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“Technical Assistance on Institutional Enhancement for Local Governance in Greece”

PUBLIC ETHICS BENCHMARKING

Strengthening Public Ethics in Greek Public Administration

FINAL REPORT

**EUROPEAN UNION – COUNCIL OF EUROPE TECHNICAL ASSISTANCE PROJECT ON
INSTITUTIONAL ENHANCEMENT FOR LOCAL GOVERNANCE, GREECE**

The present document was prepared by the Centre of Expertise for Local Government Reform
in co-operation with Mr Cezary Trutkowski and Mr Georgios Danopoulos, Council of Europe Experts



**CENTRE OF EXPERTISE
FOR LOCAL GOVERNMENT REFORM**



"Soft law, preventive measures and benchmarking actions can bring about a change of attitude towards corruption, increasing transparency and public ethics at all levels."

Ms Anastasia Christodouloupoulou, Deputy President of the Hellenic Parliament
Council of Europe Conference on Public Ethics, 15 March 2018, Athens

ABBREVIATIONS

AFETI	Agence Francaise d'Expertise Technique Internationale
Centre of Expertise	Centre of Expertise for Local Government Reform
CoE	Council of Europe
EETAA	Hellenic Agency for Local Development and Local Government
EU	European Union
GRECO	Group of States against Corruption
ITA	Institute of Local Administration
Mol	Ministry of Interior
OECD	Organisation for Economic Cooperation and Development
PEB	Public Ethics Benchmarking
RDI	Regional Development Institute
SEEDD	General Secretariat for Anti-corruption
SRSS	Structural Reform Support Service

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Introduction

In September 2017 the Centre of Expertise has initiated a new activity to strengthen the transparency and legality of public administration at local level in Greece. It was based on the Public Ethics Toolkit¹ elaborated by the Center of Expertise for Local Government Reform of the Council of Europe. **Greece has been the first member state where the new toolkit has been implemented.**

The primary goal of the implemented project was to develop and test national tools to strengthen the ethical infrastructure of local public administration. However, because of limited time available, this activity could only address selected mechanisms and procedures. It is worth stressing that counteracting corruption in public institutions is an effort that requires multifaceted actions. Apart from introducing appropriate procedures and parameterisation of the rules of conduct, efforts are also needed to strengthen the right attitudes and build ethical awareness among the employees. This should be enhanced by a well-structured network of related educational, organisational and technical components that, together with formal procedural solutions, would strengthen the effectiveness of corruption prevention.

The first Chapter provides an overview of the toolkit which was updated in 2017 to include corruption risk analysis of local government operations. The implementation of the corruption risk analysis in Greece and the development of the Greek score card are respectively analysed in Chapter I and II; a number of final remarks are presented in Chapter III.

Methodology

The project consisted of 4 main steps:

1. Selection of municipalities to conduct a risk analysis.

The Centre of Expertise has worked closely with two pilot municipalities to assess possible risks in the provision of targeted services, Larissa and Skyros. These have developed service cards to describe a number of administrative procedures in a standard form. The completion of service cards was a prerequisite to identify possible corruption risks in administrative processes. The assessment of the likelihood of a corruption risk and of the consequences of a materialised corruption risk has been assessed and parameterised. Relevant documents are available at <https://www.coe.int/en/web/good-governance/peb-in-greece>:

- **Service cards** filled in by Larissa and Skyros
- **Corruption risk assessment cards** developed by Larissa and Skyros

2. Adaptation of CoE benchmarks on public ethics to Greece.

¹ Council of Europe Toolkit on Public Ethics Benchmarking, available at <https://rm.coe.int/peb-public-ethics-benchmarking/1680746d52>

The risk analysis has been essential to inform the adaptation of Council of Europe benchmark on public ethics. Bilateral meetings and group discussions were organised with representatives of the selected pilot municipalities and relevant stakeholders to adapt the standard matrix to local needs and conditions. **Greek National Benchmark** are available at <https://www.coe.int/en/web/good-governance/peb-in-greece>:

3. Selection of a group of municipalities to implement the Greek benchmark.

The Public Ethics Benchmark adapted to local circumstances aimed at identifying a national level of public ethics against which local authorities can compare themselves. A limited number of Greek municipalities have received technical assistance by the Centre of Expertise to conduct self-evaluation through the Greek national benchmark.

4. Organisation of a final conference

Pilot municipalities, as well as those who participated in benchmarking activity, had the opportunity to share their experiences on project's implementation during a national conference organised in Athens.

I. Anti-corruption assessment and Public Ethics Benchmarking in Greece

This activity was implemented by the Centre of Expertise from October 2017 to March 2018 with the support of the Regional Development Institute. It was part of the EU – CoE Technical Assistance Project on Institutional Enhancement of Local Governance in Greece, requested by the Ministry of Interior.

The **first coordination meeting** was held on 18 September 2017. Its objective was to share background information to tailor the PEB for Greece, consider proposals for possible pilot municipalities to be involved in the CoE risk assessment phase and coordinate CoE, OECD, AFETI Technical Assistance Projects on anti-corruption implemented in Greece. It was observed that the pilot risk assessment should have involved three different types of municipalities: island, middle and large size.

