

This translation of the principles of professional conduct applicable to staff members and external committee members of the Agency from French to English produced by Santé publique France is for information purposes only. Only the French version is authentic.

Structure of Santé publique France regarding professional conduct

PRINCIPLES OF PROFESSIONAL CONDUCT APPLICABLE to staff members and external committee members of the Agency

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Note: to simplify the text, male pronouns used in the text are understood to be neutral.

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A- STRUCTURE OF SANTÉ PUBLIQUE FRANCE

The standards of professional conduct system put in place by Santé publique France and its policy for managing and preventing conflicts of interest are designed to meet the following regulatory requirements, stemming from the French law called "Bertrand"¹ law, which followed the "Mediator® affair";

- French Law of 29 December 2011 on strengthening the safety of medicines and health products;
- French Decree ("décret") of 9 May 2012 on the public declaration of interests and transparency in public health and health safety;
- French Decree of 21 May 2013 approving the Health Expertise Charter;
- French Decree of 28 December 2016 relating to the public declaration of interests provided for in Article L. 1451-1 of the French Public Health Code and to the transparency of benefits granted by companies producing or marketing products for health and cosmetic purposes for human use;
- French Decree ("arrêté") of 31 March 2017 setting out the standard document for the public declaration of interests;
- French Decree of 30 January 2020 on monitoring standards of professional conduct in civil service;
- French General Civil Service Code, in particular Chapter III: Rules on cumulation (Articles L123-1 to L123-10);
- A practical guide for civil servants on the "risks of compromising probity with regard to gifts and invitations" published by the General Directorate for Administration and the Civil Service (DGAFP) in September 2022.

The main objective of this system is to ensure that everyone can be confident in the results of the institution's work, opinions and recommendations, and to avoid any challenge to the credibility and legitimacy of the agency as a result of a breach of the principles of transparency and independence set out in the regulatory texts and in the recommendations on professional conduct laid down by the agency.

The management of conflicts of interest is based on the principles of independent expertise and impartiality in decision-making related to health, health security and safety, pursuant to the Health Expertise Charter.

The system set up by Santé publique France is based on the following:

A-1- The Internal Committee on Professional Conduct ("Comité interne de déontologie" in French, CID)

Chaired by the Chief Scientist, the remit of the Internal Committee on Professional Conduct complements that of the Professional Conduct Officer of Santé publique France and the (external) Ethics and Professional Conduct Committee (CED). It is responsible for:

- drawing up recommendations on preventing conflicts of interest;
- analysing the declarations of interest made by external colleagues and Santé publique France employees;
- assessing the risks of conflicts of interest and proposing, where applicable, steps to prevent and manage these risks to the Executive Director.

The CID is made up of:

* Four permanent ex-officio members (representing the agency's cross-departmental remits and sitting *intuitu personae*):

- the Chief Scientist, who is the chair;
- the Civil Service Professional Conduct Officer of Santé publique France (Human Resources Director);

¹ After the name of the French minister in charge of Health at that time.

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- a representative of the Division for Communication and Dialogue with Society;
- a representative of the Quality and Risk Management Unit;

* At least seven permanent members, who are volunteers drawn from the agency's divisions (they represent the agency's business lines, preferably including the different regions and data analysis, and they sit *intuitu personae*).

A-2- The Ethics and Professional Conduct Committee (“Comité d’éthique de déontologie” in French, CED)

As defined in the French decree no. 2016-523 of 27 April 2016 on the creation of the agency, the Ethics and Professional Conduct Committee (CED) "is notably responsible for:

