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Ethics Office

Annual Report 2025

ETHICS OFFICE
Annual Report 2025



ANNUAL REPORT

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STATEMENT OF INDEPENDENCE

I confirm that in the course of 2025, 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

Building Respect Together

Last December at their meeting with the Secretary General, the Secretariat of the Council of Europe expressed their ***strong commitment to respect*** *as a cornerstone value of the ethical culture within the Organisation.*

In a context marked by polarisation, fragmentation and democratic backsliding, practising respect at work goes beyond a simple individual commitment. It is also ***a collective lever*** *to resonate and amplify the promotion of democracy, human rights, and the rule of law - a lever that is activated in each of our interactions, both with colleagues and with stakeholders. Twelve months of intense activities at the Ethics Office have given me* ***valuable insights into the value of respect at the Council of Europe****, including its dimensions and aspirations:*

> ***It is built through dialogue:*** *Like democracy, respect thrives on the diversity of opinions, cultures and experiences in a dynamic way. Through dialogue - within a peaceful framework - we can understand one another, resolve disagreements or conflicts, foster acceptance of differences and embrace the necessary element of frustration.*
>
> ***It means valuing each and every one of us:*** *With human dignity at the heart of our mission, respect is shown to all, whatever the circumstances, without judgment and without distinction. Within the Secretariat, everyone is eager to contribute, each in their own way, and to be recognised for it.*
>
> ***It means acting within ethical principles and rules:*** *This sets the red lines that must not be crossed, so that the contours of respect are understood and shared. It provides some foundation for action and for holding everyone accountable. It evolves to adapt to new challenges.*

The value of respect at the Council of Europe is neither yours nor mine alone - it is one that we build together, and it holds great value.

Estelle Martin, Ethics Officer

ETHICS CONSULTATIONS

INDIVIDUAL QUERIES

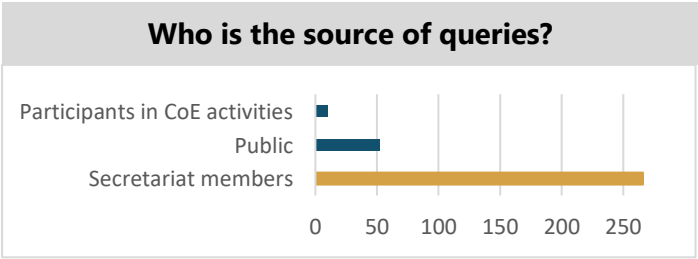
A significant increase in ethics queries: In 2025, the number of queries that received guidance from the Ethics Office was almost tripled compared to 2024, with an average response time of 2.6 working days. The Ethics Office remains committed to being a responsive and reliable resource for those seeking guidance.

328 individual queries received

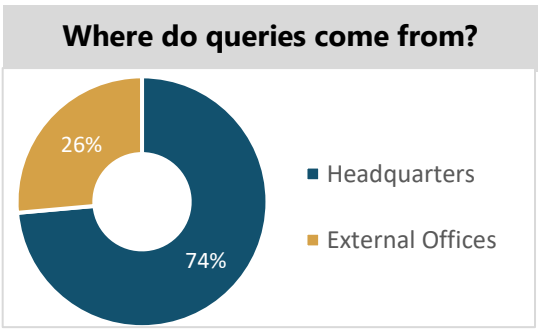
282 queries received guidance

x 2.7 compared to 2024

An ethics service to, and for, the Secretariat staff: While queries received from members of the public (52) indicate that the Ethics Office external channel is functioning, most were either redirected (31%) or out of scope (65%). Participants in Council of Europe activities (10) were almost all redirected to other competent channels (e.g. European Court of Human Rights). As in 2024, the majority of queries (266) came from Council of Europe Secretariat members, who also sought guidance on managing ethical risks identified in their interactions with participants in Council of Europe activities (34%) such as suppliers, consultants or third-party representatives. This shows that: (1) with adequate support, Secretariat staff are best placed to act as effective ethical risk managers vis-à-vis those actively involved in Council of Europe activities, in a practical and responsive way; (2) ethical standards can be effectively applied to participants in Council of Europe activities via an already rich body of existing instruments.

