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**CODE OF
CONDUCT FOR
SECONDED
OFFICIALS AND
SPECIAL ADVISORS**

**Version 1.0
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Foreword

Paraskevi Charalabogianni, Deputy Minister of the Interior

The adoption of this Code is part of a holistic approach that has been initiated over the last five (5) years to set soft law rules that serve as high standards of conduct, with the aim of instilling professional ethics, responsibility, integrity, accountability and transparency in their actions in the Public Sector.

The importance of these rules is not merely declaratory. Their observance has a practical impact, since it contributes substantially to enhancing the authority of the public administration and public authorities and to strengthening citizens' sense of trust in it.

The Code of Conduct you have in your hand or on your screen is complementary strict rules found in existing provisions, in particular Law no. 4622/2019 (A' 133) on the Staff State. It is based on best international and European practices, which are transmuted into a set of principles and values that should govern the exercise of the duties of Temporary Employees and Special Advisors, regardless of whether they are paid (Seconded Officials) or provide unpaid (Special Advisors) services to the persons who entrust them and choose to place them, for the specific period of their term of office, in the position in which they serve.

Temporary agents and special advisers are subject to special rules (e.g. concerning the procedure for the conclusion and termination of their employment relationship and its duration), compared to regular civil servants. This special legal status justifies and requires the drafting of a separate Code, in line with the specific and sensitive nature of their duties.

The National Transparency Authority has responded to this request and I thank it for the constructive and fruitful cooperation with the Ministry of the Interior.

Alexandra Rogkakou, Interim Governor of the National Transparency Authority

The Code of Conduct for Seconded Officials and Special Advisors is the culmination of the efforts made in recent years by the Greek State to ensure that the fundamental values and principles of the Administration, such as ethics, integrity, ethics and accountability, are established in every area of public authority. The added value of this Code is significant, as the framework of obligations and behaviours governing the actions of seconded officials and special advisers serving in private offices and the Presidency of the Government is not strictly defined in legislation, and will contribute to the effective functioning of the private offices of the heads of public sector entities. The National Transparency Authority publishes this Code in compliance with Article 76 para. 4, letter b' of Law 4622/2019 and the relevant Decree No. GGADDT 300/6546/2023 Decision of the Minister of Interior.

Compilation

The Code of Conduct for Employees and Special Advisors was prepared in accordance with the guidelines of the Interim Governor of the National Transparency Authority, Mrs. Alexandra Rogkakou, under the guidance and coordination of the Head of the General Directorate of Integrity and Accountability, Mrs. Maria Konstantinidou.

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A. Introduction

In the Greek administrative model, as reflected, in particular, in the provisions of Law No. 4622/2019 *"Executive State: organisation, operation and transparency of the Government, government bodies and the central public administration"* (A' 133), temporary employees and special advisors play an important role, staffing and supporting the operation of the private offices of the members of the Government, the Deputy Ministers, as well as the Secretaries General and Special Secretaries.

Despite the existing provisions in the institutional framework temporary agents and special advisers, the appropriate behaviour of such persons is not defined in a uniform and codified manner, as it is part of a broader ethical and moral framework to which the persons occupying these positions are called upon to commit themselves.

According to Art. 4622/2019, the National Transparency Authority (NTA) is designated as the competent authority called upon to specify and define the ethical and moral framework for temporary employees and special advisors. In particular, according to Article 76 para. 4(b) of the said law, "In the exercise of their duties, temporary employees and special advisers shall comply with a code of conduct, which shall be drawn up by the National Transparency Authority", in accordance with the Decision of the Minister of Interior, ΓΓΑΔΔΤ 300/6546/2023 on "Determination of the details for the establishment of a Code of Conduct for temporary employees and special advisers (...)" (B' 2473).

The present Code is in line with international and European best practices and is part of a wider effort made in recent years by the Greek State to regulate, through soft law, issues of ethics and conduct among both elected officials and public servants, so that ethics, integrity, ethics and accountability, as fundamental values and principles of the Administration, are established in every field of exercise of public authority. Indicatively, the Code of Conduct for Members of the Greek Parliament, the Code of Conduct for Elected Bodies of Local Government, as well as the Code of Ethics and Professional Conduct for Public Sector Employees.

The Code was drafted by the National Transparency Authority, following constructive cooperation between the Directorate General for Integrity and Accountability of the NTA and the General Secretariat for Public Administration of the Ministry of Interior and the General Secretariat for Legal and Parliamentary Affairs of the Presidency of the Government.

B. Purpose and scope

B.1. Purpose

The purpose of the Code of Conduct for Seconded Officials and Special Advisers (hereinafter: Code of Conduct) is to define and delineate clear rules of conduct for the above in the exercise of the responsibilities entrusted to them, in order to effectively prevent conflicts of interest and to ensure transparency, integrity and accountability in the exercise of their responsibilities.

B.2. Scope of application

The Code of Conduct shall apply to all persons appointed to posts of seconded officials or special advisers in the private offices of members of the Government¹, Deputy Ministers, and Secretaries-General and Special Secretaries, including officials acting as Directors in the aforementioned offices, with the exception of the private offices of Special Secretaries.

Similarly, the Code of Conduct also covers temporary officials and special advisers appointed and serving in the Presidency of the Government.

The Code of Ethics and Professional Conduct for Public Sector Employees shall apply exclusively to public sector employees seconded to positions as assistants in the offices of members of the Government, Deputy Ministers, as well as General and Special Secretaries.

