

# ETHICS OFFICE

Annual Report 2024



## ANNUAL REPORT

1 January – 31 December 2024

PUBLIC

ENGLISH

## CONTENT

<b>STATEMENT OF INDEPENDENCE</b>	<b>2</b>
<b>MESSAGE FROM THE ETHICS OFFICER</b>	<b>3</b>
<b>ETHICS CONSULTATIONS</b>	<b>4</b>
INDIVIDUAL QUERIES	4
QUERIES BY ETHICAL RISKS	5
ANNUAL DECLARATIONS OF INTEREST	7
<b>TRAINING AND OUTREACH</b>	<b>8</b>
<b>IN-HOUSE DIALOGUE</b>	<b>8</b>
EXCHANGE OF VIEWS	8
STANDARD SETTING AND POLICY	9
ETHICS STRATEGY & PROGRAMME	9
RESOURCES OF THE ETHICS OFFICE	9
<b>RECOMMENDATIONS</b>	<b>10</b>

## STATEMENT OF INDEPENDENCE

I confirm that in the course of 2024, I have performed my functions of Ethics Officer in full functional independence, without interference from anyone. I have only been guided by the Staff Regulations and Rules, the ethics framework of the Council of Europe, established practice, accepted international standards, impartiality and my professional judgment.

## MESSAGE FROM THE ETHICS OFFICER

### ***On an Ethics Journey***

*Last September, I had the privilege of joining the Council of Europe as Ethics Officer. Since then, I have been on a journey—one that has brought me face-to-face with the people who bring the Council of Europe to life. I have met colleagues across all levels of seniority, in headquarters and in the field, from newcomers to those who have dedicated decades to the Council of Europe's mission.*

*One thing has stood out to me: their **extraordinary engagement**. It is more than just professional commitment; they deeply care about their work, the projects they deliver on the ground, and the Council of Europe's mission of advancing human rights, democracy, and the rule of law. This is a **powerful force for shaping an organisation's ethical culture**, driven by the values staff themselves have chosen – respect, professionalism and integrity.*

*Something else stood out: in an Organisation leading the way on standard setting and legal frameworks across Europe, it seems natural to see ethics through a **rule-driven lens**. But ethics at work isn't just about rules and following them. We act ethically not because a rule says so, but because we understand the impact—positive or negative—of our actions, decisions, and behaviours on those around us and the Organisation we serve. **Ethics is about choices that go beyond compliance**; it is a journey, not a destination.*

*The Ethics Office has become a trusted resource, thanks to my two predecessors who not only laid its foundations but also actively built and strengthened its role since 2019. In 2023, a coherent set of ethical standards and rules was adopted, consolidated into the **Code of Conduct – essential for accountability**. How do they translate into my daily work? How do I recognize risks? What should I do next? By answering these questions together, we can **move ethics beyond rules and turn words into action**.*

*This is our ethics journey ahead and I am very pleased to embark on it with the Council of Europe.*

***Estelle Martin***

***Ethics Officer of the Council of Europe***

# ETHICS CONSULTATIONS

## INDIVIDUAL QUERIES

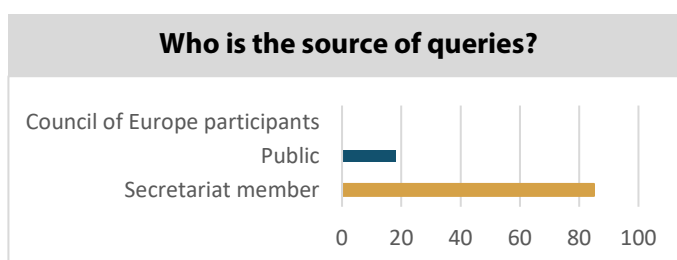
**Responsive ethics service:** In 2024, the number of queries to the Ethics Office remained **stable compared to 2023**, with an average response time of **2.2 working days**. This consistency underscores the Ethics Office's commitment to being a responsive and reliable resource for those seeking guidance.

