



HELLENIC REPUBLIC

Ministry of the Interior

General Secretariat for Human Resources in the
Public Sector



NATIONAL TRANSPARENCY AUTHORITY

DIRECTORATE-GENERAL FOR INTEGRITY & ACCOUNTABILITY



CODE OF ETHICS AND PROFESSIONAL CONDUCT FOR PUBLIC SECTOR EMPLOYEES

JULY 2022

The present Code was prepared with the valuable guidance of the Minister of Interior mr. Makis Voridis, of the General Secretary of Human Resources of the Public Sector of the Ministry of Interior ms. Vivi Charalabogianni as well as the Governor of the National Transparency Authority mr. Angelos Binis. The drafting of the Code is the result of cooperation the Ministry of Interior and the National Transparency Authority, after consultation with the Ombudsman.

Foreword

Creating an ethical and healthy working environment is a cornerstone of public administration. The adoption of a Code of Ethical and Professional Conduct expresses the administration's commitment to the ethical values that should guide public sector employees and public bodies.

The Code of Ethics and Professional Conduct has been developed based on current literature and international best practices in public integrity, which favour a system based on value-based rather than compliance-based rules.

Finally, the present Code comes to update and enrich an earlier corresponding effort of the Ombudsman and the Ministry of Administrative Reform and e-Government, focusing on new data and challenges, such as the use of the internet, remote working and the creation of a coherent and modern framework for the prevention, response and combating forms of violent behaviour, harassment and unequal treatment in the workplace.

The Minister for the Interior
Makis Vouridis

Vivi Charalabogianni

Secretary General for Human Resources in the Public Sector

Adherence to the principles of ethical and professional conduct is inextricably linked to the dynamism and credibility of professional activity and the integrity of public servants.

A key feature of the policy of the General Secretariat for Human Resources of the Public Sector is the protection of the working environment and the definition of the framework within which the public servant operates.

The Code of Ethics and Professional Conduct, in full compliance with the current legislative and regulatory framework, as well as international best practices, is a key tool in the direction of highlighting the commitment of public servants to the values of integrity, transparency and accountability in the performance of their duties, with the ultimate goal of serving the public interest and strengthening citizens' trust in the institutions.

Respect for the principles set out in the Code and the cultivation of values such as integrity, honesty, transparency, credibility, open communication and accountability are the key to strengthening the Public Sector, creating a working environment that promotes cooperation, trust and meritocracy and enhances relations with citizens.

Angelos Binis

Governor of the National Transparency Authority

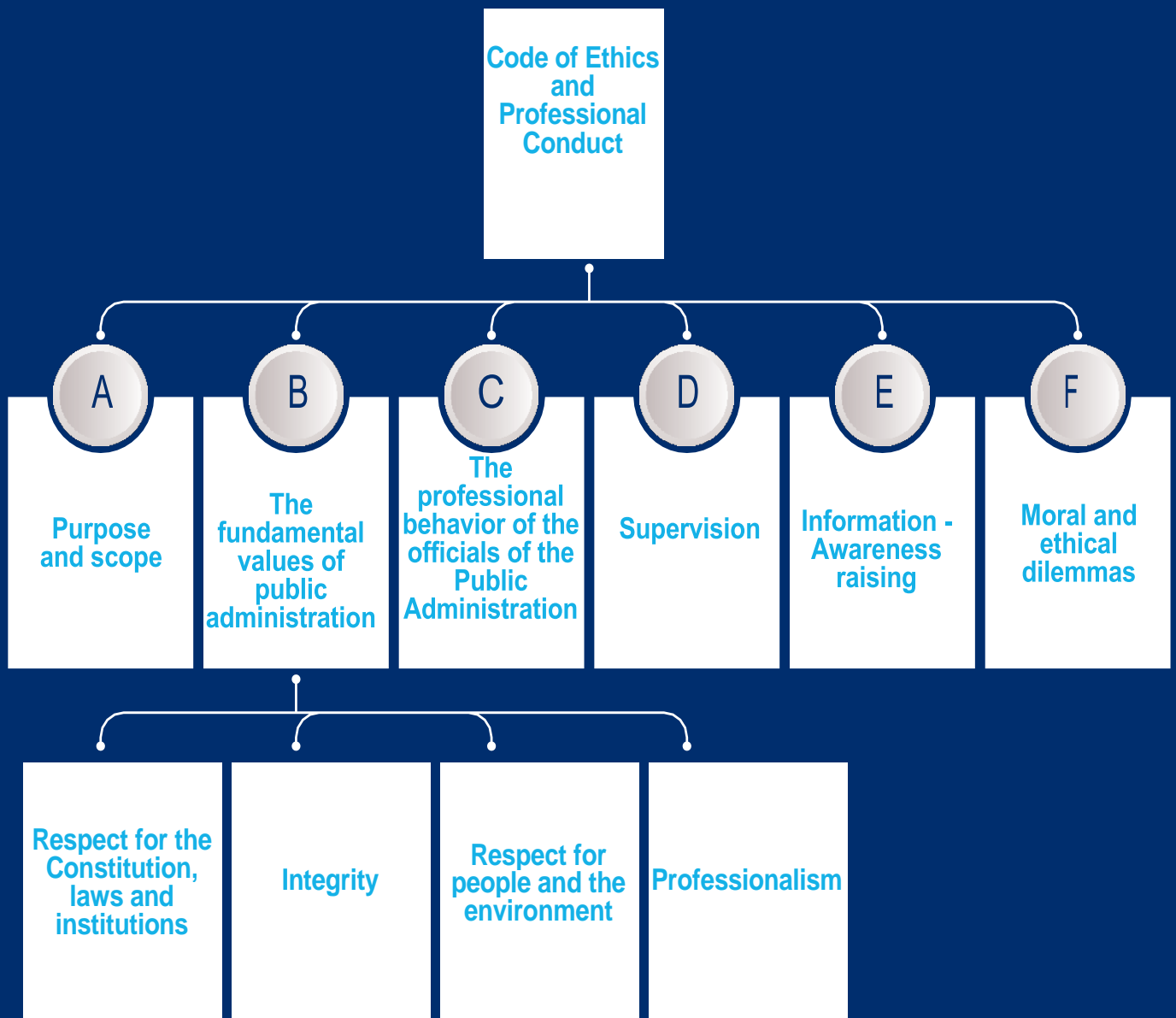
The Code of Ethics and Professional Conduct of Public Sector Employees defines and describes the rules of conduct of public administration officials in the performance of their duties, with the aim of establishing a professional ethical mentality and ensuring a standard and healthy working environment.