¹ Except for the Prime Minister (article 45(1) of Law 4622/2019).

C. Fundamental principles of conduct

The Code of Conduct contains a framework of principles of conduct which are fundamental to the ethics that should govern the behaviour of temporary and special advisers falling within scope, with a view to upholding the rule of law, building public confidence, enhancing transparency and accountability and continuously improving the quality of the services they provide to the State, always in the public interest.

The four (4) fundamental principles of conduct are as follows:

- Respect for the Constitution, laws and institutions, as fulfilled by observing the law, serving the public interest and complying with the principles of administrative action.
- Integrity, as framed by the principles of transparency, accountability, impartiality, objectivity and confidentiality.
- Respect for people and the environment, as expressed by the principles of justice, courtesy, non-discrimination and ecological awareness.
- Professionalism, which governed by the individual principles efficiency, cooperation and innovation.

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

In carrying out the tasks entrusted to them, Seconded officials and special advisers shall comply with the applicable legal framework and shall act in the public interest, always with due regard for the principles laid down in the case-law governing administrative action.

C.1.1. Compliance with legislation

Seconded officials and special advisers shall faithfully apply the Constitution, European Union law and national law, as well as the international conventions ratified by the country, exercising the powers entrusted to them within the legislative and regulatory framework in force.

C.1.2. Serving the public interest

Seconded officials and special advisers shall act in the public interest, the satisfaction of which constitutes the basic purpose of administrative action in general.

C.1.3. Compliance with the principles of administrative action

In the performance of duties, seconded officials and special advisers shall respect the principles governing administrative action, in particular the principles of discretionary powers and the principle of proportionality.

discretion, good administration, the legitimate expectations of the persons administered, proportionality, equality, good faith and discretion.

C.2. Integrity

Transparency, accountability, impartiality, objectivity and confidentiality in the activities of temporary agents and special advisers are the basic principles underlying the concept of integrity.

C.2.1. Transparency

Seconded officials and special advisers shall exercise the responsibilities entrusted to them in a transparent and honest manner in order to build trust in their partnerships.

C.2.2. Accountability

Seconded officials and special advisers shall be responsible for their acts and omissions in the performance of their duties.

C.2.3. Impartiality

Seconded officials and special advisers shall declare and abstain from actual and potential conflicts of interest and, in general, shall behave in a manner that is not dictated by personal and family interests, financial or otherwise.

C.2.4. Objectivity

Seconded officials and special advisers shall exercise their functions without empathy or prejudice, while preserving the objective nature of their professional judgement. At the same time, they shall avoid any favourable or unfavourable discrimination and shall exercise their functions neutrally and objectively, without being influenced by undue pressure or political or business interests.

C.2.5. Confidentiality

Seconded officials and special advisers shall respect and ensure the confidentiality of the information and data they receive in the course their duties.

C.3. Respect for people and the environment

Seconded officials and special advisers shall carry out their duties fairly and courteously, avoiding discrimination, being environmentally aware and generally promoting the fundamental principle of respect for people and the environment.

C.3.1. Justice

Seconded officials and special advisers behave fairly towards their colleagues, their superiors and citizens.

C.3.2. Courtesy

Seconded officials and special advisers shall behave with courtesy towards their colleagues, their superiors and citizens, showing understanding and respect.

C.3.3. Non-discrimination

Appointed officials and special advisers shall recognise the value of every human being, employee or citizen, as an individual and a member of society, regardless of race, colour, descent, gender, religious, political or other beliefs, disability or chronic illness, age, marital or social status, sexual orientation, identity, gender identity, characteristics or gender expression.

C.3.4. Ecological awareness

Seconded officials and special advisers behave in an ecologically conscious manner and protect the environment by limiting the waste of energy and natural resources.

C.4. Professionalism

The principles of efficiency, cooperation and innovation help to enhance the professionalism of temporary agents and special advisers, while maximising the added value they bring to public sector bodies.

C.4.1. Effectiveness

Seconded officials and special advisers work to ensure the efficient functioning of the private office, with the aim of building trust with citizens and other officials of the institution.

C.4.2. Cooperation

Seconded officials and special advisers work together in a spirit of teamwork in the organisation in which they perform their duties and promote a free exchange of views and knowledge among their colleagues.

C.4.3. Innovation

The Seconded officials and special advisers promote the culture of innovation of the organisation and propose ideas and actions for its optimal functioning.

D. Obligations and specific standards of conduct

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

In the performance of their duties, Seconded officials and special advisers shall be bound by the principle of legality, the principle of the public interest and the other principles governing administrative action.

In this context:

Standard D.1.1.

They shall comply strictly with any general or specific provisions of applicable national and EU's legislation, including international conventions from their ratification by law and their entry into force.

Standard D.1.2.

They comply with the operative part of the decisions of national and European courts, while seeking to ensure that their services comply with them.

Standard D.1.3.

In the exercise of their powers, they shall seek and promote compliance with the general principles of administrative law, in particular the principles of discretion, sound administration, the legitimate expectations of the persons administered, proportionality, equality, good faith and leniency.

Standard D.1.4.

Apply any codes, by-laws, special protocols, circulars, guidelines, standards and procedures in pursuit of the public interest, mission and objectives of the organisation.

Standard D.1.5.

They shall refrain from acts which could reasonably be construed as acts of administration or management of matters falling within the competence of the departments of the body or having the character of a superior authority of those departments.

