

Ministry of Interior
Rule of Law Mechanism 2025 - Answers to targeted questions
(Country- visits 17-20 March 2025)

Pillar II

5. In your view, are the reporting channels for whistleblowers working well? Do you think that the lifting of witness protection last October in the Novartis case could have a chilling effect on future whistleblowers wishing to report on allegations of corruption?

Law 4990/2022 incorporated into the Greek legal system the EU Directive 1937/2019 concerning the protection of persons who report violations of European Union Law. More recently a) the violations of national law related to bribery and influence peddling as defined in articles 159, 159A, 235, 236, 237, 237A, and 396 of the Criminal Code (article 20 of law 5095/2024), b) the liability of legal persons and entities for bribery offences (article 134 of law 5090/2024) and c) the protection of persons reporting or disclosing information in the field of cryptocurrency markets were added to the scope of the original law (Law 4990/2022).

The protection offered under the scheme of Law 4990/2022 further enhances the current scheme of witness protection by encompassing mostly administrative and other complimentary measures against retaliation and an obligation for establishing internal whistleblower channels in public and private sector entities as well as establishing NTA as the external whistleblower channel. In the Novartis case the witness protection scheme of Law 2928/2001 was applied. Under article 9 of the said law, protective measures may include guarding by appropriately trained police personnel, testifying using electronic audio and visual or audio-only transmission, and not including the name, place of birth, residence, occupation, and age in the examination report, as ordered by a reasoned decision of the competent public prosecutor, changing identity details, "relocation to other countries, as well as the transfer or reassignment or secondment for an indefinite period, with the possibility of revocation, of civil servants, decided by way of derogation from the provisions in force by the competent ministers on the recommendation of the competent public prosecutor.

Paragraph 7 of the aforementioned article states also that in cases relating to the criminal offences referred to in Articles 159, 159A and 235 to 237A of the Criminal Code, even if they were not committed within the framework of a criminal organization, it is possible to grant protection to witnesses of public interest against probable acts of intimidation or retaliation.

Data provided by NTA as the external reporting channel suggest that there has been an increase in the complaints filed under the scheme of law 4990/2022, which supports the argument that the Novartis case evolution had not any impact on future whistleblowers. Moreover, the public disclosure of other serious corruption cases such as the one for the urban and spatial planning services in Rhodes Island suggests for the opposite.

6. The written input indicates several actions taken in relation to codes of conduct. Do you have any updates on the compliance and enforcement of the following (and can you confirm that all are adopted, published, and 'in force'):

a. Code of Conduct for Political Appointees and Special Advisors.

The Code of Conduct for Political Appointees and Special Advisors has been posted on the NTAs website as of 15 January 2025 at the following link:

<https://aead.gr/publications/manuals/kodikas-deontologias-metakihtwn-ypallhlwn-kai-eidikwn-symvoulwn>

The new Code of Conduct for members of the Government, Deputy Ministers and General and Special Secretaries of the Greek State, which has been posted on the website of the General Secretariat for Legal and Parliamentary Affairs at the following link, will come into force in 2024:

https://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

As part of the ongoing project for the transformation of the National Centre for Public Administration and Local Government, the establishment of a 'leadership academy' is planned, with the main mission of intensive training of public sector executives in leadership skills and values. In this context, Senior Executives of the Public Administration, Appointed Government Executives (Ministers, Deputy Ministers, Secretaries General), Members of Parliament, Local Government Elected Officials as well as Management bodies of Organizations will have the opportunity to be trained in ethics in the exercise of their duties, among other training subjects.

7. The situation on resources for the NTA seems to have deteriorated rather than improved in the past months (139 unoccupied posts compared to 122 in March last year and 103 in 2022). What are the problems? Will you fulfil your recruitment targets planned for 2025 (mentioned on p. 55 in the written input)? Has the call for the appointment of the NTA Governor (in Q1 2025) been issued yet?

