

Doc. 16287
19 October 2025

Identifying and managing conflicts of interest in the Parliamentary Assembly

Report¹

Committee on Rules, Ethics and Immunities

Rapporteur: Mr Sergiy VLASENKO, Ukraine, Group of the European People's Party

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1. Reference to committee: Bureau decision, Reference 4875 of 11 April 2025.



A. Draft resolution²

1. Any parliament should have transparent and clear processes for identifying and managing conflicts of interest. Such systems are essential to maintaining the standards of objectivity and public service that the public expects of its democratically elected politicians. Establishing and maintaining an adequate conflict-of-interest management system within the Parliamentary Assembly is vital for maintaining public trust in Europe's democratic institutions and ensuring the credibility of its actions.

2. The Assembly already has a well-established system for declaring interests, which has been further improved and developed in its [Resolution 2596 \(2025\)](#) "Respect for the rule of law and the fight against corruption within the Council of Europe". However, to further improve its integrity system, the Assembly considers that it could benefit from:

2.1. improved definitions in the Code of conduct for members of the Parliamentary Assembly for identifying what is a "conflict of interest" for the purposes of the Rules of Procedure and the code of conduct;

2.2. clear guidance for identifying potential, perceived or actual conflicts of interest and for suggesting ways of managing conflicts of interest;

2.3. a named person whose confidential advice members can seek for assisting them in identifying and managing conflicts of interest;

2.4. efforts to simplify the language of the code of conduct – in particular to avoid repetitions between the general principles and the rules of conduct.

3. It is important that members of the Assembly are given sufficient clarity and support in declaring their interests, in identifying conflicts of interest, and in managing potential, perceived or actual conflicts of interest. Practical guidance notes tailored to the Assembly's context, regularly updated, both on making declarations of interest, and on identifying and managing conflicts of interest are a key tool in this respect.

4. In line with best practice in managing conflicts of interest, it is appropriate to have a named person to whom members can go for confidential advice based on expertise on identifying potential, perceived or actual conflicts of interest, and how to react to, or manage, that situation. It nonetheless remains the responsibility of members for declaring their interests and for appropriately resolving any conflicts of interest situation. The Assembly considers that the Council of Europe Ethics Officer has the relevant expertise, suitability, independence and availability for this role. This advice should be specifically tailored to the context of parliamentarians exercising their functions within the Assembly.

5. In light of the above, the Assembly amends the code of conduct for Members of the Parliamentary Assembly (contained in Appendix II to the Rules of Procedure) as follows:

5.1. delete paragraph 9;

5.2. after paragraph 21, insert the following new sub-section:

"Managing conflicts of interest

1. For the purposes of this code, the following definitions shall apply:

1.1. a personal "interest" is something that could lead to a personal advantage to oneself or one's close connections. The interest can arise in relation to one's occupation, finances, business interests, relationships (family and friends), liabilities or other interests;

1.2. "close connections" includes one's household, and close friends and family members;

1.3. a "conflict of interest" can be actual, perceived or potential. It is a situation where a person has a personal interest which is such as to influence or appear to influence the impartial and objective performance of their duties.

2. In their declarations of interest, members shall identify any actual, perceived or potential conflicts of interest between their personal interests and the public interest in the work of the Assembly. In doing so, special regard should be paid to that member's particular roles within the Assembly (e.g. President or Vice-President of the Assembly; chairperson or vice-chairperson of a committee, sub-committee, network, platform, alliance or political group; rapporteur (including

2. Draft resolution adopted unanimously by the committee on 1st October 2025.

co-rapporteur, general rapporteur and youth rapporteur) or member of an ad hoc committee for the observation of elections), with a separate entry included in their declaration identifying any potential, perceived or actual conflicts of interest for each role.