1. Delivering permanent oversight of best practices in the area of preventing conflicts of interest in equivalent institutions, especially those in foreign nations;
2. Providing opinions and evaluations that contribute to implementation of policies to prevent and manage conflicts of interest and the rules in force concerning conflicts of interest, in partnership with the agency's professional conduct officer. It is specifically consulted by the Management Board about the processes for implementing rules on professional conduct mentioned in parts 15 and 16 of article R. 1413-12;
3. Evaluating and formulating an opinion on the system in place to guarantee the independence of employees when they speak at public events, especially when these are organised or supported by private companies, trade unions, academic associations and societies or any other financial or social stakeholder;
4. Formulating an opinion, at the request of the executive director or on its own initiative, on any other specific situation that could call into question compliance with the code of conduct applicable to the agency's work;
5. Formulating opinions and recommendations, at the request of the executive director or Scientific Advisory Board, on any ethical issue raised by the scientific programmes and activities set up by the agency."

The CED is made up of seven members, appointed by a resolution of the Management Board on the recommendation of the executive director for a term of four years, chosen from persons recognized for their knowledge and skills in the field of professional conduct and ethics, and once their declared interests have been examined.

Any member of the Management Board, the Scientific Advisory Board or an expert committee, the agency's professional conduct officer, the executive director, and any agency employee may refer matters to the CED that are within its remit.

The CED issues its opinions and recommendations to the person or organization that referred the matter, to the Management Board and to the executive director of the agency. Its opinions are made public in compliance with privacy rules.

The CED carries out its duties in conjunction with the Internal Committee on Professional Conduct and the professional conduct officer. It issues an annual activity report that is sent to the Board of Directors.

A-3- Professional conduct officer

Pursuant to decree no. 2016-779 of 10 June 2016 relating to the professional conduct officer in health authorities and bodies, the Santé publique France professional conduct officer is appointed by the executive director, the agency having chosen to appoint him to its Ethics and Professional Conduct Committee. As a result, as a member of the CED, he participates in forming the opinions and recommendations issued by the CED on questions of professional conduct, and draws on them in the performance of his duties.

The professional conduct officer is appointed for a renewable period of three years and reports only to the executive director of the agency.

The professional conduct officer ensures that the agency takes the appropriate steps to guarantee that declarations of interest are collected from the persons subject to them and that any interests declared are examined. To this end, he informs the executive director of the organisational measures required to comply

with the obligations to declare interests and prevent conflicts of interest. He ensures that the agency has appropriate measures in place to prevent or put an end to any conflicts of interest that arise.

A-4- Civil service professional conduct officer

The civil service professional conduct officer is responsible for providing Santé publique France staff with any advice they may need to comply with the obligations and principles of professional conduct set out in Chapters I to IV of Title II of Book I of the French General Civil Service Code (dignity, impartiality, integrity, probity, neutrality, secularism, equal treatment, professional confidentiality, professional discretion, duty to inform, respect for seniority, restraint and loyalty).

In addition, the civil service professional conduct officer has specific expertise in managing conflicts of interest.

The agency's civil service professional conduct officer is the human resources director.

A-5- Scientific integrity officer

As recommended by the Ethics and Professional Conduct Committee in its opinion no. 2020-01 concerning the French Charter of Professional Conduct for Research Professions, Santé publique France has chosen to appoint a scientific integrity officer and to sign the French Charter of Professional Conduct for Research Professions.

The scientific integrity officer is appointed by the executive director of Santé publique France for a period of four years. The remit of the role is as described in the guidelines of the High Council for the Evaluation of Research and Higher Education (“Haut Conseil de l'évaluation de la recherche et de l'enseignement supérieur” in French, HCERES) of 2017, with the exception of those duties already covered by the agency's professional conduct officer and by existing internal arrangements relating to professional conduct. It includes the following:

An oversight function:

- Ensuring that the institution promotes and encourages compliance with the principles of professional conduct set out in the Code of Conduct for Research Professionals through all available means, in particular by providing training for all staff working for the institution;
- Ensuring that the procedures put in place by the institution to deal with breaches of scientific integrity are clear, known to all and transparent;
- Monitoring changes in the laws and regulations governing research practices and ensuring that this information is disseminated within the institution;
- Being a first point of contact for requests for information and providing advice on compliance with principles of professional conduct;
- Ensuring that the procedure for registering public health and environmental alerts is implemented.