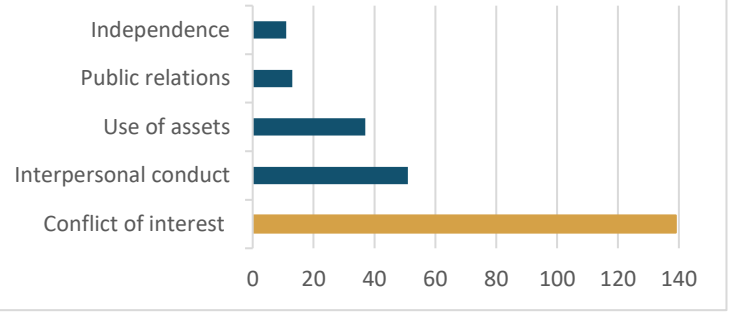


Broadening engagement: The proportion of Secretariat staff queries coming from External Offices has remained stable compared to 2024, with 15 different office locations represented. Exchanges of views with Office Heads and Deputies, on-line participation in some of their team meetings or trainings as well as a courtesy visit to the Yerevan Office in November 2025 were all opportunities to reflect on ways for the Ethics Office to better respond to their specific needs. Queries at headquarters came from 17 different Council of Europe entities, confirming a broadened engagement as compared to 2024, which likely results from sustained outreach efforts across the Organisation.



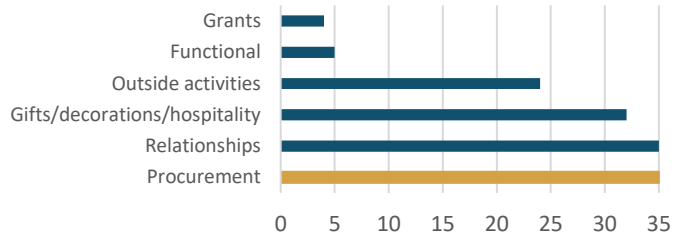
QUERIES BY ETHICAL RISKS

What are the main ethical risks raised in queries?



Diversification: 2025 saw a diversification of queries (263 excluding those redirected) compared to 2024, such as around interpersonal conduct (x8.5 increase) and use of assets (x6 increase). This can be the result of: (1) awareness-raising activities around respect and the prevention of harassment, in the form of accessible information, workshops and coordinated efforts with Human Resources; (2) efforts to reinforce the crucial and complementary role of first and second lines of defence in the responsible use of Council of Europe assets.

Breakdown of advice for conflict of interest



Conflict of interest as a risk management exercise: 51% of queries concerned conflict of interest management (actual, potential or perceived) in all its aspects. 2026 will keep the focus on shifting from a compliance approach towards a risk management one.

The procurement category captures risks that arise from consultants or bidders who may have conflicting roles (e.g. on Council of Europe representative bodies, overlapping with project subject-matter or regional scope), conflicting loyalties (e.g. as employees or civil servants) or conflicting relationships (e.g. with project beneficiaries). Upon request, the Ethics Office contributes to the case-by-case assessment of specific situations, as to whether the credibility of Council of Europe activities could be impacted and whether mitigation measures can effectively manage identified risks.

The relationships category captures risks that arise from staff who are involved in a decision-making process (e.g tender, contract, external recruitment, internal selection) and may have personal interests (relatives or personal relationships) that can influence – or be seen to influence – their judgement. Such situations are usually managed through disclosures, recusals, re-direction of decision-making and documentation. Staff with concerns over the proper management of conflict of interest for themselves or others are expected to address them promptly and directly with the Ethics Office.

With the transfer of the Gifts Register to the Ethics Office, the roll out of a new IT tool in support, awareness-raising activities and the clarification of an end-to-end procedure from gift receipt to inventory listing, the Ethics Office will gain insights into trends or risks at organisation level: who gives, who receives and in which areas of the Organisation.

Out of 176 individual gifts registered in 2025 (protocol gifts are excluded from this count but registered as well), 131 were received in the month of December and only 2.8% were estimated at over EUR50. Secretariat staff are required to register all gifts they receive, regardless of their value – unless they are token or souvenir items, which are of low value and offered for promotional purposes. The Register provides important protection for staff against allegations of corruption and other forms of improper influence. It is important to see the registration process as a safeguard for oneself rather than unnecessary extra work.

The Gifts Register allows the Ethics Office to closely monitor any increases in value, in recurrence or in areas where independence – and the perception of it – is key.

Respect, genuine value for managers: Interpersonal conduct queries increased to 20% of queries in 2025 and include concerns over, or follow up of protective measures against, retaliation. This is likely the result of this Office's active participation in the Well-being Network (with Human Resources, Mediators, Confidential Counsellors, Staff Committee, Medical Services and Social Adviser) and of colleagues being re-directed by other Network members. With managerial practices at the heart of psychological safety, respectful communication and the modelling of positive daily interactions within teams are essential.

Setting clear expectations for key managerial competencies (e.g. leadership, team management) and cascading them throughout the organisation, is instrumental to an ethical culture based on exemplarity. In 2025, the Ethics Office piloted workshops around respect specifically designed for managers, and has developed – together with mediators – an experiment with innovative ways to integrate interpersonal-skills learning into the work. In 2026, awareness-raising activities will underscore the Council of Europe's zero-tolerance commitment against all forms of harassment, including sexual harassment. Multiple dedicated resources are already in place in order to support prevention, detection and response efforts.