3. *Once an actual, potential or perceived conflict of interest has been identified, a member shall set out in their declaration of interest, remedial steps that will be taken to avoid that conflict unduly affecting their work in the Assembly. Remedial steps can include, for example:*

- disclosure;*
- third-party involvement;*
- stepping back or refusal;*
- refusal;*
- avoidance.*

4. *Advice may be sought from the Council of Europe Ethics Officer who can provide confidential advice to members, tailored to the context of parliamentarians exercising their functions within the Assembly, to assist them in identifying and managing potential conflicts of interest. Advice may also be sought from the Secretary General of the Parliamentary Assembly who is responsible for the application of the code of conduct. It remains the responsibility of the member to declare any interests and to identify and appropriately resolve any conflicts of interest. Conflicts of interest should be resolved in favour of the public interest and must be disclosed.”;*

5.3. replace paragraph 22.1.1 with the following:

“Obligation to update their declaration of interests to declare any interests relevant to that role, to identify any potential, perceived or actual conflicts of interest and to record how any such conflicts will be managed”;

5.4. replace paragraph 40.1.1 with the following:

“Obligation to update their declaration of interests to declare any interests relevant to that role, to identify any potential, perceived or actual conflicts of interest and to record how any such conflicts will be managed”.

6. The Assembly decides to modify the Guidelines on the Observation of Elections by the Parliamentary Assembly (contained in Appendix XIII of the Rules of Procedure) by replacing paragraph 20 with the following:

“All candidates for membership of an ad hoc committee, at the time of putting forward their candidacy, shall make a written declaration of interests in connection with the country concerned by an election observation; this declaration shall be added to their declaration of interests published on the Assembly website, and shall identify any conflicts of interest (as defined in the Code of conduct for the members of the Parliamentary Assembly), and any remedial steps in relation to those interests and the work of the ad hoc committee for observing those elections. Political groups shall not submit the candidatures of members with unmanaged conflicts of interest in respect of a particular country.”

7. The Assembly decides that the amendments to the Rules of Procedure set out in this Resolution shall enter into force at the opening of its January 2026 part-session.

B. Explanatory memorandum by Mr Sergiy Vlasenko, rapporteur³

1. Introduction

1. On 11 April 2025, the Committee on Rules, Ethics and Immunities (hereafter the “Rules Committee”) was seized for report on the topic “Conflicts of Interest – establishing clear guidance for members of the Assembly for dealing with potential, perceived or actual conflicts of interest”. This reference is by way of follow-up to [Resolution 2596 \(2025\)](#) “Respect for the rule of law and the fight against corruption within the Council of Europe” (Rapporteur: Frank Schwabe, Germany, SOC). I was appointed rapporteur on 25 June 2025, the same day that I was appointed General Rapporteur on ethical standards and anti-corruption, in part due to the committee’s awareness of the links between the report and the General Rapporteur role. The committee thereafter approved the modification of the title of the report as follows: “Identifying and managing conflicts of interest in the Parliamentary Assembly”.

2. To help to inform the work on this report, on 5 September 2025, the Rules Committee held a hearing with the participation of Mr Daniel Greenberg CB (Parliamentary Commissioner for Standards of the House of Commons, United Kingdom) and Ms Estelle Martin (Council of Europe Ethics Officer). I am grateful for their insights which have been essential in developing thinking on this topic.

3. In this explanatory memorandum, I will first identify the relevant international standards (chapter 2), before setting out the existing system for managing conflicts of interest within the Parliamentary Assembly (chapter 3), and identifying potential gaps within the Assembly’s existing system (chapter 4). In chapter 5, I will outline various sorts of situations and perceived, potential or actual conflicts of interest that could arise for a member of the Assembly. In chapter 6, I set out my conclusions.

2. International standards for dealing with conflicts of interest

4. There are a number of instructive documents produced internationally on preventing and managing conflicts of interest in the public sector. The relevant standards necessarily need to be tailored to the situation of parliamentarians of the Assembly, namely parliamentarians operating in an international parliamentary assembly. However, the basic principles remain the same or similar for most contexts.

2.1. International standards as concerns conflicts of interest – the G20 high-level principles

5. The [G20 High-Level Principles for Preventing and Managing Conflict of Interest in the Public Sector](#) focus on three core pillars:

- developing standards and a system to prevent and manage conflicts of interest, including establishing specific, coherent, and operational standards of conduct for public officials and identifying activities with heightened risks for conflict of interest;
- fostering a culture of integrity, by promoting an open organisational culture where conflict of interest matters can be freely raised and resolved, providing information, guidance, training, and timely advice to public officials, and promoting awareness in the private sector and civil society;
- enabling effective accountability through mechanisms like disclosure, transparency, verification, and enforcement of conflict-of-interest policies, including periodic financial and asset disclosure systems.

