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COMPARATIVE LEGAL ANALYSIS OF THE LEGAL FRAMEWORK AND BEST PRACTICE OF SOME FOREIGN COUNTRIES ON THE WORKING CONDITIONS CREATED FOR CIVIL SERVANTS AND EMPLOYEES

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ABSTRACT

This research, integral to the examination of foreign countries' best practices in civil service reform and the enhancement of social guarantees for civil servants within our nation, employs a comprehensive set of research methods. The study aims to glean insights from the transformative experiences of countries undergoing radical public administration reform. Methodologically, a comparative analysis is employed to assess the strategies and policies in the field of public service. The research focuses on nations like Georgia, Estonia, Poland, Croatia, Vietnam, and Singapore, utilizing case studies and in-depth interviews with key stakeholders.

The conclusions drawn from this research shed light on the effectiveness of various reform measures and their implications for civil service enhancement. The findings advocate for the adaptation of successful practices observed in the aforementioned countries. Moreover, the research suggests specific legislative adjustments to align our civil service framework with international best practices. The proposed legislative modifications aim to foster a more responsive, accountable, and efficient civil service, ultimately contributing to the overall development and well-being of our society.

Introduction

The imperative examination of foreign countries' best practices in civil service reform and the augmentation of social guarantees for civil servants within our nation stands as a critical endeavor. This research undertakes a focused exploration, employing a comprehensive set of research methods to glean insights from the transformative experiences of countries currently undergoing radical public administration reform. The methodological approach includes a comparative analysis, concentrating on nations such as Georgia, Estonia, Poland, Croatia, Vietnam, Singapore, and Uzbekistan. Through the utilization of case studies and in-depth interviews with key stakeholders, the research aims to unravel the strategies and policies that have proven effective in reshaping public service dynamics.

As a review article, this work synthesizes and analyzes existing literature and empirical evidence [1, pp. 138–148] on civil service reform and social guarantees. It provides a comprehensive overview of the methodologies employed in the studies of selected countries, offering a nuanced understanding of their experiences. The subsequent sections delve into the research methods employed, the nuances of transformative experiences in selected countries, and the conclusions drawn from these investigations. Furthermore, the research puts forth actionable suggestions, including specific legislative adjustments, with the overarching goal of fostering a more responsive, accountable, and efficient civil service – a crucial facet for the overall development and well-being of our society.

Materials and methods

The methodological framework involves a meticulous examination of the strategies and policies implemented in the field of public service in each country. Case studies are instrumental in providing in-depth insights into the practical aspects of civil service reform, while interviews with key stakeholders contribute valuable

qualitative data. The selection of these nations is deliberate, representing a mix of diverse socio-political contexts and reform trajectories.

The systematic review process involves categorizing and synthesizing information on civil service reform, social guarantees, and related topics. Analytical tools such as content analysis are applied to extract meaningful patterns and trends from the gathered materials. This methodological rigor ensures the reliability and comprehensiveness of the synthesized information.

By systematically reviewing and analyzing the available materials, this research aims to offer a nuanced understanding of the diverse approaches to civil service reform, highlighting successful strategies that can be adapted to the specific needs and context of our nation. The subsequent sections of this review will present the findings derived from this methodological approach and draw conclusions based on the synthesized information.

Research results

In these countries, public administration and public service are organized on the basis of the rule of law; that is, every act of public administration and public service is regulated by legislation. The most important legal sources of civil service in these countries are the Constitution and special civil service laws. For example, the main legal framework governing labor and employment in the Republic of Vietnam is regulated by the Labor Code and various decrees issued by the Ministry of Labor, Disability and Social Affairs (MOLISA) and other relevant government agencies.

Below, the experience of these countries will be considered separately with the example of their laws [2].

GEORGIAN EXPERIENCE: Principles: The Civil Service system in Georgia, as outlined in the Law of Georgia “On Civil Service,” is grounded in principles such as recruitment, professionalism, political neutrality, and transparency. Admission to the Service: Entry into the civil service occurs through a competitive process [3].