Taking into account international standards, methodologies and best practices, this Code sets out in a single text the ethical and conduct rules that public sector employees are required to apply in order to strengthen the Rule of Law, Transparency, Accountability and Open Government and, by extension, to improve the quality of services provided to citizens.

The adoption and implementation of the Code of Ethics and Professional Conduct by civil servants is a critical component of good and sound public governance, demonstrating the commitment of the public administration to the values of integrity, accountability and transparency in all aspects of its organisation and operation.

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A Purpose and scope

This Code contains fundamental values and the conduct expected of public sector employees (hereinafter referred to as "employees") in the performance of their duties. At the same time, officials are governed by a single obligation, the service of the public interest, and this requires adherence to standards of professional conduct, establishing a culture of ethics in the public administration, enhancing citizens' confidence in the integrity of its institutions.

The scope of the Code covers all public sector employees, irrespective of their employment relationship and irrespective of their holding a position of responsibility, as defined by sec. (a) of par. 1 of Article 14 of Law No. 4270/2014 (A' 143).

In addition, the following are excluded from the scope of this Regulation:

- a. Judicial officials, the main staff of the State Legal Council and forensic doctors.
- b. The members of Teaching Research Staff (D.R.P.), Laboratory Teaching Staff (L.T.I.P.), Special Teaching Staff (S.T.I.P.), Special Technical Laboratory Staff (S.T.I.L.) and the temporary teaching staff of the Higher Educational Institutions (HEIs) and the Higher Military Educational Institutions (HEIs).S.E.I.), as well as the teaching or training staff of schools or colleges or services of any name of the State, legal persons governed by public law, first and second degree local authorities and the legal persons referred to in par. 1 of the above Article and law.
- c. Military personnel, non-civilian staff of the Ministries of Civil Protection and Maritime Affairs and Insular Policy, staff of the National Service

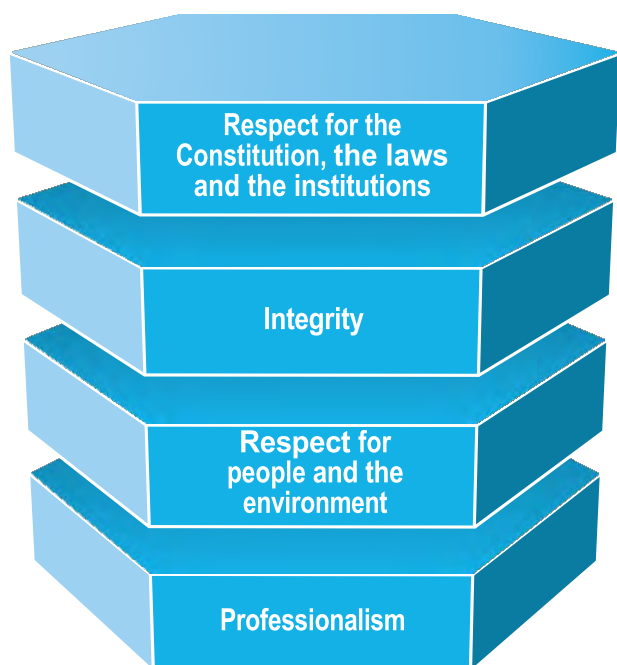
Information.

- d. The religious officials of the legal persons of the Eastern Orthodox Church of Christ, other Churches, denominations and generally known religions.



B The fundamental values of public administration

This Code contains a framework of values that is fundamental to the ethics that should govern the conduct of officials with a view to safeguarding the rule of law, enhancing transparency and accountability and continuously improving the quality of the services provided by the State to citizens. The core values are:



Each of the fundamental values is broken down into its individual components in order to clearly define their content.

Value | 1

Respect for the Constitution, laws and institutions

Compliance with the law, serving the public interest and adherence to the principles of administrative action constitute the matrix of values through which respect for the Constitution, the laws and the institutions is promoted.

a. Compliance with legislation

Officials shall faithfully apply the Constitution and European, international and national legislation, carrying out their duties within the regulatory framework in force.

b. Serving the public interest

Officials shall pursue the realisation of the public interest, as reflected in the interest of society as a whole and determined by the institutions of the State.

c. Compliance with the principles of administrative action

Officials shall respect the principles governing administrative action, in particular the principles of legality, discretion, sound administration, the legitimate expectations of the persons administered, proportionality, equality, good faith and discretion.

Value | 2 Integrity

Transparency, accountability, impartiality, objectivity and confidentiality are values that help to promote integrity in the public sector.

a. Transparency

Officials shall carry out their duties in a transparent and honest manner, without concealing facts or information.

b. Accountability

Employees shall respect the hierarchy and take responsibility for their decisions or actions with a view to ensuring the continuity of their organisation's work.

c. Impartiality

Employees shall avoid situations of conflict of interest and situations likely to create the impression that such a conflict exists, and shall behave in a manner that is not dictated by personal or family interests.

d. Objectivity

Officials shall carry out their duties free from empathy and prejudice, defending and safeguarding the objective nature of their professional judgement. At the same time, they shall avoid any discrimination and handle the cases assigned to them with neutrality and objectivity, without being influenced by undue pressure.

e. Confidentiality

Officials shall respect the value and ownership of the information they receive and shall not disclose information without proper authorisation.