6. The Good Practices Guide on [Preventing and Managing Conflicts of Interest in the Public Sector](#), contains the following main elements of any conflicts of interest management system:

- the need to define a conflict of interest – including:
 - financial and non-financial conflicts of interest;
 - apparent (or perceived), potential and actual conflicts of interest;
 - family relations and conflicts of interest (which usually includes a spouse and dependant children, and sometimes also wider family members and close contacts);
- a risk-based approach to conflicts of interest, noting high-risk areas as being public procurement, significant public spending, the issuing of permits or licences, law enforcement and justice, and the hiring and promotion of public officials.

3. The explanatory memorandum is drawn up under the responsibility of the rapporteur.

7. The Good Practices Guide addresses specific rules surrounding conflicts of interest, including risks related to the “revolving door” phenomenon concerning employment restrictions before and after holding a public position. It also sets out the importance of obligations of impartiality; regulations on accepting gifts; the use of transparency; wide stakeholder engagement and accountability as essential tools to reduce the risks of abuse of position; regulatory capture; and conflicts of interest.

8. Additionally, the guide provides practical tools for managing conflicts of interest and enforcing potential breaches. These include fostering an open organisational culture to facilitate the identification and management of conflicts, ensuring the availability of training, guidance, and advice to public officials, and demonstrating leadership commitment to proactively address conflict-of-interest situations. The guide also recommends the use of thorough declarations of interests and assets, clearly defined remedial actions such as recusal or resignation, regular review and verification of declarations, implementation of effective and proportionate sanctions for violations, and the utilisation of data analytics to identify risks.

2.2. The Council of Europe’s internal approach to managing conflicts of interest

9. The Council of Europe has its own ethics, integrity and conflict of interest management system for the secretariat and others working with and within the Council of Europe. It highlights that identifying and declaring personal interests demonstrates integrity and that the problem is not in the existence of a conflict of interest, but rather how it is declared and managed. It provides helpful definitions:

- “conflicts of interest” arise where a person has a personal interest (which could lead to a personal advantage to oneself or one’s connections) which is such as to influence or appear to influence the impartial and objective performance of their duties;
- “personal interests or connections” can arise in relation to one’s occupation, finances, business interests, relationships (including family and friends), or liabilities;
- “conflicts of interest” can be:
 - “actual” (a direct conflict can influence decisions but could still be managed);
 - “potential” (a situation could eventually lead to a conflict in the future);
 - “perceived” (a reasonable observer would think there is a conflict).

10. The Council of Europe’s policy establishes specific restrictions to eliminate or reduce risks of conflict (e.g. concerning outside employment or the employment of family members). It highlights the importance of transparency, seeking authorisation for outside activities, and keeping declarations of interest updated. It contains three core “what to do” elements: declare, manage and document.

11. It highlights methods for managing conflicts of interest including:

- disclosure (transparently declaring conflicts can, in certain circumstances, suffice);
- third-party review (involving a neutral observer to ensure impartiality);
- stepping back (withdrawing from decisions or limiting access to sensitive information);
- screening (establishing processes to redirect decisions or assignments when personal interests are involved);
- recusal (withdrawing from formally delegated roles);
- refusal (declining roles, relationships, or investments that create conflicts);
- avoidance (relinquishing conflicting roles or divesting financial interests).

2.3. The Committee of Ministers Recommendation on codes of conduct for public officials

12. On 1 May 2000, the Committee of Ministers adopted [Recommendation No. R\(2000\)10 on codes of conduct for public officials](#), which contains a model code of conduct for public officials in its appendix. Whilst the model code does not apply to publicly elected representatives, some of the principles and definitions are nonetheless informative. The model code of conduct highlights the importance of the principles of lawfulness, public interest, non-arbitrariness, impartiality, integrity and trust.