Legal Framework: This legislation encompasses the rights and responsibilities of civil servants, addressing matters related to wages, working conditions, and ethical conduct. The functioning of the civil service operates under the framework of an employment contract. **Ethical Standards:** The Code of Ethics articulates the ethical standards and conduct expectations for civil servants in Georgia. **Salary Structure:** Civil servants are entitled to a fixed salary for their duties, with the fairness of wages serving as a crucial indicator of financial support. This norm ensures reliable material and social protection, encompassing a salary that sustains a decent standard of living and additional payments. **Salary Details:** The baseline official salary for civil servants in Georgia is 1100. Approximately 301,000 individuals in the country, including school teachers, firefighters, police officers, and employees of ministries, state agencies, and municipal companies, receive salaries from the budget [4]. **Business Trips:** When civil servants embark on foreign business trips, particularly in the rotation to diplomatic and consular organizations abroad, travel expenses, compensation, and associated social guarantees adhere to the legislation of Georgia. **Leave Entitlements [5]:** Civil servants are granted 30 calendar days of work leave. State employees may take leave at their own expense for up to one year as per the law. The work leave specified can be utilized in a distributed manner. **Maternity Leave:** Civil servants are entitled to 183 calendar days of paid pregnancy and maternity leave, extendable to 200 days in specific circumstances. The leave period includes compensation equivalent to the full salary and can be distributed at the discretion of the civil servants. **Medical Protection:** In cases where an official is unable to continue in their position due to health reasons, they may transition to another compatible role through open selection or be released from service. Public employees have access to medical care, encompassing services, hospitalization, prescription drugs, and other treatments.

Pension System: A funded pension system has been implemented. **Housing Benefits:** Certain civil service positions may include housing benefits or allowances. **Accident and Occupational Disease Coverage:** Social benefits may cover workplace accidents and occupational diseases, with compensation payments established to assist the family of a deceased civil servant in unfortunate circumstances. **Labor Legislation Oversight:** The Department of "Labor Inspection" under the Ministry of Health, Labor and Social Protection of the Population oversees compliance with labor laws, occupational health and safety regulations, and other employment-related standards.

THE ESTONIAN EXPERIENCE. The Estonian civil service, regulated by the Civil Service Act [6], employs 2.8% of the working-age population. The workforce comprises 27,935 individuals, with 22,418 in state institutions and 5,517 in local government bodies. Notably, 64% of civil servants have higher education, exceeding the national average of 43%. The law establishes principles, including recruitment, political neutrality, professionalism, and integrity [7].

Appointment and Termination procedures are defined, emphasizing competition-based selection for appointments and outlining circumstances for dismissal. Civil servants operate under indefinite employment contracts, with a probationary period of up to four months. The law specifies rights and responsibilities, covering wages, working conditions, and ethical conduct.

Regarding Salary, the law delineates the salary system, allowances, and benefits. The average monthly salary is 2,072 euros, showing an increase of 11.9%. Ethical standards for civil servants are outlined, as well as the duration of the main vacation (35 calendar days). Business trips are regulated, detailing reimbursement procedures and social protection for accompanying family members during long-term trips abroad. The law provides for various expenses, including travel, accommodation, insurance, and education-related costs.

In case of delayed vacation pay, a late payment penalty is applicable. Provisions for public holidays are aligned with the Law “On Labor Contracts [8]. “The issue of leave is decided by the authorized person. The law defines the procedure for reimbursement of expenses related to the business trip of a civil servant and issues of social protection of family members. The government determines conditions, expenses, and allowances for long-term business trips abroad.

The law also defines the procedure for increasing the state pension based on seniority, with additional payments calculated according to work experience. A guilty verdict for intentional crimes results in the loss of age pension increase rights.

POLAND. The most important legal source of the Polish civil service is the Constitution of the Republic of Poland. According to Article 153 of the Constitution of Poland [9], “The corps of civil servants in public administration bodies shall operate in order to ensure the performance of public duties in a professional, conscientious, impartial, and politically impartial manner. The prime minister is the head of such a civil servant’s corps. In addition, Article 65 of the Constitution states that every person has the freedom to choose and continue his profession, to choose a place of work. The minimum level of remuneration or the procedure for determining its level is determined by law. Article 66 of the Constitution states that everyone has the right to work in safe and hygienic conditions. The methods of exercising this right and the obligations of employers are determined by law. The employee has the right to release fixed days from work as well as annual paid vacation. The maximum number of working hours is determined by law. According to Article 67 of the Constitution, a citizen has the right to receive social security when he is unable to work due to illness or disability, as well as when he reaches retirement age. In Poland, there is a special law (“Civil Service Act”) that regulates the activities of civil servants. This law defines the legal

basis of the recruitment, employment, rights, and obligations of civil servants in Poland.