D.2. Integrity

D.2.1. Transparency and accountability

Seconded officials and special advisers shall exercise the powers entrusted to them in a transparent manner, being accountable for their acts or omissions whenever and wherever required.

In this context:

Standard D.2.1.1.

They shall not withhold data or information of which they have become aware in the exercise of their powers in the event of an audit, if disclosure is mandatory under the applicable national and European legislation.

Standard D.2.1.2.

They take responsibility their recommendations and are accountable to their superiors in cases of illegal or manifestly inappropriate actions.

Standard D.2.1.3.

They shall promote transparency in their conduct within the operation of the particular office or body for which they are responsible.

D.2.2. Avoiding the performance of duties in the event of a conflict of interest

Seconded officials and special advisers must be objective and impartial in the performance of duties, serving public interest and not private interests.

In this context:

Standard D.2.2.1.

They must remain uninfluenced by personal or other private, business, political and party interests in the performance of their duties.

Standard D.2.2.2.

They shall declare to their immediate superior, or where specifically provided for in the legislation, any risks which may undermine their impartiality and objectivity in the performance of the duties assigned or likely to be assigned to them, such as risks arising from their family, professional, friendly or other relationships.

Standard D.2.2.3.

They shall declare any action, act or proceeding which constitutes participation in the taking of a decision or the expression of an opinion or proposal if they reasonably consider that the satisfaction of their personal interest or the interest of (a) their spouse or partner, (b) a relative by blood or affinity, in a direct line and without limitation, and in a collateral line up to the fourth degree, (c) a person with whom they have a special friendly or hostile relationship, by abstaining from such actions, acts or proceedings.

Standard D.2.2.4.

They shall comply with the decisions or instructions of superiors, in cases where the latter decide on their own initiative not to exercise specific responsibilities, in order to prevent conflicts of interest.

Standard D.2.2.5.

Comply with the regulations recommended and the or directives issued by the Presidency of the Government in order to effectively manage conflict of interest situations.

Standard D.2.2.6.

Avoid practices that could reasonably be perceived as exerting undue pressure on the administration and employees of the body exercising their functions in order to serve personal, family, political or business interests.

D.2.3. Rejection of gifts and benefits

Seconded officials and special advisers shall not use their position and functions for the purpose of obtaining financial or moral benefits for themselves or on behalf of others.

In this context:

Standard D.2.3.1.

They shall not accept, directly or indirectly, gifts, gratuities or other benefits offered to them in the exercise of their functions and, in particular, shall not, by their conduct, give rise to the offer of gifts and benefits.

Standard D.2.3.2.

They shall not solicit or accept the offer of services of monetary value, discounts and financial facilities, including forms of entertainment, hospitality, room and board, education, loans and travel, when (a) the offeror is a citizen or representative of a business that is affected by or derives an interest from the result of their action and (b) the offeror is a public official and the offer of the benefit is intended to secure favourable treatment.

Standard D.2.3.3.

If they become the recipients of a gift or other benefit, they shall immediately report it to their supervisor and return the gift or its value in case the return of the gift is no longer possible.

Standard D.2.3.4.

In the context of the application of standards D.2.3.1, D.2.3.2 and D.2.3.3, it is noted that Seconded officials and special advisers:

- They may accept gifts which, because of their value or nature, fall within the scope of common courtesy, on the additional condition that their acceptance does not create - and cannot be reasonably asserted by a bona fide third party to create - an obligation to reciprocate to the person or business of the donor.

- They may accept invitations and attend sport, cultural or other events, provided that they do so in their professional capacity, representing their political superior.

D.2.4. Avoidance of disqualifications and incompatibilities during and after the term of office

Seconded officials and special advisers shall avoid any action or conduct which is or may reasonably be perceived by a bona fide third party as being intended to obtain a personal or professional advantage while performing the duties assigned to them

In this context:

Standard D.2.4.1.

They shall ensure that any parallel exercise of a liberal profession or function does not, and cannot reasonably be relied upon by a bona fide third party to cast doubt on their independence, objectivity and impartiality in the performance of their duties.

Standard D.2.4.2.

They shall ensure that any parallel exercise of a liberal profession or function does not involve the misuse of the resources of the body where they exercise functions or the exploitation of its name and reputation.

Standard D.2.4.3.

They shall submit, within one month taking up their duties, a declaration of their professional activities to the Head of the Directorate-General or, failing that, to the Head of the Directorate responsible for personnel matters in the institution concerned.

Standard D.2.4.4.

They shall refrain from entering into any form of contract of any kind whatsoever with the body in which they exercise their powers and with the bodies supervised by it, which may confer a benefit on them or on third parties. This prohibition shall also apply to spouses or partners, their dependent children and to any company or firm in which the member of Seconded officials or special adviser is a major shareholder or a partner in a partnership, limited partnership or limited liability partnership, or has the status of a senior manager.

Standard D.2.4.5.

On termination of their duties for any reason whatsoever, seconded officials and special advisers shall make a declaration to the Head of the Directorate-General responsible for personnel matters of the institution concerned, if any, or to the Head of the Directorate responsible for personnel matters, concerning the professional activity they will pursue.

Standard D.2.4.6.

For a period of twelve (12) months after their departure, they must obtain a leave of absence upon application to the Ethics Committee of article 74 of Law No. 4622/2019 for any professional or business activity related to the activity of the entity in which they are employed, if it may create a conflict of interest.

D.2.5. Confidentiality

Seconded officials and special advisers shall exercise their functions, taking particular care to protect confidential official information and sensitive personal data.

