



HELLENIC REPUBLIC

CODE OF CONDUCT FOR INTEGRITY ADVISORS

Version 1.0
September 2024



NATIONAL TRANSPARENCY AUTHORITY

Foreword by the Interim Governor

The law. 4795/2021 (A' 62) established the institution of the Integrity Advisor in the Greek public administration. The Integrity Advisor is an innovative initiative of the Ministry of Interior and the National Transparency Authority (NTA), based on the continuous effort to modernise the Public Administration, the standards set by the national and European legislative and regulatory framework, the ethical rules and international best practices.

Integrity Advisors play a fundamental role in promoting a culture of transparency and ethics in public administration. This Code will guide them in upholding the highest standards of integrity and professionalism in order to best fulfil their official duties.

Alexandra Rogkakou

Interim Governor

Head of Inspections and Audits Unit

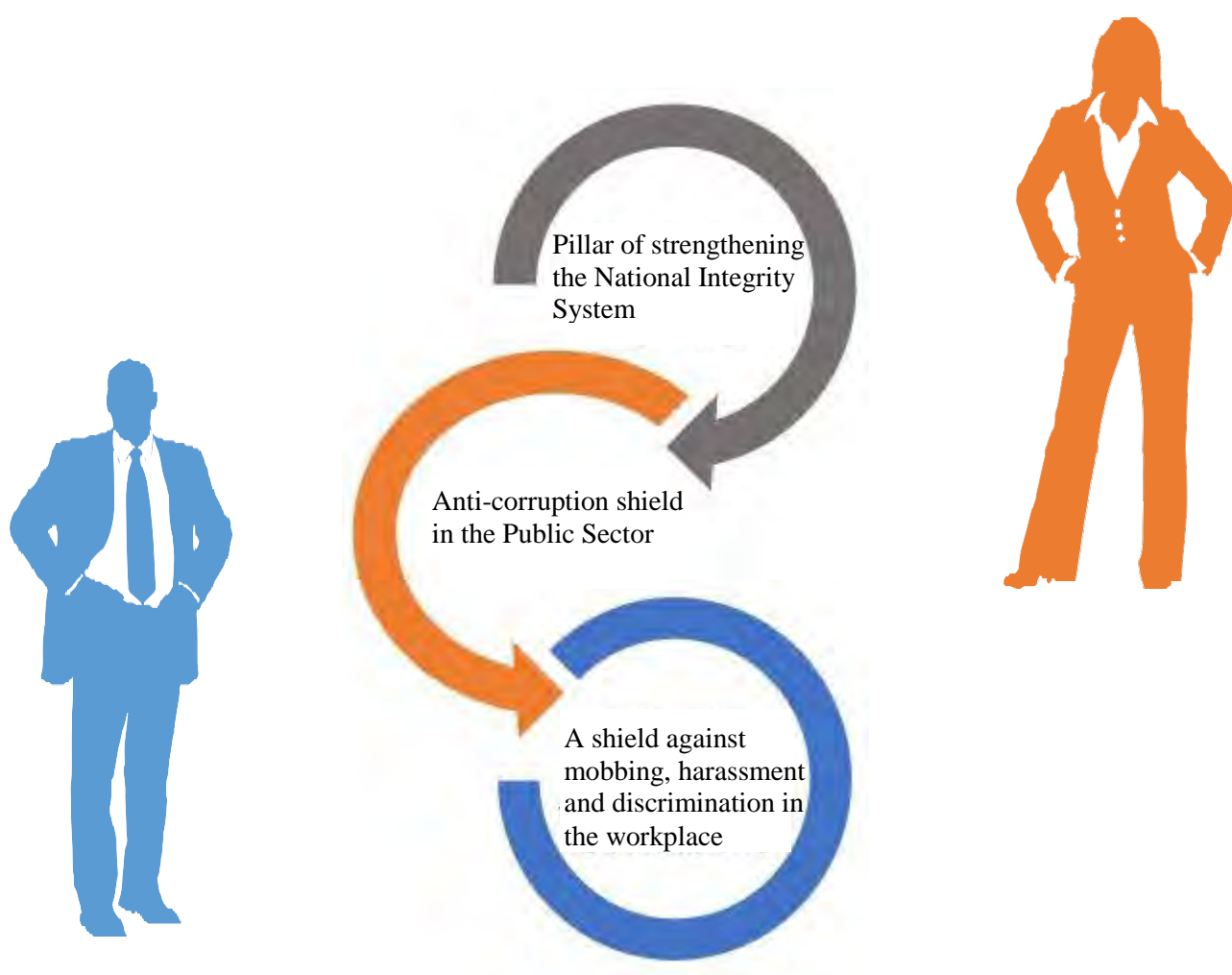
Compilation

The Code of Conduct for Integrity Advisors has been developed in accordance with the guidelines of the NTA Interim Governor Alexandra Rogkakou, under the guidance and coordination of the Head of the General Directorate for Integrity and Accountability, Maria Konstantinidou.

The project team consists of: Christos Kourtis, Head of the Directorate of Integrity Policies and Standards of the General Directorate for Integrity and Accountability, Aliko-Eftichia Konsta, Head of the Integrity Policies and Standards Development Department of the Directorate for Integrity Policies and Standards and Theodoros Hadjipavlidis, member of the Integrity Policies and Standards Development Department of the Directorate for Integrity Policies and Standards

Introduction

The institution of the Integrity Advisor was established for the first time in the Greek public administration with the provisions of Part B of Law 4795/2021 (A' 62). The Integrity Advisor is an innovative initiative of the Ministry of Interior and the National Transparency Authority, based on international best practices in the context of the continuous effort to establish a modern Public Administration, the operation of which will be governed by terms of integrity and transparency. The establishment of an ethical and integrity-driven working environment is a fundamental aspect of modern public administration and a crucial component of an integrated and effective Internal Audit System. The Code is an action, included in the Pillar "Prevention-Integrity-Accountability" of the National Integrity System 2022-2025, as described in the Annex (Action a/a 9) of the ΓΤΑΔΔΤ/707/18852/1.12.2022 Decision of the Minister of Interior (B' 6312). The action is implemented by the Directorate for Integrity Policies and Standards of the General Directorate for Integrity and Accountability of the National Transparency Authority.