Total individual queries received

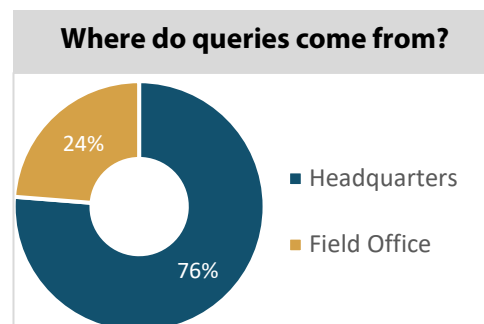
**103** → Stable compared to 2023

**Proactive Secretariat staff:** While receiving queries from the public indicates that the external communication channel is functioning, all were either redirected or out of scope. **The majority of queries came from Council of Europe Secretariat members** directly, who

also seek guidance on managing ethical risks identified in their interactions with other Council of Europe participants (e.g. experts, consultants). This gives confidence that Council of Europe staff can recognise risks around them and be proactive in responding to situations of concerns.

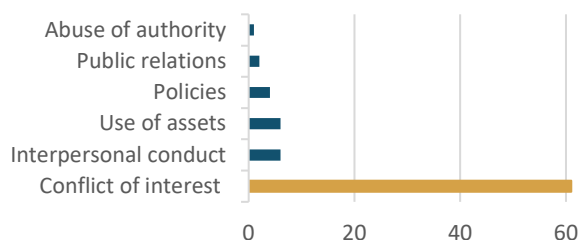


**Broad engagement:** About a quarter of the queries came from **Field Offices**, showing that despite the physical distance, field staff know about the Ethics Office and its role. Queries at **headquarters came from a wide range of Council of Europe entities**, including the Pharmacopeia, the Parliamentary Assembly or Congress Secretariats and the Court Registry. This broad engagement comforts the position of a **unique Ethics Office** highlighted by the external auditors of the Council of Europe.

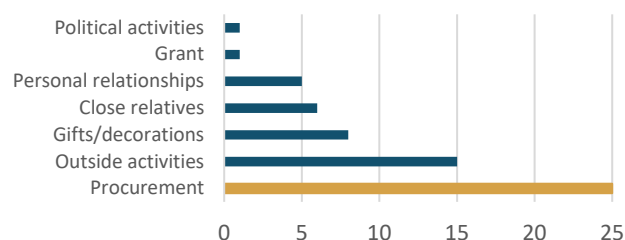


## QUERIES BY ETHICAL RISKS

### What are the ethics risks raised in queries?



### Breakdown of advice for conflict of interest



**Preventive conflict of interest management:** Most queries concerned conflict of interest (actual, potential or perceived) in procurement, often from field staff involved in project implementation. This is explained by procurement criteria that require **case-by-case assessment in certain risk-prone areas** (e.g. former Council of Europe employees, public officials). While most situations were cleared or managed through mitigation measures (such as disclosures, documentation or recusals), a few resulted in exclusions from the procurement process.



This highlights the field staff's diligence in project implementation and the effectiveness of **prevention measures that could be replicated** in areas like grant award or execution. To achieve this, it would be necessary to scale up conflict risk assessment and mitigation actions while increasing their speed and autonomy.

.....



**Crucial manager's input for outside activities:** Queries about outside activities often involve staff seeking to engage with academic or non-profit organisations in their private capacity. **Compatibility assessments done with the Ethics Office are a context exercise (not a legal one):** nature of duties, exposure, reputational risks. Managers' input may be key to draw reliable conclusions.



Certain activities requiring formal authorisations, such as those that are remunerated or relevant to the Council of Europe's mission, are processed by Human Resources. The Ethics Office is working on **consolidating data analysis for all aspects of conflict of interest**. This aims to gain a broader understanding of the effectiveness of the ethics framework and better target prevention efforts.

.....



