

DIRECTIVE NO. 15

GOVERNING POLICY FOR INTEGRITY PROMOTION, AWARENESS AND ASSESSMENT FOR PUBLIC EMPLOYEES

Issued on 20th April 2021 by the Principal Permanent Secretary in terms of the Public Administration Act (CAP 595).

1. PURPOSE AND APPLICABILITY OF THIS DIRECTIVE

1.1 The Public Administration Act (CAP 595) Article 4 (4) provides for identification of those posts within the public administration that, due to the nature of their role and responsibilities, are considered to be high risk posts. The Principal Permanent Secretary may issue directives applicable to the positions so identified.

1.2 This Directive applies to:

- those public employees in posts within the Public Administration that are listed in the Sixth Schedule of the PAA¹
- prospective candidates for Senior Management Positions (Category A - Headship Positions Scales 1-5)

2. GENERAL PRINCIPLES

Aware of the ever increasing ethical dilemmas that are often faced by public employees working in an increasingly more complex and faster paced working environment, Government is launching this Integrity Awareness Programme as a means with which to further uphold and promote the highest standards of ethical behaviour by all public employees. Setting high Governance standards is the pivot of any institution including the Public Administration as it acts as the custodian of taxpayers' money and executes on their behalf to ensure fairness and justice across the various aspects of social community life. The Public Administration not only needs to endorse such standards, but it should also have the attributes to adhere to them and to be able to take appropriate decisions in the face of dubious instances and possibly unethical decisions and behaviour.

2.1 This Integrity Awareness Programme is intended to achieve the following aims:

- *To up-scale the integrity standards for government officials by consciously subjecting them to a development programme that enhances their awareness and related pitfalls in relation to up-keeping ethical standards through their decision responses, especially in dilemmatic circumstances.*
- *To make public employees more knowledgeable and aware of their responsibilities of their actions and decisions in ethical dilemmatic situations.*

¹ Sixth Schedule is at Annex A

- *To enhance a spirit of integrity standards in the day-to-day activities and mark the public sector as an exemplar of positive risk management.*
- *To provide an opportunity for development and growth amongst public employees.*

2.2 In line with these aims, the Integrity Awareness and Support programme sets to address the visible responsiveness of decision-based ethical conduct in the Public Administration amongst senior and executive public employees as identified in 1.2 above.

3. THE INTEGRITY AWARENESS AND SUPPORT PROGRAMME

3.1 The programme is divided into two mutually inclusive parts:

Part 1: The Integrity & Ethics Awareness-Learning programme (IEAL). The IEAL is fully online and provides the candidate with important and critical highlights of proper conduct at the place of work based on appropriate codes of conduct. It provides instructions and reflections on how and why ethical dilemmas arise and what one should consider when deciding what is ethically best to do. The IEAL is obligatory for part 2.

Part 2: The Integrity Assessment: This involves a timed online multiple-choice assessment that candidates are obliged to sit for and pass.

The regulations and practices governing the Integrity Awareness and Support Programme are in Annex B.

The format and content of the programme may be reviewed and changed from time to time for continuous improvement. This directive shall remain applicable to the programme as revised.

4. IMPLEMENTATION

4.1 It shall be mandatory for all public employees in positions listed on the Sixth Schedule of the Public Administration Act, prospective candidates for Senior Management Positions and any other public employees invited to undergo the Integrity Awareness and Assessment Programme as provided for under this Directive to complete the two parts within the indicated timeframes in the invitation.

4.2 Failure to abide by this Directive is to be regarded as grounds for disciplinary proceedings.

4.3 This Directive applies indefinitely unless specifically revoked or amended by the Office of the Principal Permanent Secretary.

Mario Cutajar
Principal Permanent Secretary

Annex A

SIXTH SCHEDULE

List of those posts within the public administration that, due to the nature of their role and responsibilities, are considered to be high risk positions

[Article 4(4)]

Consideration of applications and decision-making

Building Industry Consultative Council

Skills Cards Officials

Commission for the Rights of Persons with Disability

Assistant Manager Grade 9 (Services team issuing blue badges)

Service Officers Grade 11 (Services team issuing blue badges)

Assistant Service Officers Grade 13 (Services team issuing blue badges)

Enforcement Officer Grade 11 (Accessibility team)

Identity Malta

Senior Managers responsible for decision-making and authorisation on applications for visas, Maltese citizenship, residence and issue of passports and travel documents

Senior Administrative Officer responsible for approval of passport applications and custody of passport booklet stock