The main principles of the civil service system are expressed in the state constitution and legislation on civil service. The main features of the civil service [10] system in Poland are as follows:

Merit-based system: Recruitment, promotion and dismissal of civil servants are based on their qualifications and performance rather than their political affiliation.

Professionalism: Civil servants are expected to maintain a high level of professionalism and provide effective and impartial service to the government and the public.

Legal basis: The Law on Civil Service dated November 21, 2008, defines the principles, rights, and obligations of civil servants. It covers aspects such as working conditions, salaries, transfers, and referrals.

Career Advancement: Civil servants have opportunities for career advancement through a well-defined system of promotion, transfer, and training programs.

Protection of rights: The law provides for mechanisms to protect the rights of civil servants, including the right to appeal against decisions and actions affecting their work.

Political neutrality: Civil servants are expected to maintain political neutrality in their positions to ensure the impartiality of public administration.

Rotation: The law permits the transfer of civil servants within the same office or between offices based on the needs of the administration and the qualifications of the civil servant. Certain conditions and exclusions apply.

Disciplinary measures: The law establishes the procedure for taking disciplinary measures against civil servants who violate their obligations or violate the rules of etiquette.

Appeal Mechanism: Civil servants have the right to appeal to higher authorities or authorities against decisions affecting their work.

Benefits: Government employees often receive benefits such as health care, pension plans, and other benefits as part of their employment package.

The working conditions of civil servants are regulated by international labor standards and national legislation. In particular,

Working hours:

According to the Civil Service Act, the standard working time for civil servants in Poland is usually set at 40 hours per week. This corresponds to the length of the general working week in the country. These hours are subject to some variation depending on the specific needs and nature of the civil service role.

Overtime work: In cases where civil servants are required to work overtime, the act provides for overtime work rules. Overtime usually requires additional compensation or time off in lieu of overtime pay. Specific terms and rates of overtime payment are determined by relevant regulatory documents and labor contracts.

Rest time:

Public servants are entitled to rest periods to ensure their well-being and compliance with labor standards. The law usually defines the rules on breaks during the working day as well as rest periods between working days.

Flexible working-time mode:

The Civil Service Act [11] may allow some flexibility in working hours based on the specific needs of the civil service. For example, some roles may involve irregular working hours or on-call duty, which may affect standard working hours and compensation arrangements.

Collective agreements:

In addition to the provisions of the Civil Service Law, collective agreements negotiated between relevant authorities and employee representatives may specify working hours, rest periods, and related matters for civil servants in more detail.

Holidays:

Annual leave: The standard annual leave entitlement for civil servants in Poland is usually between 20 and 26 working days,

depending on length of service and other factors. The longer the employee has worked, the more vacation days he is entitled to.

Sick leave: Civil servants in Poland are entitled to sick leave in case of illness or injury. The length of sick leave and related benefits depend on specific circumstances and the length of service.

Maternity/Paternity Leave: Maternity leave for female civil servants in Poland is usually 20 weeks. Paternity leave for male civil servants is usually around 2 weeks.

Special Leave: Special leave may be granted for various reasons such as personal emergencies, family events or special circumstances. The duration of special leave may vary depending on the situation and the policy of the organization.

The Polish Civil Service Act also defines the working hours of civil servants. For example, in Article 97 of this law, working time schedules are introduced for employees, which allow them to extend working hours up to twelve hours a day, depending on the type and organization of work. However, the total hours worked on such schedules shall not exceed an average of forty hours per week over any given period of time, not exceeding twelve weeks.

Paying for labor:

In Poland, the remuneration system of public servants is regulated by the Law on Remuneration of Public Officials.

Here are some key issues regarding the salary of civil servants in Poland:

Basic Pay: Civil servants get a basic pay commensurate with their position and level of responsibility. This base salary can vary significantly depending on the specific role.

Pay Grades: Civil servants are often divided into pay grades or pay scales. Each grade has a minimum and maximum salary range. The exact salary in this range depends on factors such as experience, qualifications, and performance.

Position and Rank: The salary of civil servants depends on their position and rank in the civil service hierarchy. Senior positions usually come with higher salaries.