Contents

A. Purpose.....	6
B. Mission of the Integrity Advisor.....	6
C. Principles and Values of the Integrity Advisor's Actions.....	7
C.1.Integrity.....	7
C.1.1 Impartiality - Avoidance of conflict of interest	7
C.1.2 Confidentiality and Privacy	8
C.1.3. Management of Information, Data Processing and Record Keeping	8
C.2 Respect for the rights and dignity of employees	9
C.2.1. Ethics in behaviour towards colleagues	9
C.2.2. Elimination of violence and harassment in the workplace - Acceptance and equal treatment of employees.....	10
C.3 Professionalism.....	11
C.3.1. Promotion of the Entity's Prestige	11
C.3.2. Competence.....	12
D. Specific commitments of the Integrity Advisor.....	14
D.1 Commitments of the Integrity Advisor to the organisation's employees who report, seek individual counselling and contact him/her.....	14
D.2 Commitments by the Integrity Advisor to the Head of the organisation	15
D.3 Commitments of the Integrity Advisor to the units of the organisation	16
D.4 Commitments to other Integrity Advisors - Integrity Advisors Network.....	16
D.5 Commitments of the Integrity Advisor to the National Transparency Authority and other external bodies	17
E. Supervision.....	18
F. Awareness-raising.....	18
G. Moral and Ethical Dilemmas.....	19
H. Foreword	22
I. Conceptual Dictionary	25
J. Useful Websites	27
K. Useful institutional framework.....	28

A. Purpose

The Code of Conduct of the Integrity Advisor, (hereinafter the Code) is a contemporary tool to guide the conduct and professional actions of the Integrity Advisor, in order to establish a working environment, grounded in the principles of integrity, transparency and professional ethics.

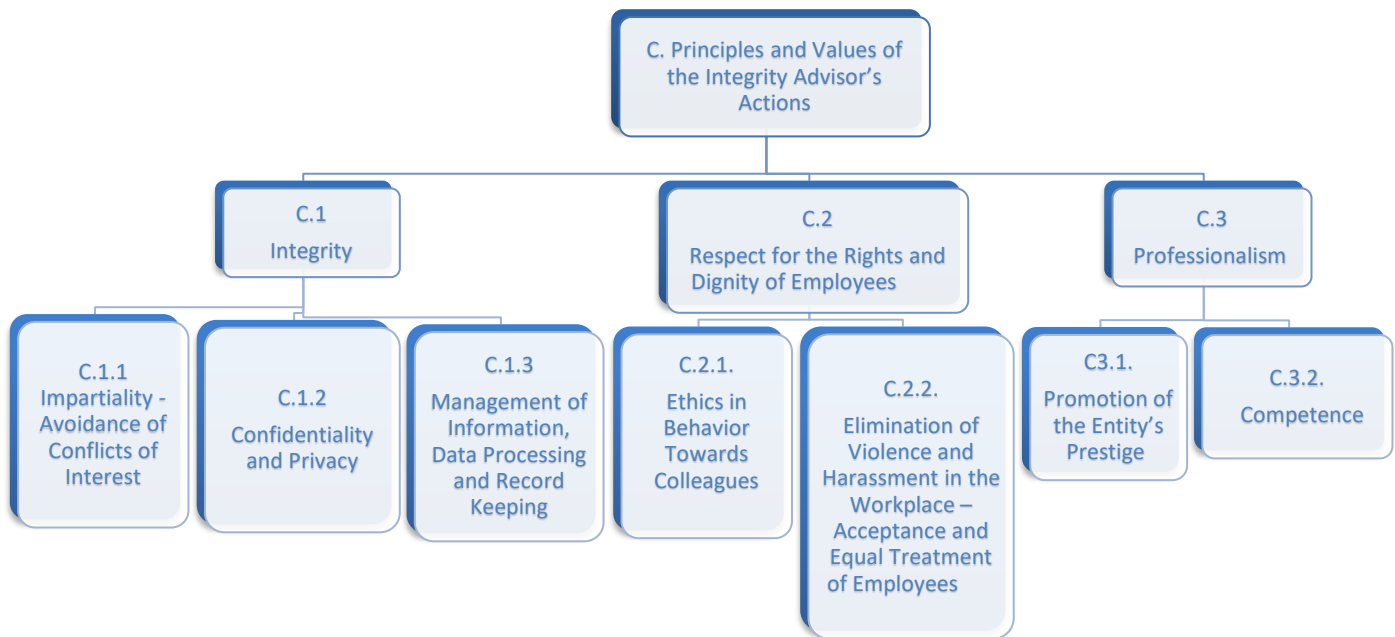
B. Mission of the Integrity Advisor

The Integrity Advisor's mission is to ensure a coherent framework for the effective protection of employees who identify, suffer the consequences of or wish to report integrity breaches, as well as to provide support, information and advice on ethics and integrity issues in their workplace. The Integrity Advisor shall work with the management of his/her organisation to strengthen integrity and transparency mechanisms.

In addition, the Integrity Advisor fulfils the responsibilities of the Reporting, Receipt and Monitoring Officer, regarding the protection of individuals reporting violations of EU law, as well as violations of domestic national law relating to offences of bribery and influence peddling, in accordance with the provisions of Articles 4 and 8 of Law No. 4990/2022 (A' 210), as in force.



Section C - Briefly



C. Principles and Values of the Integrity Advisor's Actions

C.1. Integrity

Impartiality, confidentiality and privacy are values that help promote integrity.

C.1.1 Impartiality - Avoidance of conflicts of interest

The Integrity Advisor is obliged to provide guarantees of impartial judgement in the exercise of his/her responsibilities and shall abstain from managing specific cases and declare the conflict of interest to the Head of the entity where there is a conflict of interest. Failure to declare a conflict of interest shall constitute a disciplinary offence.

In this context, they are expected to:

1.1.1 Not be influenced by personal or other interests in the performance of his/her official duties.

1.1.2 He/she shall request to be exempted, by declaring to the Head of the entity that he/she is prevented from handling cases which, as a result of their outcome

his or her personal interest of a financial or moral nature may be satisfied.

