

FIFTH EVALUATION ROUND

Preventing corruption and promoting integrity in
central governments (top executive functions) and
law enforcement agencies

SECOND COMPLIANCE REPORT

GREECE



Adopted by GRECO
at its 102nd Plenary meeting (Strasbourg, 23-27 March 2026)

I. INTRODUCTION

1. GRECO's Fifth Evaluation Round deals with "Preventing corruption and promoting integrity in central governments (persons entrusted with top executive functions, PTEFs) and law enforcement agencies (LEAs)".
2. This Second Compliance Report assesses the measures taken by the authorities of Greece to implement the recommendations made in the [Fifth Round Evaluation Report on Greece](#), which was adopted by GRECO at its 89th plenary meeting (29 November – 3 December 2021) and made public on 3 March 2022, following authorisation by Greece. The corresponding Compliance Report was adopted by GRECO at its 96th plenary meeting (22 March 2024) and made public on 26 June 2024, following authorisation by Greece.
3. As required by GRECO's Rules of Procedure,¹ the authorities of Greece submitted a Situation Report containing information on measures taken to implement the recommendations in the Evaluation Report. That report was received on 8 October 2025 and served as a basis for this report.
4. GRECO selected Spain (in respect of top executive functions in central governments) and Czech Republic (in respect of law enforcement agencies) to appoint Rapporteurs for the compliance procedure. The Rapporteurs appointed were Ms Ana ANDRES BALLESTEROS on behalf of Spain and Ms Helena KLIMA LIŠUCHOVÁ on behalf of the Czech Republic. They were assisted by GRECO's Secretariat in drawing up this report.

II. ANALYSIS

5. GRECO made 17 recommendations to Greece in its Evaluation Report. In the Compliance Report, GRECO concluded that recommendations i, ii, viii, ix, xi and xvii had been partly implemented and recommendations iii, iv, v, vi, vii, x, xii, xiii, xiv, xv and xvi had not been implemented. Compliance with the outstanding recommendations is examined below.

Preventing corruption and promoting integrity in central governments (top executive functions)

Recommendation i

6. *GRECO recommended that the legal status and obligations of political advisors be clarified and thoroughly regulated to subject them to the highest standards of integrity, including as regards rules of conduct, conflicts of interest and financial disclosure obligations.*
7. It is recalled that this recommendation was assessed as partly implemented in the Compliance Report. GRECO noted the amendments which had been introduced in the legislation to extend integrity requirements for political advisors (including by extending

¹ The compliance procedure for the Fifth Evaluation Round is governed by GRECO's Rules of Procedure as amended. See Rule 31 revised bis and Rule 32 revised bis.

limitations for employment of cohabitants, subjecting political advisors to post-employment restrictions, and allowing for complaints of the public regarding political advisors before the Ethics Committee). GRECO also noted that the draft Code of Conduct for Seconded Officials and Special Advisors had been developed.

8. The Greek authorities inform GRECO that the Code of Conduct for Seconded Officials and Special Advisors was adopted in December 2024 and published on the websites of the National Transparency authority (NTA), the Ministry of Interior and the Presidency of the Government². This Code of Conduct contains provisions on conflicts of interest, gifts, incompatibilities, the duty of confidentiality, lobbying etc. The Code is accompanied by practical guidance in the form of a self-assessment test. Where applicable, violation of this code entails disciplinary or criminal sanctions, as well as those set out in Law 4622/2019³ (see paragraph 114 of the Evaluation Report). Furthermore, the General Secretariat for Legal and Parliamentary Affairs is designing a new transparency and integrity section for its website, due to be completed by the end of 2025. This will compile links to all relevant Codes of Conduct and outline all transparency obligations. The authorities also indicate that the obligation of political advisors to submit a declaration of assets is provided for in Article 5 of Law 5026/2023. The authorities note that that political advisors are not subject to the same level of financial disclosure as government members and elected officials. Unlike the latter, they have not accepted public exposure. Information about their assets constitutes sensitive personal data, which is subject to strict data protection requirements under the GDPR. The protection of such data requires careful examination.
9. GRECO welcomes the adoption and publication of the Code of Conduct addressed to political advisors. This measure remedies an important gap in the integrity framework for persons with top executive functions (PTEFs). GRECO also appreciates the practical guidance appended to the Code.
10. GRECO further notes that the obligation to submit a declaration of assets is extended to political advisors. In this connection, it should be recalled that the Evaluation Report, paragraph 110, emphasises the need for political advisors to be subject to the same level of financial disclosure as members of the government. In particular, political advisors should declare liabilities; their declarations should be published; they should be required to submit declarations of assets, interests and liabilities for three consecutive years following the completion of the public function duties. As this is not currently the case, GRECO invites the authorities to develop appropriate disclosure requirements for this category of PTEFs, bearing in mind their rights under the GDPR and best practices in this area among other GRECO member states.
11. GRECO concludes that recommendation i remains partly implemented.

Recommendation ii

² <https://aead.gr/images/manuals/kodikas-deontologias-metaklhtwn-ypallhlwn.pdf>
<https://gslegal.gov.gr/kyvernisi/nomothetiko-plaisio/>
<https://www.ypes.gr/>

³ As amended by Law 4940/2022 (Articles 37-38).

12. *GRECO recommended that for the sake of greater transparency the names, functions and remuneration (for the tasks performed for the government) of political advisors, as well as information on ancillary activities (when those are carried out), is disclosed in a way that provides for easy, appropriate public access on-line.*
13. It is recalled that this recommendation was assessed as partly implemented. GRECO noted that following the amendments introduced to Law 4622/2019⁴, the information regarding associates was systematised through the list kept and updated by the Presidency of the Government, which is publicly accessible. However, the ancillary activities of associates, who may continue to exercise their profession, were not indicated on this list and the information was lacking on special advisors.
14. The Greek authorities indicate that the new Article 47A of Law 4622/2019 requires that the names and positions of associates referred to in Article 46 be published on the website of the relevant body⁵. Given that Article 46 regulates both associates (paragraphs 1-6) and special advisors (paragraph 7), the authorities clarify that the latter are also covered by the publication requirement under the new Article 47A. A centralised list of all associates is published on the website of the Presidency of the Government⁶ and updated annually. Special advisors are indicated as “non-remunerated”. The list indicates each associate's category (temporary or seconded) and the office concerned. The published information indicates the applicable salary scale for each associate (in numbers ranging from 3 to 19), rather than the exact amount of money, given that remuneration may vary during the year or based on qualifications and experience. Further improvements are under consideration to enhance the completeness of the published information, in particular as regards the specification of duties, ancillary activities and a clearer presentation of remuneration.
15. GRECO takes note of this information and welcomes the publication of the lists of associates (including special advisors) by each ministry and the publication of a systematised list by the Presidency of the Government. This is a step towards greater transparency in this area. GRECO further notes that the authorities intend to provide more complete information, notably on the remuneration, specific functions and ancillary activities of each associate. GRECO looks forward to receiving an update on this point in due course.

⁴ Article 36 of Law 4940/2022 introduced a new provision to Law 4622/2019 (Article 47 A).

⁵ See, for example, the lists of associates published on the websites of different ministries:

[Ιδιαίτερα Γραφεία - \(ΥΠΕΚΑ\) - Υπουργείο Εργασίας και Κοινωνικής Ασφάλισης](#) ; [Υπουργείο Εσωτερικών](#) ; [Πολιτική ηγεσία | Υπουργείο Μετανάστευσης και Ασύλου](#) ; [Στοιχεία Συνεργατών Ιδιαίτερων Γραφείων Υπουργείου Περιβάλλοντος και Ενέργειας](#) - [Υπουργείο Περιβάλλοντος και Ενέργειας](#) ; [Υπουργείο- Προβολή Υπηρεσίας](#) ; [Στοιχεία Συνεργατών Ιδιαίτερων Γραφείων του Υπουργείου Προστασίας του Πολίτη | Υπουργείο Προστασίας του Πολίτη](#) ; [Στοιχεία συνεργατών των Ιδιαίτερων Γραφείων του Υπουργείου](#) ; [Οργανογράμματα Υπουργείου | Υπουργείο Ανάπτυξης](#) ; [Ιδιαίτερα Γραφεία](#).