Value | 3 Respect for people and the environment

Fairness, kindness, non-discrimination and ecological awareness constitute the value framework through which respect for people and the environment is protected.

a. Justice

Employees treat superiors, subordinates, and citizens in a fair manner, indicating their moral quality.

b. Courtesy

Employees shall treat superiors, subordinates and citizens with courtesy, always showing understanding, respect and service.

c. Non-discrimination

Employees recognise the value of every human being as an individual and a member of society, regardless of race, colour, origin, gender, religious or other beliefs, disability or chronic illness, age, marital or social status, sexual orientation, identity or gender characteristics.

d. Ecological consciousness

Employees shall behave in a manner that promotes ecological awareness and the protection of the environment.

Value | 4 Professionalism

Effectiveness, efficiency, cooperation, innovation and lifelong learning help to enhance the professionalism of staff and ensure the prestige of the Services.

a. Effectiveness

Employees work to achieve the objectives and results set in advance by their organisation, demonstrating commitment to achieving the operational objectives.

b. Efficiency

Employees work to achieve the best possible relationship between the means used and the results achieved.

c. Cooperation

Employees ensure the development of a culture of cooperation and teamwork in their organisation, while promoting the free exchange of views and knowledge among their colleagues.

d. Innovation

Employees are enhancing their digital skills and looking for ideas to simplify the processes they follow in the course of their duties.

e. Lifelong learning

Officials shall ensure that they acquire the knowledge and skills to provide citizens with a high quality service.

C The professional conduct of public sector employees

Employees are expected to develop behaviour consistent with the core values.

C.1. Respect for the Constitution, laws and institutions

Officials shall carry out their official duties in compliance with the Constitution and the laws and with respect for the institutions, with the sole purpose of protecting the public interest and serving the citizen.

In this context it is expected to:

- 1.1. They shall comply with the requirements of any general or specific provision of Union, international and national legislation.
- 1.2. They comply with the current institutional framework applicable to their employment status (e.g. the Code on the Status of Civil Servants, the Code on the Status of Municipal and Community Employees).
- 1.3. Apply any specific standards, protocols, policies, codes or internal regulations, including internal circulars or guidelines, issued by the institution where they serve, in order to achieve its vision, mission, and strategic and operational objectives.
- 1.4. They comply with the enforceable judicial decisions of EU and national courts and international organisations.
- 1.5. Refrain from any illegal action or activity in the performance of their duties.

C.2 Integrity

C.2.1. Impartiality - avoiding conflicts of interest

Officials shall provide guarantees of impartial judgment in the exercise of their duties.

In this context it is expected to:

- 2.1.1. Not be influenced by personal or other interests in the performance of their official duties.
- 2.1.2. They request that they be excused from dealing with cases, individually or as members of collective bodies, the outcome of which may affect their personal financial or moral interests.
- 2.1.3. They apply for exemption from handling cases, the outcome of which affects the satisfaction of the interests of their spouse or a relative by blood or affinity up to the third degree.
- 2.1.4. They shall request to be exempted from dealing with cases the outcome of which affects the interests of a person with whom they have a special friendly or hostile relationship.
- 2.1.5. Comply with decisions by their superiors to exclude them from handling specific cases.
- 2.1.6. They shall report to their immediate supervisors any risks that may undermine their impartiality.

2.1.7 . Do not seek or accept any form of benefit in exchange for influencing the performance of their duties.

2.1.8 . Do not abuse their position if they move from the public sector to the private sector by exploiting the "inside information" they have acquired in the course of their duties for the benefit of the private company in which they are employed.

C.2.2. Refusal to accept gifts and benefits

Employees shall not use their position or office to obtain financial or other benefits for themselves or on behalf of others.

In this context, it is expected to:

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

2.2.2. Do not accept from anyone services of monetary value, loans, discounts, facilities, entertainment, hospitality, travel, accommodation, food, education, especially if the person offering the services is affected by - or related to - the performance of their duties.

2.2.3. Do not accept any invitation to an event where participation would normally involve the payment of a fee, such as invitations to sporting or cultural events, hotel accommodation, etc. On the contrary, they may accept invitations to events where they represent the organisation in their professional capacity.

2.2.4. If they become the recipient of a gift, they should immediately report it to their supervisor and return it to the

the gift or its value, where possible. However, in a professional context, they may accept gifts which, because of their value and/or nature, are considered to be within the scope of common courtesy (e.g. a book), provided that no obligations are created which affect their impartiality in the performance of their duties.

C.2.3. Secrecy and confidentiality

Officials shall perform their duties without disclosing, without the necessary authorisation, documents and personal data, in accordance with the relevant legal provisions and procedures.

In this context, it is expected to:

2.3.1. Ensure the protection of data or information relating to the privacy or family life of citizens in accordance with the provisions of the General Data Protection Regulation.
Regulation (EU) 2016/679, Directive (EU) 2016/680 and Law No. 4624/2019 (A' 137) as in force.

2.3.2. They shall ensure the protection of documents or information classified as confidential or secret.

2.3.3. They shall ensure that personal data are acquired, stored, managed, processed and transferred to third parties only when absolutely necessary for the performance of their work and always in accordance with national and international law.

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

2.3.5. They shall implement appropriate organisational and technical measures to ensure the confidentiality, availability and integrity of the personnel of the

data of their colleagues, citizens and business representatives.