Following discussions with representatives of the General Secretariat for Anti-corruption and the SRSS, the Centre of Expertise and the MoI identified three municipalities for the risk analysis process:

- Skyros (Island municipality)
- Kalamata (middle size municipality)
- Larissa (large municipality)

In order to start the risk analysis process, representatives of those three municipalities have been invited to the **PEB workshop** which has been organised on 19 October 2017 in Athens.

The workshop has dealt with two main issues:

1. Presentation of the contents of the Public Ethics Toolkit (the most important challenges related to counteracting corruption in European countries, the methodology of identifying and assessing corruption risk, elements of effective ethical infrastructure system in the local government office and ethical benchmarking methodology).
2. Introduction of the concept of service cards and familiarizing the participants with the methodology of developing such cards.

During the workshop, the proposed model of service cards was analysed and the critical issues related to the development of cards for the corruption risk analysis were discussed.

After the meeting municipalities of Skyros and Larissa upheld their commitment to participate in the project as pilot units. The municipality of Kalamata decided to suspend its participation due to the extended scope of works to be implemented over a relatively short period of time.

Elaboration of service cards in pilot municipalities

Following the workshop held on 19 October in Athens, the municipalities of Skyros and Larissa engaged in the risk assessment process to analyse the provision of targeted services. In November these pilot municipalities were supported by the Centre of Expertise to develop a number of service cards describing administrative procedures in a standard form (two missions took place on 24 and 28 November 2017).

In accordance with the adopted methodological assumptions², the introduction of service cards should enable participating municipalities to improve their performance - to structure their internal procedures and systematize the work of civil servants, making better use of human resources. Moreover, the introduction of service cards should help to increase transparency and to minimise the impact of subjective factors on administrative processes carried out at the office.

All service cards developed by the Municipality of Larissa and Skyros are presented in the dedicated webpage³.

Municipality of Larissa

On 24 November 2017 a working meeting took place at the Municipality of Larissa with the supervisors and competent officials of the Directorates of Local and Rural Economy, the Municipal Police and the Urban Planning Department. A detailed preparation was made by the competent coordinator of the program (Mrs. Nicolaidou) under the supervision of Deputy Mayor Mr. Soultis. Before the meeting nine service cards for corresponding services have been completed by the above-mentioned departments. The cards for the following services have been prepared by the municipalities:

- Control and functioning of farmer's markets
- Permit to operate health-regulated establishments
- Inspections of unauthorised structures/buildings
- Building approval and permit (and justified refusal to grant permit)
- Applications - certificates
- Application of the regulation for the operation of the new Municipal Cemetery (exhumations)
- Application of the regulation for the operation of the new Municipal Cemetery (burials)
- Controlling stationary - itinerant trade
- Control procedure regarding the installation of tables and chairs on pedestrian walks - sidewalks – squares

² These assumptions have been successfully tested Poland (within the country-wide project involving 700 Polish municipalities) and Ukraine.

³ available at <https://www.coe.int/en/web/good-governance/peb-in-greece>

Successive discussions were held with the participants of the meeting who showed full willingness to cooperate and to discuss issues of their competence. In particular, it is worth to indicate the following:

1. With regard to the authorisation of health-regulated establishments, upon provision by the interested party of the necessary documents concerning the location of the store, the declaration to the tax office and the fee payments to the municipality, the interested party notifies the Municipality, through a relevant electronic platform, about the launch of his/her business, without the need of any administrative act issued by the Municipality.

The Municipality informs the relevant Departments (Fire Service, Health Directorate, Urban Planning Department, and Police) about the realisation of a control of the reported data. Consequently, due to the electronic licensing procedure and according to law, there is no space for transactions between the services of the Municipality and the person concerned.

2. On the contrary, the Municipality is more intensely involved in the licensing of entertainment centers (restaurants, bars etc.), playgrounds and Internet cafes. Thus, first of all, the Quality of Life Committee (or the Municipal Community Council) grants pre-approval on the basis of land use control, while the competent Municipality Department examines the required for the license documents. The license is provided according to Mayor's decision within 30 days after the application. However, it does not seem that there is a possibility for transactions in a procedure like this, determined to such a significant extent by the assistance, or not, of objective elements. Reservations exist as for the amount of fees because of the limited number of positions and the control of the technical report of (private) engineers on the site.
3. In contrast, there is considerable margin for discretion on the part of the Municipality as it concerns the procedure of posts authorization in flea markets, since the choice of recipients is made by a Committee which takes account various criteria (the social included). Further problems may occur concerning the legitimate renewals of the authorizations since there is no electronic register, as well as the existence of vacancies for both producers and resellers.

At the same time, it seems that the main problem is the supervision of people entitled to hold a post in the flea markets as well as the collection of the foreseeable fee. The issue of upgrading a vendor's post poses a less important problem because of lack of a prescribed procedure, even if it takes place through a draw in view of the age of the license.

4. In the fields of responsibility of the Municipal Police, two service cards were discussed referring to the control of itinerant (or not) trade and to the use of tables and chairs in public areas. This latter case, although it could be objectively controlled due to the limited area that is legally granted for this purpose, it seems to be mainly subject to control after a complain of an adjacent store user, rather than ex officio. The case of itinerant trade faces more difficulties concerning its supervision also because of lack of personnel, despite the clear legislative provisions.
5. The issues discussed, concerning the Urban Planning Department, were the issuance of building permits and the control of arbitrary constructions. As regards the issuance of the permits, there is a building permit procedure and pre-requisite data regulated by law. Their existence or correctness is controlled by the Urban Planning Department in accordance with the existing planning legislation, which means that it is an objective control.