In this context:

Standard D.2.5.1.

Ensure the protection of data and information relating to the privacy and family life of citizens, in strict compliance with the relevant European and national legislation.

Standard D.2.5.2.

They strictly follow the policies, specific protocols and guidelines issued by the Data Protection Officer of the organisation and cooperate with him/her in order to ensure confidentiality in the management of personal data.

Standard D.2.5.3.

Implement, within the operation of the office or body exercising their responsibilities, appropriate organisational and technical measures to ensure the integrity of any personal data they manage, in cooperation with the body's cybersecurity unit.

Standard D.2.5.4.

They shall not disclose to third parties, inside or outside the office or the body in which they exercise their functions, classified, secret or top secret documents which come to their knowledge in their capacity or in the course of their duties.

Standard D.2.5.5.

They shall not use, for their own benefit or for the benefit of a third person or undertaking, confidential information and documents which come to their knowledge in the exercise of their functions.

D.2.6. Respect for the institutional framework for regulating lobbying activities

Seconded officials and special advisers, as institutional actors², shall respect and apply the general and specific provisions of the regulatory framework for the exercise of influence over State institutions, avoiding any action or conduct that would constitute a breach of that framework.

For this reason:

Standard D.2.6.1.

They shall at all times act in accordance with the law and the principles of integrity, transparency and equal treatment of interest representatives.

Standard D.2.6.2.

They shall not communicate with interest representatives who are not registered in the Transparency Register.

Standard D.2.6.3.

They shall not impede the exercise of influence, provided that they are carried out in accordance the provisions of the relevant institutional framework.

Standard D.2.6.4.

Inform the National Transparency Authority in case of violations of the relevant institutional framework.

Standard D.2.6.5.

They shall submit to the National Transparency Authority an annual declaration on their communications interest representatives, with a view to providing information on the timing of the communication, the identity of the interest representative, the policy area and the type of decision.

D.3. Respect for people and the environment

D.3.1. Ethical behaviour towards colleagues

Seconded officials and special advisers shall behave towards their colleagues in the institution in which they exercise their functions with courtesy, respect, fairness and empathy.

In this context:

²YA No. GGADDT 271/7073 "Determination of the institutional bodies referred to in paragraph b' of Article 3, as well as the sanctions imposed on them in case of violation of the obligations of Article 5 of Law No. 4829/2021 in accordance with par. 1 of Article 13 of Law No. 4829/2021 (A' 166)' (B' 2293).

Standard 3.1.1.

They cooperate with their colleagues in a spirit of good faith, honesty and sincerity, with the aim of optimising the performance of their work - service action.

Standard 3.1.2.

They behave with courtesy and respect towards their colleagues.

Standard 3.1.3.

They assume all liability arising from their acts or omissions.

Standard 3.1.4.

Develop with their colleagues relationships of constructive communication, mutual respect, cooperation and solidarity, with the aim of jointly managing the problems and challenges that arise.

D.3.2. Ethical behaviour towards citizens and society

Seconded officials and special advisers entrusted with the task of providing services to citizens or business representatives shall behave in an ethical, courteous and professional manner.

For this reason:

Standard D.3.2.1.

They always behave responsibly, seeking to achieve the best possible result for the organisation.

Standard D.3.2.2.

They shall ensure the development of relations of communication, good faith cooperation, sincere consultation and exchange of views with trade unions, non-governmental organisations and other representatives of civil society, with a view to serving the public interest.

D.3.3. Promotion of industrial peace and safety

Seconded officials and special advisers shall respect diversity, shall in every way preserve the dignity of the individual and shall promote through their conduct industrial peace within the organisation's circles.

In this context:

Standard D.3.3.1.

Avoid behaviour, acts, practices or threats that are intended to cause, lead to or are likely to lead to physical, psychological, sexual or financial harm, whether they occur in isolation or repeatedly.

Standard D.3.3.2.

Avoid behaviour that has the purpose or effect of violating the dignity of the person and creating an intimidating, hostile, degrading, humiliating, humiliating or aggressive environment.

Standard D.3.3.3.

Avoid any conduct that may be perceived as unjustifiable discrimination or unfavourable treatment or the dissemination of malicious comments or insults to any person on the basis of race, colour, sex, national or ethnic origin, ancestry, religious or other beliefs, disability or chronic illness, age, marital or social status, sexual orientation, identity, characteristics or gender expression.

Standard D.3.3.4.

Ensure the protection of any individual or colleague who is subjected to any form of harassment, discrimination or bullying by encouraging them to make an internal complaint (e.g. to the Integrity Advisor) or by voluntarily informing any relevant supervisory authorities.

Standard D.3.3.5.

Work with internal (e.g. Integrity Advisor) and external bodies and/or agencies with competence in harassment, inclusion and equality issues.

D.3.4. Respect for the environment

Seconded officials and special advisers shall carry out their duties in an environmentally conscious manner and conduct themselves in a way that promotes green growth.

In this context:

Standard D.3.4.1.

Reduce the waste of paper and other materials and intangible natural resources, taking advantage of the opportunities offered by modern information and communication technologies.

Standard D.3.4.2.

They shall ensure the conservation of electricity, in the context of the operation of the office or body for which they are responsible, by switching off appliances and other available equipment when not in use.

Standard D.3.4.3.

Limit, as far as possible, the use of substances harmful to the environment (e.g. single-use plastics) and make use of the relevant recycling facilities provided by the body for which they exercise their responsibilities.