⁶ [Στοιχεία Συνεργατών αρ. 36 του Ν.4940/2022 - Προεδρία της Κυβέρνησης](#). The centralised list for 2025, including the details of all categories of associates and political advisers in private offices, will be published in March–April 2026.

16. GRECO concludes that recommendation ii remains partly implemented.

Recommendation iii

17. *GRECO recommended that (i) a comprehensive code of conduct for persons entrusted with top executive functions be adopted (on issues such as contacts with lobbyists and other third parties, the prevention of conflicts of interest, gifts and other advantages, accessory activities and post-employment situations, disclosure requirements, etc.) and made easily accessible to the public, and (ii) that it be complemented by practical measures for its implementation, including written guidance, confidential advice, and training at the start of the term of office and on a regular basis thereafter.*
18. It is recalled that this recommendation was assessed as not implemented. Regarding the first part of the recommendation, GRECO noted the NTA's specialised website on lobbying and the preparatory work for publishing an electronic book and a list for gifts. A code of conduct remained to be developed. For the second part of the recommendation, GRECO welcomed the authorities' intention to appoint integrity advisors for providing confidential advice to PTEFs, however the appointment was yet to materialise in practice. Furthermore, while the NTA held a training on corruption risk management, no information was provided on whether PTEFs had actually attended such training. In any event, no training on broader integrity matters and ethical dilemmas specifically targeting PTEFs had been organised by the authorities.
19. The Greek authorities report that the Code of Conduct for Members of the Government, Deputy Ministers and General and Special Secretaries was adopted and published in 2024⁷. The Code includes provisions on conflicts of interest, contacts with lobbyists, gifts and other advantages, ancillary activities and post-employment rules. The Code of Conduct for political advisors has also been published (see Recommendation i). The authorities also refer to the Ministerial Decision no. 18552 of 08 November 2023, which lays down detailed rules on the registration of gifts and the publication of gift registers.
20. Regarding the second part of the recommendation, in terms of practical guidance, the Code of Conduct for Members of the Government contains a short section with examples of moral dilemmas and a list of useful questions to consider when faced with such a dilemma. It also provides a four-step action plan, depending on whether the relevant legislative provisions, policies, procedures, guidelines and rules of the Code of Conduct exist. As for the Code of Conduct for Seconded Officials and Special Advisors, it contains a section with practical guidance in the form of a self-assessment test.
21. As regards confidential advice on integrity matters, the authorities indicate that ministers and their deputies may seek advice from the General Secretariat for Legal and

⁷https://gslegal.gov.gr/wp-content/uploads/2025/03/%CE%9A%CF%8E%CE%B4%CE%B9%CE%BA%CE%B1%CF%82_%CE%94%CE%B5%CE%BF%CE%BD%CF%84%CE%BF%CE%BB%CE%BF%CE%B3%CE%AF%CE%B1%CF%82_%CE%91%CE%9D%CE%91%CE%A1%CE%A4%CE%97%CE%A3%CE%97.pdf

Parliamentary Affairs of the Presidency of the Government. The provision of confidential advice is also within the remit of the Integrity Advisors of the Public Administration. To date, the NTA has completed four cycles of certifying the professional competence of integrity advisors, granting certification to 69 public officials. A Code of Conduct for Integrity Advisers was published on the NTA's website⁸.

22. As regards training and awareness-raising, the authorities submit that, prior to its publication, the Code of Conduct for Members of the Government, Deputy Ministers and General and Special Secretaries has been presented to its addressees at a meeting of the Council of Ministers. The authorities also refer to the training of public officials (Heads of Departments and Directorates, as well as newly recruited public officials) in specialised teaching modules aimed at promoting transparency, accountability and integrity at the National Centre for Public Administration and Local Government. Certification Program training was also provided to internal auditors and risk managers.
23. Regarding the first part of the recommendation, GRECO is pleased to note the adoption and publication of the Code of Conduct for Members of the Government, which is an important milestone. The Code is rather comprehensive and provides useful references to the relevant legislation. The recent adoption of the Code of Conduct for political advisors is also a welcome development.
24. Regarding the second part of the recommendation, GRECO appreciates the more hands-on guidance provided in the Code of Conduct for Seconded Officials and Special Advisors (including a self-assessment test offering suggested answers) and encourages the authorities to consider a comparable approach for ministers to enhance the practical value of their Code of Conduct. GRECO welcomes the counselling and training arrangements established for PTEFs, including the role played by appointed integrity advisors.
25. GRECO concludes that recommendation iii has been implemented satisfactorily.

Recommendation iv

26. *GRECO recommended undertaking an independent assessment on access to information requirements in order to adopt regulation, and the necessary implementation measures, that fully meet the standards of the Council of Europe Convention on Access to Official Documents (CETS 205).*
27. It is recalled that this recommendation was assessed as not implemented. While noting the work in progress to update the Code of Administrative Procedure, GRECO stressed that the scope of this recommendation extended beyond merely amending the Code. GRECO emphasised the need to first examine the legislative and practical shortcomings of the existing system (set out in paragraphs 64-65 of the Evaluation Report).

⁸ <https://aead.gr/images/manuals/kodikas-deontologias-symvoulon-akeraiotitas.pdf>.

28. The Greek authorities report that the Code of Administrative Procedure was amended⁹ to strengthen the public's right to access administrative documents by clarifying that they can be requested either anonymously or with identification by any individual or legal entity, both in person and electronically, and without the previous prerequisite of "reasonable interest", unless the document contains personal data. However, the administration shall not be obliged to respond in case of rejection of an anonymous request or a request that is manifestly vague or repetitive. A request can be granted only in part. Restricted access is maintained in cases of intellectual property rights, confidentiality, discussions of the Council of Ministers and obstruction of judicial, administrative, police or military authorities concerning the commission of a crime or administrative offence. The amended text refers to the grounds for non-disclosure provided for in specific legal provisions, such as national defence and foreign policy, public credit and currency, state security and public order, medical, commercial, professional, banking or industrial secrecy. The deadline of twenty (20) days within which the administration must respond, positively or negatively, is maintained. This amendment of the Code of Administrative Procedure takes into account the Tromsø Convention of the Council of Europe (CETS 205). Following this amendment, a ministerial decision¹⁰ was adopted and a circular¹¹ was communicated to the administrative authorities giving guidance on the provisions.
29. GRECO welcomes the above-mentioned amendment to the Code of Administrative Procedure. The removal of the "reasonable interest" requirement for access request and the expansion of the possibilities for submitting such requests are undoubtedly positive measures. The 2025 Media Pluralism Monitor (p.13), referenced by the European Commission, notes overall alignment with international standards. While the existing legal framework has been improved significantly, there are still challenges with its implementation. Stakeholders have continuously highlighted persistent delays, unresponsiveness or refusals in response to requests for information or access to documents. Stakeholders have also indicated that the law's implementation is so far compromised by a lack of awareness by public authorities about the applicable legal obligations and their scope¹². From this perspective, GRECO appreciates the authorities' initiative to provide guidance through the recent ministerial decision and circular. Recalling that implementation was identified as the most problematic issue at the evaluation stage, GRECO invites the authorities to maintain focus on this matter, bearing in mind the best practices of other member states and GRECO's concerns (see paragraphs 64–66 of the Evaluation Report). GRECO finally notes that the authorities have adopted legislative amendments, without first conducting an independent assessment of the framework. GRECO trusts that the authorities will undertake such an assessment should the implementation difficulties persist.

⁹ Law 5143/2024, adopted on 9 October 2024 and in force as of 1 January 2025, amends Article 5 of the Code of Administrative Procedure, which regulates the right of interested parties to have access to administrative documents created by public services.

¹⁰ <https://search.et.gr/el/fek/?fekId=775582>.