A reservation is created by the fact that the Department, having carried out the completeness control of the file, approves in principle the content of the technical report carried out by the private engineer, who also bears the responsibility of the stated measurements, etc. In any case it has to be stated that the complexity of the legislation and the often-contested system of ownership makes more difficult in some cases the procedure of a simple and predictable building permit.

With regard to the control of arbitrary constructions, this seems to be basically conducted after a private complaint or even a police order, since the ex officio control is not possible due to lack of personnel. An inspection report is then carried out (300 per year approximately), which, as the Departments states, does not seem easy to derogate from the assessment of the infringement according to urban planning legislation.

The same applies to the definition of the amount of the fine due, which will be collected by the Municipal Tax Office or the Public Fiscal Service. According to the recommendation of the Department, the procedure of a fine imposition doesn't seem impartial.

6. As regards the management of the Cemetery by the competent authority, it has to be stated that there is a relevant regulation by the Municipality. However, some problems arise concerning the landfills disposal, because of the intense private interest, as well as the practice of (after 3 years) exhumation. Also, it is often difficult to identify the legitimate heirs who due to pay the burial fee to the Municipality. Generally, the management of the cemetery creates problems concerning the relation of church with third parties, who gain from a 'service' system, which, however, either because of a lack of clear regulatory texts or because of the important emotional factor stays out of a systematic and foreseeable administrative supervision.

Municipality of Skyros

The Municipality of Skyros is a small island municipality that employs about 20 employees (public servants). As a result, many services that are distinguished within the organisational structure of the municipality, are performed by the same employees - for instance as it concerns administrative and financial issues.

With reference to eight specific services selected by the Municipality for presentation on the service cards, a meeting with participation of CoE experts took place in Skyros on 28 November 2017. Due to previous consultations (held in Athens in October), the representatives of Skyros were already informed about the substance of the activity. The participants of the meeting held a positive attitude towards their engagement in the process and responded adequately to the methodological requirements.

As it has been mentioned above, the limited number of personnel in Skyros municipality results in the provision of the majority of services by the Administrative-Financial and Technical Department. In case of the previous the procedures concerning the licensing of health-regulated establishments, the use of public spaces, as well as the use of parts of beaches and cemeteries were examined in particular, while the discussions with the representatives of the Technical Department concerned the authorization of a projects for water resources management, the connection of a buildings with the water supply network as well as the concession of land for the acquisition of land plots.

Discussions held at Skyros indicate the possibility of increased risk related to the issuance of administrative decisions. Namely, in smaller municipalities, due to the limited human resources and thus the application of simplified procedural solutions, there might occur a potential risk arising from limited control over particular decisions issued by the municipal office.

The following service cards were prepared by the Skyros Municipality:

- Burial Permit - Use of Municipal Cemeteries
- Permit to use parts of beaches
- Permit to use public areas
- Permit to connect a building to the municipal water supply network
- Acceptance of land concession to obtain plot size and shape suitability certificate
- Permit to operate health-regulated establishments
- Authorisation to implement a project to utilise water resources

With regard to the licensing of establishments, following a recent legislative modification, the Municipality issues a certificate which notifies the competent authorities (belonging to other public authorities) after completing a notification template submitted electronically by the person concerned and also responsible for the accuracy of the reported data. The public authorities are responsible for the verification of data notified by the person concerned. As a result, any transaction risk is shifted outside the municipality.

Regarding the use of public spaces, first of all the legal status of an area as a public area has to be verified (depending on existing land use regulations) as well as the limits of that area that can be found in topographical reports drawn up by municipality employees. The above actions have a defined frame of reference so that any procedural defect could be easily detected (for example,

following a denunciation or a possible review decided by the city council).

On the contrary, no regulatory interventions are implemented by the Municipality concerning the cemetery. There is no existing regulatory framework with regard to the disposal of graves, the compulsory exhumation after a period of 3 years or the free provision of services by third parties (non-employees) in the cemetery area. Consequently, no regulatory process exists for the actions that take place in the cemetery area.

Additionally, there are some deficiencies (legal and factual) concerning the burial fees collection, which may cause damages to the interests of municipality. At this point it should be noted that this is offset by the fact that Skyros is a small municipality where everybody knows each other, so there is a quasi-social control.

Relating to water resources management, the technical department carries out only completeness check of the file, which is then promoted to the Water Directorate of the prefecture for the issuance of a relevant permit. Consequently, there is no space for any transaction since the decisive competence for this matter is exercised by another public authority.

As regards the connection of buildings with the municipal water network, the relevant authorisation requires specific supporting documents and a technical report of a competent official. Any lack of document, error during the measurement or non-compliance with the priority order for authorisation will be controlled either ex officio or following a third party's complaint.

Finally, with regard to the allocation of land for the acquisition of the rest of the plot, a risk can be identified as to the accuracy of the measurements and further on the employee's discretion to decide on the technical possibility of satisfying the claim of the person concerned. The relevant card also shows the risk of discrepancy between the (administrative) certificate of allocation and the actual allocation.