Preventing and dealing with breaches of scientific integrity:

- Preventing breaches of scientific integrity by setting up mediation for all conflict situations (determining authors before publication, data sharing, etc.) linked to research activities that are brought to its attention;
- Investigating all allegations of breaches of scientific integrity, with a guarantee of absolute confidentiality;
- Ensuring that the institutions to which the staff involved (whistleblowers and persons implicated) belong are represented during the investigation of a case or during the examination of situations where scientific integrity is in question;
- Ensuring that the agency takes the appropriate steps to guarantee that declarations of interest are collected from the persons subject to them, that any interests declared are examined and that it puts an end to any conflict of interest situations.

Reporting on the breaches handled:

- Reporting to the head of the institution on the status of ongoing cases and newly reported or observed situations;

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- Issuing the final report on the collection of objective evidence to the heads of the institutions concerned in the event of an allegation involving several institutions, while complying with the principle of confidentiality;
- Reporting on its activities and each year writing a confidential report for the head of the institution covering all its activities and the situations that have arisen.

In order to guarantee his independence in fulfilling his remit, the agency's scientific integrity officer is appointed from outside the agency, based on his research skills and qualifications, thereby ensuring that he cannot be involved in decision-making processes within the institution, reporting only to the executive director of Santé publique France. He will work with the professional conduct officer and the Ethics and Professional Conduct Committee (CED), in particular on training staff and raising awareness about matters of scientific integrity and professional conduct. In this respect, he is a permanent observer of the CED panel.

A-6- Whistleblower protection officer

Transposing European Directive no. 2019/1937 of 23 October 2019 on the protection of persons who report breaches of Union law, French Law no. 2022-401 amends the general whistleblower protection scheme introduced by the ["Sapin 2" law of 9 December 2016](#).², Decree 2022-1284 of 3 October 2022, on the procedures for collecting and processing whistleblower reports, was created, in order to improve the protection of whistleblowers, in addition to the implementation of this law.

Pursuant to these provisions, the whistleblower protection officer is appointed by the executive director of Santé publique France for a renewable period of two years. Santé publique France has appointed its "whistleblower protection officer" from outside the agency in order to guarantee his independence. This person was chosen from the Ethics and Professional Conduct Committee so that he could offer sufficient knowledge of the agency's activities and remit.

The role involves:

- Establishing a suitable procedure for receiving reports;
- Receiving alerts and warnings from staff, informing as soon as possible any employee who issues an alert that it has been received, advising him of the guaranteed confidentiality he is entitled to and of the foreseeable reasonable period for the alert to be examined for suitability;
- Examining the merits of the alert received following the established procedure, specifically by checking its plausibility and seriousness, and ensuring that the employee who reported the incident meets, on first analysis, the requirements set out in Law no. 2022-401;
- Ensuring that the incident is followed up and processed within the deadlines set, in accordance with the procedure defined in advance, and that any events or facts reported are dealt with by the agency;
- Additionally ensuring that the employee who reported the incident is kept regularly informed, in accordance with the procedures set out above, of any action, or lack thereof, taken in response to his alert;
- Providing the necessary guarantees and protection for employees who report incidents and for employees who are implicated by such reports. These guarantees and protections must, in all cases, prevent them from suffering or fearing any retaliatory measures based on an alert, provided that it was made in good faith and in compliance with the applicable procedures;
- Ensuring that employees, as well as any occasional external collaborators affected, are properly informed about the procedure put in place, which must not have the effect of limiting their right to make such a report, nor the protection to which they are entitled.

² Law of 9 December 2016 on transparency, the fight against corruption and the modernisation of economic life, called "Sapin 2" in French after the name of the French Minister for economy and finance at that time.