D.4. Professionalism

D.4.1. Promoting the prestige of the institution and the institution of temporary staff; special advisers

Seconded officials and special advisers shall exercise their functions in a way that promotes the prestige of the institution in they are employed and the confidence of civil society in the institution of Seconded officials - special advisers.

In this context:

Standard D.4.1.1.1.

They shall ensure that their actions and omissions do not lead to abuses of authority, respecting the hierarchy within the organisation in which they exercise their responsibilities.

Standard D.4.1.2.

They shall ensure quality of the services they provide to the particular office or body in which they exercise responsibilities, seeking excellent results in the management of the responsibilities entrusted to them.

Standard D.4.1.3.

They shall demonstrate exemplary conduct in every aspect of their professional career, both in their public duties and in the context of any parallel professional or business activity or liberal profession or function.

Standard D.4.1.4.

They shall report in good faith to their superiors any incidents that come to their attention that affect the authority of the institution or the institution of temporary agents - special advisers, and especially in the case of illegal actions or behaviour, they shall make use of the available internal and external channels for lodging complaints.

Standard D.4.1.5.

They express their personal views in a decent manner, both in private discussions and on social , taking care in particular to ensure that the manner and style of their positioning makes it clear that they do not express the official position of their office or the body where they exercise their responsibilities.

D.4.2. Good daily behaviour

Seconded officials and special advisers shall behave with due care and professionalism when they are present in the private office or body in which they perform their duties.

In this context:

Standard D.4.2.1.

They do not consume alcohol or other substances and do not smoke in the workplace, in addition to applying the smoking prevention policy issued by the institution where they exercise their responsibilities.

Standard D.4.2.2.

Comply with health and safety measures at work, as specified in legislation, in order to protect the health, hygiene and welfare of people in their working environment.

Standard D.4.2.3.

They shall carry out the tasks assigned to them within the timetable set by their supervisor, informing him/her in good time in cases where there is a risk of delay or impossibility of completion.

Standard D.4.2.4.

When they leave the organisation for any reason, they shall comply with the applicable departure policy and shall deliver, with a receipt, to their supervisor, the physical and digital records they have kept, informing in a complete, clear and valid manner whoever has been appointed to replace them, of any pending cases.

D.4.3. Adequacy

Seconded officials and special advisers shall ensure the continuous acquisition of digital knowledge and skills, seeking through their work to provide a high quality service to the institution and society.

In this context:

Standard D.4.3.1.

Strengthen their digital skills and develop initiatives to model, reorganise, simplify and streamline the processes followed by the private office where they exercise responsibilities, as well as by other staff of the institution.

Standard D.4.3.2.

They exploit the potential of modern information and communication technologies, such as cloud computing systems.

D.4.4. Proper use of the organisation's assets

Seconded officials and special advisers shall ensure the proper use and protection of the assets of the institution where they exercise their functions.

In this context:

Standard D.4.4.1.

Maintain in good condition the material and technical equipment (e.g. computer, telephone, printers and scanners) made available to them by the institution, using it exclusively and only to serve official needs.

Standard D.4.4.2.

They do not waste or use the available material resources and consumables in an inappropriate manner.

Standard D.4.4.3.

When they leave the organisation for any reason, they shall ensure that the material and technical equipment allocated to them is delivered with proof to the competent service of the organisation.

D.5. Special obligations of officials serving as Directors in private offices and as supervisors in the Presidency of the Government

The Seconded officials serving in the positions of Directors in the private offices and in the positions of supervisors in the Presidency of the Government set an ethical example, providing the impetus for the creation of a safe working environment governed by the fundamental values and principles of this Code.

In this context, in addition to the above specific standards of conduct, they are also bound by the following obligations:

Standard D.5.1.

They shall exercise their responsibilities with respect for the staff of the Office and the institution, taking particular care to ensure compliance with the principle of equal treatment.

Standard D.5.2.

They seek to build a working environment free of violence, harassment, intimidation and physical or psychological abuse.

Standard D.5.3.

Provide ongoing support to the staff of the office where they exercise responsibilities with information and advice on how to properly manage conflicts of interest and ethical dilemmas.

Standard D.5.4.

Inspire, guide and motivate the staff in the office where they exercise responsibilities, with a particular focus on the effective and fair handling of any conflict situations or complaints.

Standard D.5.5.

They seek to prevent corruption in the context of the office where they exercise their responsibilities, by promoting the principles integrity and accountability.

Standard D.5.6.

Communicate to the staff of the office where they perform their duties the provisions of this Code and ensure compliance with it.

E. Exercise of supervision

E.1. Compliance with fundamental ethical values, the individual principles, obligations and specific standards of conduct set out in this Code shall be an obligation for seconded staff members and special advisers falling within its scope. Such seconded officials and special advisers shall comply voluntarily with the provisions of the Code, contributing, within their respective spheres of responsibility, to the creation of an environment of ethics, integrity, conduct and accountability within the bodies exercising their functions.

E.2. Violation of the obligations of this Code, where applicable and on a case-by-case basis, may constitute a disciplinary offence or a criminal offence, if provided for and established in the legislation in force, or entail the sanctions provided for in article 75 of Law No. 4622/2019, in accordance with the provision of par. 5 of Article 76 of the same law.

E.3. In the bodies exercising the responsibilities of temporary employees and special advisers, in accordance with the current institutional framework, the responsibility for supervising compliance with the content of this Code is exercised by the head (e.g. Minister), assisted by the Director of his/her private office, as well as by the Ethics Committee of the National Transparency Authority and the General Secretariat for Legal and Parliamentary Affairs of the Presidency of the Government, within the framework of their responsibilities.

