



# Code of Ethics and Conduct of the General Secretariat of Citizenship of the Ministry of the Interior



HELLENIC REPUBLIC  
Ministry of the Interior



NATIONAL TRANSPARENCY AUTHORITY





### **Makis Vouridis, Minister of the Interior**

Until recently, the process of granting Greek citizenship was a "black spot" in the function of the Greek state. The impact of this malfunction had many implications both at the socio-political level and at the national level.

Our Government, faithful to its pre-election commitments, has worked from the very first moment to complete an important project: to modernize the institutional framework for the recognition and acquisition of Greek citizenship for foreign and expatriate citizens, putting an end to the time-consuming, costly, bureaucratically intricate and sometimes unclear procedures, while establishing a system in line with the standards of modern Western countries.

In this context, we have streamlined the process by introducing for the first time a system of written national examinations for the acquisition of the Certificate of Competence for Naturalisation, a competitive, impartial, objective and above all meritocratic process, which is the first of a series of bold steps we have taken to streamline the citizenship process.

These legislative initiatives were constructively supported by the launch of cooperation between the Ministry of the Interior and the National Transparency Authority in this field, which is based on the axis of enhancing the efficiency of the entire procedure and ensuring the principles of the rule of law.

The Code of Ethics and Conduct of the General Secretariat of Citizenship, which follows and is a result of this cooperation, comes to protect and shield this further strengthen and reinforce the effort to modernise the institutional framework for granting citizenship, in order to establish a sound, meritocratic and above all fair system of naturalisation, which will establish with integrity the existence of the basic condition for the granting of Greek citizenship: The existence of a strong bond between the applicant foreigner and Greece, our culture, our language, our identity, our political institutions, our traditions and values, our economy.



### **Angelos Binis, National Transparency Authority Governor**

In the context of our cooperation with the General Secretariat of Citizenship (G.S.C.), the present Code of Ethics and Conduct for the staff of the G.S.C. has been drafted, with the aim of cultivating and further deepening a culture of integrity among its staff. Based on internationally recognised standards, we have proceeded to codify and articulate the codes of ethics and conduct, the compliance of which will enhance public confidence in the credibility and integrity of the staff of the G.S.C. and, by extension, in the institutions and the public administration. We warmly thank both the Minister of Interior, Makis Vouridis, and the Secretary General of Citizenship, Athanasios Balerbas, for their excellent cooperation and look forward to the continuation of this constructive collaboration.



### **Athanasios Balerbas, Secretary General of Citizenship**

The strategic objective of the General Secretariat of Citizenship is the granting of Greek Citizenship through procedures that strictly respect the legality, objectivity and impartiality. In this context, a close and fruitful cooperation with the National Transparency Authority (N.T.A.) was launched in November 2019, so that the latter, with its know-how and high-level potential, can contribute to the achievement of this strategic objective. The result of this cooperation is the Code of Conduct, the drafting by the N.T.A. of which aspires to form in the Citizenship Services of the Ministry of Interior a good administrative practice in line with the best international standards. Thus, the modernization of the process of granting citizenship, which started with the important reform of the naturalization examinations under Law No. 4735/2020. At the same time, it is an investment in the human resources of the organisations, as its administrative action is becoming more universal, integrity, legality and transparency.

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# Introduction

The creation of an ethical and integrity working environment is a primary task and a cornerstone of the management of any organisation. The codification of the codes of Ethics and Conduct and the establishment of a single is a practice followed by many countries and international organisations.

In the field of administration, ethics refers to the rules governing the behaviour of the staff of the administration towards citizens and within its departments, setting limits and proper ways of behaviour. Ethical rules are of a dual nature, balancing between the ethical and the rule of law. This conclusion follows from the fact that in ethics there are both formal rules, the breach of which is punishable (criminal, disciplinary), and rules which are part of the moral sphere and form part of the internal environment of a public body with the aim of improving the performance of the official's duties, without incurring judicial or administrative sanctions, but only 'sanctions' arising from the public opinion and individual conscience.

The rules of conduct are complementary to the rules of law, improving their practical application and the quality of the services provided to citizens, and the working conditions within the institutions. Moreover, modern bibliography and international good practice suggests a system based more on ethical values rather than compliance rules.