¹¹ <https://www.ypes.gr/wp-content/uploads/2025/01/eggr21821-20241231.pdf>.

¹² See [EC Rule of Law Report \(2025\)](#), p. 14.

30. GRECO concludes that recommendation iv has been dealt with in a satisfactory manner.

Recommendation v

31. *GRECO recommended (i) facilitating early and relevant stakeholder engagement in policy/regulatory development; and (ii) establishing a legislative footprint tracking all external interventions from the beginning of the legislative process.*
32. It is recalled that this recommendation was assessed as not implemented. GRECO noted the authorities' reliance on Law 4622/2019, which had already been examined in the Evaluation Report. GRECO stressed the need for additional targeted steps to better provide for meaningful stakeholder engagement at earlier stages of decision-making processes and to track external interventions.
33. As regards the first part of the recommendation, the Greek authorities report that draft bills are systematically submitted to public consultation and the two-week statutory period for public consultation is being observed (Article 61 of Law 4622/2019)¹³. Also, the number of draft bills submitted to Parliament almost immediately after the end of the public consultation has drastically dropped. The percentage of additional provisions contained in the final text of legislation, without having been submitted to public consultation, remained limited. As of December 2024, all draft bills are submitted to the Economic and Social Council¹⁴ for its opinion in parallel with the public consultation (as provided for in Article 82, paragraph 3, of the Constitution), and, to date, it has issued 21 opinions. These opinions are included in the regulatory impact assessment (RIA) and submitted together with a draft law to Parliament¹⁵. Prior to public consultation, the competent sponsoring Ministry is generally responsible for inviting any civil society stakeholders to contribute their expertise during the preparation of the initial version of a draft bill. The RIA, which is made public during the consultation process, includes information on stakeholder consultation from the outset of the legal drafting process, including public services, ministries, social partners and independent authorities (see Table 22, Section E). Moreover, in light of the concerns that have been raised, the General Secretariat for Legal and Parliamentary Affairs has, since 2025, started to solicit input directly ahead of public consultations. Updates to the RIA are ongoing, alongside examining ways to better involve stakeholders and document external interventions in the legislative process.
34. It is also envisaged to extend and/or replace the current public consultation platform (<https://www.opengov.gr/>) through a cooperation project between the General Secretariat for Legal and Parliamentary Affairs and the Ministry of Digital Governance. The National Codification Portal, an electronic system that aims to standardise the law-

¹³ The number of draft laws posted for consultation for less than two weeks decreased from seventeen in 2023 to eight in 2024, ultimately reaching zero in 2025. Conversely, the number of consultations exceeding fifteen days has risen significantly, from one draft law in 2024 to fourteen in 2025.

¹⁴ The Economic and Social Council is a consultative body established in 1994, composed of employers, employees and other interested parties. Part of its mission is to formulate opinions on draft legislation on socio-economic policy.

¹⁵ This information also figures in [EC Rule of Law Report \(2025\)](#), pp. 16-17.

making process and to facilitate the administrative codification of legislation, is in its final stage of implementation before an official launch.

35. As regards the second part of the recommendation, the authorities report that the General Secretariat for Legal and Parliamentary Affairs is currently revising its manuals on the legislative process and RIA. They indicate that the current RIA template provides a structured record of all external contributions to the law-making process and effectively functions as a legislative footprint. Notably, it contains sections dedicated to stakeholder consultation, mapping of interested parties, and recording of proposals received, alongside the government's response (whether adopted, partially adopted, or rejected, with justification). The template also requires a summary of consultation outcomes and references to supporting documents, such as submissions or comments from the public consultation platform. Furthermore, a fiscal impact assessment is an integral part of the legislative process.
36. GRECO takes note of this information. Regarding the first part of the recommendation, GRECO welcomes the positive trend of observing the statutory timeframe for public consultations. The parallel consultation of the Economic and Social Council is another positive development, for which the authorities must be given credit. Nevertheless, there is still room for further improvements in this area. Independent authorities, justice stakeholders and business associations highlight the persistent need for early engagement of interested parties in the law-making process ahead of public consultations¹⁶. Some of these bodies publicly expressed concerns regarding the absence of prior consultation¹⁷. GRECO therefore encourages the authorities to pursue their efforts towards ensuring meaningful and early involvement of relevant stakeholders in the regulatory and policy-making processes. This part of the recommendation must be considered partly implemented.
37. As regards the second part of the recommendation, GRECO notes that the authorities are essentially relying on information assessed during the evaluation stage (see paragraphs 67–69 of the Evaluation Report) and are not reporting any new developments. While regulatory impact assessments refer to the outcomes of public consultations, they do not record all contacts and exchanges with stakeholders that may have influenced decision-making at stages preceding public consultation. During the evaluation visit, several interlocutors also expressed concerns about the type of

¹⁶ [EC Rule of Law Report \(2025\)](#), p. 16.

¹⁷ See, for example, Ombudsman, [Ετήσια έκθεση 2024, Εθνικός Μηχανισμός Διερεύνησης Περιστατικών Αυθαιρεσίας](#), p. 36 “Ombudsman was never invited by the competent authorities to contribute to the discussion on the amendment of Presidential Decree 120/2008, despite the fact that, within the scope of his competences, he has engaged in this field by submitting specific proposals for improving the quality of disciplinary control.

- Association of Administrative Judges (Ένωση Διοικητικών Δικαστών), [Announcement of 6/5/2025](#) : “Once again the Ministry of Justice is unexpectedly proposing amendments to fundamental pieces of legislation without any prior consultation with judicial associations. Furthermore, the choice to submit the said draft law to public consultation during the Easter holidays (from 12/4/2025 to 28/4/2025) hindered the meaningful participation of stakeholders, including us, the judges, in this crucial process. As an Association, we denounce the entrenched practice of drafting legislation relating to procedural law or to matters we adjudicate without any prior hearing or cooperation with judicial associations”.

- Athens Bar Association, [Press Release](#), 3-1-2025: “(...) the legal profession was never invited to participate in the Working Group for drafting the Bill, nor to present its views”.

consultations and contacts that may have occurred at earlier stages of the drafting process and remained unreported (see paragraph 71 of the Evaluation Report). The role of a legislative footprint is to track and monitor any external interventions and impact assessments cannot substitute for this. Rather, the two instruments are complementary. GRECO therefore invites the authorities to consider the practices of GRECO member States that have introduced a legislative footprint register. This part of the recommendation has yet to be implemented.

38. GRECO concludes that recommendation v has been partly implemented.

Recommendation vi

39. *GRECO recommended that the system for managing conflicts of interest of persons entrusted with top executive functions be strengthened by (i) removing decision-making power from the Prime Minister and enhancing the competences of the General Secretariat for Legal and Parliamentary Affairs of the Presidency of Government; (ii) using declarations of conflicts of interest for counselling purposes; (iii) making disqualification decisions available to the public; (iv) articulating a complaint mechanism by the public or other institutions.*
40. It is recalled that this recommendation was assessed as not implemented. Regarding the first part of the recommendation, GRECO noted that the Prime Minister's Decision no. Y150/2019 on the "Definition of procedural obligations for avoidance of conflicts of interest" was subject to a comprehensive assessment to be completed by June 2024. Regarding the second part, GRECO was informed of the forthcoming introduction of the institution of integrity advisors and of the advisory role of the General Secretariat for Legal and Parliamentary Affairs of the Presidency of the Government, which intended to publish a compilation of FAQs on conflicts of interest. As for the third part, GRECO welcomed that the Ethics Committee's decisions were published on the NTA website, however, no disqualification decisions had been rendered at the material time. As regards the fourth part of the recommendation, GRECO noted that the authorities had been looking into the possibility of introducing a procedure for submitting questions/complaints to the Ethics Committee.
41. The Greek authorities submit the following information. Regarding the first part of the recommendation, Article 72 paragraph 4 and Article 74 paragraph 1 of Law 4622/2019 were amended on 27 February 2026¹⁸. This amendment enhanced the decision-making power of the General Secretariat for Legal and Parliamentary Affairs regarding the management of conflicts of interest among persons entrusted with top executive functions.