2.3.6. Be trained and held accountable for the correct processing of personal data.

2.3.7. They cooperate and consult with the Data Protection Officer (DPO) of the organisation and the Units dealing with the security of information systems.

2.3.8. They shall not disclose to third parties information that has come to their knowledge in their capacity or duties within the organisation.

C.3. Respect for people and the environment

C.3.1. Ethical behaviour towards colleagues

Staff members shall behave towards their colleagues and superiors with courtesy, respect, responsibility, fairness and empathy.

In this context, it is expected to:

3.1.1. Treat their colleagues with courtesy, not to express derogatory comments towards them and not to defame them to the leadership of the organisation, to other colleagues and to third parties.

3.1.2. Respect the personal or professional opinions of their colleagues, and in case of disagreement, seek a constructive exchange of views.

3.1.3. They must refrain from any action to undermine the professional careers of their colleagues.

3.1.4. Do not abdicate their responsibilities or delegate their job responsibilities to other colleagues.

C.3.2. Ethical behaviour towards citizens

In the performance of their duties, employees shall treat citizens with decency, courtesy, service and respect.



In this context it is expected to:

3.2.1. They answer citizens' questions on matters within their remit in a simple and understandable manner and as fully and accurately as possible, and always substantiate their views.

3.2.2. They process citizens' cases within the time limit set by the relevant provisions of the Code of Administrative Procedure (Law 2690/1999) or within a reasonable time limit under the relevant provisions.

3.2.3. They deal with cases of recalcitrant or belligerent citizens with calm and understanding, avoiding tensions or arguments and, if necessary, requesting the assistance of the competent authorities and institutions.

- 3.2.4. They inform citizens about applicable EU, international and national legislation.
- 3.2.5. They make it easier for citizens to exercise their rights effectively, in particular the right to petition, the right to a prior hearing, the right to lodge administrative appeals and the right to be acquainted with administrative documents.
- 3.2.6. Inform and guide citizens on the possibility of obtaining information through the Internet and the special digital applications of the public administration (gov.gr, Diavgeia, etc.).



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- 3.2.7. Protect the information recorded in electronic and physical messages, documents, files and data held by the Service, which contain personal data of citizens and business representatives, in accordance with the relevant institutional framework (see additionally paragraph 2.3.1).
- 3.2.8. They must refrain from any act that could offend or diminish the personal or professional dignity of citizens and business representatives.
- 3.2.9. Treat with respect and give priority to people with disabilities or other groups of citizens who need special treatment.
- 3.2.10. They must avoid any action that could call into question their honesty, moral integrity and commitment to duty.

C.3.3. Equal treatment and elimination of bullying and harassment in the workplace

When cooperating with colleagues, citizens or representatives of other institutions and/or companies, employees must demonstrate behaviour that demonstrates their respect for the value of human beings as individuals and as members of society and their commitment to the need to deepen equal treatment and to avoid bullying and harassment in the working environment.

More specifically, employees are expected to:

- 3.3.1. They strictly comply with the provisions of Parts I and II of Law No. 4808/2021 (A' 101) concerning the prohibition of harassment and violence in the workplace and the provisions of Law No. 4443/2016 (A' 232), as in force, on the principle of equal treatment of persons.
- 3.3.2. Avoid behaviours that involve acts of intimidation, oppression, sexual harassment or violence, which may be expressed verbally, physically or psychologically.
- 3.3.3. Avoid behaviours and attitudes that could lead to unfair discriminatory treatment, threats, harassment or abuse of power of any kind, or that could reasonably be perceived as such behaviours.
- 3.3.4. Avoid actions and practices that aim at, lead to or may lead to physical, psychological, sexual or financial harm.
- 3.3.5. It is forbidden to circulate offensive or obscene material by any means and in any way.
- 3.3.6. Avoid sexual/racist jokes, comments and innuendo.

- 3.3.7.** Avoid comments about someone's appearance or character that cause shame or embarrassment.
- 3.3.8.** Do not behave in a way that could underestimate or ridicule a person's abilities, either in person or in front of others.
- 3.3.9.** Refrain from behaviors that diminish an employee's professional competence.
- 3.3.10.** Avoid outbursts of anger and refrain from making threats or using inappropriate comments.
- 3.3.11.** Avoid any unjustified discrimination or unfavourable treatment on grounds of race, colour, sex, national or ethnic origin, birth, religion or other beliefs, disability or chronic illness, age, marital or social status, sexual orientation, identity or gender identity.
- 3.3.12.** Do not disseminate malicious comments or insult someone because of their race, colour, gender, national or ethnic origin, ancestry, religious or other beliefs, disability or chronic illness, age, marital or social status, sexual orientation, identity or gender characteristics.
- 3.3.13.** Protect any person who suffers any form of harassment or bullying, either by encouraging them to make a complaint or by voluntarily informing the competent authorities.



Officials who have any questions and seek advice on matters relating to this section may contact the Integrity Adviser of their Service and/or the Ombudsman

C.3.4. Respect for the environment

Employees behave in a way that respects the environment.

In this context it is expected to:

- 3.4.1.** They avoid paper printouts, making use of the possibilities offered by electronic document exchange and digital signatures.
- 3.4.2.** Ensure that they save electricity by switching off office equipment when not in use.
- 3.4.3.** Make use of the recycling facilities provided by the Service.
- 3.4.4.** They promote green growth through their behaviour.

C.4. Professionalism

C.4.1. Preservation of the institution's reputation

Employees shall contribute to the maintenance of the reputation of their institution by the ethics and behaviour they demonstrate in the performance of their duties.