Years of service: In most cases, the salary of civil servants increases with their years of service.

Bonuses and Allowances: Civil servants may be entitled to various bonuses and allowances such as performance bonuses, hazard allowances (for certain roles), and other special allowances depending on the nature of their work.

Pensions and benefits: The salary package of civil servants also includes contributions to pension plans and other benefits, including health and social security.

Annual Increments: Periodic salary adjustments, including annual increments to account for inflation, may be part of the salary structure.

The Law of Poland “On Civil Service” stipulates that “Remuneration for the work of a civil servant consists of the basic salary specific to a certain position, a special reward arising from the specific nature of the performed tasks, and a reward for long-term employment in the civil service (Article 85).”

The basic salary for a specific position and the payment of a civil service bonus according to the level of service held are calculated using multipliers of the base amount determined in accordance with special principles in the Law “On the Budget”.

A member of the civil service corps may be paid additional wages (bonus) for the performance of additional duties assigned to him by the employer from the funds allocated for the payment of wages during the period of performance of such duties.

CROATIA. The civil service system in Croatia is regulated by the Law on Civil Servants, adopted on July 15, 2005 [12]. Civil servants in Croatia, like in many other countries, receive various social benefits as part of their employment package. These benefits may include:

Job stability: Civil service jobs often offer a higher level of job security than jobs in the private sector. This stability can provide peace of mind to civil servants and their families.

Working hours: Civil servants are obliged to observe the established working hours of the body in which they work. They work and use this time to fulfill their duties.

During working hours, civil servants cannot leave the workplace without permission.

The law does not specify specific working hours for civil servants, but the Labor Code of the Republic of Croatia [13] defines standard working hours as 42 hours per week. This corresponds to the length of the general working week in the country. It should be noted that the working hours of a civil servant may change depending on the place of work.

Retirement and Retirement Benefits: Funded Retirement System

Health Care: Most civil service positions have access to comprehensive health plans that provide government employees and their family members with medical care and treatment as needed.

Paid Leave: Civil servants generally enjoy paid leave, which includes vacation days, sick leave, maternity/paternity leave, and other forms of leave. The law also does not specify the period and duration of annual leave granted to civil servants.

Housing benefits: Some countries offer housing assistance or subsidies to government employees to provide them with adequate and affordable housing.

Childcare and family benefits: Many civil service positions have benefits such as childcare, family leave, and financial assistance for their children’s education-related expenses.

Employee Assistance Programs: These programs provide access to counseling and support services for mental health, stress management, and personal issues.

Institute of Mediation. Mediation in public service.

Mediation is the resolution of disputes arising between civil servants;

Mediation should be resorted to in the following disputed (conflict, dispute) cases:

a) Disputes between higher and lower civil servants on operational issues;

b) Assessment of the work and efficiency of high-ranking civil servants;

c) Complaints regarding cases of personal harassment, discrimination, abuse of office.

Article 69 of the Civil Service Law defines the procedure for “Electing mediators”. According to it, civil servants in each state body elect one or more civil service mediators (1 mediator for every 50 civil servants). Civil servants performing tasks related to the planning and management of human resources, as well as employees performing similar tasks, can be elected as mediators.

The civil servant who receives the most votes is appointed as mediator for a term of three years.

If the mediator is not elected, the head of the executive power of the state body appoints a person to temporarily perform the duties of the mediator.

Social protection: A civil servant who is transferred to another position more than 100 kilometers from his place of residence must be provided with a place of residence, suitable housing for himself and his family. If a different procedure is provided by separate legal documents, the cost of living will be paid by the state body.

A civil servant and his family shall be entitled to compensation for increased expenses incurred due to separation from his family until housing is provided. This norm defines the working conditions created for civil servants in the Republic of Croatia.

VIETNAM EXPERIENCE. The main legal framework governing labor and employment in Vietnam includes the Labor Code [14] and various decrees issued by the Ministry of Labour, Disability and Social Affairs (Molisa) and other relevant government agencies. Civil servants are subject to the Labor Code, but there may be special rules for the public sector.

The working conditions of civil servants in Vietnam may vary depending on their specific positions and agencies. However, some common aspects of working conditions include:

The Constitution of the Republic of Vietnam has only one norm on civil service. Article 96 of the Constitution enumerates the powers of the government. According to him, the management of the public service is the responsibility of the government.