General observations and recommendations

Introduction of service-cards in a municipality helps to strengthen the principle of transparency that should be one of the key guiding rules for the operations of local administration. Any activity funded from public money has to be evident, and information about it has to be equally and easily accessible to all citizens. Basic documents regulating local government activity (laws, statute, regulations, and budget) should be easily available, and individuals should have been informed how to use them.

Behind the introduction of service-cards, there is a belief that a citizen should be informed in advance how to deal with a given issue, who is responsible for the solution of a particular problem and what kind of documents are required to handle the administrative procedure. It is assumed that acquaintance with administrative procedures would eliminate (or at least limit) the arbitrariness of decisions, protraction of issuing the resolutions, demanding improper fees, or multiplying problems in case of an officer's bad will.

Service cards help to increase transparency of administrative processes – they offer detailed recording of municipal service delivery. The cards can be accessible to citizens through various ways – they can be displayed in the Municipal Office or located at municipal webpage, etc. Therefore, apart from the obvious practical benefits for the citizens and service providers, they can contribute to increase of effectiveness and better use of available resources. They can also serve as an obvious manifestation of the principle of good administration and rule of law.

Corruption risk analysis in pilot municipalities

Corruption risk assessment with regard to the services described with the use of the prepared service-cards was the next phase of the implemented project. All activities involving Council of Europe experts and representatives of the participating pilot units, were organised in December 2017 - January 2018. Necessary work has been conducted prior to the meetings in order to gather all relevant information and to prepare draft risk-assessment cards. In case of the Municipality of Larissa the risk-assessment session was conducted during the CoE expert's field mission. Same activity with the representatives of the Municipality of Skyros was organised in Athens.

All risk-assessment cards for selected services prepared by the Municipality of Larissa and Skyros are presented in the dedicated webpage⁴.

Corruption risk-assessment in the Municipality of Larissa

In Larissa the planned meeting took place in the presence of all competent department supervisors. As a result of efficient preparations, all involved officials were well aware of the content of requested information and thereby they could discuss the potential risk of corruption in the performance of their duties within the framework of their competences.

Firstly, a thorough research was conducted on the issue of flea markets and itinerant trade. The lack of electronic monitoring concerning the allocated positions and the payment of corresponding fees, the not distinct delimitation of the available positions as well as the inadequate staffing of the audit service were considered as important factors that increase the risk of potential illegal transactions. The organisational restructuring of competent services in order to ensure a more efficient monitoring, the rotation of personnel in charge for the monitoring as well as the creation of an electronic database for each trader / professional are factors that help the reduction of corruption risks.

Services related to urban planning mainly face the risk of issuing illegitimate permits or delays in the issuance of legal permits. Some cases of minor delinquencies for the benefit of beneficiaries were also identified in relation to control of arbitrary constructions, the possibility of failure in carrying out a requested control or a "targeted" control, as well as the non-disclosure of control results, should be highlighted as sources of potential risks. Although there is no high possibility for any of the above to materialise, their potential occurrence would have severe impacts for the municipality. The proposed solutions to handle identified corruption risks would include rising staff

⁴ Available at <https://www.coe.int/en/web/good-governance/peb-in-greece>.

knowledge of legislation, introduction of staff rotation and an increase in sample controls.

Various political pressures in order to serve specific citizens' interests, as well as vague legislation have been pointed out as factors increasing potential corruption risk related to the issuance of permits. These risks might be magnified by the employees' lack of interest or limited work commitment (resulting from work routine). It was emphasized that staff rotation between various departments, as well as more effective controls carried out by supervisors can reduce these risks.

Conducted risk analysis revealed that probability of corruption is potentially high within the area of services related to the operation of cemeteries – due to aggravated emotional state of the persons involved it may especially concern decisions related to location of graves. Transparency in regards of available graves location, rotation of the relevant personnel and elaboration of straight and visible internal procedures are factors that can act as a precautionary measure.

Corruption risk-assessment in the Municipality of Skyros

Service cards prepared by the Municipality of Skyros were examined in relation to potential corruption risks during the meeting conveyed in Athens on January 11th, 2018. Representatives of Skyros, together with CoE experts, referring to the context of services provided by small island municipality, highlighted the probability of risks arising from the use of communal areas. Issues of an unauthorized occupation of parts of beaches, as well as town located public spaces, were discussed. Unlicensed occupation of beaches seems to be increased due to the lack of competence of staff of various services (Municipality, Port Authority, Real Estate Corporation, etc.), while in case of communal areas where business activities are undergoing, the risk is enlarged due to the pressure from various local actors. Also, the need for clear definition of concessions was pointed out.

Concerning the licensing of health-regulated premises, a selective or non-effective control of their operation might be observed. Breaches of procedures in this area may imply quite critical consequences for the municipality. The development of an appropriate information system was proposed for the protection of relevant processes.

An increased probability of corruption in cases of acquiring a connection to water supply network of the Municipality was discussed. It was raised that some possibility of inadequate application of relevant regulations, as well as cases of preferential selection of priorities among applications, is possible as this task is handled by a single employee. The electronic monitoring of the service in question may significantly limit this risk.