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B- PRINCIPLES OF PROFESSIONAL CONDUCT APPLICABLE AT SANTÉ PUBLIQUE FRANCE

B-1: Introduction

a- Purpose

The purpose of this document is to define the framework for professional conduct within which Santé publique France, hereinafter referred to as "**the agency**", operates and to set out the rules that people working with the agency must follow in performing their duties.

b- Scope

The document applies to all persons used by the agency to fulfil its remit. They include:

Internal employees, to whom sections B-2 and B-3 of this document apply, i.e. any person employed by the agency, in particular, under an employment contract (including those holding multiple posts and those in the healthcare reserve corps), an apprenticeship contract, a vacation contract, an internship agreement, a secondment agreement or a hosting agreement and, in addition, civil servants (in a normal working position or on secondment);

Members of the agency's committees, to whom sections B-2 and B-4 of this document apply, i.e. the members of the agency's governance bodies and the members of the committees as defined in the typology of Santé publique France's committees.

c- Formalities and prior notifications

The French version of this document is published on the agency's Intranet and Internet sites.

In addition, as this document has a general scope relating to standards of professional conduct in the field of public health, the agency has also submitted this document for review to:

- its professional conduct officer;
- its civil service professional conduct officer;

for approval to:

- the agency's Executive Management,

and for information to:

- its Ethics and Professional Conduct Committee
- its Committee for Employee Welfare

In addition, Santé publique France has drawn up recommendations for the "Prevention of conflicts of interest - Santé publique France's relationships with the private sector (*Industry or entity with special or commercial interests*)". These recommendations are intended to answer practical questions about preventing conflicts of interest and the agency's relationships with the private sector. They are issued by the Internal Committee on Professional Conduct and approved by the agency's executive director; they are updated whenever necessary and made available to all Santé publique France employees on the Intranet.

B-2- Principles of professional conduct common to internal employees and committee members

The principles of professional conduct set out in this section apply to all persons listed in part b- and they are collectively referred to in this section as "**colleagues**".

d- Duty of probity and independence

Complete honesty is required when performing duties. It is forbidden to receive money or benefits in exchange for influencing the work carried out within the agency.

All employees must avoid any situation that could call their independence into question.

e- Duty of impartiality

The duty of impartiality demands that issues are treated with the utmost neutrality and that positions taken are based on objective factors. The slightest breach of impartiality can taint the actions of a colleague, discredit all the work in which he has participated, and even discredit other work carried out by the agency.

This means that colleagues should not work on a matter in which they have a direct or indirect private interest, nor should they allow personal interests to prevail. They must act independently of any outside influence, use only the assessment criteria of their scientific disciplines, base their conclusions and judgements on an objective analysis of all the data available to them, and pay particular attention to uncertain and/or contradictory data.

f- Duty of professionalism

- Performing duties personally:

All agency colleagues are appointed in a personal capacity for their recognised skills. A colleague may not delegate his duties to a third party, except delegation of signature provided for by a decision of the executive director.

In an assessment or scientific advice, the colleague speaks in his personal capacity. Opinions expressed during or at the end of his assignment and in connection with it should not be expressed in the name of his organisation unless he has been named as the representative of that organisation.

- Obligation of means:

All agency colleagues are required, with the means at their disposal, to make their best efforts to devote themselves to their assignment.

This means they must carry out their work rigorously and, where appropriate, in accordance with scientific methodology. It is important to exhaustively document how the assignment is carried out, as this will mean that in the event of a dispute, it will be possible to establish that the assignment was carried out in line with the gold standard for the discipline.

g- Duty of confidentiality

All agency employees are bound by professional confidentiality. In this respect, unless given prior authorisation, they must not disclose any facts, information or documents of which they become aware in the course of or in connection with carrying out their duties.

Nor shall they disclose the work they produce, or that is produced individually or collectively by other employees of the agency, unless authorised to do so by the agency.