Administrative Officer (Back Office)

Administrative Officer (Front Office)

Jobsplus

Unit Manager (Employment Licences)

Senior Executive Officer (ELU)

Executive Officer (ELU)

Malta Communications Authority

Chief, Spectrum Management and Technology

Senior Manager, Spectrum Planning and Authorisation

Malta Competition and Consumer Affairs Authority

Director, Regulatory Affairs

Senior Manager, Regulatory Affairs

Professional Officer - Scientist

Senior Professional Officer - Scientist

Professional Officer - Engineer

Senior Officer - Technical

Technical Officer – Laboratory

Malta Financial Services Authority

Members of decision-making and other bodies

Malta Individual Investor Programme Agency

Chief Officer, Risk and Compliance

Administrative Officers who deal with applications for residence and citizenship

Medicines Authority

Director (Licensing Directorate)

Director (Post-Licensing Directorate)

Director (Strategy, Operations and Regulatory Affairs Directorate)

Director (Advanced Scientific Initiatives Directorate)

Senior Quality Assessor (Licensing Directorate)

Medical Assessor (Post-Licensing Directorate)

Clinical Assessor (Licensing Directorate)

Assessor, Safety and/or Pharmacokinetics (Licensing Directorate/Post-Licensing Directorate)

Quality Assessor (Licensing Directorate)

Junior Assessor (Licensing Directorate/Post-Licensing Directorate)

Malta Police Force

Superintendent responsible for issuing weapons licences

Superintendent responsible for issuing fireworks licences

Superintendent responsible for issuing private guards services licences

Malta Tourism Authority

Director, Licensing

Manager, Licensing

Assistant Manager, Licensing

Executive, Licensing

Ministry for Health

Clerical staff at Burials (Environment Health Directorate)

Social Care Standards Authority

Head of Licensing and Legal Office

Manager, Licensing and Legal Office

Manager, Regulation and Standards Office

Assessors

Finance, procurement and resource management

All government organisations

Chief Officers responsible for finance

Financial Controllers

Heads of Procurement

Managers responsible for procurement

Officers and Executives responsible for procurement

EU Fund Managers

Ministries and departments of government

Directors responsible for financial administration

Assistant Directors (Procurement)

Grand Harbour Regeneration Corporation

Manager, Quantity Surveyor

Heritage Malta

Manager

Senior Executive Officer

Executive Officer

Identity Malta

Senior Manager responsible for revenue collection

Administrative Officer responsible for tenders and procurement

Advisor - tenders advice regarding tenders and procurement

Institute of Tourism Studies

Manager, Finance

Assistant Manager, Procurement

Jobsplus

Head of Finance, ICT and Procurement Division

Department Manager (Finance)

Unit Manager (Procurement)

Senior Executive Officers (Procurement)

Executive Officers (Payments)

Malta College of Arts, Science and Technology

Director, Capital Projects

Malta Communications Authority

Senior Manager, Finance, HR and Administration

Malta Competition and Consumer Affairs Authority

Senior Professional Officer - Finance

Administrative Officer – Procurement

Malta Council for Science and Technology

Deputy Director, Finance

Deputy Director - EU Framework Programmes

Executive Officer (Erasmus Funds Project Administrator)

Senior Procurement Manager

Malta Film Commission

Manager, Finance

Malta Freeport Authority

Executive, Finance

Medicines Authority (Inspectorate and Enforcement Directorate)

Director

Senior Medicines Inspector

Medicines Inspector

Enforcement Inspector

Junior Inspector

Enforcement Officer

Malta Residency and Visa Agency

Administration Officer collecting payments with applications for the residency by investment programme

Procurement Administrators

Ministry for Education and Employment

Senior Manager, Finance and Administration (European Union Programmes Agency)

Quantity Surveyors (Foundation for Tomorrow's Schools)

Head of Finance (Institute for Education)

Senior Manager, Administration and Finance (Institute for Education)

Ministry for Finance

Officers in charge of handling revenue and officers authorised to cancel dues by debtors
(Commissioner for Revenue, Customs Department)

Accountants (Commissioner for Revenue)

All public procurement officials (Contracts Department)

Ministry for Gozo

Officer in Grade 4 (Procurement Unit)

Senior Principal (Procurement Unit)

Principal (Procurement Unit)

Ministry for Health

Head, Revenue Collection (Mater Dei Hospital)

Manager, Revenue Collection (Mater Dei Hospital)

Manager, Contractual Services (Mater Dei Hospital)