This Code of Ethics is part of the cooperation between the General Secretariat of Citizenship of the Ministry of Interior and the National Transparency Authority (NTA) with the signing of a Memorandum to enhance transparency and integrity. The Code was prepared by the Directorate General for Integrity and Accountability of the NTA in cooperation with the General Secretariat for Citizenship.

*“The prestige and force of law does not depend on coercion as a form of sanction, but on the place of institutions in the minds of citizens.”*  
(D.Tsatsos, 2009)



# A. Mission and organizational structure of the General Secretariat for Citizenship

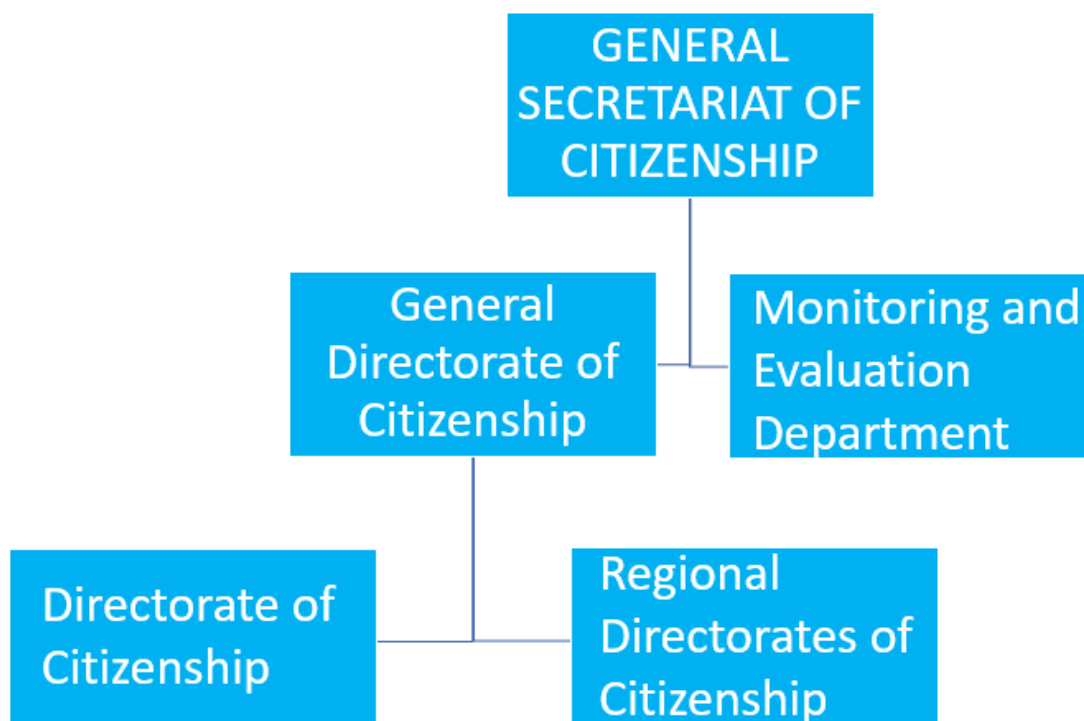
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The General Secretariat of Citizenship of the Ministry of the Interior (hereinafter referred to as the Organisation) is responsible for planning and implementation of public policies on issues relating to the acquisition and loss of Greek citizenship. At the same time, it exercises effective coordination, supervision, hierarchical control and guidance of the organisational units under its authority.

By Law 3284/2004 (A'217), the Code of Greek Citizenship, which was drawn up by the Committee of Article 18, paragraph 22, subparagraph d, of Law 2503/1997 (A'107), was ratified.

The last amendment of the above mentioned Code of Citizenship was made by Law 4735/2020 (A' 197) of the aforementioned Code of Citizenship in order to simplify the procedures for the naturalization of foreigners as Greek citizens, to reduce the number of bureaucratic procedures, speeding up the examination of naturalisation applications, ensuring objectivity and transparency, as well as enhancing the possibility of effective participation of naturalised Greeks in the civil life of the country.

## Organisational Structure



## **B.** About Citizenship

Citizenship is the civil bond between a person and the state to the people of which he/she belongs; it is an important element of personalisation and is of great importance for the state itself.

Citizenship is granted on the individual by the state and this unifying bond between him/her and the state is created by the national law of each state. It defines the legal relationship between the individual and the State and confers on the individual rights and obligations vis-à-vis the State with which he or she is associated.