The management of the cemetery was also considered a potentially vulnerable service. The risk of corruption in this area is increased by lack of specific control mechanisms. The implementation of transparent management was proposed as preventive ways to reduce the risk.

General observations and recommendations

Corruption risk analysis helps to identify factors directly related to the emergence of immoral or ethically incorrect behaviors that facilitate illegal transactions and/or materialisation of corruption threats. Among issues of key importance, the discretionary decision-making (being a consequence of vague legislation or insufficient control mechanisms) has been identified.

The adopted project's approach has helped to reveal potential administrative and organisational weaknesses or deficiencies in the administration of municipalities, which could potentially create smaller or bigger corruption risks. As a result, the elaborated findings can facilitate some corrective interventions at the administrative level.

After the evaluation of the risk assessment cards it becomes visible, that:

- the appropriately elaborated procedural framework inclusive of the standardization of procedures pertaining in the office,
- electronic register of services and involved procedures,
- clear division of responsibilities between employees and departments,
- systematic internal control, assessment and evaluation of the performance of administration, and
- elaboration of an accessible and understandable information for citizens on the regulatory framework

are some administrative measures that can reduce the corruption risks.

Transparency and control over decisions should be strengthened in the areas where possible political or private interest driven pressures are strongest (e.g. entertainment centers licensing, designation of post in flea markets, renewal of licensing or awarding of vacations of authorizations, landfill disposal in cemeteries, determination of fees, the control of arbitrary constructions, etc.).

It is worth mentioning, that according to observations made by participants of the project, discretionary decision making leads to immoral behaviors or to materialisation of corruption threats more rarely in the cases of smaller ("closed") social environments, where intense social control is exercised.

There is yet another important outcome of the risk-assessment activity. Representatives of the involved local units, thanks to the possibility of discussing the problems of counteracting corruption threats in their organisational structures, have gained the opportunity to broaden their awareness of corruption threats related to public services. As a result, they were better prepared to evaluate and develop a set of indicators forming the national benchmark for public ethics.

II. Elaboration of the national ethical benchmark and score card

The European Score Card, as presented in the Public Ethics Toolkit is a list of good European practices. It is made up of six separate Chapters.

With the cooperation of the municipalities that participated in the pilot phase of the project, these chapters were adapted to the country's conditions (including deleting or adding sections and statements and by modifying others) and a National Score Card was created.

The Score Card helps identify the basic ethics framework at local level as proposed by the European Handbook of Good Practices and is thus intended to help municipalities to identify their strengths and weaknesses. Strengths should be shared, while weaknesses should be addressed by the preparation and implementation of effective Improvement Programmes.

Creation of the Greek National Public Ethics Benchmark

The European Score Card was discussed during the meeting organised in Athens on 12 January 2018, with the participation of representatives of pilot municipalities and Council of Europe experts.

A thorough discussion took place concerning the sub-topics of the European Score Card. It resulted in deletions or amendments of specific elements of the model benchmark in line with the Greek national legal system (especially in relation to staff responsibilities, liability of employees, election system, etc.). For various, merit-based reasons some chapters or units were deleted, such as those referring to the financing of political parties (Chapter B) or the privatisation of public enterprises (indicators 4.1-3). Finally the Greek National Benchmark was prepared in cooperation with stakeholders engaged in the risk analysis phase.

Group work on the elaboration of Greek National Benchmark (12 January 2018, Athens)



Public Ethics Benchmarking in selected municipalities

An invitation to participate in a pilot programme related to self-assessment against the National Benchmark was directed to all Greek municipalities. The invitation contained detailed instructions on how to conduct the self-assessment and a request to submit any comments relating to the construction of the benchmark.

In the self-assessment, on a voluntary basis, a total of 19 municipalities of various sizes (both large cities and small villages) participated, below in alphabetical order:

- | | | |
|--------------------|-----------------------|--------------------|
| 1. Agia Varvara | 8. Kalymnos | 15. Penteli |
| 2. Agios Dimitrios | 9. Karpenissi | 16. Phylli |
| 3. Almopia | 10. Larissa | 17. Sintiki Serron |
| 4. Athens | 11. Milos | 18. Tripoli |
| 5. Chalkida | 12. Orchomenos | 19. Zagori |
| 6. Domokos | 13. Palaio Faliro | |
| 7. Igoumenitsa | 14. Papagos–Cholargos | |

Collective self-assessment results are presented in the further part of this report.

Majority of the comments provided by the municipalities referred to the existing legislation and relations between indicators included in the benchmark and specific provisions of legal acts.

Results of the risk assessment and benchmarking activity were presented on 15 March 2018 in Athens, during the Conference on Public Ethics jointly organised by the Centre of Expertise and the Body of Inspectors Auditors of Public Administration, with the support of the Regional Development Institute of the Panteion University. On this occasion, high representatives of the Hellenic Parliament, the Government, Council of Europe, European Union, OECD, and other national and international stakeholders discussed trends and challenges in the field of corruption prevention.