1.1.3 He or she shall apply to the Head of the entity for an exemption, by declaring to the Head that he or she is precluded from dealing with cases where the outcome of the case is likely to satisfy the interests of a relative by blood or affinity, directly or indirectly, up to the second degree, as well as persons, whether natural or legal, with whom he or she has a special relationship or a special connection, enmity or friendship.

1.1.4 Encourages petitioners to refer to other internal or external monitoring bodies if it finds that any case conflict of interest.

1.1.5 Forwards the report to the National Transparency Authority, in case it raises objections against the body responsible for investigating reports within the entity or against the Integrity Advisor, informing the reporter accordingly.

1.1.6 Do not accept, directly or indirectly, any gift for matters handled in the course of his official duties.

1.1.7 Do not abuse his/her position, in the event of a job transfer from the public sector to the private sector, by exploiting internal/confidential information acquired in the course of his/her official duties for the benefit of the private company in which he/she is employed.

1.1.8 Do not abuse his/her position, in the event of a transfer to another public sector service, by exploiting the internal/confidential information acquired and the network of partnerships developed in the course of his/her duties for the benefit of his/her career advancement.

C.1.2 Confidentiality and Privacy

The Integrity Advisor shall respect and observe the rules of confidentiality and privacy on matters of which he/she has become aware in the course of his/her duties. This obligation is described as critical to the successful fulfilment of his/her mission and the achievement of his/her objectives. The reporting official must feel secure and be able to express himself freely, without restraint or fear.

In this context, it must:

1.2.1 Maintain confidentiality and not disclose personal data and information that could directly or indirectly identify the reporting person without the consent his/her directly or indirectly, to the identification of the petitioner without his/her consent, subject to specific provisions.

1.2.2 Not disclose to anyone other than the authorised audit bodies of the report any personal data and any information of any kind leading, directly or indirectly, to the identification of the reporting person and any third person named in the report.

1.2.3 Maintain confidentiality in all cases where common experience and common sense dictate it, about facts or information of which it receives

knowledge in the course of or in connection with the performance of his duties.

1.2.4 Ensure documents' protection or information classified as confidential or secret.

1.2.5 Not disclose to third parties information that has come to his/her knowledge in his/her capacity or duties within the organisation.

1.2.6 Ensure documents' protection and/or confidential information in cases where his/her Independent Office is also staffed by employees of the entity concerned for administrative support.

1.2.7 He/she shall sign a declaration of confidentiality upon taking up his/her duties. The obligation of confidentiality shall remain in force for five (5) years after the expiry of his/her term of office.

C.1.3. Management of Information, Data Processing and Record Keeping

Maintaining confidentiality and privacy involves a series of actions and procedures related to information management, data processing and record keeping.

In this context, the Integrity Advisor must:

1.3.1 Ensure that information management, data processing and record keeping are carried out in accordance with the provisions of General Regulation (EU) 2016/679, Directive (EU) 2016/680 and Law No. 4624/2019 (A' 137) as in force.

1.3.2 Process personal data in a transparent manner after informing the employees concerned, respecting their rights.

1.3.3 He/she is limited to the access/processing necessary for the performance of his/her tasks, strictly respecting the principles of lawfulness of processing.

1.3.4 Ensure that reports are stored for a reasonable and necessary period of time in order to be retrievable and

comply with the requirements imposed by law until the conclusion of any investigation or judicial proceedings.

13.5 Keep a record, when making a report or during communication with the official, in any way, applying the relevant legislation.

Principles of lawful processing under Article 5 of the GDPR:	The principle of lawfulness, fairness, and transparency
	The principle of purpose limitation
	The principle of data minimization (proportionality)
	The principle of accuracy of data
	The principle of setting the time frame for processing
	The principle of integrity and confidentiality
	The principle of accountability of the data controller

13.6 Educate and update his/her knowledge on the correct processing of personal data.

13.7 He/she shall implement appropriate organisational and technical measures, in cooperation with the competent units, to ensure the confidentiality, availability and integrity of staff members' personal data who communicate with him/she in any way.

13.8 He/she cooperates and consults the Data Protection Officer (DPO) of the entity, as well as the Units dealing with the security information systems.

13.9 Complies with the framework and security policy implemented by the entity.

13.10 Reports without delay to the competent body any incident or occurrence of a breach of the Security Framework. (Information systems security policies, procedures and measures)

C.2 Respect for the rights and dignity of employees

The Integrity Advisor respects and promotes the fundamental rights, dignity and worth of all employees

C.2.1. Ethics in behaviour towards colleagues

The Integrity Advisor shall conduct himself/herself towards his/her colleagues with courtesy, respect, responsibility, fairness and empathy.

In this context, he/she is expected to:

2.1.1 Behave with courtesy to colleagues, not to express disparaging remarks to them and not to defame them to the leadership of the entity, other colleagues and third parties.

2.1.2 Respect colleagues' personal or professional opinions, and in case of disagreement seek a constructive exchange of views.

2.1.3 Do not abdicate his/her responsibilities or delegate the responsibilities his/her job to other colleagues.

2.1.4 Promote a spirit of teamwork and cooperation.

2.1.5 Cooperate with his/her colleagues in a spirit of honesty and sincerity in order to optimise the performance of his/her work/service activities.

2.1.6 Develop solidarity with his/her colleagues in order to jointly manage any problems and emerging challenges.

2.1.7 Work in harmony and provide guidance to colleagues who may staff and administratively support the Integrity Advisor's Office.

2.1.8 Behave himself/herself with modesty/ethos and in accordance with ethical values and principles in order to gain the trust and respect of colleagues who may potentially seek his/her assistance.

C.2.2. Elimination of violence and harassment in the workplace - Acceptance and equal treatment of employees

The Integrity Advisor provides personalised counselling and receives complaints about violence and harassment issues, as well as unequal treatment in the workplace. His/her contribution in this area is considered to be of key importance and adds value to the functioning of the public administration. It is obvious that, by virtue of his/her position, he/she should set the impetus and example for the creation of an ethical and integrity-free environment, free of violence and harassment. Respect for diversity and ensuring the dignity of individuals are milestones in the performance of his official duties.