Procurement and Administrative Officer (CPSU)

Chief Projects Officer (Foundation for Medical Services)

Procurement Coordinator (Foundation for Medical Services)

Ministry for Justice, Culture and Local Government

Assistant Director, Finance and Administration (Corporate Services Directorate)

Ministry for Foreign Affairs and Trade Promotion

Officer in charge of EU funds and projects (Office of the Permanent Secretary)

Ministry for the Environment, Sustainable Development and Climate Change

Officer i/c Revenue (Finance and Administration Directorate)

Ministry for the Family, Children's Rights and Social Solidarity

Senior Procurement Officer (Corporate Services Directorate)

Manager Grade 7, Finance Department (Commission for the Rights of Persons with Disability)

Manager, EU Project Management (Commission for the Rights of Persons with Disability)

Officers in charge of awarding benefits and officers authorised to cancel dues by debtors (Department of Social Security)

Director, Financial Governance and Planning

Assistant Director, Budgeting and Planning (Financial Governance and Planning Directorate)

Assistant Director, Finance (Gozo Overpayments Section)

Senior Principals (Gozo Overpayments Section)

Senior Procurement Officer (Ministerial Procurement Unit)

Senior Manager, Procurement (Social Care Standards Authority)

Ministry for Transport, Infrastructure and Capital Projects

Senior Manager, Finance (Office of the Permanent Secretary)

Manager, Compliance (Office of the Permanent Secretary)

Head, Quantity Surveying Unit

Assistant Head, Quantity Surveying Unit

Quantity Surveying Staff (PTO, IPSL, ERL)

Assistant Director, Contracts (Finance and Administration Directorate)

Procurement Section staff (Finance and Administration Directorate)

Director, Project Design and Engineering (Works and Infrastructure Department)

Director, Manufacturing and Services (Works and Infrastructure Department)

University of Malta

Director (Procurement Office)

Senior Administrative Officers (Procurement Office)

Inspections and enforcement

Building Regulation Office

Assistant Director, Enforcement

Enforcement Officers

Third Party Rights Officers

Energy Performance of Buildings Officers

Bureau of Air Accidents Investigation

Chief Investigator

Department for Industrial and Employment Relations

EIRA Inspectors

Department of Probation and Parole

Probation Officers

Housing Authority

Manager, Estate Management Inspectorate

Jobsplus

Senior Executive Officer (Compliance)

Senior Inspectors

Senior Executive Officer (Monitoring)

Executive Officers (Monitoring)

Lands Authority

Enforcement, Inspectorate and Compliance Director and staff

Technical Officers (Joint Office)

Local Enforcement System Agency

Regional Enforcement Officers

Malta Gaming Authority

Officers (AML, Enforcement, Due Diligence, Investigations, Compliance, Authorisations, Player Support)

Gaming Inspectors

Malta Industrial Parks Ltd

Inspectors

Malta Competition and Consumer Affairs Authority

Director, Inspectorate and Cartel Investigations

Inspector - Customer Enforcement

Market Surveillance Officer

Officer - Customer Enforcement

Inspector - Market Surveillance

Administrative Officer - Metrology

Senior Quality Manager

Technical Officer – Metrology

Malta Tourism Authority

Director, Compliance and Regulatory

Senior Manager, Compliance and Regulatory

Officer, Compliance

Executive Officer, Regulatory

Ministry for Finance

Director General, Operations (Commissioner for Revenue)

VAT Inspectors

Revenue Officers (Commissioner for Revenue)

Enforcement Officers (Commissioner for Revenue)

Inspectorate Officers (Commissioner for Revenue)

Inspectors of Customs

Ministry for Gozo

Principal (Licensing and Testing)

Assistant Principals (Licensing and Testing)

Principal (Trade)

Assistant Principal (Trade)

Senior Environmental Health Practitioner (Health Inspectorate)

Senior Environmental Health Officers (Health Inspectorate)

Ministry for Health

Licensing Inspector (Health Standards Directorate)

Standards Licensing Officer (Health Standards Directorate)

All Environmental Health Officers in all grades

Ministry for the Family, Children's Rights and Social Solidarity

Director, Benefit Compliance

Assistant Director, Investigations (Benefit Compliance Directorate)

Inspectors (Benefit Compliance Directorate)

Occupational Health and Safety Authority

Occupational Health and Safety Officers

Planning Authority

Assistant Director of Compliance and Enforcement

Social Care Standards Authority

Head of Inspectorate Office

Manager (Inspectorate Office)