In this context, it is expected to:

- 4.1.1. They ensure the quality of the services provided in order to enhance the credibility of their operator.
- 4.1.2. They demonstrate exemplary behaviour in all aspects of their professional life.
- 4.1.3. Use means that are legitimate and proportionate to the objective pursued, avoiding the restriction of rights or the imposition of burdensome measures when these are disproportionate to the importance of the public or private interest served.
- 4.1.4. Report to their superiors, in good faith and in confidence, any incidents that affect the reputation of the organisation.
- 4.1.5. Report any unlawful conduct that comes to their attention through internal or external reporting channels.
- 4.1.6. They shall pay particular attention to the expression of opinions and personal convictions so as not to create in any way the impression that they are the views of or are directly or indirectly linked to their provider.
- 4.2.3. They come to work in decent clothing.
- 4.2.4. Ensure the tidiness of their workplace.
- 4.2.5. Not to consume alcohol or other substances and not to smoke in the workplace, in compliance with the provisions of Law 4633/2019 (A'161), as applicable.
- 4.2.6. Comply with all health and safety measures for the protection of their colleagues and the public, adopt and implement all protocols and actions provided by the National Public Health Organisation (EODY) aimed at promoting and protecting public health and ensuring health and safety conditions in the workplace.
- 4.2.7. Organise and carry out the tasks and duties assigned to them within the specified time schedule.
- 4.2.8. Provide clear, complete and timely information on the cases they handle and not to invoke unsubstantiated reasons for the impossibility or delay in handling their cases.

C.4.2. Daily behaviour

Officials must behave with due care and professionalism in the performance of their duties.

In this context, it is expected to:

- 4.2.1. Comply with any specific standards of professional conduct established by law or by the organisation itself.
- 4.2.2. They keep their working hours.
- 4.2.9. They must provide a receipt for the physical and digital records kept by them in the event that they leave the Service for any reason, and ensure that their supervisor and the person who will replace them, if appointed, are informed of their pending cases.
- 4.2.10. They promote teamwork and good cooperation between colleagues.
- 4.2.11. Develop relationships with their colleagues

solidarity, with a view to jointly managing any problems and emerging challenges.

4.2.12. Assist colleagues who are experiencing any work difficulties.

4.2.13. Handle cases on the basis of the chronological order of the submission of the respective

requests, taking into account any exceptions provided for by legislation and/or the internal rules of operation of their Office.

C.4.3. Adequacy

Officials shall ensure the continuous acquisition of the knowledge and skills required for effective

in the exercise of their duties, so that citizens receive appropriate and high-quality services.

In this context, it is expected to:

4.3.1. They have a positive attitude towards continuing education and lifelong learning.

4.3.2. 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.

4.3.3. They are constantly improving the quality of the services they offer.

4.3.4. They take the initiative to develop new ideas and provide suggestions for solving any problems they may encounter in the performance of their duties.

4.3.5. Encourage and develop a spirit of cooperation and teamwork in the Service, through communication, participation and the exchange of views and knowledge.

4.3.6. Take initiatives to develop and implement new ideas.

4.3.7. Promote digital culture by enhancing their digital skills and making use of new technology systems.

4.3.8. They promote volunteering through their behaviour.

C.4.4. Use of assets of the institution

Employees shall protect and safeguard the assets of their organisation.

In this context, it is expected to:

4.4.1. Maintain in good condition the material and technical equipment distributed to them, in particular computers, telephones, printers and scanners.

4.4.2. Avoid the excessive use of their logistical equipment and the digital tools of the institution (such as the official e-mail) for purposes not related to their official duties.

4.4.3. They shall ensure that they hand over the office equipment when they leave the organisation.

4.4.4. Do not abuse the available consumables and material resources of their institution.

C.4.5. Distance working using technology

Employees who work remotely using technology must adhere to certain principles to ensure that their work is efficient both for themselves and for their organisation.

In this context, it is expected to:

- 4.5.1. They know all the obligations and rights arising from the legal framework for teleworking in the public sector.
- 4.5.2. They are informed of their organisation's existing telecommunications policy and contact the relevant Units in the event of any concerns or questions regarding it.
- 4.5.3. They shall ensure the protection of the computer equipment (workstation) provided by the institution.
- 4.5.4. They organise their working environment properly so that it is friendly and meets the necessary standards.
- 4.5.5. Adhere strictly to the prescribed working hours.
- 4.5.6. Take security measures to protect the integrity, confidentiality and availability of the records they manage and process, both in physical and electronic form.
- 4.5.7. Take all necessary security measures to protect the workplace, with the aim of preventing cases of destruction or theft of the digital media where the files they process or the documents they manage are stored in physical form.
- 4.5.8. They communicate frequently with their colleagues and their supervisor in order to receive constant feedback and not to feel isolated from the physical working environment.

C.4.6. Use of internet and social media

Employees must use social media and the Internet in a way that does not harm the interests of their organisation.

In this context, it is expected to:

- 4.6.1. They shall take into account the regulatory framework and internal rules of procedure, which refer to issues of confidentiality and secrecy.
- 4.6.2. Avoid using social media in the course of their work, unless it is related or authorised by their supervisor.
- 4.6.3. Avoid using, transmitting, copying or voluntarily accepting material that infringes copyright.
- 4.6.4. They are informed of any existing policies on the correct use of the Internet, social networking media, the internal communication network, e-mails and the organisation's information systems.

C.5. Specific obligations of supervisors regardless of their level of responsibility

Supervisors, regardless of their level of responsibility, must respect the people they manage, support and motivate them, so that they all contribute to the achievement of the objectives of the institution. Leadership by example and proper guidance can ensure the effectiveness of this Code.

