedures.
- Medium - high risk regarding PDP2: The assessment involves the reduced, as initially scheduled, physical object in the Project, since the SP2, SP3 are opted-out. As far as SP1 “Strengthening the National Framework for Integrity in the Public Sector” is concerned, the timeframes are reaching too close to a safe distance from the final end date of eligibility due to the delay of administrative tasks, creating risks for the effective and on time completion of the Project.
- High Risk regarding PDP3: The completion schedule of Sub-Projects 8 "Supply of IT equipment" and 9 "Upgrade of the Software" extends until the end of the eligibility period of the Programme while some of the remaining Sub-Projects risk not being completed. The implementation schedules of the Sub-Projects are very close to a safe distance from the final end date of eligibility due to the delay of administrative tasks in SP5 "Organisation of workshops, staff trainings,

international conferences, travel expenses" and SP6 "Awareness campaign, development of educational material".

- Medium - low risk regarding Support actions of Programme Operator of "Good Governance, Accountable Institutions, Transparency", Sub-project 6: Staff training: The timetable for the conclusion of the implementation of sub-project close the end of eligibility period.

## **7.2. Examination of the administrative capacity, quality and effectiveness of the Mechanisms**

On the basis of the data and information presented, as well as, conclusions drawn in the previous chapters, delays noticed in the progress of both, as has already been analysed. Part of the delays in the execution of the physical and financial objects of the Programme is related to reasons that are considered to be externalities to the established legal and administrative framework in the Programme, in all stages of preparatory actions, approvals and permits to reach the required maturity and the in time awards and implementation of the projects.

The Programme Operator plays an effective coordinating role among all stakeholders and Project Promoters. Thus, significant difficulties and problems have been overcome, despite the serious issues raised, such as, problems in the administrative part of the MIS, changes in public procurement procedures, revision of budgets and transfer of funds between sub-projects, transfer of some sub-projects in other Financial Mechanisms, review of Legal Commitments required after the projects awards, needs for modification of schedules.

All competent authorities, that is Programme Operator, the Project Promoters of three (3) predefined Projects (the Greek Ombudsman, National Transparency Authority, General Secretariat for Digital Governance and Simplification of Procedures), as well as the National Technology and Research Infrastructure Network and other partners have established a good cooperation scheme, although they have to cope with a “heavy” bureaucratic Management and Control System incorporating many extra interconnections and overlapping responsibilities and excessive reporting system both in Greek and English.

The Project Promoters are adequately organized and staffed with experienced personnel, as they are already operating similar programmes, co-financed by EU Funds. Additionally, external consultants have been hired to cover shortages in experience, know-how, areas of specific expertise and available capacity. Thus, their administrative capability, quality and effectiveness is satisfactory for the management, operation and promotion of projects’ activities. What is in priority for the coming period is to manage and control the existing risks.

## **8. Conclusions/ Proposals**

As a result of the findings of the evaluation of the Programme which were presented in detail in this Report, this section includes the conclusions drawn from the analysis as well as recommendations regarding the main aspects of the implementation of the Programme that can also be used in the context of the design and planning of the forthcoming Programming Period and a potential new Programme.