E.4. Seconded staff members and special advisers may refer to the Integrity Adviser of the organisation they are assigned to resolve any ethical or moral dilemmas.

E.5. The fundamental ethical values, the individual principles, obligations and specific standards of conduct of this Code may be updated whenever necessary.

F. Dissemination, information and awareness raising

F.1. This Code is posted on the websites of the Ministry of Interior, the Presidency of the Government and the National Transparency Authority.

F.2. In the care of the Presidency of the Government, each seconded official and each special adviser shall receive an electronic copy of this Code at the e-mail address he/she provides when registering in the electronic list maintained.

F.3. The Presidency of the Government and the National Transparency Authority shall undertake training, capacity building, awareness raising and communication activities to inform both temporary officials and special advisors and civil society of the contents of this Code.

Z. Examples of moral and ethical dilemmas - self-assessment guide

This Section of the Code of Conduct sets out ten (10) practical questions of ethical and moral dilemmas, which temporary employees and special advisers serving in the Presidency of the Government and in the private offices of members of the Government, Deputy Ministers, as well as Secretaries General and Special Secretaries, including employees acting as Directors in the aforementioned offices³ are encouraged to answer.

These questions have a dual function. On the one hand, they have the character of practical examples of ethical dilemmas, most of which the member of Seconded officials or special adviser is likely to encounter in the performance of his duties. On the other hand, they serve as key points of a self-assessment guide, in an attempt by seconded officials and special advisers to assess the extent to which they have become familiar with the standards, provisions and general provisions of the Code of Conduct.

Each correct answer to the following questions gives the answering employee 10 points and therefore, the perfect score is 100 points. Depending on the sum of the correct answers, a qualitative assessment of the degree of familiarity with the Code standards is also provided.

³ Except for the private offices of Special Secretaries.

1. Questions

Question 1

In the context of your work with officials of the Ministry, you serve as a special adviser to the Minister, you have found, in view of the drafting and issuing of a circular, that a long-standing position of the service contradicts specific provisions of the Treaty on the Functioning of the European Union. What should you do?

- A. To inform the Minister, so that he can address the officials responsible for the formulation and maintenance of the official position which is contrary to specific provisions of European law.
- B. Take no action, since the post in question was created before your appointment to the Ministry, and providing information about it will target you among the officials.
- C. Inform the Minister and the officials, seeking to formulate a new official position, in accordance with European law, after cooperation.

Question 2

In the context of the operation of the private office of the Deputy Minister, in which you serve as a seconded official, an internal process of accountability has been launched for a major management failure in a case that you handled jointly with three other colleagues. The Deputy Minister has summoned one of your colleagues to a hearing, holding him solely responsible for the failure. What should you do?

- A. Do not take any action, since the colleague who was called to the hearing asked you to do so, and in doing so you will not jeopardise your position in the private office of the Deputy Minister.
- B. Personally inform the Deputy Minister about the colleagues who took over the management of the case and the actions of each of them, as well as the data - information that was used, so that each official assume his/her share of responsibility.
- C. Take all the responsibility before the Deputy Minister, trying to exonerate your colleagues, although in reality, the management failure is also due to their own acts or omissions.

Question 3

When the act of appointment is issued in the private office of the Secretary General of the Ministry, you contact the relevant unit to request the publication of your name and status on the Ministry's website. The official responsible will inform you that there is not yet a space on the website

of the Ministry, since in response to a question he had asked, he was informed that the publication of your data on the Internet is not compulsory. What should you do?

A. Ask the responsible official to inform you when a space is created on the Ministry's website.

B. Do not take any further action, because although you are aware that the publication of your name and status on the Ministry's website is mandatory, the responsibility for violating the legal framework does not belong to you, but to the staff of the competent unit.

C. To inform the competent official that publication of your name and status on the Ministry's website is mandatory, according to article 47A par. 1 of the Law. 4622/2019 and insist that, as soon as possible, a relevant space be created on the Ministry's website in order to post your details.

Question 4

With a view to selecting one (1) additional associate in the private office of the Minister where you have been posted as a temporary employee, you are entrusted with the responsibility of checking the qualifications of the CVs of three (3) candidates, as the Minister highly values your experience in human resources management issues. When examining the files of the candidates, you note that among the CVs is that of your good friend and best man, who you know is in a poor financial situation and is urgently seeking employment. What should you do?

A. Abstain from the process of evaluating the candidates' CVs if you feel that you cannot be impartial, since your decision may affect the interests of your best man.

B. To carry out the responsibility assigned to you without informing the Minister, in order help your best man, ensuring that he is selected for appointment.

C. Refrain from the process of evaluating the candidates' CVs in any case, informing the Minister, even if you reasonably believe that you could be impartial in making a final decision.

Question 5

In the context of developing good relations with the private office of the newly appointed Minister, of which you are the Director, X, a representative of a major construction company, proposes that you and your family attend a series of theatre performances as part of an annual theatre festival organised thanks to a major sponsorship by the company. In fact, despite your initial polite refusal, you are informed that X has left an envelope containing forty (40) first-class tickets for the entire theatre festival at the office of protocol

the private office, with your name written on the outside of the envelope. What do you need to do?

A. Return the invitations to the construction company and do not attend, you or any other member of the private office, any theatrical performance, as you are not legally entitled to accept the offer of services valued in monetary terms, including forms of entertainment or hospitality.