According to article 96 of its constituent law (Law 4622/2019), 503 organic positions have been established in the NTA, of which 320 must be occupied by inspectors-auditors. Specifically, based on par. 8 of this provision, the organic positions of inspectors-auditors are covered by procedures carried out exclusively by the NPA, namely by a single decision of the Administrator of the Authority, with secondments of personnel serving in the public sector. Indicatively, during the current period, the procedure for staffing 53 inspectors-auditors positions is taking place following the issuance of a relevant notice by the NTA in July 2024. This notice was posted on the NTA website at the following link:

<https://aead.gr/prokirixeis/prokirixi-stelexosis-monadas-epithewrhsewn-elegxwn-2024>

Regarding the recruitment of new staff at the NTA, it is recalled that the Ministry of Interior, based on the annual recruitment plan for the three-year period 2022-2025, has approved the filling of twenty-four (24) positions of staff of various specialties, including two positions of lawyers with a paid mandate. At the same time, with regard to transfers and secondments of staff in the NTA to positions beyond those of inspector-auditors, based on data from the "Single Mobility System":

- during the year 2022 (first and second mobility cycle), twenty-four (24) applications for transfer and secondment to the National Transparency Authority were submitted, twenty (20) of them were accepted and the transfer of seven (7) university, technological and secondary education officials to the NTA was finally completed.
- in the year 2024 (first phase of mobility), a total of twenty-one (21) applications for transfer and secondment to the National Transparency Authority were submitted, all of them were accepted and the transfer of a total of five (5) university and technological education officials to the NTA was finally completed.
- during the current, second mobility cycle for the year 2024, a total of twenty-seven (27) applications for transfer to the NTA have been submitted for which final approval decisions are pending.

The call for applications to fill the post of the Governor of the NRA has been posted from 7 March 2025 on the NTA website at the following link:

<https://aead.gr/prokirixeis/upobole-upopsephiotetas-gia-ten-kalypse-tes-theses-tou-dioikete-tes-ead>

On May 6th the preliminary results for the procedure have been published :

<https://aead.gr/prokirixeis/anartisi-pinakon-axiologisis-ipopsifion-gia-ti-thesi-dioikitead>

9. What is your assessment of the functioning of the lobbying legislation and registration in the transparency register (only a modest increase in registrations so far)?

Law 4829/2021 came into force in September 2021 to enhance transparency and accountability in state institutions. Based on Article 8 of this legislation, a 'Transparency Register' was established, which operates as an electronic database and is maintained at the National Transparency Authority, which has been designated as the administrator and responsible for the processing of relevant data. Interest representatives are obliged to register in the Transparency Register, and the NCA ensures the smooth operation and maintenance of the Register, provides information

on registration and navigation in the Register, and at the end of each year prepares a report with statistics on the operation of the Register and the registration of relevant information.

According to the publicly available data (<https://lobbying.aead.gov.gr/dsae2/transparency-registry/search.xhtml>) a total of 39 lobbying/interest representatives have been registered (31 are active) and 239 institutional bodies. It is important to stress that, regardless of the number of registrations, a significant change in attitude towards lobbying and transparency has been taking place in the Greek public administration over the last period of time.

With a view to incorporate the new EU Directive on transparency of interest representation carried out on behalf of third countries when it will be finalized the Ministry of Interior, in cooperation with the NTA, will start the process of reviewing the existing legislative framework of Law No. 4829/2021.

Pillar III

13. The Commission is aware that in October 2024, Greece enacted Law 5143/2024, introducing significant amendments to the legal framework governing access to public information with a key change on universal access foreseeing that any individual or legal entity can request access to public documents, either anonymously or with identification, in person or electronically. On this issue, GRECO had recommended that Greece undertake an independent assessment to adopt regulations fully meeting the standards of the Council of Europe Convention on Access to Official Documents (CETS 205). Are there any concrete plans to further follow-up on this recommendation?

The Greek Government's intention was to fully incorporate the requirements of the Tromsø Convention on the right of access to public documents in order to strengthen the rule of law. For this reason, in October 2024, Law 5143 was passed, through which Article 5 of the Code of Administrative Procedure, which enshrines this specific right, was completely reformed.

The new article includes all the provisions of the Convention. In particular, it provides for the possibility of access to public documents for any natural or legal person. The exceptions to this rule are provided for restrictively and are as follows: when documents contain personal data, a legitimate interest of the applicant is required. This concept is defined as the connection of the applicant's rights or interests with the specific case and must be invoked and proven by the applicant himself. For sensitive personal data, access is based on the GDPR Regulation. The second exception is when public documents are protected by a legally protected secret, namely by the secret of national defense and foreign policy, public faith and currency, state security and public order, medical, commercial, professional, banking or industrial secret. Finally, access is limited to documents on which intellectual property rights exist.