In particular, in the exercise of their duties, supervisors are expected to:

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- 5.1. They shall ensure that the principle of equal treatment of officials under their authority and the principle of legality are strictly observed.
 - 5.2. They shall exercise their powers and perform their duties with due respect for the officials over whom they exercise authority.
 - 5.3. Maintain open channels of communication with employees, creating an environment conducive to dialogue.
 - 5.4. They shall ensure the briefing and smooth integration of newly recruited officials in the unit to which they are assigned.
 - 5.5. They inspire, energise and motivate employees and in the case of exceptional performance they reward them morally.
 - 5.6. Set an example and promote diversity and pluralism through their involvement.
 - 5.7. Support employees with information and advice on how to handle situations of conflict of interest or potential ethical dilemmas and suggest appropriate ways of dealing with them.
 - 5.8. Recognise the training and knowledge needs of staff and encourage their participation in training activities, taking into account the needs of the service.
 - 5.9. They care about the professional competence of employees and support their continuous development of skills and professional fulfilment.
 - 5.10. Resolve conflict situations, disputes and complaints that may arise from citizens and representatives of institutions and businesses, in cooperation with the employees of the team they manage.
 - 5.11. They handle conflict situations, quarrels and complaints that may arise between the officials they supervise.
 - 5.12. They organise regular meetings with the officials of the services they head in order to ensure feedback and exchange of views on the various thematic areas.
 - 5.13. They shall ensure the fair distribution of work among the officials.
 - 5.14. Ensure fair and merit-based appraisal of staff members with a view to improving their individual performance.
 - 5.15. Promote digital culture by adopting and using new technology and e-government systems.
 - 5.16. Provide protection, support and information to employees who work remotely due to teleworking and special circumstances, in compliance with the provisions of labour law.
 - 5.17. Ensure the provision of the necessary material and technical equipment and personal protective equipment, when required.
 - 5.18. They shall ensure that they have the necessary resources for the proper and efficient operation of their Service.
 - 5.19. Ensure the control of compliance with health and safety rules, informing the competent department of the organisation when necessary.
 - 5.20. Encourage participation in social and voluntary activities.
 - 5.21. They contribute to the "construction" of a working environment which is free of bullying and harassment and in which the

everyone will feel valued and respected for their contribution (see additionally section C.3.3.)

- 5.22.** Communicate the provisions of the Code to staff and ensure compliance with it to the greatest extent possible.

D Supervision

1. Compliance with the general and more specific standards of ethics and conduct set out in this Code is an obligation for public sector employees, who are called upon to contribute to the creation of an environment of integrity and ethical behaviour towards the Service itself, citizens, businesses and their colleagues.
2. Violation of many of the specific standards of conduct contained in this Code constitutes disciplinary and/or criminal misconduct. For this reason, it is underlined that the Code is complementary and subsidiary to the existing regulatory framework.
3. The responsibility for exercising ultimate supervision of the implementation of this Code shall be exercised by the head of each entity, who shall designate the person responsible for supervising the implementation of the provisions and integrity safeguards of this Code.
4. This Code is a building block of the Internal Audit System developed in each public body, which is evaluated by the Internal Audit Unit and other internal and external supervisory bodies, which provide reasonable assurance on the maturity and effective operation of the individual elements and control networks of the system.
5. This Code may also be used by the Ombudsman within the scope of his/her powers.
6. The Guide to Good Administrative Behaviour, issued by the Ombudsman and the Ministry of Administrative Reform and e-Government in 2012, remains in force for those issues not regulated by the provisions of this Code.
7. More specific Codes of Ethics, Conduct and Professional Conduct relating to specific bodies and categories of officials/professionals shall continue to apply in addition to this Code.
8. The provisions of this Code may be updated whenever necessary.

E Information - Awareness raising

1. This Code of Ethics and Professional Conduct for Public Sector Employees is posted on the website of the Ministry of Interior and the National Transparency Authority, as well as on the websites of all public sector bodies, if they have employees governed by its provisions.
2. The heads of the public sector bodies ensure that the Code of Ethics and Professional Conduct for Public Sector Employees is distributed electronically to all their employees.
3. The Integrity Advisors of the Public Administration Law 4795/2021 (A'62), as in force, provide information and advice on the issues of this Code. They also ensure the implementation of information and awareness-raising activities in cooperation with the services dealing with human resources issues and with public and private bodies.
4. The Ombudsman, as the body responsible for monitoring and promoting the implementation of the principle of equal treatment and equal opportunities, provides advice and guidance on matters within its remit.

F Moral and ethical dilemmas

In order to make the concepts of the present section understandable and familiar, a practical implementation tool is provided in this section, which contains examples of situations and dilemmas that employees may face during their work, as well as relevant methodology for handling them, in accordance with international best practices.

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 is the disadvantage and what is the advantage of my decision or action. The non-existence of a perfect and fully satisfactory solution is the basic characteristic of every moral dilemma. An ethical dilemma arises whenever several alternatives, each of which has different consequences, are proposed for the solution of a problem, each of which is adequately justified. Usually these alternatives are contradictory and therefore very difficult to reconcile. Nevertheless, one is asked to choose between them, which is why in all approaches involving ethical dilemmas a conflict between values arises.

Liarakou G. (2013)

The moral dilemma, University of the Aegean

In summary, an employee may face ethical dilemmas when:

Moral / ethical dilemmas



F.1. Areas for identifying moral/ethical dilemmas - examples

1. Conflict of interest

A

The Head of a Directorate of a Ministry is entrusted with the task of conducting an Administrative Inquiry under oath on a matter bullying and harassment in the Ministry's workplace. In the process, this Director realizes that he has a strong friendly relationship with the perpetrator.

What should he do?

B

You discover by chance that two officials who were members of your organisation's project evaluation committee used to work for the company that was eventually selected as the contractor. You maintain excellent professional relations with employees.

What should you do?

C

You work in a unit that deals with insurance and tax audits and your wife runs an accounting office. In the course of exercising your responsibilities, you realise that some of the audited businessmen are clients of your wife's accounting firm.