In this context, he/she is expected to:

2.2.1 Be a pillar for strengthening prevention mechanisms for incidents of harassment and unequal treatment.

2.2.2 Inform and advise employees on current policies, actions and institutional tools that they can use to prevent and address incidents of violence and harassment and unequal treatment.

2.2.3 Protect, within the scope of his/her duties, and support any staff member who is subjected to any form of harassment, intimidation and discrimination.

2.2.4 Promote awareness of issues of harassment, mobbing and discrimination by encouraging employees to make a complaint.

2.2.5 Encourage and advise the management of the entity to take measures to combat all forms of discrimination, in particular preventive measures against harassment and sexual harassment in the workplace, in accordance with national legislation and practice.

2.2.6 Contribute to the "structuring" of a working environment, which is free of

mobbing, harassment and discrimination, in which everyone feels valued and respected for their contribution.

2.2.7 Adopt and implement modern strategies for managing diversity, equal opportunities and inclusion.



The staff member shall :

- × **Not engage in and avoid conduct, acts, practices or threats that are intended to cause, result in or are likely to result in physical, psychological, sexual or financial harm, whether occurring in isolation or repeatedly. (violence and harassment)**
- × **Not to engage in and avoid conduct that is intended to or has the purpose or effect of violating the dignity of employees in an intimidating, and hostile, degrading, humiliating or offensive environment, whether or not it constitutes a form of discrimination, and includes harassment based on gender or other discriminatory reasons (harassment)**
- × **Avoid any unjustified discrimination or unfavourable treatment and refrain from making malicious comments or insulting remarks about someone because of: race, colour, sex, national or ethnic origin, ancestry, religious or other beliefs, disability or chronic condition, age, marital or social status, sexual orientation, identity, gender identity, characteristics or gender expression.**

2.2.8 Set a moral example and promotes acceptance, diversity and pluralism through its behaviour.



The Integrity Advisor invests in the Equality Policy, Diversity and Inclusion, expressing the entity's commitment to these principles. More specifically:



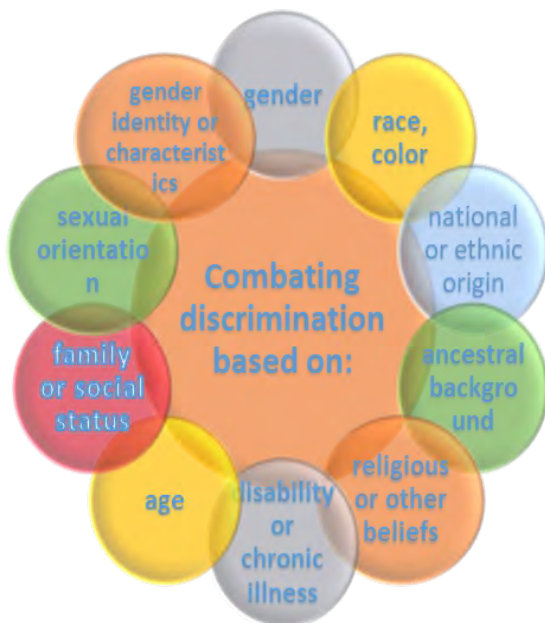
Encourages the integration of equality in structures, attitudes and behaviours as well as the culture of the entity.



Promotes employee inclusion policies based on the principles of social justice, equality, equal treatment and non-discrimination, ensuring an inclusive working environment.



Places particular emphasis on the rights of people with disabilities or chronic condition, ensuring that the entity adopts and implements the current institutional framework.



C.3 Professionalism

Effectiveness, efficiency, collaboration, innovation and lifelong learning contribute to enhancing the professionalism of the Integrity Advisor, while ensuring the protection of the institution's prestige and reputation.

C.3.1. Promotion of the Entity's prestige

The institution of the Integrity Advisor promotes transparency, integrity and accountability and acts as an assistant to the entity in the fight against corruption. As such, his/her function is instrumental in enhancing entity's prestige and reputation.

In this context, the Integrity Advisor is expected to:

3.1.1. Demonstrate exemplary behaviour in all aspects of his/her life.

3.1.2. Shall avoid any action that might call into question his/her honesty, moral integrity and commitment to duty.

3.1.3. Shall plan actions and activities in the performance of his/her duties in order to avoid the risk of

administrative burden and enhance the quality of the services provided.

3.1.4. Shall pay particular attention to the expression of opinions and personal beliefs, so as not to create in any way the impression that they are the views of the author or are directly or indirectly linked to it.

3.1.5. Know and respect the limits of the professional/ service responsibilities.

3.1.6. Communicate by any appropriate means the Code of Ethics and Professional Conduct for Public Sector Employees or any specific codes of the entity.

3.1.7. Take responsibility and initiative for the achievement of his/her objectives, acting in accordance with the rules of ethics and conduct.

3.1.8. Contribute through the effectiveness and efficiency of its operational functions to the strengthening of the Internal Control System.

3.1.9. It adopts the tools and policies provided for in the institutional framework that contribute to the strengthening of the National Integrity System.

3.1.10. Use social media and the internet in a way that does not harm entity's interests and reputation.

3.1.11. Act as a productive force for new ideas and actions that could shape a culture of integrity and transparency in the entity.

3.1.12. Contribute to the creation of a working environment **that encourages** employees to **report** incidents of integrity breaches, without fear of retaliation.

3.1.13. Contribute to build a working environment that **discourages** employees **from committing** incidents of integrity breaches and engaging in misconduct.

3.1.14. Adopt and implement practices, policies and actions for the maintenance and

Promotion of core values in the workplace, such as:

- respect for the dignity and independence of the individual,

The Integrity Advisor acts as a channel for receiving reports, without further investigative and audit duties.

- prohibition of discrimination,

- respect for diversity and acceptance of individuals.