B. Attend some of the theatrical performances, as a courtesy gesture on your part, while the rest of the invitations should be given to the staff of your particular office. Moreover, accepting the invitations does not in fact constitute a bribe, since they were not offered as part of the management of a pending case of the construction company.

C. Attend all the theatrical performances, since accepting invitations does not constitute bribery, but be accompanied not by members of your family but by a different member of the particular office you are in charge of, in order to ensure the application of the principle of equal treatment of employees.

Question 6

As part of your work as a special adviser in a private minister's office, you often work with X, the managing director of a large consultancy firm, which undertakes the design and submission of investment dossiers for co-financed development projects to the Ministry. Over time, X, impressed by your expertise in managing investment dossiers and your networking within the Ministry, takes the liberty of proposing that you work alongside the Ministry and the company he manages on the same subject, after hours and exclusively in the afternoons. Naturally, you are concerned about accepting the proposal. What should you do?

A. Accept the work offer of the consultancy firm, since according to Law No. 4622/2019, the assignment of special advisor duties in private offices of Ministers does not imply the suspension of the exercise of the relevant profession or function.

B. Reject the consultancy firm's offer of employment, since acceptance of it would cast doubt on your independence, objectivity and impartiality in the performance of your duties as a special adviser to the Ministry, particularly since you will be working in the same field.

C. Inform the Minister, who in any case is responsible for deciding whether or not you can accept the job offer during the work in his or her private office.

Question 7

About a year after your appointment as a seconded ministerial official, during which time you have been assigned to oversee a specific portfolio, your friend and old colleague C is appointed as a managing director of a limited liability company overseeing your Ministry. You have a close friendly and professional relationship with Ms C. You have worked together successfully in the past on numerous projects, some of which have been particularly challenging. In view of the above, the C, after taking up its duties, invites you to resume your cooperation. In particular, it explains that, in order to avoid any issues arising your current work, and taking into account the specific procedures governing the company as a legal person governed by private law, it is preferable to sign a contract for consultancy services. Indeed, your C states that the tax and insurance treatment of project contracts is, among other things, more favourable than that of employment contracts. What should you do?

- A. Reject the tender for a project contract with the public limited company, as it is under the supervision of the Ministry in which you are working.
- B. Accept the offer to enter into a contract with the limited liability company, since your appointment as a temporary employee in the private office of the Minister does not entail the suspension of any other occupation or function, and does not act as a deterrent to entering into any other occupation or function.
- C. Send a question to the Ethics Committee of the National Transparency Authority, as it is competent to rule on professional issues concerning temporary employees and special advisors of the private offices of members of the Government.

Question 8

In the context of the recent reshuffle, the Minister in private office you served as special adviser was removed from office. For that reason, in order to look for a new job and because, in your opinion, the subject you were working on as a special adviser was within your interests, three (3) months after leaving the Minister's private office, you decided to send your curriculum vitae to Company K, which operates in a sector regulated by the Ministry in which you were working. Indeed, within a week, a representative of Company K invited you for an interview, at the end of which, impressed by your knowledge and experience in the field, he made you an offer of cooperation. What do you have to do?

- A. You must refrain from signing the employment contract described above, as for a period of twelve months from the date of completion of your duties you may not engage in any professional or business activity related to the activity of the Ministry in which you were employed as a special adviser.

B. Submit an application to the Ethics Committee of the National Transparency Authority in order to obtain permission before signing the described employment contract, as for a period of twelve (12) months from the completion of your duties, you are required to obtain permission from the Ethics Committee for any professional or business activity related to the activity of the entity where you were employed as a special advisor that may create a conflict of interest.

C. Sign the employment contract described above, if you wish to do so, as you bear no responsibility whatsoever for the fact that the Minister in whose private office you served as a special advisor has been dismissed.

Question 9

As part of your responsibilities as a seconded employee, in the position of Director, in the private office of the Deputy Minister, you receive on a daily basis, for supervisory purposes, confidential information and data of companies active in the field of investment services. Recognizing the value of the aforementioned confidential information in the market, since you are knowledgeable in the field, you contact your old friend and associate D, managing director of an investment services company, who proposes that you disclose to him confidential documents of his company's main competitor in the market, in exchange for the provision of special office space for your lawyer wife, which is located in close proximity to the local courthouse. What should you do?

A. Do not disclose to D the confidential documents of the competing company, as the consideration you are offering is too small compared to the benefit you can reasonably expect to obtain.

B. Not to disclose to D the confidential documents of the competing company, as it is prohibited to use for your own financial benefit or for the financial benefit of a third party confidential information and documents that come to your knowledge in the course of your duties.

C. Disclose to D the confidential documents of the competing company, you do not benefit yourself, but your wife does.

Question 10

In the private office of the Secretary General of the Ministry, where you serve as a seconded official, a private sector executive with excellent references has been assigned as a special advisor. Despite the unquestionable professional career of the above-mentioned executive, however, the officials of the private office quickly found that he was a person of a particularly irascible character. You personally found the same thing, as during

of a partnership you had, he insulted you with vulgar language. What should you do?

A. Report the incident to the Director of the private office, as such conduct, acts, practices or threats, whether isolated or repeated, intended to cause or likely to cause physical, psychological, sexual or financial harm, will not be tolerated in the context of the operation of the office.

B. Do not report the incident, giving a "second chance" to the Special Adviser to the Secretary-General, because it comes with excellent references and is sure to add value to the private office.