The lack of citizenship for a person born, living, growing up and educated in a country makes it difficult for them to integrate and is a major obstacle to their personal development. Greece, which in its modern history has a complex relationship with the migration phenomenon, must integrate these people in the perspective of the benefit of society as a whole.

The General Secretariat of Citizenship is addressed to foreigners who wish to become Greek citizens. The fact that these persons usually belong to vulnerable social groups and that services are provided through the Regional Units of the General Secretariat at the local level, reinforce the need for the Organisation to operate in a secure environment unaffected by external and endogenous levers of pressure. This Code will contribute to the promotion of the values of integrity and transparency, protecting the transacting citizens and at the same time shielding the Entity from corruption and breaches of integrity.

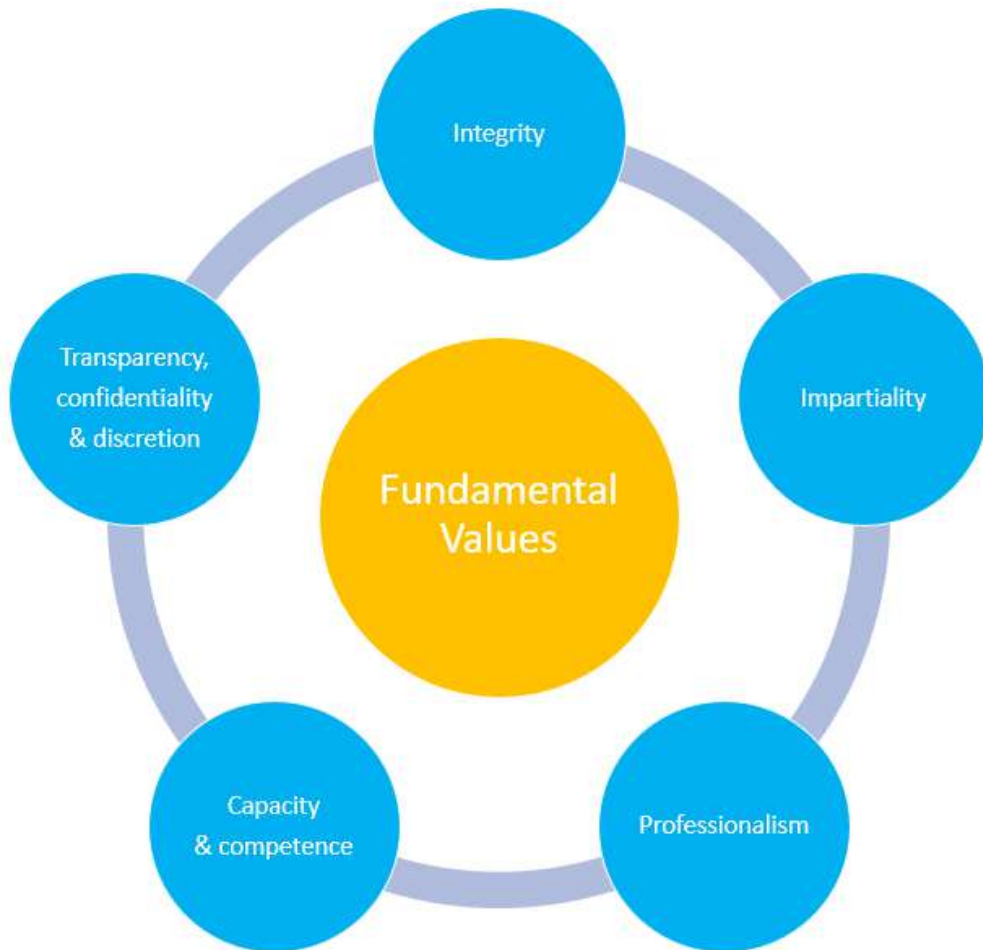
## **C.** Purpose and scope of this Code

The Code aims to establish a working and monitoring environment in the General Secretariat of Citizenship, which will be built on the principles of integrity and good professional ethics and will demonstrate the commitment of the leadership and staff of the Organisation to the values of ethics and transparency in the execution of the responsibilities and the implementation of the mission of this Organisation.

The principles and rules of the Code of Ethics and Conduct apply to all employees in any employment relationship, as well as the administrative hierarchy of the General Secretariat of Citizenship of the Ministry of Interior.