The duty of confidentiality does not preclude reporting an incident under conditions laid down by law.

h- Duty of restraint

No agency colleague may speak on behalf of the agency, including about his own remit, without having been duly authorised to do so. However, he may become the agency's spokesperson on a subject within his remit if the agency instructs him to do so.

Public expression on matters relating to the agency's remit must not prejudice its interests or bring it into disrepute. Similarly, without prejudice to the freedom of opinion that they are entitled to, colleagues must refrain from expressing either in writing or verbally any outlandish opinions or offensive or materially inaccurate criticism likely to undermine the public service with which they work. The same vigilance must be applied to posts on social media.

i- Ban on receiving gifts

The persons mentioned in article L. 1451-1 of the French Public Health Code (i.e. the agency's directors, the members of its committees and its staff) and any persons participating ad hoc in the agency's work should not receive benefits in kind or in cash, in any form whatsoever, directly or indirectly, from private companies operating in the agency's field of expertise (except as provided for in article L.1453-7 of the French Public Health Code).

j- Obligation to declare interests when speaking publicly

Pursuant to paragraph 2 of article L. 1451-2 of the French Public Health Code, the persons or members referred to in point i are required to disclose to the public their main interests, in particular any interests they have with companies and institutions producing or operating healthcare products, with consultancy bodies working on these products or with companies working in the agency's field of expertise, when they speak about subjects that may be related to the aforementioned products or fields, in particular, when:

- at a public event;
- teaching at a university;
- delivering ongoing training or therapeutic education;
- appearing in written or audiovisual media or in any written or online publication.

B-3- Additional principles applicable to internal employees

The provisions of this section apply to the agency's internal employees.

k- Declaration of interests (DI)

- Before taking up their duties, internal staff with a contract of employment complete a declaration of interests (DI) drawn up in accordance with the specifications of the standard document provided for in part II of article R. 1451-2 of the French Public Health Code.
- At the request of the Human Resources Division, the agency's Division for Scientific and International affairs will examine the employee's declared interests before he takes up his duties.
If there are interests declared that are likely to generate a risk of a conflict of interest, the Division for Scientific and International affairs will ask the Internal Committee on Professional Conduct to analyse the situation (depending on the nature, strength and continuation of the declared interests) and to make recommendations to the Executive Director on the action to be taken.
On this basis, the executive director decides whether or not to accept the appointment.
- Once they have taken up their post and pursuant to article L. 1451-1 and parts I and III of article R. 1451-1 of the French Public Health Code, internal employees whose posts are listed in resolution 2017-2 approved by the agency's Management Board on 13 March 2017, must complete a public declaration of interests DoI ("déclaration publique d'intérêts" in French DPI) by logging on to the ministerial portal DPI SANTE <https://dpi-declaration.sante.gouv.fr/dpi-webapp/app/authentication>, which is under the responsibility of the French Minister for Health. These DoIs are made public on the website <https://dpi.sante.gouv.fr/dpi-public-webapp/app/consultation/accueil> once the non-publishable part has been removed.
Pursuant to Article R. 1451-12 of the French Public Health Code, the professional conduct officer has access to this information.
- Internal employees subject to DoI must update their declaration any time their interests change. Even if nothing has changed, they are required to update their DoI at least once a year.

l- Second jobs

All internal employees are prohibited from holding any paid or unpaid employment with private companies operating in the agency's field of expertise.

For any other paid or unpaid activity (apart from the cases mentioned in the previous paragraph) that an internal employee may wish to carry out outside his post and on an ancillary basis, he must first ask for his line manager's opinion using a specific form that is sent to the Human Resources Department, which informs the chief scientist who, together with the director of human resources, is responsible for determining whether this additional role is likely to generate a conflict of interest.