Transport Malta

Airworthiness Inspectors

Flight Operations Inspectors

Inspecting officers for flight operations, approvals and licensing, ANS and aerodromes, air transport navigation, personnel licensing and general aviation

Senior Marine Safety Investigators

Marine Safety Investigators

Junior Marine Safety Investigators

Vessel Traffic Services Supervisor

Flag and Port Inspector

Port Security Compliance Inspector

Senior Port Inspector

Port Inspector

Annex B

REGULATIONS AND PRACTICES GOVERNING THE INTEGRITY AWARENESS AND SUPPORT PROGRAMME

The programme shall be governed and managed by the following regulations and practices:

Part 1:

- The Governance Action Directorate will periodically identify potential candidates in line with clause 1.2 above and communicate the list to the Institute for the Public Services (IPS). As the administrator of the system IPS issue these candidates with an email invitation that includes a link to the system. The system can only be accessed with the CORP account (for those who are gov employees) and eID for those coming from entities who do not have a CORP account.
- Login details will be provided to respective candidates.
- The IEAL is not a timed event; candidates can scroll back and forth through the programme but will typically take 90-120 minutes to complete.
- The IEAL is divided into three broad sections: Concepts, Insights and Integrity Framework.
- The IEAL has been developed as an interactive tool to make it interesting and also ease memory. The programme is filled with questions that candidates are asked to answer to test themselves and with other visually stimulating presentations to maximise the learning process.
- The assessment (Part 2) will follow Part 1 and cannot be done independently of Part 1. This IEAL is a prerequisite for sitting the Integrity Assessment.

Part 2:

- The assessment is composed of a number of items covering a wide range of multiple-choice questions.
- Each item has 3 responses, only one of which is correct.
- Candidates are encouraged to answer all questions in the time provided.
- All questions have an equal weighting.
- Any questions left out will be marked as zero; there is no negative marking.
- The items will be generated from a wider pool of items so as to ensure that different candidates are assessed upon a different pool of items and prevents candidates who are re-attempting the test to be presented with the same items in the previous test.
- Candidates have a maximum of 20 minutes to complete the test.
- There shall be a pass mark established for the assessment.
- Candidates can go back and forth to review the answers at any time during the testing session.
- Should the candidates finish the test before the time is up, candidates may select the 'Finish' button to submit. Otherwise the test will be submitted automatically once the time is up.

- Candidates will receive the result of their test by email immediately on completion of the test.

Other provisions:

- On passing the assessment, an e-certificate will be generated. e-Certificates using Blockchain Technology will be issued to the respective officer and a copy also sent to the People & Standards Division (P&SD) to go into the officer's online file on the Human Resource System.
- P&SD will inform the respective officers' superiors on the attainment of the e-certificate. Data on un/successful candidates will be sent to the responsible Permanent Secretary.
- If a candidate fails the first time, the candidate must repeat the assessment within 6 months from the first attempt.
- For employees on the Sixth Schedule of the Public Administration Act (PAA), failing a second time will mean that the employee cannot be considered for promotion to higher grades listed in said schedule before the lapse of two calendar years. In this case, the employee will be permitted to redo the assessment within 6 months of the 2-year lapse period.
- Prospective candidates for Senior Management positions (Category A) shall be required to undergo the Integrity Awareness and Assessment Programme and achieve a pass mark as part of the **Entry to Senior Management Programme** offered by IPS.
- Candidates for positions listed on the Sixth Schedule shall be required to undergo the Integrity Awareness and Assessment Programme and achieve a pass mark as part of the selection process to be eligible for appointment.
- A support unit has been set up within the Employee Support Programme (ESP) to provide professional support to those who have failed the assessment twice. The support unit will also provide support to those who have encountered or are going through ethical dilemmatic situations and would prefer to 'bounce off' these issues with third party professional staff to enable them to take better courses of action. The Governance Action Directorate, in collaboration with this Unit and IPS, may undertake outreach initiative in line with its role to support integrity within the Public Administration.
- The system can also be used as a screening tool prior to recruitment of employees not listed in the Sixth Schedule, therefore, any Ministry that wishes to utilise the system for selection processes must request authorisation from the Governance Action Directorate by submitting a list of officers/applicants who are to do the programme, and in turn the issue of invitations to indicted employees will be authorised by the Office of the Principal Permanent Secretary or his delegate.
- The test regulations and format apply to all grades and levels.
- Public employees on the Sixth Schedule of the PAA shall be obliged to repeat the assessment biennially.