## SECTION 1 Fundamental Values - Principles of Action



## 1.1 Integrity

The Employees of the Organisation shall respect the principle of legality of administrative action, the protection of the public interest and sound administration in the performance of their duties with integrity, responsibility and good faith.

More specifically:

- carry out the work with responsibility and diligence assigned to them,
- respect the provisions of the legislative/regulatory framework in force and conduct their administrative activity exclusively within it,
- refrain from any action that violates the law or the Code of Ethics and Conduct
- always act in good faith and pursue the public interest.

## 1.2 Impartiality

The Employees of the Organisation shall carry out their duties with complete objectivity and independence.

For this reason:

- they shall avoid any situation and shall be free from any influence which might affect the impartiality of their professional judgement,
- behave in a way that is not dictated by personal or family interests or political influences,
- have the capacity to provide immediate, specific and to provide a detailed statement of reasons within their recommendations, as well as to any official initiative they take in the exercise of their duties.

## 1.3 Transparency, confidentiality and discretion

The employees of the Organisation shall perform their duties in a manner which facilitates the transparency of the Organisation's activities, the full information of citizens and public opinion, and public dialogue, without disclosing, without the necessary authorisation, private documents and personal data, in accordance with the relevant legislative provisions and procedures.

In particular:

- ensure that the individual or regulatory administrative acts to be published are posted on the Internet,
- ensure that citizens are informed of documents or other acts concerning them as soon as possible,
- ensure the protection of data or information relating to the private or family life of citizens, as well as the protection of documents or information classified as confidential or secret, in accordance with the provisions of General Regulation (EU) 2016/679, Directive 2016/680 and Law 4624/2019 (Government Gazette 137/A'), as well as Decision 2013/488/EU of the Council of the European Union (L' 274/1).

## 1.4 Capacity and competence

Employees of the Organisation shall respond to the requirements of their working position by ensuring that they acquire the appropriate knowledge and skills required and shall have a positive attitude towards lifelong learning.

In particular:

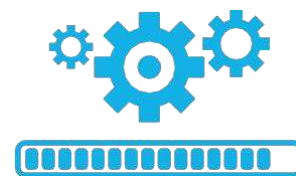
- seek to acquire or update their knowledge, as well as to strengthen their skills,
- take advantage of learning and self-improvement opportunities provided by the National Centre for Public Administration and Local Government and/or other public or private bodies,
- take the initiative to develop and implement new ideas,
- promote digital culture, adopting and using new technology systems.

## 1.5 Professionalism

Employees of the Organisation shall behave in a manner appropriate to staff members of outstanding integrity and professionalism, using means appropriate to the purpose for which they are employed.

In particular:

- perform their duties with due diligence,
- ensure that they are informed of any legislative, regulatory or other developments that affect or change the scope of their duties,
- take initiatives to comply with any specific standards of professional conduct arising from established or non-statutory rules, regulations, etc,
- refrain from any abuse of their position and the power it confers on them,
- exercise due care and avoid any unprofessional behaviour, both during their employment and in their personal life,
- promote ecological awareness through their behaviour,
- adopt and implement all the protocols and actions provided for by the National Public Health Organisation, which aim to promote and protect public health.



## SECTION 2 Obligations of Employees

### 2.1 Obligations towards the Organisation

#### 2.1.1 Compliance with the legislation

The employees of the Organisation shall carry out their duties in accordance with the fundamental principle of legality.

In particular:

- comply with the requirements of any general or specific provision of international, EU and national legislation,
- comply with the requirements of the Civil Servants Code,
- comply with any specific policies, standards, protocols, codes or internal regulations issued by the Ministry of Interior in order to achieve the objectives of the Organisation,
- refrain from any illegal activity in their task execution,
- comply with court judgments.

#### 2.1.2 Promoting the authority and credibility of the Organisation

Employees shall take care to promote the image and reputation of the Organisation, both in their task execution and in their personal lives.

In this context:

- comply with their working hours,
- are distinguished by their professional competence, in accordance with the specific provisions of paragraph 1.5 of this Code,
- take care of the tidiness of their workplace, take care of their personal appearance,
- do not smoke and do not consume alcohol or other substances in the workplace,
- inspire confidence in all aspects of their professional and personal lives,
- ensure the appropriateness of any postings on social media,
- shall not make public announcements on matters related with the Organisation without the consent of their Head,

- report to their supervisors, in good faith and in confidence, any instances which may be prejudicial to the reputation of the Organisation,
- comply with all hygiene measures to protect their colleagues and the public.