**Focus on transparency for gifts:** Following an intranet communication on the Council of Europe's no-gift policy published in early December, gifts-related queries have increased. The message conveyed was that **transparency is key, not the value of the gift**. When gifts cannot be refused or returned due to circumstances, all must be declared and recorded in the gifts register irrespective of value. This enables the Ethics Office to identify trends or risks at organisation level that may remain undetected otherwise. This can trigger recommendations to bring specific situations back in line with the ethical framework and protect staff.



Responsibility for the **gifts register has been transferred** from Protocol to the Ethics Office at year-end and will be co-managed until July 2025 for a smooth transition.

.....



**Choose respectful dialogue in our interactions:** Interpersonal conduct queries typically involve conflicts, usually with a manager, arising from work methods, performance monitoring or evaluation and personal frictions that were not addressed in respectful dialogue or not sufficiently early. These conflicts lead to breakdown in communication and concerns over escalation to the point of harassment. This highlights that **no conflict is too small or addressed too early, as timely and expert intervention can help maintain respectful professional relationships**.



The Ethics Officer has joined the Well-being Network (Human Resources professionals, Mediators, Confidential Counsellors, Staff Committee, and Medical Services). It is working to collect anonymous but structured information from the forum to **gain a clearer, evidence-based understanding** of any systemic issues of an ethical nature. This will also support the HR People Strategy and Action Plan dedicated to Well-being at work.

.....

## ANNUAL DECLARATIONS OF INTEREST

**Align actions with words:** With the declaration review moved from internal oversight to internal control, the annual exercise witnessed strengthened collaboration with the Ethics Office. This blend of compliance and ethics perspectives is good news for the meaningful management of conflict of interest at the Council of Europe. There is always a risk that staff go through the motion as a tick box exercise and overlook the **true erosive effect of conflicts of interest – and as importantly the perception of conflict - on public trust**. With the integrity of public officials at the heart of the Council of Europe’s mission, the annual declaration exercise is a **key opportunity to align Council of Europe’s actions with words**.

Compliance rate  
in formal financial roles



Some organisational entities **prioritise transparency over formalistic compliance**, asking all their staff to submit declarations regardless of the legal requirement (involvement in procurement or grant award). With decentralised procurement operated at the Council of Europe, this is a prudent approach. As observed in 2023, most declared interests did not present significant risks and had mitigation measures in place (screening, recusal). Others have been mitigated to the Ethics Office’s satisfaction.



2097 Declarations submitted

138 Positive declarations

24 Ethics Officer responses



A review of the annual declaration process, questionnaires and tools is being co-  
led by Internal Control and the Ethics Office. **Aiming to expand the exercise to  
all staff in 2026**, the purpose is to facilitate user experience and integration  
across the Council of Europe (ethics side), while enhancing both automation and  
data protection (compliance side).

.....

## TRAINING AND OUTREACH

New Secretariat staff joining the Council of Europe provides an excellent opportunity to introduce the Council of Europe's core values and how they can be demonstrated in daily work. These **monthly sessions**, delivered jointly with Internal Oversight, have evolved into standard Human Resources and ethics training that will be gradually rolled out to all staff and build common references.



**238**

New Secretariat staff received basic training

With the adoption of the new ethics framework in 2023, the mandatory 2019 **ethics e-learning** is being renewed and will be relaunched for all staff in the course of 2025.



Completion rates of mandatory e-learning

**87,60%** - Ethics

**82,39%** - Anti-fraud

## IN-HOUSE DIALOGUE

### EXCHANGE OF VIEWS

With a new Ethics Officer joining the Council of Europe in September 2024, there were opportunities for introductions and exchange of view on the **Ethics Office mandate, achievements and upcoming priorities** on many levels:

#### Strategic

- GR-Programme, Budget and Administration
- Deputy Secretary General
- Oversight Advisory Committee
- External Auditors

#### Governance

- Regular exchanges with Private Office
- Data Protection Commissioner
- Risk Management Group

#### Co-ordination

- Parliamentary Assembly Secretariat
- Registry of the Court
- Registry of the Administrative Tribunal
- Directors General
- Heads of major administrative entities
- EDQM management
- Staff Committee
- Deputy Heads of Field Offices