What should you do?

2. Harassment - bullying - equal treatment

A

A newly appointed official takes up a post in his/her institution. In the department to which he is assigned, he encounters communication difficulties with a colleague who has many years of experience and expertise. In particular, he is subjected to dismissive and derogatory behaviour whenever he tries to obtain some operational information on the responsibilities of the department.

What should he do?

B

Maria, your colleague in the office, receives daily sexist comments and jokes about her appearance from the Director of the Office. She confides her indignation to you but because she is shy she tries to show the Director, in a subtle way, that she is annoyed. However, the Director continues to behave in the same way.

What should you do?

C

Your colleague suffers from a speech disorder and his accent sounds funny. Some of his colleagues tease and make fun of him, which makes him feel insecure.

What should you do?

3. Information management/disclosure

A

Official X asks Official P to use his personal username-password in order to process entries in the financial reporting management information system, with the excuse that he does not have time to do the work himself.

What should the employee P do?

B

Eleni and Michael are colleagues in an agency dealing with human resources management issues and discuss in a public area a case involving sensitive personal data of an employee of the agency. Other employees are in the same area, as well as citizens waiting to be served. You are present at the debate.

What should you do?

C

You discover that your colleague is using social media to highlight practices of the Service with which he or she does not agree. In the documents posted, it defames the Office and publishes personal data of officials.

What should you do?

4. Work culture

A

You happen to discover that the driver of your institution's company car, whose work behaviour has never been criticised, also uses it for his personal business.

What should you do?

B

A colleague in the Procurement Department, whose work behaviour has never been the subject of criticism and with whom you have a close friendly relationship, has recently been receiving small gifts and facilities from a private company wishing to take part in a procurement tender of the institution.

What should you do?

C

You undertake the completion of a project within your remit that was originally assigned to another member of your department. You discover an error which proves that your colleague did not do a diligent and careful job. You have a good working relationship with this employee.

What should you do?

5. Leadership

A

The Head of the Directorate in which you are serving asks you to persistently sign an individual administrative act to which you object. During the discussion, he insists that you do not submit your objections to the document, as required by the legislation, using extortionate arguments.

What should you do?

B

You are an employee of the Human Resources Department and you check the authenticity of the qualifications of your employees in accordance with the legislation in force. Your supervisor, with whom you have a very good working relationship, asks you to overlook the check on a particular employee of the institution who is related to a senior manager. You express your objections, but the Director insists on its original position.

What should you do?

C

A paid committee is to be set up in the department you serve to find a building for relocation. Your Head of Service will be appointed as chairman and, in order to recommend your appointment as a member of this committee, he is asking you to vote in favour of the proposals he will put forward.

What should you do?

F.2. Methodology for managing and addressing ethical and moral dilemmas



F.3. Useful questions to address moral and ethical dilemmas

When you are faced with moral dilemmas and find it difficult to choose between two decisions, you can answer a few questions that will help you make the right decision. More specifically, consider:

1. Which option will be more beneficial and less damaging?
2. Which option will be more just?
3. What will be the short and long term effects of each of my choices?
4. Which decision respects human rights and promotes dignity and respect among all parties involved?
5. Which decision does not conflict with the operational responsibilities of the Unit/Directorate where I work?
6. Is the choice I make consistent with my moral values and principles? What values may conflict?
7. What moral and legal implications will the decision I make have for both the people involved and myself?
8. What impact can the decision I make have on my organisation or on citizens?
9. Have I encountered a similar incident in the past? How did I react?
10. Is there a colleague I could consult in the first instance?
11. Is there a chance that the choice I make will cost me a business friendship or a business partnership?
12. In case of inaction and indifference to any decision, what will be the consequences?

Didn't you answer all of them?

The aim is not to give a clear answer to every question but to understand what you need to test. These questions will help you to realise what you need to think about and where you need to focus in order to have a "compass" that will possibly lead you to make the right decision.

G. In lieu of epilogue

We support and adopt the Code of Ethics and Professional Conduct because it will help us:

Shield our moral value systems and principles

Identify and deal promptly with irregular and unethical behaviour in our working environment

To solve possible problems and dilemmas that arise daily in our work To feel active members of a Public

Administration that respects and protects us and promotes integrity, accountability and transparency

Improve professional links with our colleagues

To get closer to the leadership and share our professional concerns and any problems in the work environment

Build a relationship of mutual trust with citizens

Become better people both at work and in our personal lives

H Conceptual Dictionary

Teleworking/ telecommuting:

A form of work organisation and execution in which the employee performs his/her duties remotely, using information and communication technologies.

Internal Audit Unit:

It is the organisational unit that provides the head of the organisation with reasonable assurance and advisory services 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:

Forms of conduct which have the purpose or effect of violating a person's dignity and creating an intimidating, hostile, degrading, humiliating, degrading or offensive environment, whether or not they constitute a form of discrimination, and including harassment on the grounds of sex or other grounds of discrimination.

Conflict of interest:

It shall include any situation in which the impartial performance of the official's duties is objectively affected.

Integrity Advisor:

An institution established for the first time in the Greek public administration by Law 4795/2021. It is a dedicated point of contact for the employees of the institution in order to seek support, information and advice on ethics and integrity issues in their workplace, promoting cooperation and integrity within the institution by designing and implementing training and awareness-raising activities.

Internal Audit System:

A matrix of functions and procedures, as well as controls adopted by the organisation, which is designed to provide reasonable assurance to the organisation that the objectives will be achieved:

- a) effectiveness and efficiency of its business operations,
- (b) reliability of financial and other reports,
- (c) compliance with the laws, regulations and policies governing its operation.