#### 2.1.3 Avoiding conflicts of interest

The Employees of the Organisation shall provide guarantees of impartial judgment in the execution of their task.

For this reason:

- shall not be influenced by personal or other interests during their task execution,
- request that they be excluded from the handling of cases or from participation in the conduct of meetings, the outcome of which may affect the satisfaction of their personal interests, whether economic or moral,
- request that they be excluded from handling cases or participating in the conduct of negotiations the outcome of which may affect the satisfaction of the interests of a person with whom they have a family, special friendly or hostile relationship,
- comply with decisions by their superiors to exclude them from handling specific cases,
- do not use official information for personal gain,
- report to their immediate superiors any risks that may undermine their independence

## 2.1.4 Permission to do private job for a payment

Employees of the Organisation shall adopt professional standards in the execution of their duties while it is not permitted, in principle, to simultaneously to do private work or work for payment.

An exception to the rule is made in cases where employees:

- They do private work or work for remuneration in accordance with the provisions of Staff Regulations, provided that such work does not conflict with the interests of the Organisation, is not incompatible with their duties, does not interfere with the proper performance of their tasks and does not undermine the status of the Organisation.
- The prohibition of doing private work shall not apply to an employee's writing and scientific activities in general, but the approval of the Secretary- General and the agreement of the Organisation's Staff Committee may be required when it relates to information which has come to its knowledge in the execution of its duties because of its duty of confidentiality.

## 2.1.5 Refusal to accept gifts

Employees of the Organisation shall be of integrity and shall not use their position or Organisation to gain economic or moral benefits for themselves or on behalf of others.

In this context:

- shall not accept, directly or indirectly, any gratuity in respect of matters within their official capacity,
- do not accept services of economic value, fees, discounts, facilities, entertainment or hospitality, travel, accommodation, food or education,
- not accept any invitation to an event where participation requires the payment of a fee, such as invitations to sporting or political events, hotel accommodation, etc. However, they may accept invitations to events representing the Organisation in their official or professional capacity,
- if they are the recipients of a gift, they shall declare it to their supervisor and return the gift or its value, if possible.

## 2.1.6 Use of assets

The Employees of the Organisation shall ensure that the assets of the Organisation are protected and preserved.

In particular:

- protect available consumables and material resources,
- maintain in good condition the material and technical equipment they have been charged with, in particular computers, telephones, printers, scanners, etc,
- ensure that they save electricity by switching off all appliances when they are not in use,
- avoid printing paper, taking advantage of the benefits of the electronic document exchange system,
- hand over the office equipment when they leave the office and the printed and digital files kept,
- use of the recycling facilities provided by the Organisation.

## 2.1.7 Specific obligations in the exercise of their responsibilities

The Employees of the Organisation shall execute their duties and responsibilities in a consistent manner.

In particular:

- are fully informed about the provisions of the current Code of Greek Citizenship (Law 3284/2004, A' 217),
- are aware of the corruption risks and fraud in the Organisation's operations, according to the Risk Assessment Report prepared in cooperation with the National Transparency Authority (NTA),
- Execute their duties without being subject to any political or other external influence. They should make a balanced assessment of all the facts and should not be influenced by the interests of others or the undue influence of third parties in forming their professional judgement, particularly when recommending or taking decisions,

- must, in particular the employees of the Regional Citizenship Offices, execute their work without being affected by any "pressures" from local communities and others,
- suggest ways of improving the efficiency and effectiveness of the Organisation's procedures in order to execute their tasks in the best possible way.

## 2.2 Obligations towards colleagues

The employees of the Organisation treat their colleagues with respect, fairness and courtesy.

More specifically:

- They treat their colleagues with courtesy, they do not express negative comments to them, do not harass them and do not defame them to the leadership of the Ministry, to other colleagues and to third parties,
- help to eliminate gender-based discrimination and inequalities within their working environment,
- They respect the personal or professional opinions of their colleagues and, if they disagree with them, discuss with them in order to find the best solution,
- They avoid a behaviour that involves acts of intimidation, oppression, sexual harassment or violence, which may be expressed verbally, physically or psychologically,
- They cooperate with their colleagues in a spirit of honesty and sincerity in order to optimise their performance,
- They develop solidarity relations with their colleagues in order to jointly manage any problems and emerging challenges,
- They promote team spirit and cooperation.