C.3.2. Competence

The Integrity Advisor through the "Certification of Professional Competence of Integrity Advisors" programme acquires the necessary knowledge, skills and competences to exercise his/her responsibilities with the specific objective of ensuring the quality of his/her relevant support, advisory and informative work. However, due to the complexity and breadth of his/her professional field, he/she must demonstrate an interest in lifelong education and training in order to acquire a high level of professional and scientific expertise.

In this context, it is expected to:

3.2.1. Maintain a positive attitude towards ongoing training and lifelong learning.

3.2.2. Ensure that he/she is kept up to date with legislative, regulatory or other developments affecting or changing his/her operational area. In particular, ensure that he/she keeps abreast of current developments in the field of violence and mobbing in the workplace.

3.2.3. Ensure that it he/she is kept up to date with the mission and the strategic and operational objectives of the entity. (organisation chart)

3.2.4. Attends and participate in the educational and awareness actions organised by the National Transparency Authority.

3.2.5. Take advantage of training and empowerment opportunities provided by the National Centre for Public Administration and Local Government, and/or other public or private bodies from Greece or abroad, depending on training needs.

3.2.6. Develop digital skills and make use of new technology systems.

3.2.7. Continuously improve and upgrade social skills and attitudes that will help him/her to perform his/her work properly, such as:

- Management of Conflict
- Emotional intelligence/
empathy
- Communication and
development of
interpersonal relationships
- Negotiation, influence and persuasion
- Focus on results and initiatives
- Innovation and creativity
- Ability to work under pressure
- Ethics and integrity
- Planning and organisation

Section D - Briefly

D. Specific Commitments of the Integrity Advisor

D.1 Integrity Advisor's commitments to entity's employees who submit reports, seek personalized advisory support and communicate with them

D.2 Integrity Advisor's commitments to the head of the entity

D.3 Integrity Advisor's commitments to entity's units

D.4 Commitments to the other Integrity Advisors – Integrity Advisors Network

D.5 Integrity Advisor's commitments to the National Transparency Authority and other external entities

D. Specific commitments of the Integrity Advisor

D.1 Integrity Advisor's commitments to reporting, seeking tailored advice and consulting with the organisation's employees

As part of the support axis, the Integrity Advisor provides personalised advice on ethics and integrity issues faced by the staff member in the performance of his/her official duties and acts as a channel for receiving reports of integrity violations and misconduct within the organisation.

In this context, he/she is expected to:

- 1.1 Treat employees who communicate with him/her with due respect.
- 1.2 Make himself/ herself available to the employees of the entity in every possible way, using all available communication channels.
- 1.3 Be patient and listen actively and attentively to what is being said to him/her by employees who seek his/her assistance.
- 1.4 Inform employees of his/her role within the entity and of the channels available



In special cases:

- ✓ If the employee is unable to attend in person due to geographical constraints and special circumstances, the Integrity Advisor shall use videoconferencing systems, upon request, within a reasonable time from the date of the petitioner's request for contact.
- ✓ In instances where concerns about confidentiality and privacy arise due to spatial limitations, such as the Integrity Advisor's work office being on the same floor as the employee's work office, the Integrity Advisor may, at their discretion and with mutual agreement, determine the time and location for the meeting within the institution. For instance, the meeting may be scheduled after working hours or

for reporting a possible report.

- 1.5 Inform the employee of the relevant legislation that applies to incidents similar to the one reported and of the sequence of procedures that should be followed or are suggested.

1.6 Advise the employee to include the relevant evidence in his/her report.

1.7 Communicate regularly with the employee to keep him/her informed of the progress of the report.

1.8 Guarantee and ensure the anonymity, absolute confidentiality and privacy of information and personal data (see section [C.1.2](#) & [C.1.3](#)).

1.9 Provide guidance and individualized counselling is provided in cases that present simple and everyday ethical dilemmas, encouraging employees to act and make ethical decisions.

1.10 Provide guidance and advice on issues related to the Code of Ethics and Professional Conduct for Public Sector Employees or any other specific codes.

1.11 Utilise clear, simple and comprehensible language.

1.12 Demonstrate empathy, understanding, an "open" mind, dynamism and positivity.

1.13 Be proactive, gentle, supportive, flexible, adaptable.

1.14 Ensure an environment of respect, safety, trust and interaction.

1.15 Maintain neutrality and objectivity without being distant and indifferent at the same time.

1.16 Motivate, encourage and morally empower the petitioner.

1.17 Respect the uniqueness, diversity, values, beliefs, convictions, motivations and needs of the employees who communicate with him/her ([see section C.2.2](#)).

1.18 Act towards employees in a manner free of personal preferences, beliefs and prejudices, not expecting responses that are identical to his/her own beliefs ([see section C.2.2](#)).

1.19 Reinforce and encourage the possibility of reporting misconduct and corruption, especially in cases where employees fear retaliation and

doubts about the outcome of the reporting incidents.

1.20 Request that he/she be excluded from handling specific cases where there is a conflict of interest ([see section C.1.1](#)).

1.21 Deal calmly and sympathetically with cases of argumentative employees who express their concerns and reports in a strong manner during their course of communication, avoiding tensions or arguments.

In addition, he/she must not:

- × criticize,
- × stigmatize,
- × denigrate,
- × be absolute.

D.2 Integrity Advisor's commitments to the Head of the entity

The Integrity Advisor is a standalone role, reporting directly to the Head of the entity executing his/her duties with autonomy and independence. Additionally, the Integrity Advisor collaborates with entity's Head and senior management to cultivate an ethical and professional working environment.

In this context, he/she is expected to:

2.1 Respect the institutional status of entity's Head and always act in cooperation and harmony with the management.

2.2 Submit the Annual Report to entity's Head within the deadline, i.e. within the first quarter of each year.

2.3 Make proposals to the entity's Head

to improve the mechanisms for preventing, deterring and detecting breaches of integrity.

2.4 Immediately report to entity's Head any incidents of breaches of integrity that may directly damage organisation's reputation

2.5 Shall avoid any act or conduct that could be considered an abuse of his/her functional independence.

2.6 Cooperate in a harmonious and constructive manner with the Head and senior management of the organisation, with the ultimate aim of achieving the operational and strategic objectives of the entity.