However, even in cases falling within these exceptions, the administrative authorities must partially satisfy the request in the part that is not protected without any intermediate procedure, e.g. judicial.

Furthermore, the possibility of submitting an anonymous application, as well as an electronic one, is provided. Finally, the administrative authorities must provide the necessary assistance to the applicant in order to locate the public document of interest.

In case of submitting an anonymous application, the applicant himself, by choosing anonymity, has limited his access to public documents containing personal data. The provision has rightly chosen to give priority to the protection of personal data. This obligation also arises from the GDPR Regulation, which Greece must also implement. Furthermore, the applicant may not request access to personal data, sometimes even sensitive data, when he does not reveal his own identity.

However, even in this case, the anonymous applicant's access to public documents can be partially satisfied, that is, he may receive from the administrative file those documents that do not contain personal data. Ultimately, the administration does not deny him access to the administrative file altogether, his rights are partially satisfied.

Finally, it is emphasized that the rest of the restrictions provided for (e.g. confidentiality) are identical for any type of application, named or anonymous, in-person or electronic.

The new legislative provision (Article, 59 Law 5143/2024) entered into force on 1/1/2025 and the following day the Ministerial Decision (FEK B' 7302/31.12.2024) specifying it was issued. At the same time, circular ΔΙΔΔΗ/Φ. 22/31.12.2024 was sent to the administrative authorities explaining the provisions of the new law. In the context of awareness raising, the Ministry of Interior in collaboration with the National Center of Public Administration are planning training actions, initially for public sector senior executives.

Last but not least, the Greek Government is committed to monitoring the implementation of the new provision and to taking corrective action, if deemed necessary. For this reason, the provision provides that the Ombudsman may, by his decision, establish a working group consisting of experts, executives of Civil Society organizations and executives of the Public Administration, which monitors its implementation. The conclusions and proposals of the working group are forwarded to the Hellenic Parliament, the Ministry of the Interior and the Council of Europe and are posted on the Ombudsman's website. At the same time, the Ministry of the Interior is in direct communication with Civil Society Organizations such as Vouliwatch in order to tackle any difficulties and resolve them with the required improvement actions. Working meeting between the General Secretary of Public Administration of the Ministry of the Interior and representatives of the Vouliwatch took place on January 10, 2025.

In addition to the above, the accountability of public authorities and political authorities to citizens is a priority of the Greek Government. For this reason, with the adoption of Law 5056/2023 (Article 33), the 'Local Government Performance Monitoring Hub' was established at the Ministry of Interior, with the aim of enhancing transparency and public accountability of the country's municipalities and regions, through direct access of all citizens to data concerning their operation and work. It is a tool that aims to record the key elements of the operation and activity of local authorities, as well as to provide a comparative assessment of their performance, through indicators by sector of operation. The indicators for measuring and evaluating the performance of the country's local authorities will be published on the platform 'deiktesota.gov.gr' on an annual basis and their data will be freely accessible to all.

Immediately after the completion of the submission of the data by the Municipalities and Regions to the Hub, the calculation of the measurement indicators and the evaluation of the performance for the year 2024 by the Ministry of Interior and the visualized publication of the results on the platform 'deiktesota.gov.gr' will follow.

Pillar IV

7. Could you please provide updates on:

- (i) The interoperability between the Central Database and the Registries under MoMA. Has it become operational?**

Please refer to our answer provided in question 17 below.

- (ii) MoMA's intention to launch a survey aiming to collect feedback from CSOs.**

Please refer to the answer of the MoMa.

- (iii) The process of evaluating the existing framework for CSOs registration.**

The data from the registrations of Civil Society Organizations in the two registers of the Ministry of Interior (Public Database and Special Register), which are provided under question 16 below, demonstrate the extremely significant increase the last 8 months. This, of course, does not mean that efforts are not being made by the leadership of the Ministry of Interior to further facilitate the registration of more and more CSOs in them.

In the context of reviewing the existing legislative and regulatory framework for CSOs and with a view to further ease the process and give incentives for registrations to CSOs the Ministry of Interior in the draft bill which will soon be uploaded for public consultation and in accordance with the Bodossaki Foundation Action Plan for Civil

Society in Greece¹, will include among others a provision through which it will become possible to register and thus to be financed by General Government entities, the CSOs which are active in the field drug rehabilitation, whose Boards of Directors include persons who may have been irrevocably convicted in the past of a misdemeanor under the Drug Law. A prerequisite for the registration of these CSOs will be that their members have followed and completed programmes of detoxification, rehabilitation and social integration. In other words, the new regulation removes yet another obstacle to the registration of certain CSOs in the relevant registers of the Ministry of Interior, which makes it possible for them to receive funding from any public body or organization.