“Implementation of unified management of the national bureaucracy; manages public service in personnel, civil servants, officials, and state bodies; reviews and investigates citizens’ complaints and complaints; fights against power and corruption in the state apparatus; directs the work of ministries, ministerial-level bodies and government bodies, and people’s committees at all levels; and guides and supervises the implementation of the legal duties and powers of the people’s councils.

Recruitment: Civil servants are recruited by examination, except for the cases provided for in paragraph 2 of this article. The form and content of the examination for the recruitment of civil servants should be suitable for each field and profession and should ensure the selection of persons with the appropriate qualities, qualifications, and capabilities.

People who meet all the conditions provided for by the law and who voluntarily commit to work for at least 5 years in mountainous, bordering, island, remote, deep-dwelling or ethnic minority areas or areas with special socio-economic difficulties are recruited through selection (competition) for public service. will be done.

Recruitment of civil servants by examination or selection (competition) is determined by the government.

Appointment of ranks and titles of civil servants

1. The ranks of civil servants include:

- a) Senior specialist and equivalent;
- b) Chief specialist and equivalent;
- c) Specialist and equivalent;
- d) Technical and equivalent;
- e) Employee

Service Housing: Provides funds for the construction of public investment housing for staff and civil servants to rent during

rotation or tour of duty. After the end of this period, personnel and civil servants return the service houses to the agencies, organizations, and units that manage them.

Departments, organizations, and departments managing service homes ensure the purposeful use of these homes.

Promotion:

Personnel and civil servants who have performed their public duty at an excellent level can be awarded in accordance with the legislation on incentives. Personnel and civil servants who have been awarded for their achievements or services have the right to receive early salary increases and, when necessary, to be assigned to higher positions by agencies, organizations or units.

Salary and benefits. Civil servants have the right to receive regular wages, bonuses, and other benefits stipulated in the labor laws and their labor contracts.

The minimum wage level is the minimum wage paid to an employee who performs the simplest work under normal working conditions in order to ensure the minimum living conditions of the employee and his family, consistent with the conditions of socio-economic development.

The minimum wage is determined by region and is determined on a monthly and hourly basis.

The minimum wage level is established based on the minimum living conditions of employees and their family members; their relationship with the market wage rate; the consumer price index and economic growth rate; labor supply and demand; employment and unemployment; labor productivity; and the solvency of enterprises.

Wages for overtime and night work:

1. An employee who performs work outside of working hours is paid from the wage unit or the wage actually paid to his current job, in particular, in the following amounts:

- a) It is equal to at least 150% on normal working days;
- b) At least 200% on weekends;

c) is equal to at least 300%, except for holidays and paid holidays, holidays and paid holidays for employees who receive daily wages.

2. An employee engaged in night work shall be paid an additional fee in the amount of at least 30% of the salary calculated based on the wage unit or actually paid wages for the work performed on regular working days.

3. An additional fee in the amount of 20 percent of the salary calculated on the basis of the salary unit, in addition to the payments provided for in clauses 1 and 2 of this article, shall be paid to the employee who performs work outside of working hours at night.

Vacation: Vietnam's labor law provides for various types of vacations, including annual leave, sick leave, maternity leave, and special leave. Civil servants are entitled to such leave in accordance with the Labor Code.

Holidays:

1. An employee who has worked for the employer for a full 12 months is entitled to a fully paid annual leave as specified in his employment contract, which is determined as follows:

- a) twelve working days for employees working under normal conditions;
- b) for minor employees, employees with disabilities or persons performing heavy, dangerous or hazardous work - fourteen working days;
- c) sixteen working days for persons performing extremely difficult, dangerous or hazardous work.

Personal leave, unpaid leave

1. The employee has the right to take a fully paid personal leave in accordance with the following procedure and must notify the employer:

- a) marriage: 3 days;
- b) having a child or marrying an adopted child: 1 day;
- c) death of his parents or adoptive parents; mother-in-law or adoptive father-in-law; her husband; or his descendant or adopted child: 3 days.

Workplace Safety: Employers, including government agencies, are responsible for providing a safe work environment and ensuring compliance with occupational health and safety regulations.