On three occasions, the recommendation of the Ethics Office was to make a formal report to the Human Resources Director under the Respect & Dignity Policy, as indicators warranted the establishment of facts.

ANNUAL DECLARATIONS OF INTEREST

Towards consolidation : The 2025 annual declaration review was a joint exercice between Internal Control and the Ethics Office – combining their expertise in **compliance and ethical risk management for enhanced harmonisation and documentation of conflict of interest management** at the Council of Europe. There is always a risk that staff sees declarations as simply "compliance paperwork", and personal interests as faults to minimise. To address this, the Ethics Office has regularly included the topic in awareness raising and consistently highlighted (1) the importance of transparency and practical ways to balance it with privacy; (2) that personal interests are part of life, and problems only arise if they are not declared or managed and can influence – or be perceived to influence – our work; (3) how declarations afford protection to staff against allegations of impropriety. 2025 also saw consolidation efforts from internal control functions across different entities and allowed for a **unique consolidated 2025 exercise report** to the Deputy Secretary General, with recommendations for improvement. As observed in 2024, most declared interests did not present significant risks and others were mitigated to the Ethics Office's satisfaction.

Compliance rate
in formal financial roles



100 %



2120 Declarations submitted

5% Of declarations with interest

46% Subjected to checks by Int. Control



The annual declaration process has now been updated to expand the scope of the exercise to all Secretariat members, to better capture non-financial interests . It has been postponed to the month of March instead of January. It also sets the principle of a risk-based approach with a view to focus resources on higher risk-prone situations. The new process will be implemented in 2026, with transitional measures.

TRAINING AND OUTREACH

AWARENESS RAISING



1351
Number of participants

With efforts concentrated on raising awareness among Secretariat members, different formats of sessions with adapted content were tested – from standard training with large groups to small workshops on selected topics of interest (e.g. Treating each other with respect, Speaking up), from participation in team meetings to targeted interventions included on the agenda of local training initiatives. A large proportion of these activities were conducted at the invitation of Heads of entities (e.g. Court Registry, DGI, Congress project staff, EDQM or ITEM) or Heads of External Offices.

NEWCOMERS

New Secretariat staff joining the Council of Europe provides an excellent opportunity to introduce the Council of Europe's ethical values and how they can be demonstrated in three simple steps. These monthly sessions help build, from the outset, common references and ethical habits (react promptly, consult dedicated resources, report via dedicated formal channels) in an interactive way. A quiz at the end helps gauge impact i.e. the proportion of participants who retained the training key message.



298
New Secretariat staff received standard training



91%
Retention rate

MANDATORY E-LEARNING

The mandatory 2019 ethics e-learning has been updated to reflect the ethics framework adopted in 2023 and was tested with a pilot group of around 50 staff members. After adjustments have been made to take account of feedback, it will be launched for all staff in Q1 2026.

INTERNAL OUREACH

The end-of-year all-staff meeting with the Secretary General (11 Dec. 2025) served to "bring home" some of the external challenges faced by the Council of Europe – promoting dialogue against polarisation, supporting fact-checking against disinformation, building trust in accountability mechanisms and the equal enforcement of rules. Understanding how we act at work directly reflects on how we are perceived outside and is essential for the credibility of our collective work. On this occasion, the Secretariat staff reaffirmed their strong commitment to the value of respect and their stand against double standards.

IN-HOUSE DIALOGUE

EXCHANGE OF VIEWS

Insightful discussions took place with internal stakeholders on topics of common interest, with a view to positioning the Ethics Office as a strategic and supportive asset to the Organisation:

Strategic

- Secretary General
- Quarterly discussions with the Deputy Secretary General
- Senior Management Group
- Regular exchanges with Private Office

Governance

- Budget Committee
- Regular exchanges with the Oversight Advisory Committee
- Data Protection Commissioner
- Risk Management Working Group
- Regular exchanges with Internal Control and Investigations

Co-ordination

- Heads and Deputies of External Offices
- Directorate of Human Resources
- Staff Committee
- Bilateral discussions with DGI, DGII and DPC

STANDARD SETTING AND POLICY

The adoption or review of standards and policies related to ethical behaviour, as well as discussions on emerging issues or policy needs, allow for contribution from the Ethics Office. In 2025, examples of this diverse involvement include:

- Review of the ethical framework
- Rule on the annual declaration of interest exercise
- Rules of procedure of the European Youth Foundation
- Guidelines on engaging with civil society
- Governance on the ethical use of Artificial Intelligence & position paper
- Input to the PACE Committee on Rules of Procedure, Immunities and Institutional Affairs
- Guide to performance assessment
- External review of the investigation function