For further information, please refer to the information memo on the Intranet at: http://tamtam.ansp.local/intranet/pii_43865/note-d-information-cumul-activites

Where paid or unpaid work is authorised, the employee must, at the very least, declare it when updating his DoI, if required to complete one. Any other additional activities related to the agency's remit must also be declared in the DoI.

m- Benefits and gifts

- The following are considered to be benefits or gifts:
 - sums of money, legacies and discounts;
 - travel;
 - personal invitations to non-professional events (sporting events, shows, etc.);
 - any service or object with a market value;
 - invitations to attend a paid professional event for free without the employee's involvement;
 - perishable or shareable goods;
 - low-value "promotional" items;
 - business meals.

- The rule, set out in point i- of this document, that receiving benefits from private companies operating in the agency's field of expertise is prohibited, applies to all internal employees.

- All internal employees must also refuse benefits offered by public or private bodies other than those mentioned in the above paragraph (in particular institutional partners, contract holders or contractors).

Any attempt at corruption must be reported to the employee's line manager.

It should be noted that gifts or benefits offered by a representative of a foreign country on the occasion of an institutional visit are authorised, as these gifts or benefits are part of a protocol.

n- Participation in professional events

As part of their duties, internal employees may be asked to take part in professional events (such as congresses, symposia, seminars and conferences) organised by public or private bodies, either as speakers or delegates.

This article does not apply to professional training events provided by public or private bodies, for which a specific system has been set up.

- **Prior agreement:**

Any time an employee participates in a professional event, this must be approved in advance by his line manager. Once approval has been obtained, the internal employee must declare that he will be absent attending a professional event (training course/conference) in accordance with the procedures laid down by his department.

If participating as a speaker, the associated documents (presentation, poster, journal publication, etc.) will be approved in advance by the line manager. Within a few days of the event, the employee must report back to his line manager and/or department on the key information and main discussions from the event.

- **Costs covered by the organiser:**

Registration fees, travel expenses and accommodation must not be paid for by the organiser.

As an exception to the above, when the employee is presenting at an event, the registration fees may be paid by the organiser. This will be considered on a case-by-case basis, depending on the nature of the company organising the event.

o- Participation in panels

- Santé publique France committees:

Any internal employee who participates, as a member or as an invited guest, in a committee as defined in the typology of Santé publique France committees (with the exception of expert committees), is considered to be a participant. As such the provisions in force for the prevention and management of conflicts of interest apply in the same way as for external members.

The employee's declaration of interests is analysed by the committee's scientific coordinator before each meeting and in light of the agenda.

- Panels, commissions and committees of a third-party organisation involved in the agency's field of expertise:

If any internal employee wishes to become involved in a panel, commission or committee of a third-party organisation involved in the agency's field of expertise, this must be approved in advance by his line manager and the Executive Management.

Once agreed, if involvement requires participation *intuitu personae*, the employee must declare that he will be absent by booking the corresponding days of leave in the human resources system.

If this involvement falls within the scope of Article L. 1451-1 of the French Public Health Code, the employee must update his declaration of interests³.

p- Participation in expert scientific assessments or advice

Internal employees cannot be members of Santé publique France's expert committees.

As for involvement in providing expertise externally, this implies *intuitu personae* participation in expert scientific assessments or advice carried out by national or international public institutions. Any participation in this kind must be approved in advance by the employee's line manager and the agency's Executive Management.

Once agreed, the employee must declare that he will be absent by booking the corresponding days of leave in the human resources system.

If this involvement falls within the scope of Article L. 1451-1 or L. 1452-3 of the French Public Health Code, the employee must update his declaration of interests³.

q- Scientific publications

The production of intellectual works within the meaning of article L. 112-2 of the French Intellectual Property Code is exercised freely.

However, in accordance with the agency's rules of procedure, any publication, communication, conference or public appearance by an employee in direct connection with his professional activity at the agency may be made in his personal capacity or in the name of the agency, and requires prior authorisation from his line manager, who may refer the matter to the executive director as necessary. The line manager must respond within one month. This period is extended if the matter is referred to the executive director.

Any communication with the media is subject to prior agreement from the executive director.