¹⁸ In accordance with the amended Article 72 para. 4, any specific issue relating to the application of the procedural obligation to avoid conflicts of interest (particularly declaration requirements) shall be determined by a decision of the Secretary-General for Legal and Parliamentary Affairs. The amended Art. 74, para. 1 grants the Secretary General for Legal and Parliamentary Affairs the power to submit any matter relating to the codes of conduct, integrity, and conflicts of interest of PTEFs to the Ethics Committee.

42. As regards the second part of the recommendation, the authorities report that the General Secretariat for Legal and Parliamentary Affairs of the Presidency of the Government is currently developing a new system for submitting declarations of conflict of interest, which will be operational in early 2026. These declarations are envisaged to be used for preventive and counselling purposes, primarily to enable the timely identification and appropriate management of potential or actual conflicts of interest, and to support PTEFs in complying with their integrity obligations. While the information contained in the declarations is subject to applicable data protection and confidentiality rules, the General Secretariat is engaging Integrity Advisors to provide counselling. Furthermore, a new field entitled “Transparency and integrity” is being developed on the General Secretariat’s website, and it will include a section on FAQs.
43. As regards the third part of the recommendation, the authorities inform GRECO that in 2024 -2025, the Ethics Committee examined several requests for authorisation of a post-government professional activity (Article 73 § 2 of Law 4622/2019). Decisions refusing the authorisation were published on the NTA’s website¹⁹. As yet, there have been no decisions to disqualify individuals based on a conflict of interest during their active government service.
44. As regards the fourth part of the recommendation, the authorities indicate that the Ethics Committee receives and examines complaints or reports relating only to matters of ineligibility, incompatibility and conflict of interest. The process for submitting a complaint to the Ethics committee has been standardised and a special webpage has been developed for this purpose²⁰.
45. GRECO takes notes of the information submitted. As regards the first part of the recommendation, GRECO welcomes the recent legislative amendment that strengthens the General Secretariat for Legal and Parliamentary Affairs’ decision-making power regarding the management of conflicts of interest. Specifically, the Secretary General for Legal and Parliamentary Affairs will now be responsible for deciding on any issue relating to the application of the procedural obligation to avoid conflicts of interest. Furthermore, the Secretary General is now also empowered to refer matters to the Ethics Committee established within the National Transparency Authority, as is the Prime Minister. In GRECO’s view, this part of the recommendation can be seen as being implemented in a satisfactory manner.
46. As regards the second part of the recommendation, GRECO notes the authorities’ ongoing work to improve the system for submitting declarations of conflict of interest and to develop new guiding materials on the General Secretariat’s website. These are valuable measures from the prevention perspective. GRECO further notes the

¹⁹https://aead.gr/images/epitropi_deontologias/2024/%CE%91%CF%80%CF%8C%CF%86%CE%B1%CF%83%CE%B7_15_2024.pdf.

https://aead.gr/images/epitropi_deontologias/2025/ead-ed-apofasi_18_2025.pdf.

https://aead.gr/images/epitropi_deontologias/2025/ead-ed-apofasi_19_2025.pdf.

https://aead.gr/images/epitropi_deontologias/2025/ead-ed-apofasi_22_2025.pdf.

²⁰ <https://aead.gr/complaints-deontologia/>.

authorities' intention to use declarations of conflict of interest for the counselling purposes and looks forward to seeing this measure implemented in practice.

47. As regards the third part of the recommendation, GRECO takes note of the publication of the decisions refusing authorisation of specific post-government activities of former PTEFs. Acknowledging the authorities' commitment, GRECO trusts that any future decisions to disqualify PTEFs based on conflicts of interest during their period of government service will also be published on the NTA's website. The requirement underlying this part of the recommendation should be considered to be met.
48. As regards the fourth part of the recommendation, GRECO is satisfied that the procedure for submitting complaints to the Ethics Committee has been articulated and that a webpage has been developed to this effect. This part of the recommendation has therefore been implemented satisfactorily.
49. GRECO concludes that recommendation vi has been partly implemented.

Recommendation vii

50. *GRECO recommended that the post-employment regime be reviewed in order to assess its adequacy and that it be strengthened by broadening its scope in respect of persons with top executive functions.*
51. It is recalled that this recommendation was assessed as not implemented. GRECO noted the legislative amendment extending the post-employment regime to political advisors. However, the adequacy of the post-employment regime had not been reviewed, notably regarding the length of the cooling-off period (12 months) and the revolving door policy with respect to possible conflicts of interest arising out of activities prior to government service of PTEFs.
52. The Greek authorities refer to the recent adoption and publication of the Code of Conduct for Seconded Officials and Special Advisors, which contains a requirement to submit a declaration on their prior professional activities within one month of taking up their duties, and a declaration on their intended post-government activities upon the termination of their duties. In addition, for twelve months after leaving public office, they are required to seek authorisation of the Ethics Committee in respect of any professional or business activity relating to the entity to which they have been appointed, if it could create a conflict of interest. The Code of Conduct for Members of the Government contains the same requirements. The authorities also report that a dedicated study by the OECD, which had been commissioned by the NTA, was published in 2024²¹. In cooperation with all the relevant stakeholders, the Government and the NTA are in the process of analysing the OECD recommendations with a view to developing further legislative amendments.

²¹ <https://aead.gr/xrimatodotika-ergaleia/ee-grants-2014-2021/paradotea-praxis-enishisis-tou-plaisiou-akeraiotita-diafania-katapolemisi-diafthoras>.

53. GRECO takes note of this information and welcomes the fact that post-employment rules now cover political advisors, as well as the strengthening of the post-employment regulatory framework through the recently adopted Codes of Conduct, which address conflicts of interest arising from pre- and post-government activities. GRECO also appreciates the authorities' decision to seek the OECD's expertise and looks forward to receiving information on further measures to be taken, particularly regarding the length of the cooling-off period.
54. GRECO concludes that recommendation vii has been partly implemented.

Recommendation viii

55. *GRECO recommended further streamlining and strengthening the oversight of the declarations of assets and financial interests of persons entrusted with top executive functions.*
56. It is recalled that this recommendation was assessed as partly implemented. GRECO noted that a new Law on asset disclosures (Law 5026/2023) had entered into force on 28 February 2023. This Law on paper substantially strengthened the oversight system of asset declarations. GRECO looked forward to receiving further information on how this Law was working in practice, through fully operational implementation arrangements.
57. The Greek authorities reiterate the main developments of the asset declaration system under the new Law 5026/2023, including the implementation arrangements, such as e-filing, upgrades of the relevant IT system, appointment of an audit coordinator, public annual report on outcome of verifications. The total number of audits carried out by the Audit Committee²² in 2023 (16,818 declarations) exceeded the 5% target, reaching 6% of all declarations²³. In 2024, the total number of audits (19,341) reached 7 % of all declarations. Financial interest declarations are also subject to audit. Any financial interest data intended for publication is screened against GDPR requirements, as are the published asset data. The electronic platform *e-pothen* has been upgraded to allow for the higher number of declarations²⁴ and files to be registered more efficiently and transparently as the necessary financial data will be retrieved electronically from banks directly through the interconnection with the *e-pothen* platform²⁵. The audit coordinator is tasked with the monitoring of the management and operation of this platform, as well as with the overall supervision of the auditing process, ensuring coherence and coordination with other competent audit bodies.
58. The authorities further report that Law 5026/2023 was amended and its revised version entered into force in August 2024. Its provisions aim to strengthen transparency, improve compliance, and simplify and streamline the process of asset declaration and

²² The annual Activity Reports of the Parliamentary Committee for the Investigation of Declarations of Assets (CIDA) are available via the following link: [Επιτροπή Ελέγχου > Η Επιτροπή](#)

²³ In 2023, 28 cases of violations were referred to the competent prosecution authorities. In 2024, the Court of Audit issued six rulings and had nine pending applications for unjustified assets.