## 2.3 Obligations towards applicants for Greek citizenship

### 2.3.1 Equal treatment

The Employees of the Organisation shall ensure that the principle of equal treatment is strictly applied. The role of this principle is very important, taking into account that these citizens usually belong to vulnerable social groups.

In particular:

- avoid any unjustified discrimination or unfavourable treatment of applicants on the grounds of nationality, sex, race, colour of skin, ethnic or social origin, sexual orientation, language, religion, political opinion, religion, conviction, disability, etc,
- respect cultural and individual differences, including those based on age, gender, race, minority, ethnic origin, religion, sexual preference, disability, language and socio-economic level. They must comply in all cases with the applicable legislation on equal treatment.

### 2.3.2 Service and respect

Employees of the General Secretariat shall, while they execute their duties, behave with courtesy and respect.

The also:

- must answer the questions as fully and accurately as possible, avoiding the use of legal or difficult-to-understand terms and always substantiating their opinions,
- must give specific and detailed reasons for the administrative actions and documents they issue, informing the person concerned immediately and in written form,
- must facilitate the effective implementation of the rights of applicants, in particular the right to petition, the right to a prior hearing and the right to lodge an administrative appeal,
- ensure that cases are dealt with on the basis of the chronological order in which the corresponding requests are submitted, as evidenced by the date of the relevant file numbers, taking into account exceptions provided for by law,
- confine their relations to a strictly formal and professional framework, so as not to compromise their ability to function objectively, and

serenity and independence,

- deal calmly and sympathetically with cases of recalcitrant or argumentative applicants, avoiding tensions or arguments and, if necessary, seeking the assistance of the responsible departments,
- inform applicants about the current Greek Citizenship code and answer specific questions and queries about it,
- inform applicants about the multilingual form/guide for the acquisition of Greek citizenship which is posted on the website of the Ministry of Interior,
- inform applicants about the electronic guide to acquiring Greek citizenship available on the website of the Ministry of Interior. If it is not possible to use the electronic guide, information is provided by telephone or in person,
- provide applicants with the form, digital or printed,

in which all the necessary information is written about the supporting documents they must provide,

- inform applicants that some of the necessary supporting documents may be sought administratively and ex officio, using the interoperability systems of the institutions,
- provide the persons concerned with a receipt of their application, including the file number of the application and the contact details of the employee who is in charge,
- provide feedback and monitoring of the progress of the application, informing the person concerned,
- protect the information listed in the digital and printed documents, records and data held by the Organisation which contain personal data of the citizens concerned.

## SECTION 3

### Commitments of Employees involved in the interview process of applicants for citizenship

Employees involved in the interview procedure of applicants for citizenship, as defined in par. 6 of Article 7 of Law 3284/2004, must also:

- treat the candidate with due respect,
- are neutral, discreet, objective,
- use simple and understandable vocabulary, without the use of complicated and obscure expressions,
- withdraw from the interview panel if they have a particularly friendly or hostile relationship with the candidates,

- have absolute confidentiality and respect the confidentiality of the information and personal data of the candidate, which they use exclusively for the civil registration procedure,
- provide sufficient reasons for accepting or rejecting the request for naturalisation to ensure the transparency, integrity and objectivity of their decision.



## SECTION 4 Commitments by the Heads of the Organisation

The Heads of the Organisation, in the execution of their duties, must:

- they shall respect their Employees and the principles of this Code,
- maintain open channels of communication with employees,
- encourage, motivate and morally reward employees,
- communicate this Code to staff and ensure to the fullest extent possible that it is observed,
- support employees and provide them with assistance in any ethical dilemmas they may face,
- deal with possible conflicts and complaints that may arise between the Employees over whom they have authority,
- handle possible conflict situations and complaints that may arise from the

- applicants for Greek citizenship, in cooperation with the Employees of the team they manage,
- support the career development of staff through training activities,
- ensure that the work is distributed fairly among staff members,
- organise regular meetings with the employees of the units they supervise so that there can be feedback and exchange of views on various topics; avoid behaviour that could lead to discrimination, threats, harassment, sexual harassment or abuse of authority or that could reasonably be perceived as such behaviour,
- be an example regarding their behaviour,
- ensure fair and merit-based appraisal of staff members with a view to improving their individual performance.