During the Conference, the Deputy Mayor of Larissa, Mr Soultis shared their experience on risk analysis and benchmarking processes undertaken with the Centre of Expertise: *"The risk assesment cards helped us building a common understanding of public ethics (...) and putting on paper in black and white what had been intangible till then. (...) By filling in the Benchmarks we realised that the Greek municipalities can benefit from many rules and pieces of legislation on the matter, but these don't make the system uncorrupted."* By taking part in this activity *"we understood that we don't own the laws in place, a change of attitude cannot be forced by law. We need these kind of exercises, where different members of local administration can have open discussions, take the time and reflect on the administrative procedures and possible risks of corruption. Only by doing so we can raise awarness on public integrity, it cannot be a taboo if we want to improve ethics. And to succeed we must keep working on it, we need assistance and good collaboration with the Central Government."*

Cumulative results of self-assessment

The table below presents aggregated results obtained from 19 collected self-assessment cards. The maximum values ("max score") correspond to the total number of points assigned to the indicators within individual chapters. The following columns present the arithmetic mean of the results obtained and their median (i.e. the central value, indicating the number of points that were obtained by at least half of the participating municipalities). Percentages for the mean and median indicate level of self-assessment in relation to the maximum possible score. These values are also information about the development of ethical infrastructure in the particular areas among the participating municipalities.

	MAX SCORE	MEDIAN	MEAN	RESULT (median)	RESULT (mean)
Chapter A. Status of Local Elected Representatives	145	80	69,7	55%	48%
Chapter B. Control and audit of local authorities	88	57	56,5	65%	64%
Chapter C. Status of local public servants	142	79	71,9	56%	51%
Chapter D. Transparency, administrative procedures, anti-corruption campaigns and evaluation	111	78	74,7	70%	67%
Chapter E. Local authorities' relations with the private sector	153	118	115,1	77%	75%
TOTAL	639	404	387,9	63%	61%

The Greek National Score Card

	MAX SCORE	MEDIAN	MEAN	RESULT (median)	RESULT (mean)
Chapter A. Status of Local Elected Representatives	145	80	69,7	55%	48%
1. General Framework	91	52	43,4	57%	48%
2. Rights and Obligations of Elected Representatives	30	18	16,6	60%	55%
3. Training, informing and co-operating with local elected representatives	24	8	9,7	33%	41%
Chapter B. Control and audit of local authorities	88	57	56,5	65%	64%
1. External Control	19	17	13,4	89%	71%
2. Internal Control	27	11	12,7	41%	47%
3. Judicial supervision	18	18	16,6	100%	92%
4. Alternative mechanisms	24	15	13,7	63%	57%
Chapter C. Status of local public servants	142	79	71,9	56%	51%
1. General framework	44	24	20,9	55%	47%
2. Rights and obligations of local public servants	41	22	21,3	54%	52%
3. Training, information, co-operation and transparency	57	28	29,7	49%	52%
Chapter D. Transparency, administrative procedures, anti-corruption campaigns and evaluation	111	78	74,7	70%	67%
1. Transparency and access to information	60	45	44,9	75%	75%
2. Administrative procedures	8	7	6,6	88%	83%
3. Anti-corruption campaigns and policies	18	12	11,4	67%	63%
4. Evaluation of compliance with ethical standards	25	12	11,7	48%	47%
Chapter E. Local authorities' relations with the private sector	153	118	115,1	77%	75%
1. Public contracts for the supply of goods or services, concluded by local authorities	17	15	14,1	88%	83%
2. Delegation of public services to the private sector	16	14	14,0	88%	88%
3. Relations with the non-profit sector: subsidising associations and delegating public services to them	30	26	20,2	87%	67%
4. Issuing licences/permits and certificates (particularly in town planning matters)	49	40	35,2	82%	72%
5. Management of municipal assets	41	34	33,4	83%	81%

A detailed list of self-assessment results among participating local government units is presented in Appendix I.

When analysing the results of self-assessment, it is worth paying particular attention to those areas where the obtained results were the lowest. In general terms, this is an area of internal regulations and solutions related to ensuring ethical conduct and transparent functioning of the legislative bodies - local councils and councilors.

The following table presents particular indicators with the lowest obtained ratings (at the particular municipality level):

Indicator:	RESULT (median)	RESULT (mean)
The municipality included amendments to Code of Conduct for councilors to reflect local circumstances*	0%	32%
The municipality has an induction manual for councilors	0%	29%
The municipality publishes the procedure and person or committee responsible for dealing with alleged breaches of the Code in accordance with the law and established employment practice	22%	41%
The relevant committee of the municipality annually reviews the Code of Conduct	25%	27%
There are regular campaigns to encourage citizens' resistance to bribe requests and whistle blowing	25%	42%
The municipality has monthly worker consultative committees to: report to the council on constraints on, and improvements to, municipal services; discuss terms and conditions of service	29%	31%
The personnel department seeks to share the annual training programme with neighboring municipalities	29%	34%
Publication to council or a central government agency of an annual report reviewing ethical framework in terms of Code, documentation, public survey, procedures, work with other agencies, breaches, and imposition of sanctions	33%	33%
The municipality publishes an annual anti-corruption strategy, with risk assessments and actions taken	33%	36%
The municipality undertakes an annual public survey on perceptions of ethics and conduct and on service satisfaction; the survey includes questions on the supply side (availability to pay bribes)	33%	28%

* Adoption of standard Code of Conduct to include clear guidance to councilors = (score, mean) 54%

General observations and recommendations

Analysis of the obtained results and comments presented in the submitted self-assessment questionnaires leads to several important observations relating to locally applied practices of strengthening the ethical infrastructure of local government offices and counteracting the occurrence of corruption threats. They are presented below with regards to the corresponding chapters of the adopted ethical benchmark structure.