ETHICS STRATEGY & PROGRAMME

The Ethics Office's strategy (2025-27) remains fully relevant and its programme will be updated in Q2 2026. While **priorities remain on the two key responsibilities** of the Ethics Officer's mandate identified for 2025, progress achieved in the promotion of ethical standards through awareness raising and training will enable a shift of focus towards **monitoring the effectiveness of the Organisation's ethics framework** in 2026. This is a critical pillar for a mature ethics management programme and a trusted ethics framework, as it sets qualitative and quantitative indicators to demonstrate how words in ethics policies are effectively translated into actions and implemented

RESOURCES OF THE ETHICS OFFICE

The Ethics Office has been **reinforced with a full-time ethics support team member** with extensive experience at the Council of Europe, who started in May 2025. She has been instrumental in making the volume and variety of activities possible. While the Ethics Office **does not have a separate budget** line, it has benefitted from the budgetary and corporate service support of the Directorate General of Administration for its needs without any difficulty (e.g. communication, learning & development, IT developments, duty travel).

EXTERNAL OUTREACH

The Council of Europe is a member of the **Ethics Network for Multilateral Organisations**, with about 60 other multilateral institutions, and the Ethics Officer attended its annual conference hosted by the Asian Infrastructure Investment Bank (Beijing, 14-17 Oct. 2025). This is always a unique opportunity to exchange on good practices and trends with peers, and this year addressed with expert guests the use of AI by ethics offices. The Network also contributed to the drafting of **Standards of Practice for Ethics Functions** in international organisations.

With the New Democratic Pact in mind, the Ethics Office contributed to the conference *Parliamentary Integrity in the OSCE Region: Spotlight on Eastern Europe and South Caucasus* at the invitation of the OSCE-ODIHR in Yerevan (24-25 Nov. 2025).

RECOMMENDATIONS 2025

These recommendations address the three pillars of an effective ethics framework (prevention-detection-response) for selected risks identified on the basis of 2025 ethics consultations.

1. Conduct periodic **assessments of psycho-social risks at organisation level**, with harmonised methodology and data analysis.
   - Feed a risk-based and specific **psycho-social risks** prevention plan where all **the members of the Well-being Network play an active role.**

2. Reinforce the effective implementation and documentation of **conflict of interest management arising from non-financial interests** of staff.
   - Cultivate **trust in the central declaration of interest register** (accessible to authorised staff), governance roles and oversight functions.

3. Invite delegations and visiting groups to support the **effective implementation of the Council of Europe no-gift policy** towards Secretariat staff.
   - Encourage tokens of appreciation of a **purely symbolic nature**, in lieu of gifts.

4. Consolidate an **organisational understanding of respect**, as a core value that is built through dialogue and to the benefit of everyone.
   - **Embed ethical culture** through tone from the top, mandatory training, assessment of managerial competencies, structured support to existing networks (such as Confidential Counsellors, HR interlocutors) and innovative dissemination initiatives.

5. Introduce a **register of practice and exceptions** to document the consistent and harmonised application of the ethics framework.
   - **Prevent any appearance of double standards** in the implementation of ethical standards (Staff Rules, Code of Conduct, Respect & Dignity Policy, Diversity, Equality and Inclusion Policy).

RECOMMENDATIONS 2024 - OUTCOME

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.

Dynamic intranet content, based on individual consultations, that can be used as a common reference, with continuous improvements.

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

Combined efforts to promote mediation, at Senior Management Group, HR and Ethics Office level; joint ethics-mediation intiatives (lunchtalk, pilot on fostering ethical culture through dialogue); significant increase in use by staff.

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.).

Quarterly exchanges between HR professionals across entities and Ethics Office (e.g. harassment, managing conduct) to reinforce harmonisation of good practices and discuss challenges. Localised participation of Ethics Office in managers' training or seminars that needs expanding. Regular exchanges with Internal Control that need expanding to other governance functions.

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).

Work well underway for a harmonised and comprehensive declaration of interest exercise; an updated system for the registration of gifts, which will also be used for honours and decorations.

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

Specific checklists to spot and manage risks of conflict of interest in projects or grants developed, to be adapted through lessons learned; help to implement existing procurement guidelines.

Our values



RESPECT

We co-operate with, listen to and help our colleagues, as well as treat all people with dignity and respect and without discrimination as regards racial, ethnic or national origin, gender, beliefs, lifestyle, sexual orientation, disability, etc.



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 independent advice to the Secretary General and advice on a confidential basis to 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

Secretariat staff can contact the Ethics Office via its internal channel; all others can use its external channel (https://www.coe.int/en/web/ethics)

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www.coe.int

The Council of Europe is the continent's leading human rights organisation. It comprises 46 member states, including all members of the European Union. All Council of Europe member states have signed up to the European Convention on Human Rights, a treaty designed to protect human rights, democracy and the rule of law. The European Court of Human Rights oversees the implementation of the Convention in the member states.

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