D.3 Integrity Advisor's commitments to the organisational units of the entity

In the context of the advisory axis, the Integrity Advisor establishes partnerships within his/her entity, with the aim of preventing and identifying misconduct at its earlier stages, as well as disseminating the principles of integrity and transparency. In particular, he/she develops partnerships at several levels with the Internal Audit Unit and Unit dealing with HR issues.

In this context, he/she is expected to:

3.1 Work constructively with the Internal Audit Unit, the HR unit and risk management bodies to develop and implement integrity policies and standards within the organisation.

3.2 Organise regular meetings, upon request, with the Internal Audit Unit and

Risk management bodies to ensure the most effective operation of the Internal Control System.

3.3 Provide advice on anti-corruption issues, strengthening the public integrity of entity's services and in particular the audit bodies.

Heads of entities who are not covered by the Code of Conduct for Members of the Government may contact their organisation's Integrity Advisor on ethical and conduct issues of concern to them.

3.4 Cooperate constructively with the competent bodies responsible for monitoring reports in order to follow the investigation process closely and inform the reporter accordingly.

3.5 Work with the HR Unit in order to jointly contribute to the development of an organizational culture free of any form of discrimination, violence and harassment, by jointly organising training and awareness-raising campaigns.

3.6 Participate, as instructed by the Head of the entity and the National Transparency Authority, in working groups and committees whose work relates to matters within his/her remit.

3.7 Cooperate constructively on matters within his/her remit with the competent control bodies and the units of the legal entities supervised by the host entity, where they do not have an Integrity Advisor.

D.4 Commitments to other Integrity Advisors - Integrity Advisors Network

The Integrity Advisors share a common vision of enhancing integrity and strengthening prevention mechanisms in the public administration sector to combat corruption. The Network of Integrity Advisors, which is hub

communication, providing up-to-date knowledge and strengthening cooperation and loyalty to the institution, helps to achieve this vision.

In this context, he/she is expected to:



**PUBLIC ADMINISTRATION INTEGRITY
ADVISORS NETWORK**

- 4.1 Cooperate and consult with the Network coordinator, namely the Directorate of Integrity Policies and Standards of the General Directorate for Integrity and Accountability of the National Transparency Authority.
- 4.2 Exchange information, expertise, best practices and professional experience through the Network.
- 4.3 Cooperate harmoniously and organise joint actions, subject to the information and approval of the General Directorate for Integrity and Accountability of the National Transparency Authority, with the aim of enhancing transparency and integrity.
- 4.4 Use the services of the Network hosted on the website of the National Transparency Authority, respecting the rules of ethics and proper use of the Network.
- 4.5 Contribute to the creation of a friendly environment in which Network members can express and present their ideas, respecting the personalities and opinions of their colleagues.
- 4.6 Actively participate in all the cycles of educational activities (workshops) organised by the National Transparency Authority and addressed to the members of the Network.
- 4.7 Ensure that new Integrity Advisors are briefed and integrated smoothly into the Network.

D.5 Integrity Advisor's commitments to the National Transparency Authority and other external bodies

The Integrity Advisor cooperates with the National Transparency Authority and other relevant external bodies to develop policies, systems, methodologies, standards and tools to enhance integrity.

In this context, he/she is expected to:

- 5.1 Follow and implement the standards, templates, guidelines and recommendations of the General Directorate for Integrity and Accountability of the National Transparency Authority, which has assumed the coordinating role of the institution, providing expertise and support.
- 5.2 Report to the National Transparency Authority, either through the Annual Report or by direct communication, any operational problems that impede the smooth exercise of his/her responsibilities.
- 5.3 Cooperate harmoniously and consult with the relevant external bodies, social partners and trade unions on issues of equal treatment and policies to combat mobbing and harassment in the workplace.
- 5.4 Participate in awareness-raising campaigns to disseminate good practices on integrity, transparency and accountability.

E. Supervision

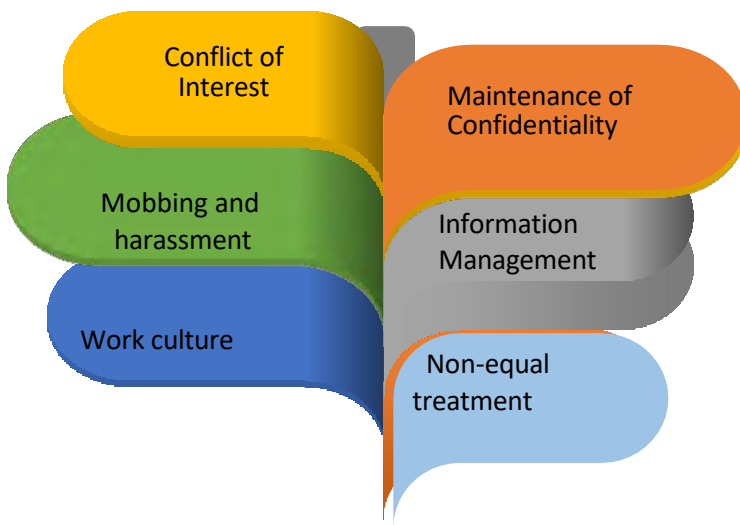
1. Violation of the majority of the obligations and specific standards of conduct in this Code constitutes disciplinary misconduct or even a criminal offence. In such cases, the Code shall be applied in a complementary and subsidiary manner to the regulations which standardise the misconduct or offences in question.
2. The Integrity Advisor, in the exercise of his/her duties, is subject to the Governor of National Transparency Authority, for matters of disciplinary responsibility, who is his/her disciplinary superior, and to the Disciplinary Board of the National Transparency Authority.
3. The authority to exercise supreme supervision for the implementation of this Code shall be exercised by the Head of each body and the National Transparency Authority.
4. The Code is complementary to the Code of Ethics and Professional Conduct for Public Sector Employees.
5. The provisions of this Code may be updated whenever required.