C. Do not report the incident, otherwise you will be seen as having betrayed your colleague, which will have important consequences for the confidence of other colleagues in you.

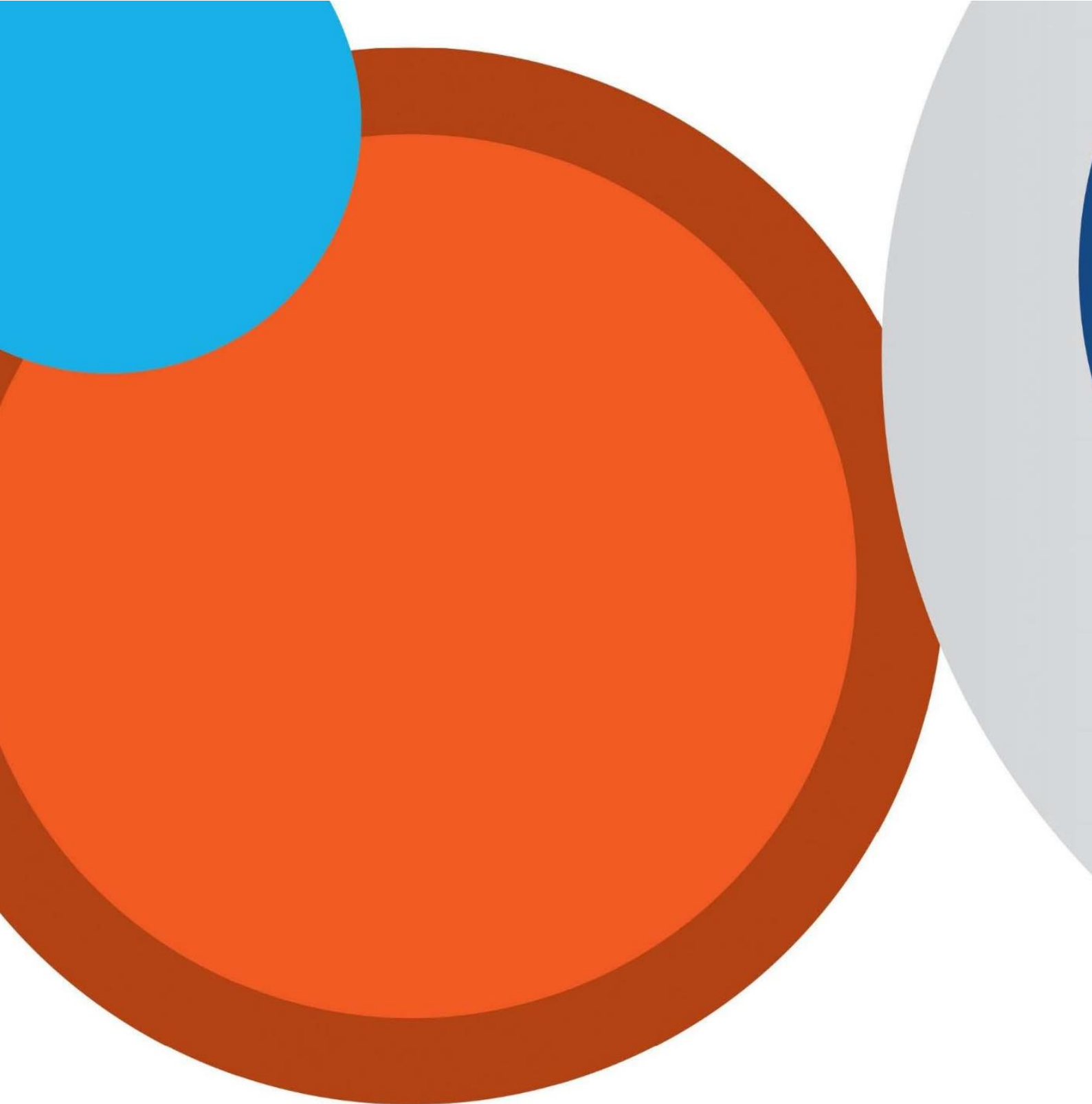
2. Correct answers - interpretation of result

α. Table of correct answers

Question number	Correct answer	Related model
1	A	D.1.1.
2	B	D.2.1.1.
3	C	D.2.1.
4	C	D.2.2.3.
5	A	D.2.3.2.
6	B	D.2.4.1.
7	A	D.2.4.4.
8	B	D.2.4.6.
9	B	D.2.5.5.
10	A	D3.3.

β. Interpretation of the result

Rating scale (%)	Number of correct Answers	Result message
80-100	≥ 8	Congratulations! You are aware of all (or almost all) your obligations under this Code of Conduct. However, do not be complacent! Ensuring your compliance with the values and specific standards of conduct of the Code requires your continued effort and, in particular, regular reading of the Code.
70-79	7	You did very well! You are aware of most of your obligations under this Code of Conduct. However, because you answered some questions incorrectly, we suggest that you reread the standards corresponding to your incorrect answers and retake the short test in the Self-Assessment Guide. Be sure that with just one repetition you will achieve better results!
50-69	5 - 6	It would be a good idea to read the Code of Conduct again in detail, as it is clear from your answers that you are ignoring a significant part of the ethics of Seconded officials and special advisers.
0-49	≤ 4	From your answers it seems that you are unaware of many of the standards of behaviour that you are required to follow in carrying out your duties. We suggest that you read the Code of Conduct in full detail and repeat the questions in the self-assessment guide as soon as you feel ready.



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