I Bibliography

1. National Transparency Authority, Code of Ethics for Internal Auditors, 2021.
2. National Transparency Authority, Code of Professional Conduct for Inspectors - Auditors of the National Transparency Authority, 2020.
3. National Transparency Authority, Code of Ethics and Administrative Behaviour for the staff of the National Transparency Authority, 2020.
4. National Centre for Public Administration and Self-Government, Proceedings of the conference entitled "Ethics and Ethics in Modern Public Administration", 2012.
5. Single Independent Public Procurement Authority (SIPA), Code of Conduct for members and staff of the Single Independent Public Procurement Authority (SIPA), 2017.
6. Eliminating harassment and oppression in the workplace, European Transfer Workers' Federation, 2013.
7. European Ombudsman, The European Code of Good Administrative Behaviour, 2015.
8. Republic of Cyprus, Code of Ethics and Conduct of the Department of Taxation, 2016.
9. Republic of Cyprus, Guide to Conduct and Ethics of Public Servants, 2013.
10. ICL Code of Conduct, 2017.
11. Liarakou G., The moral dilemma, University of the Aegean, 2013.
12. Marinos K., Issues of Ethics and Conduct in Governance, Theory and Practice of Administrative Law, Nomiki Bibliothiki, 2014.
13. Mitropoulou E., Tsaousis I., Xanthopoulou D., Petridis K. (2014), Seeking the Characteristics of the Moral Leader: an empirical study in the workplace, *Psychology* (21), 2 161-162.
14. Papaloi E., "Attitudes, behaviour, emotional intelligence & organisational cognition in Lifelong Learning Organisations" on line: <https://eclass.hua.gr/modules>.
15. Pilavaki A., Code of practice for the prevention and treatment of sexual harassment in the workplace, 2012.
16. Raikos, D. G., Public Administration and Corruption: From the perspective of Administrative Law, Athens: Ant. N. Sakkula, 2006.
17. Citizen's Advocate - Ministry of Administrative Reform and e-Government, Relations between civil servants and citizens: A Guide to Good Administrative Behaviour, 2012.
18. Ministry of Finance, Code of Ethics and Conduct, 2013.
19. Bérubé, G., Villeneuve, F. Ethical dilemmas and the decision-making process: is a consensus realistic? *Energy Policy*, 30, 2002.
20. BIOS, Integrity management in the public sector, The Dutch approach, 2016.
21. Deloitte, Suggested guidelines for writing a code of ethics/ conduct, 2009
22. EUROSAI, How to implement ISSAI 30 (INTOSAI CODE OF ETHICS), 2017.
23. EUROSAI, Task Force on Audit and Ethics, Implementation of ISSAI 30 (INTOSAI Code of Ethics), 2017.
24. GRECO, Codes of conduct for public officials, GRECO findings & recommendations, 2019.
25. High Authority for Transparency in Public Life, Handbook for public managers and Ethics Officers, 2019.
26. INTOSAI, ISSAI 130, Code of Ethics, 2019.
27. Recommendation No R 10 of the Committee of Ministers to Member states on codes of conduct for public officials, 2000.
28. Remote Working Policy and Guidelines on its implementation, Government of Malta, 2021.
29. The ethical GPS-Navigating everyday dilemmas (2007) - George Mason University.
30. The International Code of Ethics for Professional Accountants, International Ethics Standards Board for Accountants (IESBA), 2021.

Legislation

1. **L. 2690/09.03.1999** (A' 45) "The Code of Administrative Procedure and other provisions".

2. **L. 3528/09.02.2007** (A' 26) "Ratification of the Code on the Status of Public Civil Servants, Administrative Employees and Employees of N.P.D.D.".

3. **L. 3584/28.06.2007** (A' 143) "Ratification of the Code on the Status of Municipal and Community Employees".

4. **L. ^{ns} 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 - Harmonisation of the legislation in force with Directive 2006/54/EC of the European Parliament and of the Council of 5 July 2006 and other relevant provisions".

5. **L. 4443/09.12.2016** (A' 232) "1) Implementation of Directive 2000/43/EC on the application of the principle of equal treatment of persons".

6. **L. 4622/07.08.2019** (A' 133) "Executive State: organization, operation and transparency of the Government, government bodies and central public administration".

7. **L. 4624/29.08.2019** (A' 137) "Personal Data Protection Authority, measures implementing Regulation (EU) 2016/679 of the European Parliament and of the Council of 27th April 2016 on the protection of natural persons with regard to the processing of personal data and transposing into national legislation Directive (EU) 2016/680 of the European Parliament and of the Council of 27th April 2016 and other provisions".

8. **L. 4633/16.10.2019** (A' 161) Establishment of the National Public Health Organization (EODY), regulations on tobacco products, other issues of the Ministry of Health and other provisions.

9. **L. 4727/23.09.2020** (A' 184) "Digital Governance (Incorporation in Greek Law of Directive (EU) 2016/2102 and Directive (EU) 2019/1024) - Electronic Communications (Incorporation in Greek Law of Directive (EU) 2018/1972) and other provisions".

10. **L. 4795/17.04.2021** (A' 62) "Internal Audit System of the Public Sector, Integrity Advisor in public administration and other provisions for public administration and local government".

11. **L. 4807/11.06.2021** (A' 96) "Institutional framework for teleworking, provisions for human resources in the public sector and other urgent regulations".

12. **L. 4808/19.06.2021** (A' 101) "Ratification of Convention 190 of the International Labour Organization on the Elimination of Harassment Violence in the World of Work - Ratification of Convention 187 of the International Labour Organization on the Framework for the Promotion of Safety and Health at Work".

Useful websites



ΕΛΛΗΝΙΚΗ ΔΗΜΟΚΡΑΤΙΑ
Ministry of the Interior

www.ypes.gr

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