Furthermore, in the same direction of easing the registration of CSOs the Ministry of Interior has prepared in cooperation with the other competent Authorities:

- a draft Joint Ministerial Decision for the exemption from payment of traffic fees for special-purpose vehicles of public benefit institutions and registered CSOs
- a draft Joint Ministerial Decision to facilitate the voluntary participation and work of individuals in CSOs.

(iv) Plans to establish an additional platform for the compulsory registration of all CSOs.

Please refer to our answer provided in question 17 below.

11. Could you please provide more information on the study on improving the functioning of the independent authorities?

In order to improve the framework for the operation of the Independent Authorities, the Greek Government, on the initiative of the former Minister of State in cooperation with the General Secretariat for Coordination, commissioned in September 2024 the study on the improvement of the operation of the independent authorities to the OECD. The project is funded by the Technical Support Instrument (TSI) programme. The duration of the project is 24 months.

¹ The Action Plan provides a comprehensive overview of the current state of Civil Society in Greece, incorporates best practices from international experience, identifies areas for improvement, and proposes actionable changes based on three key pillars: institutional functionality, financial sustainability, and social interaction. The recommendations are directed both to the State—emphasizing the critical importance of an appropriate institutional framework for the proper and effective functioning of Civil Society—and to the Civil Society sector itself, offering recommendations for self-regulation.

The project aims to review and explore the mechanisms that constitute the institutional and functional responsibilities and work of the Independent Authorities in areas such as:

- Staffing procedures
- Institutional Planning / Planning
- Operational Support Funding Issues
- Reporting & Reporting Obligations (Action and Reporting)
- Accessibility of Information

The project will utilize best practices proposed by the OECD to improve the functioning of independent authorities. A series of meetings are currently taking place with representatives of independent authorities. A representative of the Directorate-General for Structural Reform Support (DG Reform) of the European Commission is participating in the process.

12. Pursuant to article 20(1) Law 4622/2019 the statutes of all independent authorities are adopted, amended, repealed by decision of those authorities, without prejudice to applicable specific rules. According to the information you provided, the new statute of the Hellenic DPA has been adopted by Presidential Decree 30/2024, pursuant to the specific rules set out in Article 18(3) Law 4624/2019. Could you please provide information on the applicable rules governing the adoption of the statutes of the other four constitutionally protected independent authorities? Could you elaborate on the reasoning behind perhaps different applicable rules, thereby considering the enhanced requirements for independence of the five constitutionally protected authorities?

A. Personal Data Protection Authority (APDPX)

According to par. 1 of article 20 of Law 4622/2019 the organization and operation of the bodies of the Public Administration are determined by Organizations, which are drawn up by Presidential Decrees, which are issued on the proposal of the Minister or the Prime Minister and the Ministers responsible for the budget and for matters of organization of the public administration. The organization and operation of the Independent Authorities shall be determined by Statutes, which shall be established, replaced or amended by decisions of their competent governing bodies.

In accordance with the provisions of article 20 of Law 4622/2019, with the par. 2 of article 17 of Law 4624/2019 stipulates that all matters relating to operational and substantive issues of the Personal Data Protection Authority (APDPX), such as its operation as a collective body, the manner of decision-making, the procedure for conducting audits, the distribution of powers in the plenary and the Departments, as well as the delegation of powers to unilateral bodies and matters of disciplinary proceedings are set out in the Rules of Procedure of the Authority, which are approved by decision of the President of the Authority. The existing Rules of Procedure of the

Authority were adopted by decision of the Authority's President and adopted in 2022 (Decision No 9/10.2.2025, FEK B 879/2022).

According to par. 3 of article 18 of Law 4624/2019 provides for the adoption of the Authority's Statute by presidential decree, but it regulates organizational and procedural issues that ensure the proper functioning of the Authority's Secretariat. In any event, the Authority's opinion is required for the adoption of the decree. The Statute of the Authority was adopted in accordance with the above by the Presidential Decree 30/2024 (FEK A 89/2024), while the minutes of 19.09.2022 and 28.03.2023 of the Plenary of the Authority were considered for its adoption.