²⁴ At the end of 2024, 340,000 declarations had been submitted making up 60% of the total number of liable persons.

²⁵ This information figures in [EC Rule of Law Report \(2024\)](#), p.14

financial oversight by digitalisation of the submission process, automatic filing, transfer and extraction of the data, and greater interoperability of the *e-pothen* electronic platform. The new system is designed to enable the authorities to uncover discrepancies, unexplained wealth and hidden assets more quickly and efficiently. The law expands the scope of persons covered, the scope of the assets and interests to be declared both in Greece and held abroad and introduces administrative sanctions for non-compliance by financial institutions²⁶. The authorities indicate that asset declarations remain published online, on the Parliament's website, for three years.

59. GRECO welcomes the additional measures taken by the authorities to enhance the oversight mechanism. Successful implementation of the new arrangements hinges on coordination with the other bodies involved in auditing asset declarations and interoperability of the e-Pothen platform. The number of verifications carried out by the Audit Committee (CIDA) is gradually increasing²⁷. GRECO considers that the oversight mechanism has been substantially strengthened overall, but encourages the authorities to keep this key matter under review as time and experience with the system evolves, particularly with regard to resources and timeliness.
60. GRECO concludes that recommendation viii has been implemented satisfactorily.

Preventing corruption and promoting integrity in law enforcement agencies

Recommendation ix

61. *GRECO recommended that dedicated measures be taken to strengthen the representation of women at all levels in the police.*
62. It is recalled that this recommendation was assessed as partly implemented. GRECO welcomed the adaptation of the minimum height requirement and the resulting increase in female students in police schools. It trusted that, in time, this would be positively reflected in the number of female police officers. However, continuing efforts were still needed not only to actively increase the number of female recruits, but also those in managerial positions, which required assessing what obstacles might have hindered their career and identifying the positive policies and practices that needed to be taken to ensure gender balance in the police.
63. The Greek authorities explain that the percentage of women in the highest ranks of the hierarchy today is directly linked to the small number of women admitted to the Police Academy until 1995, when direct admission of civilians to the Officers' Academy began. At this point, the number of women admitted to the Officers' Academy gradually increased. In 2025, the first officers to enter the Academy in 1995 were promoted to the rank of Brigadier General. Specifically, 40 officers were promoted to this rank, 18 of whom were women (almost 50% of the total). Consequently, it is estimated that the

²⁶ This information figures in [EC Rule of Law Report \(2025\)](#), pp. 9-10.

²⁷ It is dealing with a 7% to 10% increase in audits. High-risk verifications amounted to 5% (4% in 2023). 109 (out of 9 532) cases of misconducts sent to the prosecutor concerned politically exposed persons or persons with top executive functions ([EC Rule of Law Report \(2025\)](#), p. 10 footnote 56).

proportion of women in the highest ranks of the hierarchy will gradually increase in the coming years. The authorities further indicate that the evaluation and promotion system for police officers is governed by the provisions of Presidential Decree 24/1997 (as amended). Evaluations are conducted by evaluation councils, which are independent, collective bodies comprising only senior officers. The evaluation procedure is uniform for both male and female officers, thus ensuring equality and merit-based treatment. The authorities submit the following statistical information.

Statistics per type of posts and gender covering police personnel of all ranks (as of 15 December 2025)²⁸

Type	Male	Female	Subtotal
General Duties	42725	8983	51708
Special Duties	224	258	482
Special Guards	2956	417	3373
Border Guards	1792	210	2002
Total	47697 (82,9%)	9868 (17,1%)	57565

Statistics per managerial posts and gender of police personnel holding an officer rank (until 15 December 2025)

Type	Male		Female	
	Total officers	Managerial posts	Total officers	Managerial posts
General duties	4286	1072	1027	179
Special duties	202	28	265	18
Subtotal	4488 (77,7%)	1100 (85%)	1292 (22,3 %)	197 (15%)

Statistics on the number of female police staff and managers (until 31 December 2025)

	2019	2023	2024	2025
Total number of female staff	7488	8806	9364	9425
Female managers	129	153	160	173

64. GRECO takes into account this information and notes that in 2021-2025, the total proportion of female police staff raised from 14% to slightly over 17 %. In December 2025, the proportion of female police officers amounted to 22,3 % and the proportion

²⁸ According to the statistics presented in paragraph 119 of the Evaluation Report, 14% of police personnel of all ranks were female as of 22 September 2021.

of female police managers – to 15 %. Since 2019, the number of female police staff and managers is gradually increasing. GRECO further welcomes the recent promotions of female officers to one of the leadership ranks. GRECO notes this encouraging trend and trusts that the authorities are committed to taking more determined and targeted measures to bring about a substantial change in the figures, such as a deliberate recruitment/promotion policy giving priority to qualified female candidates, including at the most senior levels. GRECO also underlines the importance of policies promoting work-life balance, harassment prevention, training, counselling and other measures to promote inclusiveness, as well as effective sanctioning of non-compliance with gender equality legislation. GRECO invites the authorities to continue their efforts, drawing on the best practices of member States that have achieved a significant change in the gender structure of police forces.

65. GRECO concludes that recommendation ix has been implemented satisfactorily.

Recommendation x

66. *GRECO recommended that a comprehensive risk assessment of corruption prone areas and activities be undertaken in the police, to identify problems and emerging trends, and that the data is used for the pro-active design of an integrity and anti-corruption strategy for the police.*
67. It is recalled that this recommendation was assessed as not implemented. The authorities essentially referred to the oversight activities, in particular reporting, of the Internal Affairs Agency, which had already been examined by GRECO at the evaluation stage. GRECO underlined the need for an assessment distinct from regular reporting and covering input from sources other than criminal and disciplinary cases. Moreover, no information was submitted on the development of a preventive strategy adapted to the specificities of the Greek police.
68. The Greek authorities indicate that Articles 22A to 22D of Law 4795/2021, as amended, govern risk assessment within public sector entities. These entities are required to develop and implement a risk management policy and framework, maintain a risk register and establish risk assessment bodies. The responsibilities of the latter include submitting an annual report to the head of the entity, who then communicates it to the NTA. In October 2024, the NTA issued a template for risk management policy and framework, ensuring a uniform approach among public sector entities. The template covers the categorisation of risks and the assessment scales. Additionally, a joint decision by the Ministry of the Interior and the Governor of the NTA (No. 9383, 14 May 2024) established the structure of the aforementioned annual report, which should contain sections on risk assessment and evaluation of the risk management policy and framework.
69. As regards the follow-up in the Hellenic Police, the authorities refer to the reorganisation of the Hellenic Police under Law 5187/2025 of 21 March 2025, whereby the new Directorate of Ethics and Internal Audit was established. Work is now in its final stages to set up an Internal Audit Office within this Directorate. The Office will collect statistical data on corruption-related complaints from the Directorate of Uniformed

Personnel and on administrative investigations conducted by the Directorate of Ethics and Internal Audit. It will also collect the statistics disclosed annually by the Internal Affairs Agency. Based on this information, the Office will conduct a comprehensive risk assessment of sectors and activities within the police that are prone to corruption, identify problems and emerging trends, and design an integrity strategy aimed at preventing corruption within the police.

70. GRECO welcomes that the necessary regulations have been adopted by the NTA and the Ministry of the Interior to pave the way for the risk assessment and management in the public sector. GRECO also notes that the leadership of the Hellenic Police is finalising the arrangements establishing a structural unit entrusted with risk assessment and devising the anti-corruption strategy. GRECO looks forward to receiving an update on the completion of these promising developments in due course.
71. GRECO concludes that recommendation x has been partly implemented.