Pension: Article 31, Part 2 and Article 60, Part 2 of the Law on Personnel and Civil Servants of November 13, 2008. The staff shall notify his governing body, organization or division in writing of the exact time of retirement six months before the date of retirement. Three months before the personnel's retirement, his governing body, organization or department shall make a decision on his retirement.

THE SINGAPORE EXPERIENCE

The Singapore Civil Service has about 150,000 skilled civil servants in 16 ministries and over 50 state councils as of August 2023. 86,000 of them work in ministries, and the remaining 64,000 work in various fields of public service.

Section 9 of the 1959 Singapore Constitution [15], Sections 102-119, sets out the legal status of the Civil Service. If we look at the government guarantees in Singapore, it can be seen that a mechanism has been formed for civil servants to rise to the top of the career ladder based on their existing potential. Service activity is formed on the basis of modern material and technical base. By law, Singapore civil servants are required to complete a 100-hour refresher course each year.

In Singapore, the relationship between employer and employee is primarily governed by the employment contract between them. As a general rule, parties can enter into contracts as they see fit, subject to labor law and certain limitations. Employment contracts contain several important clauses, such as: position, term of employment contract, remuneration package, working hours, employee benefits, and rules of conduct.

Under Part IV of the Act, employees earning less than S\$2,600 per month are provided with additional protections ("holiday, working hours and overtime, holidays, annual leave, sick leave, severance pay, retirement

benefits, annual additional payments, and other variable benefits").

According to the law, employees are given various types of compensation in addition to their regular wages. Benefits may include sick leave, annual leave, maternity leave, incentives and bonuses, relocation assistance, medical allowances, pension fund contributions, housing allowances, child education allowances, childcare allowances, travel allowances, etc.

The salary paid to an employee depends on the position and skills required. An annual bonus equal to at least 1 month's salary, commonly known as 13th month pay, has become the norm in Singapore. The exact amount of the annual bonus may vary according to company policy and usually depends on the employee's performance as well as the company's performance. The details of the annual bonus policy are usually specified in the employment contract. In Singapore, during good economic times, it is not unusual for employees to receive an annual bonus of 2-3 times their monthly salary.

According to the Labor Law, employees have the right to work no more than 8 hours a day or 44 hours a week. Employees are entitled to 1 day off per week (from midnight to midnight is considered a non-working day).

According to the Labor Law, an employee has the right to a paid vacation on public holidays, but the exact dates can be changed to another day by mutual agreement between the employer and the employee. If Sunday falls on a holiday, the following Monday is considered a paid holiday. In addition, if the day off falls on a day when the employee is not required to work according to the contract, he will be paid an additional day's wages or compensation in the form of an additional day off instead.

According to the Labor Law, all employees are given at least 7 days of vacation per year. In practice, all employees are granted approximately 14 days of annual leave per year (well above the minimum required leave). The duration of annual leave depends

on the contract between the employee and the employer, but during the first year and for each additional year of work, 1 additional day. Unless otherwise stipulated in the employment contract, annual leave up to half a working day is considered 1 day leave. An employee's annual leave will be canceled if he is fired for illegal behavior, if he is fired without permission for more than 20% of the working day in a month, or if he does not use the leave in each year of 12 months of continuous work.

According to the law, if the employee has worked for the company for at least 6 months: The employee is entitled to 14 days of sick leave and 60 days of hospitalization leave per year. If employed for less than 6 months: the employee is entitled to 11 days of sick leave per year and 45 days of hospital leave (including 11 days).

There is no statutory requirement in Singapore to provide private health insurance benefits to employees. Working professionals who are Singapore citizens or permanent residents are automatically provided with medical insurance called Medishield - the basic level of insurance protection for all Singaporeans.

According to the law, female employees who have worked for more than 3 months can be granted pregnancy and maternity leave. Existing female employees are entitled to a total of 16 weeks of leave. Employers are prohibited from dismissing employees on maternity leave. If an employee is terminated without reason within 3 months

of giving birth, employers are required to pay maternity leave in full. In addition to maternity leave, eligible female workers are entitled to 6 days of parental leave per year if they have worked for the employer for more than 3 months and are the parents of a child under the age of 7.

Most companies in Singapore offer their employees some benefits outside of the law, which ensures that their workforce is well taken care of. Some of the common benefits include: medical care and personal benefits, daily travel expenses, relocation package (Most companies provide relocation allowance for expatriate employees who have to relocate to Singapore with their family from their home country. The compensation package usually includes: paid delivery of personal belongings, air tickets, free or subsidized housing, payment of utility bills, paid childcare, and school fees for children).