## SECTION 5 Supervision & Information - Awareness raising

### 5.1 Supervision

- Compliance with the general principles of the Code is up to the supervisors, but also on the Employees themselves, by developing a culture of integrity and ethical behaviour towards the Organisation, citizens and their interpersonal relationships.
- Many of the matters referred to in this Code constitute disciplinary or criminal offences. Therefore, the Code applies in addition to Law No. 3528/2007 'Ratification of the Code on the Status of Public Civil Servants and Civil Service Employees' (A' 26) and the Criminal Code.
- The Secretary General shall monitor the implementation of the Code.
- In cases where it is found necessary to fill gaps in the explanatory notes in this Regulation, officials may apply to their direct superior.
- The provisions of this Code may be updated whenever required.

### 5.2 Awareness Raising

- The Code of Ethics and Conduct shall be distributed digitally to all Employees of the Organisation, ensuring that every employee is aware of it.
- The Code must be posted on the website of the Ministry of Interior.
- The Head of Human Resources Department must organise staff empowerment and information meetings regarding the implementation of this policy, as well as feedback discussions.





## Legislation

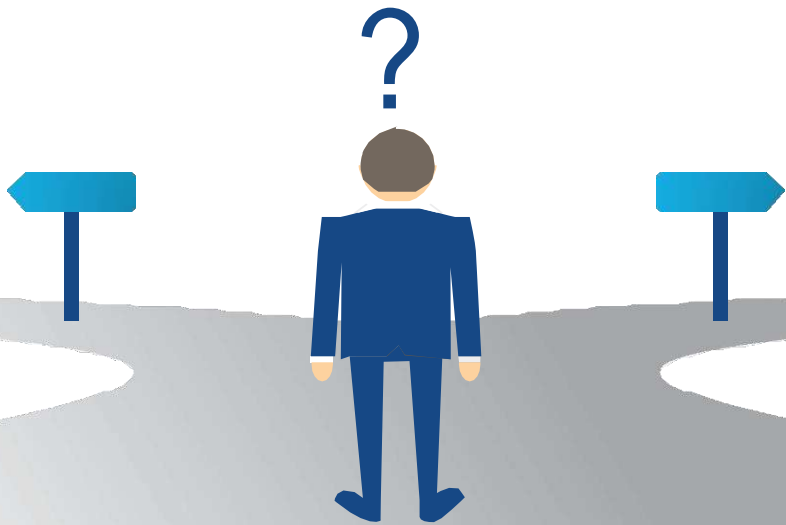
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“ Integrity means not only "to do the right thing", but to do it "the right way" even when no one is watching/monitoring us. (Heywood and Rose, 2015) ”