It is noted that the enclosure of legislative provisions in the form of a presidential decree is a safeguard for the administration, since they are subject to the preventive control of the Council of State (StE), the highest administrative court of the country, which examines the provisions as to their legality.

Strengthening the uniformity of the institutional framework governing the organizational issues of the IAs is, inter alia, the subject of the work taking place with the OECD on strengthening the powers and functioning of the Independent Authorities (see reply to question 11).

In any case, the Greek Government is positively inclined to review the institutional framework governing the way the Authority's Secretariat is organized and operates, in order to harmonize it with the provisions of article 20 of Law No. 4622/2019.

B. Other Independent Authorities

For the National Broadcasting Council (ESR) according to article 6 of Law 2863/2000 (FEK A 262/2000), the Staff Regulations are drawn up by decision of the ESR and ratified by decision of the Minister of Press and Media. The same article stipulates that the reorganization of the ESR may be decided by a decree, issued upon the proposal of the Minister to whom the powers of the Minister of Press and Media and the Minister of Public Administration and Decentralization are delegated, following a recommendation of the Plenary of the ESR.

For the Ombudsman in accordance with the provisions of par. 9 of Article 5 of Law 2477/1997 (FEK A 59/1997), it is provided that the organization and operation of the Authority, the allocation of staff, the organization of the Secretariat, the number of staff positions and their allocation to services and branches/specialties are regulated by the Authority's Rules of Procedure. These Regulations shall be adopted by a Presidential Decree, issued on the proposal of the Minister of Interior, after obtaining the consent of the Ombudsman. To this end, Presidential Decree 273/97 was adopted, which was amended by the Regulation on the Operation of the Ombudsman by his decision (No. F.10/1489/FEK B'1000/29.5.2008).

For the High Staff Selection Board (A.S.E.P.) in par. 7 of article 60 of Law 4765/2021 (FEK A 6/2021) provides that for the organization of the services of the Secretariat of the A.S.E.P., the composition and number of staff positions, the allocation of staff to branches and specialties and any other relevant matter, a Statute shall be issued in accordance with the provisions of the second subparagraph of Paragraph 4765/2021. The current regulation has been issued by a joint decision of the Deputy Minister of Finance and the President of the ASEP (Decision No. 84/19.5.2022, FEK B 2578).

As regards the Communications Privacy Assurance Authority, its Statute was issued by a joint decision of the Minister of Finance and the President of the Authority (No 1560/12.4.2023, FEK 3030/2022), while the minutes of the Plenary of the Authority dated 9.3.2022 were taken into account for its issuance.

As can be seen from the above, in all cases, the adoption of regulatory acts, whether they are adopted by decree or by a joint decision of the President of the Authority and the Minister, is subject to prior decisions of the Plenary of the Authorities.

It is reminded that with the addition of Article 2A to Law No. 3051/2002 (FEK A 220/2002), which was added by Article 55 of Law No. 5043/2023 (FEK A 91/2021) strengthened the functional independence and provided for judicial defense and legal assistance to members and staff of the staff of all constitutionally guaranteed independent authorities serving and employed by them in any legal relationship, when they are sued or investigated or accused of acts or omissions exclusively related to the exercise of their powers and the performance of their duties.

13. The 2024 Rule of Law Report referred to the importance of effective and timely investigations into incidents of alleged misconduct involving state officials. Could you please provide information in this respect, including statistical data if any.

This specific point of the 2024 Rule of Law Report concerns law enforcement officers and coastguard officers. The preliminary investigation of such incidents as well as for any incident concerning alleged violation of duties of any public official is conducted by the competent authorities/officers and is confidential.

16. Regarding the Registries (both the Central and the Special ones), in addition to the data regarding registered CSOs which are already included in the input, could you please also submit data about rejected applications and the reasons for it?