F. Awareness-raising

1. This Code of Conduct for Integrity Advisors is shall be published: a. on the website of the Ministry of Interior, b. on the website of the National Transparency Authority, c. on the website of the entity where the Integrity Advisor's Office operates and d. on the Integrity Advisors Network.
2. At the request of the Directorate for Integrity Policies and Standards of the General Directorate for Integrity and Accountability of the National Transparency Authority, this Code shall be distributed electronically to all Integrity Advisors.
3. The Integrity Policies and Standards Directorate of the General Directorate for Integrity and Accountability of the National Transparency Authority shall undertake communication activities and disseminate this Code of Conduct.

G. Examples of moral and ethical dilemmas

Fields for identifying moral/ethical dilemmas



1. You are employed as an Integrity Advisor when an employee of the organization approaches you to file a report an incident of sexual harassment. During the course of the communication, you realize that you and the alleged perpetrator have a friendly relationship. What should you do?

A. You decide to receive the report and commit yourself to act independently and objectively, without being influenced by your friendly relationship with the alleged perpetrator.

B. You are convinced that the alleged perpetrator is a good person and there is no possibility that he or she committed sexual harassment. You attempt to use arguments to convince the employee not to file a report and close the case.

C. You decide not to receive the report, considering that there is a conflict of interest and that your judgment may be affected. You refer the official to submit the report directly to another competent audit body.

2. You are employed as an Integrity Advisor and an employee of the organization whose work office is located in the same building and on the same floor as your office wishes to make a report in person and consult with you. In a telephone conversation, she/he tells you that she/he does not want her/his visit to you to be noticed by employees who work in the same building-floor. What should you do?

A. You inform her/him that you are available in your private office and only during your working hours with no other option.

B. You inform her/him that should submit the request by email without the possibility of a face-to-face meeting.

C. You inform her/him that you can discuss the matter of her/his concern via teleconference or, if she/he is unable to connect digitally, you alternatively suggest that you meet at a place and time that will not be seen by colleagues on the same floor.

3. You are employed as an Integrity Advisor in a Ministry and an employee has reported you for embezzlement of funds by the Head of the Financial Management Division of the Directorate General of Financial Services. The reporting party has filed the report and wishes to remain anonymous. The Head of the Directorate General for Financial Services, who has heard rumours of the incident and with whom you have excellent friendly and professional relations, asks you to disclose to her, on a friendly basis, the name of the petitioner and the content of his complaint. What should you do?

A. You tell her the content of the complaint and the petitioner, since you know that she is a confidential person and will not disclose the information. After all, she has helped you on a professional level many times.

B. You tell her the content of the complaint and the identity of the complainant, since as Head of the General Directorate of Financial Services she must know exactly what is happening in her department.

C. You tell her that the obligation of confidentiality and secrecy does not allow you to provide any information. The competent audit bodies will take action and act accordingly.

4. You are employed as an Integrity Advisor in a Legal Entity of Public Law when you receive by email an anonymous report containing allegations against an employee serving in an organisational unit responsible for complaint handling within the organisation. You cooperate with the official concerned in the exercise of your responsibilities and maintain a good working relationship. What should you do?

A. You should file the report, as it is anonymous and there is no need to investigate it.

B. You should forward the report to the disciplinary superior of the official concerned.

C. You should forward the report immediately to the National Transparency Authority to deal with the matter.

5. You are employed as an Integrity Adviser in a Ministry and you realise that you have lost a physical file that was delivered directly to you and contained a complaint with personal data. The complaint in question had been digitised but not logged. What should you do?

A. You do not take any action as you consider the degree of risk to be too low. After all, you have the complaint in digital form.

B. You act in accordance with the organization's Security Policy, immediately informing the competent body on personal data breach issues, in order for them to rule on the matter and inform you of the next steps to be taken.

C. Notify the National Transparency Authority and await instructions.

Ethical Dilemma	Correct answer
1	C
2	C
3	C
4	C
5	B



**CODE OF ETHICS AND
 PROFESSIONAL CONDUCT FOR
 PUBLIC SECTOR EMPLOYEES**

JULY 2022

Please refer to section F of the
 Code of Ethics and Professional
 Conduct for Public Sector
 Employees, which contains
 information on the methodology
 for managing and dealing with
 moral and ethical dilemmas.

H. Foreword

The Integrity Advisor must follow the standards of conduct in the Code of Conduct because:

1. She/he is a key pillar in promoting integrity, transparency and justice. Therefore, her/his actions and the proper exercise of her/his powers reflect the reputation of the institution.

2. She/he is the protection shield and the voice of employees in matters of integrity violations, mobbing, harassment and equal treatment. She/he therefore acts and exercises her/his duties with a view to protecting and promoting their dignity and rights.

3. The nature of his/her duties requires professionalism, competence and self-motivation. She/he must therefore take the initiative, continuously improve and keep up with the latest developments in her/his professional field.

Five tips for a successful Integrity Advisor

He/She should be discreet, ethical, honest, and impartial



He/She should be patient, approachable, a good listener, and possess empathy



He/She should respect, advise, and protect employees



He/She should have a willingness for continuous self-improvement and education



He/She should collaborate harmoniously with the head of the organization and the National Transparency Authority



I. Conceptual Dictionary

Violence and Harassment:

The forms of conduct, acts, practices or threats of such conduct, that are intended to cause, result in or are likely to cause physical, psychological, sexual or economic harm, whether occurring on an individual basis or on a repeated basis.

National Anti-Corruption Action Plan (NACAP): Is the national strategy for a comprehensive response to the phenomenon of corruption. The NACAP is a dynamic policy tool that facilitates the design, implementation, monitoring and evaluation of horizontal and sectoral actions and an integrated mechanism for coordinating the action public policy actors, in which synergies with the private sector and civil society are developed. It includes a coherent set of actions, interventions and projects aimed at preventing and tackling corruption, strengthening transparency, integrity and accountability, and systematically raising awareness of corruption issues in society.

National Integrity System (NIS):

It is an intervention of strategic importance that is part of the broader framework of the National Anti-Corruption Action Plan (NACAP) and includes a coherent framework of actions related to the Public Administration that focus on strengthening integrity and accountability in the public sector.