Chapter A. Status of Local Elected Representatives

It seems that the local circumstances with regard to the status of local elected representatives are not often taken into account. The systematic and organised attempt to regulate rules of ethical behavior in a form of a code of conduct is uncommon.

Obtained results indicate also, that training of the elected representatives remains at occasional level.

Chapter B. Control and audit of local authorities

With regard to the control and audit of local authorities, the vulnerable points seem to be related to the internal and the alternative control mechanisms. The first can be executed through the appropriately organised internal control unit while the second requires a more systematic and transparent approach to the legality control of the activities of local administration.

Chapter C. Status of local public servants

From the information contained in the questionnaires sent, it can be concluded that the systematisation of the activities of local officials is not always treated as a priority. In particular, this refers to the regulation of behaviours that are a potential source of corruption threats.

It seems that briefings concerned with issues of ethical conduct are at best occasional. Additionally, internal meetings of staff concerning the duties of employees and the improvement of delivered services seem not to be a common practice.

Finally, there is a lack of systematic training on ethical issues. It is recommended that training programs for employees of local administration are organised and practices of rising ethical standards are introduced and systematized.

Chapter D. Transparency, administrative procedures, anti-corruption campaigns and evaluation

Local authorities, as the closest to citizens, must be principally concerned with transparency of their activities and demonstrate intolerance to any unethical conduct. Local government plays not only an administrative role but also has educational and culture-creating functions. A citizen observing the activities of his local government learns the basics about the functioning of public administration.

Municipalities should intervene constantly in order to raise citizens' awareness of local government operations and safeguard ethical conduct of local administration. This requires constant efforts to communicate existing procedures and regulations with aim of empowering citizens to take responsibility for the public interest.

Principles guiding ethical conduct of local government office should be widely communicated and municipalities should invest efforts to inform citizens on access to public information. However, according to the data obtained, citizen awareness campaigns on corruption risks and ethical issues are undertaken rarely. There is a very limited attempt to bring ethical issues to public attention.

Chapter E. Local authorities' relations with the private sector

Issues covered by this chapter seem to get highest scores. However more attention is needed in relation to subsidising associations and delegating public services to them. Furthermore, some more detailed procedural solutions safeguarding licensing from the unlawful influence of bidders and contractors.

III. Conclusions

The experience of the implemented project undoubtedly demonstrates the need to strengthen the broadly understood ethical infrastructure in local public administration in Greece. Although the results of benchmarking activity should generally be considered as moderately positive, they also indicated a number of challenges related to the transparency and integrity of the functioning of local governments. In the context of difficult, complex but heterogeneous experiences related to the economic crisis of recent years, it is advisable to endorse a coordinated and comprehensive approach. The most crucial challenges in this area include:

- reinforcement of monitoring and service-delivery evaluation systems with regard to internal control procedures and transparency of operations
- recruitment of employees by their merits and the introduction of professional performance appraisal system
- strengthening citizens' access to public information, ensuring full transparency of the functioning of local administration, reinforcing direct communication with citizens and non-governmental sector

Among the most urgent needs, it is worth pointing out a few basic elements that directly translate into strengthening the ethical dimension of public administration activities at the local level:

- training of local administration employees on self-government's jurisdictions, prerogatives and competencies,
- adoption of ethical codes of conduct at the local level, taking into account specific local circumstances
- establishing mechanisms for handling grievances and complaints from citizens

It is worth considering the idea of developing a separate, comprehensive strategy for counteracting corruption threats at the local level. In order to translate such possible anti-corruption strategy into concrete action, it should be complemented by:

- an action plan (with clear timeframes, indicators of success and assignment of responsibilities), and
- an institutional mechanism (for example a commission and secretariat) responsible for the management, coordination and monitoring of the anti-corruption strategy.

Finally, it is worth emphasising that regular assessment of corruption risks in public administration offices should become part of systematic practice. This exercise should take into account the identification of changes in the institution, its external environment and the impact of these changes on corruption risks related to the analysed processes. It is important to bear in mind that a change to the pre-defined values of parameters and/or the effects of a corruption event can be made only on the basis of a clear indication of the impact of these changes.

APPENDIX 1: DETAILED BENCHMARKING RESULTS

	MAX SCORE	MEDIAN	MEAN	RESULT (median)	RESULT (mean)
Chapter A. Status of Local Elected Representatives	145	80	69,7	55%	48%
1. General Framework	91	52	43,4	57%	48%
A1.1	10	6	5,4	60%	54%
A1.2	5	0	1,8	0%	36%
A1.3	9	6	4,4	67%	49%
A1.4	10	4	3,7	40%	37%
A1.5	8	4	3,7	50%	46%
A1.6	8	5	4,0	63%	50%
A1.7	10	5	4,8	50%	48%
A1.8	8	8	6,1	100%	76%
A1.9	10	5	4,5	50%	45%
A1.10	7	4	2,8	57%	40%
A1.11	6	2	2,2	33%	37%
2. Rights and Obligations of Elected Representatives	30	18	16,6	60%	55%
A2.1	10	8	7,6	80%	76%
A2.2	10	7	5,1	70%	51%
A2.3	10	5	3,9	50%	39%
3. Training, informing and co-operating with local elected representatives	24	8	9,7	33%	41%
A3.1	10	0	2,7	0%	27%
A3.2	8	4	3,8	50%	48%
A3.3	6	4	3,2	67%	53%