**ANNEX: Moral/ethical dilemmas**



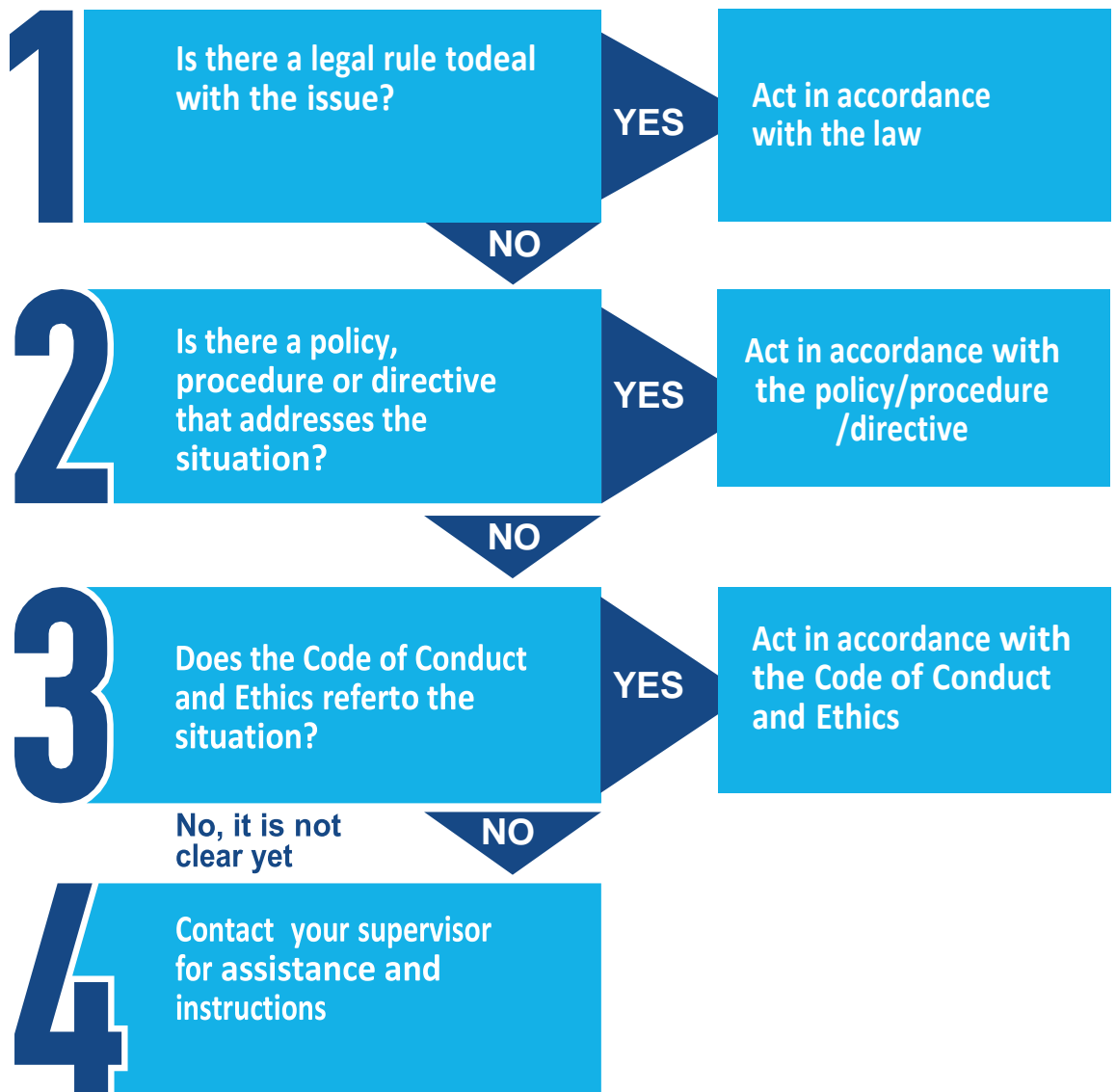
**Ethical dilemmas an Employee may face when:**

- for a decision, two or more solutions are possible and legal.
- there is a choice of a different way of acting, with different consequences depending on the decision taken.
- has doubts about the appropriate way to handle a situation.
- there is a conflict with its own ethical values or it has doubts or difficulties on the definition of the rule or principle that applies to each case.


## Process for dealing with a moral/ethical dilemma

So how should we think, act and deal with the moral and ethical dilemmas that are presented to us? The following "guide" will help you...


### STEPS




## Examples of moral/ethical dilemmas



Employee of the Regional Department about citizenship conduct an interview with an applicant, in accordance with the provisions of par. 6 of Article 7 of Law 3284/2004. During the interview, finds out that the applicant does not meet the essential qualifications provided for in the Code of Greek Citizenship. However, during the discussion, he realises that the candidate is suffering from many financial and personal problems, which can be solved by acquiring citizenship. What should he do? (STEP 1)



You accidentally discover that your colleague, whose behavior has never been criticized, copying entire books from the library into a copy machine and printing online books to create his own library at home. What should you do (STEP 1, 3 and 4)



You are examining the file of a candidate for the acquisition of Greek citizenship and you realise that the candidate in question is a familiar person because he or she has a strong friendly relationship with a person in your family. The candidate will participate in the interview process in accordance with the provisions of paragraph 1. 6 of article 7 of Law 3284/2004. You have been appointed as one of the three Employees who will conduct the interview. What should you do? (STEP 3)



You are collecting the supporting Documents in order to prepare the application file for the acquisition of Greek citizenship. The candidate visits you at your place of work and offers you a symbolic and small gift to thank you for your service. What should you do? (STEP 3)



The management of the organisation exerts pressure on an Regional Organisation of Citizenship employee to draw up the content of the transcript of the interview referred to in paragraph 1.6 of article 7 of Law 3284/, in such a way that the naturalisation request of the applicant for Greek citizenship is accepted.  
What should he do? (STEP 3)



Following a negative decision in you are subjected to abusive attacks and critical/threatening comments by the person concerned.  
What should you do? (STEP 3 AND 4)





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