Publications that fall within the scope of the agency's remit but were initiated before taking up employment with the agency must mention the position previously held, without mentioning the agency.

³ This applies to cases where the panel, commission or committee in which the employee is involved has been identified by decision of the third-party organisation as a body subject to the obligation to declare interests under article L. 1451-1.

If the scientific publication does not fall within the agency's field of expertise, it is made by the employee in his personal capacity. It requires prior authorisation from his line manager, who may, if necessary, refer the matter to the executive director.

r- Participation in the evaluation of a project for the allocation of a grant

All internal employees involved in the selection of a project for the allocation of a grant must ensure that their impartiality cannot be called into question.

If he has a direct or indirect interest with a project coordinator, a participating team or the project being evaluated, the employee must report this immediately to his line manager.

The line manager examines the declared interest in light of its relationship with the evaluation requested and removes the employee from the selection procedure if the declaration is believed to constitute a conflict of interest.

s- Participation in the initiation or execution of a public contract

All employees involved in initiating or executing a public contract must ensure that their impartiality cannot be called into question.

A conflict of interest⁴ exists when a person is unable to avoid the risk of bias due to the existence of competing interests (personal interests versus the agency's interests).

To initiate a public procurement procedure or participate in its execution, an employee must sign a declaration stating that he has no actual or potential conflicts of interest in relation to the contract in question. He must declare that there are no facts or circumstances, past, present or likely to arise in the foreseeable future, that might call into question his impartiality and independence.

Any change in circumstances must be reported immediately to his line manager and to the department responsible for purchasing and contracts.

An employee with a conflict of interest does not take part in the procedure (or in monitoring the delivery of contracts) and is replaced.

t- Obligations when a contract ends

When an internal employee's contract comes to an end, he must respect the principles of confidentiality and restraint as set out in point's g- and h-.

Employees must not disclose to anyone whatsoever any plans, studies, designs, projects, achievements or software created or used in the course of their duties at the agency, whether this was on behalf of the agency's partners or for the agency itself. The same applies to information and results arising from work carried out in the agency or by one of its partners.

All materials or media containing any type of information and all agency property that has been in the employee's custody or possession must be returned, and the employee must not retain any materials or media, nor any copies or property belonging to the agency.

u- Non-compliance by internal employees

In accordance with the agency's rules of procedure, failure by an internal employee to comply with an obligation set out in this document may result in disciplinary action.

In addition, under article L. 1454-2 of the French Public Health Code, a fine of €30,000 is imposed on any person, including internal employees who are subject to a Dol, who knowingly fails to write or amend their

⁴ Article 48 of Ordinance no. 2015-899 of 23 July 2015: "A conflict of interest is any situation in which a person who participates in the public procurement procedure or is likely to influence its outcome has, directly or indirectly, a financial, economic or any other personal interest that could compromise his impartiality or independence in the context of the public procurement procedure."

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declaration of interests in order to update the information contained therein, or who provides false information that undermines the accuracy of the declaration.

B-4- Additional principles applicable to committee members

The provisions of this section apply to members the agency's committees.

v- Public declaration of interests (DoI)