	MAX SCORE	MEDIAN	MEAN	RESULT (median)	RESULT (mean)
Chapter B. Control and audit of local authorities	88	57	56,5	65%	64%
1. External Control	19	17	13,4	89%	71%
B1.1	9	8	6,4	89%	71%
B1.2	10	8	7,0	80%	70%
2. Internal Control	27	11	12,7	41%	47%
B2.1	10	6	4,6	60%	46%
B2.2	9	6	4,5	67%	50%
B2.3	8	4	3,6	50%	45%
3. Judicial supervision	18	18	16,6	100%	92%
B3.1	9	9	8,1	100%	90%
B3.2	9	9	8,5	100%	94%
4. Alternative mechanisms	24	15	13,7	63%	57%
B4.1	6	4	3,7	67%	61%
B4.2	6	3	2,9	50%	49%
B4.3	6	4	3,6	67%	60%
B4.4	6	4	3,5	67%	59%

	MAX SCORE	MEDIAN	MEAN	RESULT (median)	RESULT (mean)
Chapter C. Status of local public servants	142	79	71,9	56%	51%
1. General framework	44	24	20,9	55%	47%
C1.1	10	8	6,5	80%	65%
C1.2	8	4	3,4	50%	42%
C1.3	8	2	2,1	25%	26%
C1.4	9	2	3,9	22%	43%
C1.5	9	6	5,1	67%	57%
2. Rights and obligations of local public servants	41	22	21,3	54%	52%
C2.1	10	6	5,7	60%	57%
C2.2	7	4	3,9	57%	56%
C2.3	8	4	4,2	50%	53%
C2.4	9	6	5,4	67%	60%
C2.5	7	2	2,1	29%	29%
3. Training, information, co-operation and transparency	57	28	29,7	49%	52%
C3.1	8	8	7,3	100%	91%
C3.2	7	3	2,4	43%	35%
C3.3	8	4	3,5	50%	44%
C3.4	7	2	2,3	29%	32%
C3.5	7	5	3,8	71%	54%
C3.6	6	6	4,6	100%	77%
C3.7	8	3	3,5	38%	44%
C3.8	6	2	2,3	33%	38%

	MAX SCORE	MEDIAN	MEAN	RESULT (median)	RESULT (mean)
Chapter D. Transparency, administrative procedures, anti-corruption campaigns and evaluation	111	78	74,7	70%	67%
1. Transparency and access to information	60	45	44,9	75%	75%
D1.1	8	5	4,7	63%	59%
D1.2	8	5	4,4	63%	55%
D1.3	6	3	2,3	50%	38%
D1.4	8	8	7,3	100%	91%
D1.5	8	8	7,7	100%	97%
D1.6	6	6	4,6	100%	77%
D1.7	7	7	6,8	100%	97%
D1.8	9	8	7,1	89%	79%
2. Administrative procedures	8	7	6,6	88%	83%
D2.1	8	7	6,6	88%	83%
3. Anti-corruption campaigns and policies	18	12	11,4	67%	63%
D3.1	10	10	7,9	100%	79%
D3.2	8	2	3,5	25%	44%
4. Evaluation of compliance with ethical standards	25	12	11,7	48%	47%
D4.1	9	6	4,7	67%	52%
D4.2	6	2	1,8	33%	31%
D4.3	10	4	5,2	40%	52%

	MAX SCORE	MEDIAN	MEAN	RESULT (median)	RESULT (mean)
Chapter E. Local authorities' relations with the private sector	153	118	115,1	77%	75%
1. Public contracts for the supply of goods or services, concluded by local authorities	17	15	14,1	88%	83%
E1.1	7	6	5,5	86%	79%
E1.2	10	10	8,6	100%	86%
2. Delegation of public services to the private sector	16	14	14,0	88%	88%
E2.1	9	9	8,4	100%	94%
E2.2	7	6	5,6	86%	80%
3. Relations with the non-profit sector: subsidising associations and delegating public services to them	30	26	20,2	87%	67%
E3.1	8	7	5,4	88%	67%
E3.2	8	7	5,6	88%	70%
E3.3	7	6	4,7	86%	68%
E3.4	7	6	4,5	86%	65%
4. Issuing licences/permits and certificates (particularly in town planning matters)	49	40	35,2	82%	72%
E4.1	9	8	7,3	89%	81%
E4.2	9	8	7,4	89%	82%
E4.3	7	7	6,4	100%	92%
E4.4	7	6,5	5,3	93%	76%
E4.5	9	8	7,3	89%	81%
E4.6	8	4,5	3,6	56%	46%
5. Management of municipal assets	41	34	33,4	83%	81%
E5.1	8	6	5,7	75%	71%
E5.2	7	7	6,1	100%	87%
E5.3	6	6	5,0	100%	83%
E5.4	6	6	5,1	100%	84%
E5.5	7	6	5,8	86%	83%
E5.6	7	7	5,7	100%	81%