- ✚ The initial design, coordination and management of the Programme has faced challenges and setbacks as there are budget re-allocations, reductions in the physical object and two Sub-Projects under PDP2 are completely opted-out and will be funded by alternative resources. As a result, the Programme is not implemented as designed.
- ✚ However, in terms of its existing implementation course, the Programme remains strategically relevant and in full alignment with national policies and strategies.
- ✚ The rate of contracting and hence of the absorption of resources is low, mainly due to the implicated complex administrative procedures
- ✚ In addition to delays in open tender procedures, implementation is challenged by the fact that the Management and Control System of the Programme is excessively complicated and “heavy” regarding the tendering procedures and the assignment of the contracts, especially for small sizes and low budget projects.
- ✚ In the absence of measurable data on the physical progress and to the extent that the approved Projects do not currently yield significant output and results, there are no measurable values of the pre-selected indicators. Thus, the evaluation of the effectiveness and the efficiency of the resources of the Programme cannot be assessed quantitatively at this time. Nevertheless, on the basis of the evidence and information provided to the evaluator, qualitative conclusions may be reached. More specifically, the effectiveness of the Programme is expected to be reduced by not absorbing its budget and not reaching its goals, taking in account the existing reductions in the physical object in PDP2 which directly negatively impact the Programme’s Basic Objective “Transparency and integrity in public institutions enhanced”. Further implementation issues are observed in all Projects, mainly because of the high risks of PDP1 and PDP3, the medium - high risk of PDP2, but also lower level risks in Programme Management activities. The evaluator has submitted recommendations to mitigate these risks;
- ✚ High Risk regarding PDP1: The timetable for completion of Sub-Projects 1 "Project Management", 2 "Dissemination - Communication", 4 "Improvement of services provided by CSCs" extends until the end of the eligibility period of the Programme with an increased risk for SP4 not to be completed on time. Similarly, the timetable for the implementation of SP6 "Implementation of electronic signatures in the CSC network" is very close to the final end date of eligibility due to delays in administrative procedures.
- ✚ Medium - high risk regarding PDP2: The assessment involves the reduced, as initially scheduled, physical object in the Project, since the SP2, SP3 are opted-out. As far as SP1 “Strengthening the National Framework for Integrity in the Public Sector” is concerned, the timeframes are reaching too close to a safe distance from the final end date of eligibility due to the delay of administrative tasks, creating risks for the effective and on time completion of the Project.
- ✚ High Risk regarding PDP3: The completion schedule of Sub-Projects 8 "Supply of IT equipment" and 9 "Upgrade of the Software" extends until the end of the eligibility period of the Programme while some of the remaining Sub-Projects risk not being completed. The implementation schedules of the Sub-Projects are very close to a safe distance from the final end date of eligibility due to the delay of administrative tasks in SP5 "Organisation of workshops, staff trainings, international conferences, travel expenses" and SP6 "Awareness campaign, development of educational material".



- ✚ Medium - low risk regarding Support actions of Programme Operator of "Good Governance, Accountable Institutions, Transparency", Sub-project 6: Staff training: The timetable for the conclusion of the implementation of sub-project close the end of eligibility period.
- ✚ The above risks can be mitigated by incorporating recommendations 1, 2, 3, 4, 6, 7, 8, 9 for (i) the close monitoring of the approved time schedule of PDP 1 (SP1, SP2, SP4, SP6), PDP 2 (SP1), PDP 3 (SP5, SP6), (ii) the speeding-up of both the tender processes and the finalization of all pending issues in the revised agreement with the OECD in PDP2, (iii) the elaboration of the necessary amendments in the Programme Management activities where appropriate, to avoid further delays in the above-mentioned sub-project assignment and its implementation.
- ✚ There is an identified common comprehension of the necessity to implement the Programme by all organisations involved.
- ✚ The operational capacity of the Project Promoters to complete the entire physical and financial object of the Programme, with the incorporation of the recommendations of the evaluator can be evaluated as satisfactory and it is expected to be further enhanced through the experience to be gained and lessons learned.
- ✚ As far as indirect impacts are concerned, it is expected that the implementation of the Programme will directly positively impact the operations of the Programme Operator, the Project Partners and the Project Promoters. However, in terms of the National Transparency Authority these positive effects will be significantly lower than initially envisaged due to the large reductions in the physical object of PDP2.
- ✚ The required communications and reporting, both in English and Greek, are carried out not only under the established hierarchy of interactions among the relevant and implicated competent authorities, but also at a horizontal level, resulting in complex structures of communication and overlapping responsibilities with, consequently, significant management waste.
- ✚ All implicated bodies have reported an excellent collaboration between the Project Promoters, the Programme Operator, the NFP, the FMO and international partners, where applicable and as appropriate, and stress the importance to also strengthen the co-working links between the Beneficiary State and the Donor Countries.

### **Recommendations for the competent authorities:**

The following recommendations are drawn from the evaluation of the Projects' and the Programme's effectiveness, efficiency of resources, estimated effects, duration and sustainability of interventions and review of the Mechanism's administrative capacity and the efficiency of the Programme's implementation procedures. In this context, the analysis takes into account the time schedules of the projects and sub-projects, as well as, the submitted proposal of amendment for the overall Programme which includes reductions in the physical and financial object of the Programme as set out in detail in the evaluation report.