## STANDARD SETTING AND POLICY

The adoption or **review of standards and policies related to ethical behaviour at work**, as well as discussions on emerging issues or policy needs, provide opportunities for the Ethics Office to contribute. In 2024, this involvement included:

- People Strategy 2024-27
- HR Action Plan Well-being
- HR Action Plan Diversity & Inclusion
- Policy on Diversity
- Mission of the Well-Being Network
- Administrative Reform
- Policy and process for the annual declarations of interest
- Ethical risks arising from the use of AI-powered tools
- Input to the PACE Committee on Rules of Procedure, Immunities and Institutional Affairs (context of draft report *"Respect for the rule of law and the fight against corruption within the Council of Europe"*)

## ETHICS STRATEGY & PROGRAMME

As foreseen in the Ethics Officer's mandate, a strategy (2025-27) and programme (2025) have been developed and are being shared with stakeholders for comments and build on achievements over the last years. The **resulting priorities focus on two key responsibilities** of the Ethics Officer's mandate that need to be strengthened:

- ✓ promoting ethical standards through awareness raising and training.
- ✓ monitoring the effectiveness of the Organisation's ethics framework.

## RESOURCES OF THE ETHICS OFFICE

The Ethics Office currently has **one full-time A4-grade Secretariat member** on a fixed-term appointment, with a maximum term of six years. It **does not have a separate budget** line and relies on the resources of the Directorate General of Administration for its needs. In 2024, **budget was granted for an additional full-time B3-grade position**, which will reinforce the Ethics Office in the first semester 2025 and ensure continuity of service.

## RECOMMENDATIONS

Recommendations address the **three pillars of an effective ethics framework** (prevention-detection-response) for selected risks identified in the 2024 ethics consultations.

- 1 Sponsor the Ethics Office intranet page as the gradual **single source repository** for information materials, tools, infographics and FAQs on ethical risks consolidated in the Code of Conduct.



Facilitate **access** by staff and **consistency** of ethics-related communication.

- 2 Encourage, and even give recognition to, the **early use of informal resources** - especially among managers - to resolve workplace conflicts, with special **emphasis on mediation**.



Effectively maintain or restore **respectful dialogue** and find solutions more likely to bring immediate and lasting benefits to individuals and the Council of Europe.

- 3 Sponsor the use of available **digital collaborative platforms to create communities of practice** for managers and existing professional networks across the Council of Europe (e.g. HR or communication correspondents, internal controllers etc.)



Leverage existing networks to share and **embed consistent ethical practices** in daily work.

- 4 Prioritise the **integration of** procedures, tools and data analysis for **all aspects of conflict of interest management** when changes are planned or underway (gifts register, outside activities, decorations, annual declarations, ad hoc disclosures, assessments).



Facilitate detection and **analysis** of trends or emerging risks at organization level and better target prevention efforts.

- 5 Consider additional **brief procurement guidelines** that both target conflicts of interest and maintain market access



Support and **speed up the case-by-case assessment** of conflict of interest situations in projects and autonomy in ethical decision-making.



# Our values



## RESPECT

We co-operate with, listen to and help our colleagues and treat all people with dignity and respect and without discrimination.



## PROFESSIONALISM

We act in a professional manner, we are committed to the mission and goals of the Organisation and we strive to achieve the highest standards.



## INTEGRITY

We are ethical, honest and fair in our actions and decisions, and we operate with impartiality and independence from undue external influences.

The Ethics Officer enjoys functional independence and acts as a focal point for ethics-related questions and standards in the Council of Europe by:

- ★ providing confidential advice to the Secretary General, Secretariat members and other persons participating in the activities of the Council of Europe,
- ★ promoting and monitoring the effectiveness of the ethics framework of the Organisation;
- ★ co-ordinating ethics-related activities in the Council of Europe.

Contact the Ethics Office via its external channel: <https://www.coe.int/en/web/ethics>