- Pursuant to article L. 1451-1 and part I of article R. 1451-1 of the French Public Health Code, members of the Management Board and of committees (as defined in the Santé publique France typology of committees) must, when they take up their posts, complete a public declaration of interests (“déclaration publique d’intérêts” in French, DPI) by logging on to the ministerial portal DPI SANTE <https://dpi-declaration.sante.gouv.fr/dpi-webapp/app/authentication>, which is under the responsibility of the French Minister for Health. These DoIs are made public on the website <https://dpi.sante.gouv.fr/dpi-public-webapp/app/consultation/accueil> once the non-publishable part has been removed. Declarations must be updated any time interests change. Even if nothing has changed, DoIs must be updated at least once a year. Pursuant to Article R. 1451-12 of the French Public Health Code, the professional conduct officer has access to this information.
- All committee members must ensure that the interests declared in connection with the committee's remit are exhaustive and, where applicable, consistent with the information about them available on the public database transparence.sante.gouv.fr.
- The declarations are analysed by the division in charge of the committee in light of its remit, if necessary seeking an opinion from the Internal Committee on Professional Conduct, and again before each meeting in light of the items on the agenda. Pursuant to paragraph 6 of part I of article 1451-1 of the French Public Health Code, the persons referred to in paragraph 1 of this part may not, subject to the penalties laid down in article 432-12 of the French Penal Code, take part in the work, deliberations or votes of these committees if they have a direct or indirect interest in the matter being examined.
- Pursuant to article L. 1454-2 of the French Public Health Code, a fine of €30,000 is imposed on any person who knowingly fails to write or amend their declaration of interests in order to update the information contained therein, or who provides false information that undermines the accuracy of the declaration.

w- Expert committees

To ensure that the expert scientific assessment and advice process complies with the principles of impartiality, transparency, plurality and the adversarial process set out in article L.1452-1 of the French Public Health Code, the provisions of part v- apply to the members of the expert committees.

- The declarations are analysed by the division in charge of the committee, if necessary with the Internal Committee on Professional Conduct, in light of the scope of the committee and again before each meeting in light of the items on the agenda.
- In the event of a conflict of interest concerning the expert scientific assessment or advice envisaged, the agency may, pursuant to the Health Expertise Charter⁵ and if the conditions

⁵ French Decree no. 20123-413 of 21 May 2013 approving the Health Expertise Charter provided for in article L.1452-2 of the French Public Health Code

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set out therein are met, seek the expert's input by other means, such as a hearing or written contribution.

- Members of an expert committee must not receive any personal remuneration from businesses operating in the field of expertise concerned, nor should they participate in the scientific or strategic advisory activities of these businesses during their term of office.

x- Publicising the composition of committees

The roles and remits of the committees are presented on the agency's website, to raise awareness of the committees and their contribution to the agency's work,. Another reason for this is to comply with the principle of maximum transparency regarding the committees on which the agency relies to implement its work programme.

In view of the typology of Santé publique France committees, the following rules apply:

Type of committee	Publication of the list of committee members on the website	Comments
<p>Evaluation panels (evaluation of calls for proposals, evaluation of projects and evaluation of scientific articles):</p> <ul style="list-style-type: none"> * Temporary bodies * Permanent bodies 	<p>No, provided on request</p> <p>Yes, as soon as members are appointed</p>	<p>A list of the members of these committees can be provided on request.</p> <p>As these are permanent committees responsible for the periodic evaluation of the agency's scientific partners, their composition is made public, as are the terms of office for which members are appointed, their remits, their objectives and the ways in which they operate.</p>
<p>Dedicated Scientific Advisory Board (in particular for studies and surveys.)</p>	<p>Yes, as soon as members are appointed</p>	<p>These scientific advisory boards are set up on a long-term basis around major surveys or studies.</p>
<p>Expert committees:</p> <ul style="list-style-type: none"> * Permanent expert committees dealing with multiple issues/mandates * Expert committees set up to respond to a specific mandate, possibly on a sensitive subject 	<p>Yes, as soon as members are appointed</p> <p>Yes, when the committee's work is published</p>	<p>In order to avoid any risk of external influence or pressure on members prior to publication of the work.</p>
<p>Other committees:</p> <ul style="list-style-type: none"> * Steering committees * Thematic Support Committees * Interface committees 	<p>No, provided on request</p>	<p>A list of the members of these committees can be provided on request.</p>

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y- For civil servants

Members of the agency's committees who are French civil servants are advised to check with their main employer whether or not it is necessary to have authorisation to carry out additional activities on an ancillary basis and to ensure their situation complies in accordance with the provisions of article 10 and subsequent articles of French decree no. 2020-69 of 30 January 2020 relating to monitoring standards of professional conduct in civil service.