- **Recommendation 1:** The evaluator recommends the close monitoring of the approved time schedule of PDP1, SP 1 and the speeding-up of the tender process in order to avoid further delays in the sub-project assignment and its implementation.

- **Recommendation 2:** The evaluator recommends the close monitoring of the approved time schedule of PDP1, SP 2 and the speeding-up of the tender process in order to avoid further delays in the sub-project assignment and its implementation.
- **Recommendation 3:** The evaluator recommends the close monitoring of the approved time schedule of PDP 1, SP 4 and the speeding-up of the tender process in order to avoid further potential delays in the sub-project assignment and its implementation.
- **Recommendation 4:** The evaluator recommends the close monitoring of the approved time schedule of PDP1, SP 6 and the speeding-up of the tender process in order to avoid further delays that could impact on its objectives and the sub-project’s implementation.
- **Recommendation 5:** The evaluator recommends the close monitoring of the approved time schedule of PDP1, SP8 and the speeding-up of the tender process in order to avoid further potential delays that could impact its objectives.
- **Recommendation 6:** The evaluator recommends the close monitoring of the approved time schedule of PDP2, SP1 and the speeding-up of the procedures for finalizing all pending issues in the revised agreement with the OECD in order to avoid further potential delays that could impact its objectives.
- **Recommendation 7:** The evaluator recommends the close monitoring of the approved time schedule of PDP3, SP5 and the speeding-up of the tender process in order to avoid further potential delays that could impact its objectives.
- **Recommendation 8:** The evaluator recommends the close monitoring of the approved time schedule of PDP3, SP6 and the speeding-up of the tender process in order to avoid further potential delays that could impact its objectives.
- **Recommendation 9:** The evaluator recommends the close monitoring of the progress of the physical object of all Predefined Projects and modify the physical object of the project “Support actions of Programme Operator of "Good Governance, Accountable Institutions, Transparency" as appropriate.
- **Recommendation 10:** Considering the opt-out of sub-projects 2 and 3 of PDP2, the evaluator recommends that the Project “Technical consultant support for the enhanced maturity and preparation of the Predefined Project “Strengthening of integrity, transparency and anti-corruption framework" should be removed from the Programme, as it is no longer relevant to its scope. The budget of the Project could be transferred to other technical support action to remain readily available to cover additional supporting needs.
- **Recommendation 11:** Upon completion of the approved Projects, measurable data should be appropriately selected and calculated for the purposes to enable the evaluation of the following parameters of the Projects and the Programme as a whole: (i) the effectiveness, (ii) the ability to achieve the set objectives, (iii) the efficiency, (iv) the impacts in the existing conditions in Greece in the areas of efficiency, integrity and accountability of the public administration system in the future.

- **Recommendation 12:** As the Management and Control System was reported to be excessively complicated and “heavy”, there is perhaps scope to introduce an increased degree of flexibility in cases of smaller budgeted projects.
- **Recommendation 13:** Simplifications in the adopted Management and Control System are recommended, especially for the decision-making processes during the implementation of Projects that have already been adopted in previous stages, such as in the Programme specialization and resources allocation process or for Projects that may be implemented by the Project Promoter’s own means. It is nevertheless important to reach an effective compromise between close collaboration and re-thinking the communication hierarchy of all relevant parties, in order to ensure excellent collaboration terms, as reported to the evaluator by all implicated authorities from the part of the Beneficiary State.

## 9. References

The sources of information and data collection which were used by the Evaluator are the following:

- ✓ Strategic, legal and regulatory documents in the context of the Programme such as: Memorandum of Understanding, Programme Agreement, Regulation for the implementation of the EEA FM 2014-2021, Ministerial Decision on Co-financing of the Programme, Management and Control System.
- ✓ Bibliographic review of key institutional and regulatory texts, provisions and other related sources through desk research.
- ✓ Primary data and views collected by the Programme Operator and Project Promoters through direct communication and personal interviews with executives.
- ✓ Detailed information about the actions and schedules for the course of maturation and implementation of the Sub-Projects (progress of maturity, tendering, contracting and implementation, as well as payments/financial progress).
- ✓ Technical sheets and specifications of the Projects/Sub-Projects.
- ✓ Projects’ contracts and all the relevant documents.
- ✓ Analysis of the accounting elements of the implementation, as these had been inserted in the official Integrated Information System.
- ✓ Monitoring and Control reports and Annual Programme reports.
- ✓ Primary data and views collected by the Programme Operator and Project Promoters through direct communication and personal interviews with executives. The details of interviews are presented below:

- ❖ **Meeting with the Management & Implementation Authority for Information and Communication Technologies of the Ministry of Digital Governance (M&IA ICT)**

Date / time: 21 December 2023, 11:00am

Venue: M&IA ICT offices, Lekka 23-25, Athens 10562

Interviewees: Ilias Kastritis, Manolis Giampouras, Mr. Andreas Attaloglou

- ❖ **Meeting with the Greek Ombudsman**

Date / time: 23 January 2023, 11:00am

Venue: The Greek Ombudsman offices, Chalkokondili 17, Athens 10432

Interviewees: Ms Roukounaki, Andreas Pottakis

❖ **Meeting with the National Transparency Authority**

Date / time: 23 January 2023, 16:30pm

Venue: NTA offices, Lenorman 195, Athens 10442

Interviewees: Olga Mpanteka

❖ **Video Conference with the Digital Governance and Simplification of Procedures**

Date / time: 27 January 2023, 12:00pm

Venue: - [virtual meeting]

Interviewees: Mr Kaparos, Mr Antzoulidis

### Regulatory Documents

- ✚ Annual Programme Report, FM 14-21, GR-Good Governance, Accountable Institutions, Transparency 2022
- ✚ Strategic Report FM14-21 (Greece), Reporting Period: 01 November 2021- 31 October 2022
- ✚ Memorandum of Understanding on the Implementation of the EEA Financial Mechanism 2014-2021 between Iceland, the Principality of Liechtenstein, the Kingdom of Norway, hereinafter referred to as the “Donor States” and the Hellenic Republic, hereinafter referred to as the “Beneficiary State”, together hereinafter referred to as the “Parties”.
- ✚ Regulation on the implementation of the European Economic Area (EEA) Financial Mechanism 2014-2021, adopted by the EEA Financial Mechanism Committee pursuant to Article 10.5 of Protocol 38c to the EEA Agreement on 8 September 2016 and confirmed by the Standing Committee of the EFTA States on 23 September 2016, as amended on 9 December 2021 and on 29 April 2022
- ✚ Official Gazette B/5355 /7.12.2020 / Joint Ministerial Decision 124428, entitled "Co-financing of the Programme, entitled: Programme F - Good Governance, Accountable Institutions, Transparency, with the Management & Implementation Authority for Information and Communication Technologies (M&IA ICT) of the Ministry of Digital Governance as Programme Operator, with the resources from the Financial Mechanism Office of the European Economic Area (EEA Grants), period 2014-2021 and National resources of the Public Investment Programme"
- ✚ Joint Ministerial Decision No. 13249/2020/ Official Gazette 526/B/19-2-2020 “Definition of a Management and Control System for the implementation of the Financial Mechanism of the European Economic Area (EEA) period 2014-2021 - Allocation of Resources”.
- ✚ Annual Programme Reports

### National Strategies- Policies

- ✚ Digital Transformation Bible 2020- 2025 (July 2019), Ministry of Digital Governance
- ✚ Disability Rights Strategy titled “Union of Equality – Strategy for the Rights of Persons with Disabilities 2021-2030” (March 2021)- launched by the European Commission

- ✚ Action Plan for e-Governance 2014- 2020 (1/1/2014), Ministry of Administrative Reform & Electronic Government
- ✚ National Digital Strategy 2016-2021 (December 2016), General Secretariat of Digital Policy, Ministry of Digital Policy, Telecommunications and Information
- ✚ National Policy on Administrative Procedures (NPAP), as managed by the Ministry of Digital Governance
- ✚ National Anti-Corruption Action Plan 2022 - 2025 (NACAP), National Transparency Authority
- ✚ National Strategy for Administrative Reform 2017- 2019 (July 2017), Ministry of Administrative Reconstruction
- ✚ Operational Programme "Public Sector Reform 2014- 2020"
- ✚ Recovery and Resilience Facility- National Recovery and Resilience Plan 2.0