Recommendation xi

72. *GRECO recommended that (i) the Code of Ethics for the Police be updated in order to address current challenges of policing and to include detailed guidance on integrity matters (conflicts of interest prevention, gifts, misuse of information, abuse of public resources, etc.); (ii) the professional training (initial and in-service) for police officers on ethics be further developed, taking into consideration the specificity of their duties and vulnerabilities and with a practice-oriented focus; and (iii) a regular communication strategy is devised to evidence ethical standards to the front-line workforce.*
73. It is recalled that this recommendation was assessed as partly implemented. As regards its first part, GRECO noted that the Hellenic Police Headquarters were working on a guide for police officers dealing with incidents of corruption and integrity issues. As regards the second part of the recommendation, GRECO appreciated that more importance had been given to the integrity issues in the relevant programmes of the Hellenic Police Schools. In this connection, recalling that the second part of this recommendation was closely linked to the first one, GRECO looked forward to receiving an update on further measures aimed at developing the relevant professional training of the police officers and a regular communication strategy on ethical standards after the new explanatory guide had been published.
74. Regarding the first part of the recommendation, the Greek authorities report that the National Strategic Plan for Combating Corruption (NACAP) 2022-2025 has been amended²⁹ to include the updating of the Code of Ethics for the Police (Action 2.3.21). Following the reorganisation of the structure of the Hellenic Police pursuant to Law 5187/2025 of 21 March 2025, the newly established Directorate of Ethics and Internal Audit will be in charge of this task, in consultation with the Ombudsman, the NTA and the National Commission for Human Rights. The Ethics Department of this Directorate, which is already operational, will also provide advice and detailed guidance on matters of integrity. In addition, the Hellenic Police leadership is finalising arrangements to

²⁹ Decision of the Council of Ministers No. 38 of 30-07-2024 (GG A 132/12-08-2024).

establish a working group that will be in charge of updating the Code of Ethics and developing the necessary practical guidance.

75. In this connection, the authorities underline that the Police Code of Conduct is soft law, as it contains general principles and guidelines. Any violation of legal rules automatically constitutes a breach of the Code of Conduct. By contrast, disciplinary law, which is much broader and more specific, is the main regulatory framework. In November 2024, the rules on disciplinary procedures in the police were simplified, speeding-up their administration and facilitating the dismissal or suspension of officials from active service for serious disciplinary or criminal offences³⁰.
76. Regarding the second part of the recommendation, the authorities submit information from the Directorate of Education and Human Resources Development on integrity related courses in the curricula of the Police Officers' School, the Police Academy, the School of Continuous Education and training of the Hellenic Police and the National Security School (academic years 2023-34 and 2024-25). In addition, guidelines outlining the procedures for fighting corruption and promoting integrity within the Police are currently under review and will be incorporated into police ethics courses.
77. As regards the third part of the recommendation, the authorities indicate that the Press and Information Office and the Directorate of Communication of the Ministry of Citizen Protection are preparing a strategic communication plan for the uniformed personnel, based on the Code of Conduct. Moreover, following the amendment of the disciplinary law of the police personnel (see paragraph 75 above), on 10 November 2024, the Chief of the Hellenic Police issued a circular order providing detailed guidance. In addition, a teleconference was held between senior officers at the Police Headquarters and officers from regional police services across the country involved in disciplinary matters to provide further guidance and raise awareness on issues of corruption and integrity.
78. GRECO takes note of this information. As regards the first part of the recommendation, GRECO appreciates that the updating of the Code of Conduct for the Police has been included into NACAP 2022-2025 and assigned to the Directorate of Ethics and Internal Audit, which was established recently, following the reorganisation of the Hellenic Police. A dedicated working group is about to be set up to advance the updating process. GRECO looks forward to receiving the updated Code of Conduct in due course, accompanied with detailed guidance containing practical real-life examples, which should be tailored to the specific challenges of the Hellenic Police. This part of the recommendation remains partly implemented.
79. As regards the second part of the recommendation, GRECO appreciates that the ethics module has been further developed in various educational and training programmes of the Hellenic Police. GRECO trusts that once updated, the Code of Conduct for the Police

³⁰ Presidential Decree no. 61/2024 of 5 November 2024 (Government Gazette A' 174/2024) amended the provisions of Presidential Decree 120/2008 "Disciplinary Law of Police Personnel". In 2024, 87 police officers were suspended from service, a significant increase of 174% from the 32 cases in 2023. This information also figures in [EC Rule of Law Report \(2025\)](#), p. 9.

will become a central part of these programmes. This part of the recommendation can be considered fully implemented.

80. As regards the third part of the recommendation, GRECO notes that the Ministry of Citizen Protection is working on a strategic communication plan for the police and looks forward to its adoption in order to consider this part of the recommendation fully met. GRECO also notes the measures taken to provide guidance on the recent amendments of the disciplinary of the police personnel (a circular of the Chief of the Police and a teleconference with regional police offices).
81. GRECO concludes that recommendation xi remains partly implemented.

Recommendation xii

82. *GRECO recommended that a mechanism be introduced for providing confidential counselling to police officers on ethical and integrity matters.*
83. It is recalled that this recommendation was assessed as not implemented. GRECO noted that the provision of confidential counselling had been entrusted to a call centre in charge of receiving complaints within the Internal Affairs Agency. However, GRECO had misgivings about this move as it could have a chilling effect on agents to turn for advice, when confronted with an ethical dilemma.
84. The Greek authorities indicate that the Ethics Department of the newly established the Directorate of Ethics and Internal Audit, which is already operational³¹, is tasked with designing and developing a mechanism for providing confidential advice to uniformed personnel on matters of ethics and integrity. Although this mechanism has not yet been developed or publicised, the authorities consider that it has effectively been introduced by Law 5187/2025, which lists it as one of the Ethics Department's tasks³². It is, moreover, envisaged to include a provision on the confidential counselling mechanism in the updated Code of Conduct for the Police.
85. GRECO appreciates that following legislative amendments, the development of the confidential counselling mechanism has been entrusted to the newly established Directorate of Ethics and Internal Audit (notably its Ethics Department). For this recommendation to be considered fully implemented, this task must be completed effectively: trained counsellors must be formally appointed, and the counselling possibility must be properly announced and publicised among police staff.
86. GRECO concludes that recommendation xii has been partly implemented.

³¹ The department currently has one police captain, one police lieutenant and one police sergeant on its staff. Work is now in its final stages to establish an Internal Audit Office within the department's structure, which will be responsible for integrity matters.

³² Art. 13 par. 3 section (ae) of Law 5187/2025.

Recommendation xiii

87. *GRECO recommended strengthening integrity checks during staff recruitment, as well as at regular intervals throughout police careers.*
88. It is recalled that this recommendation was assessed as not implemented. As regards the pre-recruitment checks, GRECO noted the introduction of new psychometric tests. However, these tests could not provide the relevant factual details about a candidate's professional and private life that are essential for detecting dishonest tendencies. GRECO therefore urged the authorities to continue developing robust background checks, particularly by incorporating elements beyond the scope of criminal law (e.g. a candidate's family, associates, financial and driving records). GRECO also urged the authorities to design a system of periodic background checks, independent of appraisal and career management processes, to enable regular monitoring of changes in police officers' personal circumstances that could increase their vulnerability to corruption.
89. The Greek authorities inform GRECO that following the reorganisation of the Hellenic Police, the Ethics Department of the newly established the Directorate of Ethics and Internal Audit is now responsible for designing and developing a mechanism to strengthen integrity checks during the recruitment of personnel, as well as at regular intervals during their police career³³. Work is now in its concluding stages to establish an Internal Audit Office within the Directorate's organisational structure. This office will be responsible for integrity matters. Additionally, the Hellenic Police leadership is finalising set-up arrangements for a working group that will develop an integrity checks mechanism. At the same time, the authorities emphasise that disqualifying a candidate from admission to the Hellenic Police on the grounds of conduct that did not result in criminal or other legal proceedings would be contrary to the Constitution and EU law. They underline that every police officer is closely monitored by their superiors and by the public, who can report any unethical behaviour. Furthermore, relevant procedures are in place to investigate complaints against police personnel, and disciplinary procedures have recently been simplified and streamlined. Administrative investigations respect the principle of impartiality and are subject to the supervision of the Ombudsman, an independent authority.
90. GRECO acknowledges the initial steps taken to develop the integrity checks mechanism following the reorganisation of the Hellenic Police, and looks forward to receiving an update in due course. GRECO reiterates that integrity checks are primarily preventive tools that cannot be replaced by procedures triggered by misconduct. Furthermore, while monitoring by superiors is important, this task requires dedicated human resources and inter-institutional cooperation.
91. GRECO concludes that recommendation xiii has been partly implemented.