For the initial registration in the Public Database of the CSOs there are prerequisites, which are defined in provisions of Law no. 4873/2021. Due to failure to meet them, the applications of the following bodies have been rejected:

- a. **the Association of Professional Motor Vehicle Drivers' Instructors of North Athens (SEEOAVA)**, since its mandate does not correspond to that of civil society organizations, as described in relevant provisions of Law. 4873/2021 (e.g. on the public benefit purpose of the operation and the voluntary and non-profit character of each NGO, as well as on their independence from the state, government, local authorities, public organizations under public and private law, as well as from any commercial, trade union and professional organization, cooperative or association).
- b. **of the Panhellenic Union of Retired Radio Telegraphers of Merchant Navy Officers (PESRRAEN)**. Rejected for the same reasons as the preceding one.
- c. **of the Panhellenic Federation of Social Cooperatives of Limited Responsibility**. The application of this federation was rejected, as under their institutional framework (Article 12 of Law 2716/1999), Social Cooperatives of Limited Responsibility are "legal entities under private law with limited liability of their members, which have commercial activity and are mental health units". Therefore, their even partially commercial nature is not compatible with the relevant conditions for inclusion in the Public Database of CSOs.
- d. **of "EDRA – Social Cooperative Activities"**. The application of this civil non-profit cooperative was rejected, as its statutes are governed by provisions on civil cooperatives. For this reason, it does not meet the relevant requirement of Law No. 4873/2021 on independence from any commercial, trade union or professional organization, cooperative or association (art. 4, par. 1, subparagraph a).

In addition to the above rejection decisions for registration in the Public Database of CSOs, there have also been provisional rejections of applications from other institutions and organizations, which have requested for their inclusion in the Database the amendment of their initial application.

The main and most common reasons for their temporary rejection are the following:

- the failure to provide up-to-date certificates (e.g. from the district court or the GEMI) of changes to their statutes.
- the incorrect submission of the required solemn declaration of compliance with the essential criteria and the independence of the bodies.
- the incorrect submission of their financial statements.

For the Special Register of Civil Society Organizations, specific provisions of the relevant Law 4873/2021 also provide for specific requirements that interested civil society organizations must meet in order to be registered in it. As the relevant prerequisites were not met, the following application was rejected:

- **of the organization named "Kivotos tou Kosmou - Civil Non-Profit Company / Voluntary Non-Governmental Organization"** as it did not meet the essential criteria of the law for registration in the Special Register of NGOs. and in particular the condition of independence from any legal person belonging to the public sector, including in their management bodies and the general assembly, since the management body of the Ark of the World is the NGO "National Center for Social Solidarity" (EKKA).

Apart from the above rejection decision for registration in the Special Register of the O.K.I.P., there has also been a provisional rejection of applications from other bodies and organizations, which have requested the amendment of their initial application.

The main and most common reasons for their provisional rejection are as follows:

- the failure to submit an auditor's report.
- the incorrect submission of their financial statements.
- the failure to provide updated certificates from the competent authority concerning changes, the validity of elections or judicial solvency.
- the incorrect submission of the required declaration of compliance with the substantive criteria and the independence of the CSOs.

More generally, however, as of April 30, 2025, a total of 1505 CSOs had successfully completed their registration in the Ministry's Public Database, while another 475 had applied without their registration having yet been finalized. In the Special Registry of the Ministry of Interior, the registration of a total of 716 CSOs has been completed, and the finalization of the applications of 282 more CSOs is pending. From the above data and compared to the corresponding figures of previous months, it can be concluded that the new regulatory framework for CSOs that has been put into effect (Law 4873/2021, Joint Ministerial Decision 6216/2023 and circular number DOKoiP/13756/25.07.2024 of the Ministry of Interior) has contributed significantly to the drastic increase in registrations on the two relevant platforms.

17. Could you update us on the state of play of the interoperability between the Registries?

The Ministry of the Interior, in line with the principle of submitting documents only once, reducing administrative burdens, and simplifying procedures to make things easier for applicants, intends to legislate in the near future on a single point of entry/reference for the initial registration of all civil society organizations, general-purpose associations, civil companies, and foundations, including those that do not receive state funding, the so called "Repository/Observatory." All the above-mentioned organizations, institutions, associations, and non-profit civil companies will be registered there through interoperability with the information system of the

Independent Authority for Public Revenue (IAPR). The data entered in the IAPR information system will automatically appear in the new "Repository/Observatory" and their representatives will only be required to enter their contact details and select their field(s) of activity without having to submit supporting documents, free of charge and not for audit purposes. Subsequently, and only if they wish to apply for state funding or if they are required to register under a specific provision/regulatory act, they will be automatically redirected either to the Public Database or to the Special Register or to one of the other special/sectoral registers of the other Ministries in order to complete the remaining information requested. It goes without saying, that the information already available in the "Repository/Observatory" will be automatically transferred through interoperability to the existing Registers of the other Ministries, as well as to the Public Database and the Special Register of the Ministry of the Interior. It also goes without saying that the data already registered in the Public Database and the Special Register of the Ministry of the Interior, as well as those of any other Ministries that keep electronic registers, will be transferred by the competent Directorate of the Ministry of the Interior to the "Repository/Observatory" to be created. In addition, the "Repository/Observatory" to be created will have a specific electronic space where all these bodies can post either their already implemented projects or their planned future actions. This will make it easier and completely transparent for both public and private bodies to identify specific actions or bodies according to their field of activity that they would like to contribute financially.