Analysis of research results

This comparative review delves into the civil service systems of Poland, Vietnam, Croatia, Singapore, Estonia, Georgia, and Uzbekistan, analyzing key aspects such as merit-based principles, professionalism, global reputation, efficiency, working conditions, legal compliance, ongoing reforms, and research contributions. The following tables offer a succinct overview of the diverse strengths and challenges observed in each country, providing valuable insights into the nuances of their civil service models and their respective impacts on effective governance.

Table 1

Merit-Based Systems and Professionalism

Country	Merit-Based System	Professionalism	Legal Framework
Poland	Strong commitment	High	Well-established
Vietnam	Ongoing reforms	Moderate	Evolving
Croatia	Commitment to legal principles	Emphasized	Strong legal basis
Singapore	Well-established meritocracy	High	Robust legal framework
Estonia	Commitment to meritocracy	High	Strong legal foundation
Georgia	Ongoing research and reforms	Evolving	Evolving understanding
Uzbekistan	Ongoing reforms and research	Evolving	Modernization focus

Table 2

Global Reputation and Efficiency

Country	Global Reputation	Efficiency	Strategic HRM
Singapore	High	Very High	Strong emphasis
Vietnam	Improving	Moderate	Ongoing reforms
Uzbekistan	Improving	Developing	Modernization focus

Table 3

Working Conditions and Legal Compliance

Country	Working Hours	Rest Time	Collective Agreements	Legal Compliance
Poland	40 hours/week	Defined by law	Yes	High
Estonia	Defined by Civil Service Act	Flexibility allowed	Yes	High

Table 4

Ongoing Reforms and Research

Country	Ongoing Reforms	Doctoral Work	Contribution to Governance
Georgia	Yes	Yes	Evolving understanding
Uzbekistan	Yes	Yes	Modernization focus

Table 5

Conclusion and Future Implications

Summary
Diverse strengths and challenges observed
Nuanced understanding of civil service models
Importance of legal foundations, meritocracy, and adaptability
Ongoing research and reforms contribute to effective governance

Conclusion

In conclusion, this comprehensive review has provided insights into the civil service systems of Poland, Vietnam, Croatia, Singapore, Estonia, Georgia, and Uzbekistan. Each nation presents a unique perspective on civil service governance, offering valuable lessons and practices that contribute to the overall understanding of effective public administration.

Poland's merit-based system, emphasis on professionalism, and strong legal foundation, as outlined in the «Civil Service Act,» underscore its commitment to a transparent, accountable, and responsive civil service.

Vietnam's civil service system showcases adaptability and ongoing reforms, with notable progress in areas such as professionalism, recruitment processes, and legal frameworks. The nation's commitment to enhancing public administration reflects its resilience in the face of evolving governance challenges.

Croatia stands out for its dedication to legal principles, emphasizing political neutrality and transparency. The country's focus on ethical conduct within the civil service aligns with a commitment to fairness and accountability, evident in its legal provisions and adherence to international labor standards.

Singapore's renowned civil service model emphasizes meritocracy, professionalism, and strategic human resource management. The city-state's commitment to continuous training, performance-based evaluations, and efficient public administration contributes to its global reputation for high performance.

Estonia, with its regulated civil service system under the Civil Service Act, demonstrates a commitment to professionalism and a merit-based approach. The legal framework provides a solid foundation for recruitment, employment, and defining the rights and obligations of civil servants.

Georgia, with its emphasis on principles like recruitment, professionalism, and political neutrality, contributes to the understanding of effective civil service governance. Ongoing research and doctoral work in the

field of public administration further enrich the country's experience.

Uzbekistan's civil service experience, characterized by ongoing reforms and research at the Academy of Public Administration, offers valuable lessons. The nation's commitment to modernizing its civil service aligns with global trends in enhancing public administration effectiveness.

In navigating the complexities of modern governance, these countries collectively offer a rich tapestry of experiences, highlighting the importance of legal frameworks, merit-based recruitment, and professionalism. As the global landscape evolves, continuous learning from these diverse experiences can inform future reforms, fostering responsive, efficient, and accountable civil service systems worldwide.

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