³³ Art. 13 par.3 section (ac) of Law 5187/2025.

Recommendation xiv

92. *GRECO recommended (i) ensuring an adequate financial reward system for overtime; and (ii) implementing a shift pattern which meets public service as well as individual officers' demands, thereby assuring work-life balance in the police.*
93. It is recalled that this recommendation was assessed as not implemented. As regards the first part of the recommendation, GRECO noted that the relevant bodies were considering introducing a financial reward system for overtime. Regarding the second part, however, no action had been taken. The authorities referred to several orders issued by the Hellenic Police Headquarters in 2010, 2013, 2014 and 2019, which emphasised the importance of strictly adhering to domestic rules on rest entitlements and announcing the weekly task schedule. Despite several reminders from top-level management, however, there was no improvement. GRECO therefore urged the authorities to take more determined and systemic action with regard to this recommendation.
94. Regarding the first part of the recommendation, the Greek authorities report that, following recent legislative amendments³⁴, a new allowance has been introduced for work outside of fixed working hours. The amount of this allowance depends on a police officer's rank and ranges from 205 to 600 EUR. This allowance increases in the case of marriage or civil partnership, and increases further in the case of having a child. Furthermore, security forces personnel (Hellenic Police, Fire Brigade and Coast Guard) will receive special compensation for each additional day worked above five days per week (46 EUR) and for each hour of night work (3.33 EUR). The maximum number of hours of night work, as well as the terms and conditions for granting this allowance, shall be determined by a joint decision of the Ministers of National Economy and Finance, along with the relevant minister.
95. As regards the second part of the recommendation, the authorities indicate that the Police Headquarters examine complaints regarding changes to the shift roster, and that such changes are usually justified by important reasons. Mechanisms have recently been developed to address urgent, unforeseen needs for additional police staff. For example, a regulation has been introduced that requires the police to be notified in good time of any public gathering. Another rule stipulates that prisoner transfers should be supported by personnel from neighbouring services of the same level and their supervising authorities, coordinated by the Police Directorates. Over the past two years, the Headquarters has not received any complaints or grievances concerning working hours or shift rosters.
96. GRECO takes note of this information and welcomes the introduction of allowances and special compensation for overtime and night work, as this is a significant development for the police. Equally important are the measures taken to find solutions for unexpected situations that urgently require more police staff than are allocated to the shift roster. GRECO encourages the authorities to continue these efforts in consultation with the relevant professional associations.

³⁴ Article 127 of Law 4472/2017 as amended by Article 53 of Law 5167/2024 (in force since 1 July 2025).

97. GRECO concludes that recommendation xiv has been implemented satisfactorily.

Recommendation xv

98. *GRECO recommended assessing the effectiveness of the current system/policy of parallel and post-employment business interests/activities of the police, including by establishing unequivocal criteria for permissible secondary activities and streamlining the authorisation process to render it clear, timely and effective.*
99. It is recalled that this recommendation was assessed as not implemented. GRECO noted that the authorities had been processing information received from other EU Member States in response to an official request regarding domestic legislation and practices relating to secondary activities and post-employment restrictions. The authorities were considering amending Article 5 of Presidential Decree No. 538/1989. GRECO urged the authorities to take decisive action to revise the authorisation procedure and make it less protracted and bureaucratic.
100. The Greek authorities report that the aforementioned input from the EU Member States has been analysed, and a proposal note is expected to be submitted to the leadership of the Hellenic Police in order to make a relevant decision and issue a presidential decree. The authorities also describe the current regulatory framework and practices relating to authorising secondary activities of police personnel (as summarised in paragraphs 155–158 of the Evaluation Report and paragraph 79 of the Compliance Report). They indicate that the entire authorisation process takes up to 50 days, with most requests being processed within approximately one month. All authorisations granted so far have been digitised and included in the newly created electronic database. The authorities also submit statistics for 2023-2025 on authorisations granted and refused by type of activity. They stress that the criteria set out in Article 5 of Presidential Decree 538/1989 are applied with strict scrutiny to ensure that only lawful and appropriate activities are permitted³⁵.
101. GRECO takes note of this information and appreciates that the authorisation procedures have become more efficient, and are now considerably shorter³⁶. The development of the internal electronic database is another useful measure that enables consistent processing and efficient monitoring. GRECO also notes that the authorities are considering amendments to the regulatory framework and looks forward to receiving an update in due course.
102. GRECO concludes that recommendation xv has been partly implemented.

³⁵ A total of 563 requests were examined in 2023: 501 authorisations were granted, while 62 were refused. Between 2024 and 2025 (until 15 December 2025), a total of 2,098 applications were examined. Of these, 1,871 were granted authorisation and 227 were refused.

³⁶ From up to 14 months, as indicated in paragraph 157 of the Evaluation Report, to 50 days or even less.

Recommendation xvi

103. *GRECO recommended strengthening the protection of whistleblowers within the police and taking all other measures deemed necessary to facilitate the reporting of corruption, including by guaranteeing whistleblowers' confidentiality, as appropriate.*
104. It is recalled that this recommendation was assessed as not implemented. GRECO noted the adoption of Law no. 4990/2022 transposing the EU Whistleblowing Directive (no. 2019/1937) into the Greek legal order (the Whistleblower Protection Act). However, since its scope was limited to breaches of EU law in designated areas, it was not considered targeted action to implement this recommendation. A draft law was being prepared to extend whistleblower protection to those reporting corruption. GRECO stressed that the framework needed to cover all areas relevant to police work and that whistleblowers within the police, especially in sensitive cases, might require enhanced protection. It therefore invited the authorities, in consultation with the police, to identify gaps in the current framework and determine the measures required to address them.
105. The Greek authorities report that, on 15 March 2024³⁷, the Whistleblower Protection Act was amended to extend its protection to persons who report or disclose violations of domestic law relating to offences of bribery and influence peddling³⁸. Moreover, the Hellenic Police leadership is finalising measures to establish an Integrity Advisor's Office within the newly formed Directorate of Ethics and Internal Audit. One of its tasks will be to identify gaps in the existing legislative framework and the need for additional regulation, in collaboration with the Directorate of Uniformed Personnel and the Internal Affairs Agency. The office will also determine the necessary protective measures for police officers acting as whistleblowers.
106. The authorities also indicate that the external reporting channel³⁹ run by the NTA has been operational since August 2023. This channel enables secure, anonymous communication between the NTA and whistleblowers. Whistleblowing reports can also be submitted by post, email and/or during a personal meeting with the NTA's investigators. The internal channels for handling corruption-related complaints have also existed to date, with such cases being handled by the Internal Affairs Agency of the Hellenic Police.
107. GRECO welcomes the legislative amendment that extends the scope of the Whistleblower Protection Act to include persons reporting misconduct relating to

³⁷ Art. 20 of Law 5095/2024 (GG 40).

³⁸ As defined in Articles 159 (passive bribery of political persons), 159A (bribery of political persons), 235 (passive bribery of public officials), 236 (bribery of public officials), 237 (passive bribery and bribery of judicial officials), 237A (trading in influence intermediaries) and 396 (passive bribery and bribery in the private sector) of the Criminal Code and in Article 134 of Law 5090/2024 (A' 30-liability of legal persons for bribery offences).

³⁹ <https://extwhistle.aead.gr/#/>.