The Ministry has already coordinated the necessary actions and has worked with the relevant Ministries to check for overlaps with other registers in terms of the supporting documents required. Specifically:

- it has collected and processed the institutional framework governing the establishment and operation of the registers kept by central government bodies.
- examined the common fields - registration documents of public benefit organizations per register, so that this can form the basis for the development and implementation of the planned interoperability.
- has concluded an agreement on the implementation of interoperability with public bodies and registers kept by other ministries (e.g. the "Solon" register of the Ministry of Justice and the "taxis" platform of the Independent Authority for Public Revenue).

18. According to the input, the Ministry of Migration and Asylum has completed the collection and processing of the proposed changes to the legal framework and registration procedure for its Special Registries (p.135). The input refers also to the process of evaluating the existing legislative framework to simplify the registration procedures (p.137). Could you please clarify if these statements refer to the same action? Could you also please provide more information on (i) the process of collection of proposed changes; (ii) the main findings of this process; (iii) next steps, and in particular how do you intend to conduct the evaluation; and (iv) timeline.

Please refer to the answer of the Ministry of Migration and Asylum.

19. Could you please provide more information about the structured dialogue and the planning of the thematic meetings?

The Ministry of Interior, in the context of its strategy to ensure the integrity, transparency, good governance and accountability of CSOs, promotes both structured dialogue, cooperation and ongoing consultation between bodies that either constitute or are involved in issues of Civil Society Organizations, as well as information and awareness-raising actions on CSOs issues:

Participation in thematic meetings and awareness-raising activities of members of the political and administrative leadership of the Ministry of Interior, as follows:

Already completed:

- at the event on "The Importance of Transparency in Civil Society Organizations", organized in mid-January 2025 by 'HIGGS', the relevant hub for the empowerment of Civil Society Organizations and in which the relevant actions of the Ministry of Foreign Affairs were presented
- at an event held at the Bodossaki Foundation at the end of January 2025, where proposals for new legislative initiatives to facilitate the operation and funding of CSOs
- at a working meeting between representatives of the political leadership of the Ministry of Interior and the Volunteer Blood Donors Federation, which took place on 6 March 2025
- at a workshop held in March 2025 at the Ministry of Interior between its political leadership and representatives of the Greek Federation of Cancer Patients (ELLOK)
- in April 2025, in the context of the annual Delphi Economic Forum, a discussion took place on the new framework for the operation, registration and funding possibilities of Civil Society Organizations.
- In April 2025 an informative video meeting with the Financial Directorates of line Ministries which are responsible for the financing of CSO's took place.

Scheduled:

In the near future, the political leadership of the Ministry of Interior is going to inform the Greek Parliament about CSOs.

In the context of raising citizens' awareness:

- using IT tools, a message has been sent by gov.gr to more than one million users to inform them about the maintenance of the two CSOs Registers at the Ministry of Interior.

- an electronic brochure has been prepared and videos with instructions on how to register in the two registers of the Ministry of Interior have been published both on the Ministry's YouTube channel and on the Ministry's website
- two new videos are being prepared to inform the interested CSOs in relation to the possibility of updating and modifying their data in the Public Database and the Special Registry of the Ministry of Interior.

In the context of informing and providing instructions and guidance to public bodies on the CSOs:

- On 4.4.2025, a teleconference was organized with representatives of the General Directorates of the Ministries' General Directorates of Financial Services, as well as the KEDE and ENPE, in order to inform the services involved in the processing and approval process of the application/documents of an CSO/public benefit organization applying for state funding, either on its own initiative or following an invitation from the organization
- A briefing is being planned for representatives of the Economic Chamber of Greece to seek, through structured dialogue, further solutions to facilitate the financing of the CSOs

20. Could you please provide more information on ongoing plans to include a new subsystem for the registration of all organizations?

Please refer to our answer for question 17.