Ethical Dilemma:

An ethical dilemma is defined as a situation in which two or more values are in conflict. It is specifically a situation that involves conflicting moral claims and raises specific questions such as: What should I do; What is right and what is wrong; What are the disadvantages and advantages of my decision or action? The non-existence of a perfect and fully satisfactory solution is the key feature of any moral dilemma. An ethical dilemma arises whenever there are several alternatives proposed to solve an issue, each of which has different consequences and each of which is adequately justified.

Internal Audit Unit:

It is the organisational unit that provides the head of the organisation with reasonable assurance and advice on the adequacy and effectiveness of the system and processes of governance, risk management and the individual elements and controls of the internal control system.

Harassment:

Behavior which has the purpose or effect of violating the dignity of a person and of creating an intimidating, hostile, degrading, humiliating or offensive environment, whether or not it constitutes a form of discrimination, including harassment on the grounds of sex or other grounds of discrimination.

Conflict of Interest:

A conflict of interest is defined as any situation in which the impartial performance of the Integrity Advisor's duties is objectively affected. The impartial performance of the duties is affected, in particular, when a benefit or harm, financial or otherwise, arises for the persons themselves, their spouses or partners, within the meaning of Article 1 of Law no. 4356/2015, blood relatives or relatives by marriage, in a direct line, without limitation, and indirectly, up to the second degree, as well as for persons, natural or legal, with whom they have a special bond or special relationship, enmity or friendship.

Inclusion:

Inclusion means recognising the individuals' identity and preferences so that they can make their full contribution to the collective goals of the organisation. It involves changing

the culture of the organisation to respect these preferences and the needs of employees with different characteristics.

Internal Control System:

A set of functions and procedures, as well as controls adopted by the organisation, to provide reasonable assurance that the organisation will achieve the following objectives:

- (a) effectiveness and efficiency of its operational functions;
- (b) reliability of financial and other reporting;
- (c) compliance with laws, regulations and policies applicable to its operation.

I. Useful Websites



HELLENIC REPUBLIC
Ministry of the Interior

<https://www.yypes.gr>
(Ministry of the Interior)

<https://aead.gr/>
(National Transparency
Authority)



<https://www.synigoros.gr/>
(Ombudsman)

<https://www.ekdd.gr/>
(National Centre for Public
Administration and
Local Government)



<https://www.kethi.gr/>
(Research Centre for
Gender Equality)

[https://dsadd.aead.gr/home
page-public/](https://dsadd.aead.gr/home-page-public/)
(Integrity Advisors
Network)



IA. Useful institutional framework

IA. Useful Institutional Framework

1. Law 4990/11.11.2022 (A' 210) Protection of persons reporting violations of EU Law - Incorporation of Directive (EU) 2019/1937 of the European Parliament and of the Council of October 23, 2019 (L 305) and other urgent regulations (Whistleblowing Protection Law)
2. Law 4808/19.06.2021 (A' 101) For the Protection of Labour - Establishment of an Independent Authority "Labour Inspectorate" - Ratification of Convention 190 of the International Labour Organization for the elimination of violence and harassment in the workplace
3. Law 4795/17.04.2021 (A' 62): Internal Audit System in the Public Sector, Integrity Advisor in the public administration and other provisions for the public administration and local government
4. Law 4624/29.08.2019 (A' 137) on the Personal Data Protection Authority, Implementing the Regulation (EU) 2016/679 of the European Parliament and the Council of April 27, 2016 on the protection of natural persons with regard to the personal data processing and transposing into national law the Directive (EU) 2016/680 of the European Parliament and the Council, April 27, 2016 and other provisions
5. Law 4443/09.12.2016 (A' 232) Incorporation of Directive 2000/43/EC implementing the principle of equal treatment between persons irrespective of racial or ethnic origin, Directive 2000/78/EC establishing a general framework for equal treatment in employment and occupation work
6. Law 3896/08.12.2010 (A' 207) Implementation of the principle of equal opportunities and equal treatment of men and women in matters of employment and occupation - Harmonization of existing legislation with Directive 2006/54/EC of the European Parliament and of the Council of 5 July 2006 and other related provisions
7. Law 3528/09.02.2007 (A' 26) Ratifying the Code of Conduct for Public Administrative Employees and Legal Entity of Public Law Employee (and in particular Part E - Disciplinary Law)
8. The Joint Decision (no. DIDAD/F.58/1007/indiv. number 5559/29.03.2023) of the Minister of Finance, Minister of Interior and the NTA Governor "Determination of the manner of exercising the responsibilities of the Integrity Advisor, the procedures to be followed and the criteria for the renewal of his/her mandate" (B' 2207 and Web Posting Number: 6ΓMΦ46MTΛ6-1Ξ6)
9. The Joint Decision (no. DIDAD/F.64/989/indiv. number 6510/11.04.2023) of the Minister of Justice, Minister of the Interior and the NTA Governor "Arrangements for more specific on issues relating to the operation and management of the Integrity Advisors Registry" (B' 2474 and Web Posting Number: 94ΠM46MTΛ6-PME),
10. The Joint Decision (no. DIDAD/F.64/990/indiv. Number 6526/11.04.2023) of the Minister of Justice, Minister of Interior and the NTA Governor "Specification of the selection criteria for Integrity Advisors, the additional desirable qualifications that may be included in the call for expressions of interest and the on how the criteria are to be evaluated" (B' 2474 and Web Posting Number: OM1Θ46MTΛ6-IΩ5)
11. The Decision of the Minister of Interior no.DIDAD/F.64/996/Oik.6766/2023/19.4.2023 (Government Gazette B' 2561): Prevention and response to violence and harassment at work in public institutions. (Government Gazette B' 343 and Web Posting Number:923046MTL6-4ΘΨ)
12. The Decision of the Minister of Interior no. ΓΓΑΔΔΤ 707/18852/05.12.2022 "Establishment of the National Integrity System 2022-2025" - (Government Gazette B' 6312 and Web Posting Number: 6HΔB46MTΛ6-BP3)
13. The Joint Decision of the Minister of Interior and the NTA Governor "Integrity Advisors Network" (Government Gazette B' 1041 and IDA: ΨP9P46MTΛ6-H3Y)



NATIONAL TRANSPARENCY AUTHORITY