In 2024, 116 whistleblowers reports were submitted. In addition, 28 calls were received via the telephone line 2132129900.

bribery and influence peddling, as defined by the relevant provisions of the Criminal Code. GRECO observes that whistleblower protection does not yet extend to violations outside the criminal law sphere, or more generally to misconduct (including ethical breaches), as pinpointed in paragraph 170 of the Evaluation Report. However, GRECO notes that the newly formed Directorate of Ethics and Internal Audit is expected to reassess the adequacy of the existing framework and trusts that this shortcoming will be addressed in due course. GRECO encourages the authorities to continue their efforts to implement fully this recommendation.

108. GRECO concludes that recommendation xvi has been partly implemented.

Recommendation xvii

109. *GRECO recommended (i) additional safeguards be introduced to provide for independent and effective investigation into police complaints and a sufficient level of transparency to the public; (ii) a tracking-system of public complaints be established.*

110. It is recalled that this recommendation was assessed as partly implemented. GRECO welcomed the stronger emphasis on independent and transparent investigations of corruption complaints, including the clarification that only minor misconduct is handled internally, the requirement that disciplinary corruption cases be examined by an independent body, and the expanded mandate of the Ombudsman. It also noted improvements in the registration of disciplinary and criminal complaints, but encouraged the authorities to avoid a compartmentalised approach to data processing in order to enhance transparency.

111. Regarding the first part of the recommendation, the Greek authorities refer to the recent amendments to the Police Personnel Disciplinary Law (Presidential Decree No. 61/2024) and the 10 November 2024 circular from the Chief of the Hellenic Police, which provides detailed instructions on the proper implementation of these amendments. In particular, preliminary administrative inquiries are assigned to officers from a Directorate or equivalent service, other than that of the police officer involved. Similarly, preliminary and sworn administrative inquiries concerning the use of a weapon during duty, or general allegations of mistreatment, abuse, racism or other extreme behaviour, are assigned to officers who are not administratively dependent on the officers under investigation⁴⁰. Furthermore, following the reorganisation of the Hellenic Police's structure pursuant to Law No. 5187/2025 of 21 March 2025, the newly established Directorate of Ethics and Internal Audit (the Administrative Examinations Department) will conduct investigations following an order for a preliminary or sworn inquiry concerning uniformed personnel serving in any department, regardless of administrative affiliation⁴¹.

112. Regarding the second part of the recommendation, the authorities report that the newly established Directorate of Ethics and Internal Audit intends to streamline the management of complaints against the police and reinforce the impartiality of internal

⁴⁰ Articles 24 and 26 of Presidential Decree no. 120/2008 as amended by Presidential Decree no. 61/2024.

⁴¹ Article 13 paragraph 3 (b) of Law no. 5187/2025.

audits, in collaboration with the General Directorate of Human Resources (the Directorate of Uniformed Personnel). The latter Directorate currently handles all complaints requiring an administrative investigation, while complaints of a disciplinary nature are forwarded to the Directorate of Ethics and Internal Audit, complaints of a criminal nature - to the Internal Affairs Agency, and particularly heinous acts are reported to the Ombudsman and the NTA. Each complainant receives information, either by post or email, initially about which service has been ordered to conduct the disciplinary investigation of their case and ultimately about the outcome of the disciplinary procedure, including whether criminal proceedings have been initiated against the police officer in question. Complainants may submit a request at any time, by whatever means they deem necessary, to be informed of the stage of their case. This request will always be answered promptly by the relevant directorate. It is envisaged that the new Directorate of Ethics and Internal Audit will design and implement an electronic platform with a tracking system for public complaints. This platform will also allow complainants to track the progress of their complaint.

113. GRECO takes note of the above information. GRECO welcomes the recent amendments to the Police Personnel Disciplinary Law, which strengthen the independence of administrative inquiries. GRECO also appreciates the fact that police complaint investigations will be streamlined and assigned to the newly created Directorate of Ethics and Internal Audit as a result of the reorganisation of the Hellenic Police. Together with the measures implemented during the previous reporting exercise, these positive developments allow GRECO to conclude that the first part of the recommendation can be considered fully implemented. Regarding the second part, GRECO notes positively the steps taken to consolidate and improve the management of police complaints, including strengthened oversight by the new Directorate of Ethics and Internal Audit. It further welcomes the development of an electronic tracking system, which promises greater transparency and clearer information for complainants.

114. GRECO concludes that recommendation xvii has been implemented satisfactorily.

III. CONCLUSIONS

115. In the light of the foregoing, GRECO concludes that Greece has satisfactorily implemented six of the seventeen recommendations set out in the Fifth Round Evaluation Report. Eleven recommendations have been partly implemented.
116. More specifically, recommendations iii, viii, ix, xiv and xvii have been implemented satisfactorily, recommendation iv has been dealt with in a satisfactory manner, and all the remaining recommendations (i-ii, v-vii, x-xiii and xv-xvi) have been partly implemented.
117. With regard to persons with top executive functions (PTEFs), good progress has been made in a number of key areas. Several Codes of Conduct have been adopted and published, including the Code of Conduct for Government Members, Deputy Ministers and General and Special Secretaries; the Code of Conduct for Seconded Officials and Special Advisors; and the Code of Conduct for Integrity Advisers. The public's right to

access administrative documents has been strengthened through amendments to the Code of Administrative Procedure. Regarding public consultations, there has been an encouraging trend of adhering to the statutory timeframe and submitting draft legislation to the Economic and Social Council. Oversight of financial declarations has been strengthened through the work of the Audit Committee; as time and experience with the system evolve, it remains essential to ensure adequate resources and timely processing.

118. At the same time, further targeted measures are required in the following areas. While the names and positions of political associates are published, their specific functions, ancillary activities and the exact amount of remuneration are not. The financial disclosure regime for political advisors needs to be tightened. Early engagement of interested parties in the law-making process ahead of public consultations is also necessary, as is establishing a legislative footprint that tracks all external interventions from the beginning of the legislative process. Further measures are needed to strengthen the system for managing the conflicts of interest of PTEFs, as well as to review the length of the cooling-off period.
119. With regard to the law enforcement agencies, GRECO welcomes the recent reorganisation of the Hellenic Police and the amendments to police disciplinary law. Notably, administrative inquiries have been granted greater independence, and investigations into police complaints have been simplified and streamlined, with further improvements expected once the electronic tracking system becomes fully operational. Additionally, the ethics component of various training programmes at the Hellenic Police Schools has been substantially upgraded. Authorisation procedures for secondary activities have been considerably shortened and facilitated by the development of an electronic database. Allowances and special compensation for overtime and night work have been introduced, and other measures have been taken to avoid unexpected changes to shift rosters. The scope of the Whistleblower Protection Act has been extended to include individuals reporting bribery and influence peddling. A positive trend has been set towards achieving gender balance in the police.
120. However, some outstanding matters remain to be addressed. The Police Code of Conduct needs updating and practical guidance. A confidential counselling mechanism should also be developed and become fully operational. A risk assessment and a preventive anti-corruption strategy still need to be developed, as do integrity checks. Whistleblower protection should cover the reporting of violations outside the criminal law sphere or, more generally, misconduct.
121. In view of the above, GRECO concludes that Greece is not in sufficient compliance with the recommendations contained in the Fifth Round Evaluation Report within the meaning of Rule 31 revised bis, paragraph 10 of the Rules of Procedure. GRECO therefore decides to apply Rule 32 revised, paragraph 2 (i) and asks the Head of delegation of Greece to provide a report on the progress in implementing the outstanding recommendations (i.e. recommendations i-ii, v-vii, x-xiii and xv-xvi) by 31 March 2027.

122. In addition, in accordance with Rule 32 revised, paragraph 2, sub-paragraph (ii.b) of the Rules of Procedure, GRECO invites the President of the Statutory Committee to send a letter – with a copy to the Head of delegation of Greece – to the Permanent Representative of Greece to the Council of Europe, drawing attention to the non-compliance with the relevant recommendations and the need to take determined action with a view to achieving tangible progress as soon as possible.
123. Finally, GRECO invites the authorities of Greece to authorise, as soon as possible, the publication of the report, to translate it into the national language and to make the translation public.