13. In relation to conflicts of interest, Article 8 provides that a “public official should not allow his or her private interest to conflict with his or her public position. It is his or her responsibility to avoid such conflicts of interest, whether real, potential or apparent. The public official should never take undue advantage of his or

her position for his or her private interest.” In Article 13 it defines a conflict of interest as arising “from a situation in which the public official has a private interest which is such as to influence, or appear to influence, the impartial and objective performance of his or her official duties” and that “private interest” includes “any advantage to himself or herself, to his or her family, close relatives, friends and persons or organisations with whom he or she has or has had business or political relations. It includes also any liability, whether financial or civil, relating thereto”. It then sets out obligations on the official to be alert to actual or potential conflicts of interest, to take steps to avoid such conflicts, and to disclose any conflicts.

14. The model code contains specific provisions in relation to the requirement to make declarations of interests (article 14), concerning incompatible outside interests (article 15), gifts (article 18), how to react to improper offers (article 19), the importance of avoiding being put in a position of obligation to return a favour (article 20), and misuse of official position (article 21).

2.4. The definitions used by the United Kingdom’s National Audit Office

15. It is also helpful to explore different systems and approaches – many of which are already set out in the G20 best practice guide described above. By way of one national example, the National Audit Office of the United Kingdom has set out a good practice guide on managing conflicts of interest.⁴ It uses the following definitions, which could be of assistance:

- a “conflict of interest” is “a set of circumstances that creates a risk that an individual’s ability to apply judgement or act in a role is, or could be, impaired or influenced by a secondary interest. The perception of competing interests, impaired judgement or undue influence can also be considered a conflict”;
- an “interest” is “a thing that may affect an individual’s judgement such as a financial interest, outside role, family relationship or friendship”;
- a “potential conflict of interest” is a situation where “an interest may become a conflict of interest due to the nature of the postholder’s role or organisation. These require declaration and may require mitigations”;
- an “actual or perceived conflict of interest” is a situation where “a reasonable person might believe that a conflict of interest is likely to occur in a specific decision or activity. There is no need for systems to differentiate between actual and perceived conflicts because both require declaration and mitigation”;
- “mitigations” are “the agreed actions to manage a conflict of interest. These can range from letting other people know about the conflict through to removing the interests (for example by selling shares)”;
- “managed conflict of interest” is a situation “where appropriate mitigations have been put in place to manage actual or perceived conflicts such that a reasonable person would say that the activity was carried out with objectivity, integrity and accountability”.

16. The National Audit Office proposed that public bodies therefore put in place governance systems and processes to enable public officials to:

- declare any interests they have;
- identify when these interests may give rise to a conflict;
- manage the risk this conflict presents through mitigation or removal.

3. The existing system for dealing with conflicts of interest within the Parliamentary Assembly

17. The Rules of Procedure of the Parliamentary Assembly, including the Code of conduct for members of the Parliamentary Assembly (contained in Appendix II to the Rules of Procedure), have been updated over the years to ensure that they are fit for purpose and adapted to respond to current challenges.

18. The Assembly’s current system relies on:

- a mandatory obligation on all members of the Assembly to make an annual written declaration of interests and to keep it up-to-date, together with an obligation to make an oral declaration of interest if necessary, and restrictions if the written declaration is not made;⁵

4. National Audit Office, “[Managing conflicts of interest](#)”.

- enhanced declaration obligations for those with specific roles within the Assembly (Presidents and Vice-Presidents of the Assembly, chairpersons and vice-chairpersons of committees, sub-committees, networks, platforms, alliances and political groups; rapporteurs (which includes co-rapporteurs, general rapporteurs and youth rapporteurs), and those participating in an ad hoc committee for the observation of elections);⁶
- a requirement for members to avoid conflicts of interest – which is expressed in a number of different ways, including some specific prohibitions (for example not to act as a paid consultant or advocate; not to use their public office for their or anyone else's private gain; not to accept any reward intended to affect their conduct; not to accept inappropriate gifts) and obligations (for example to take decisions solely in the public interest or to use information with discretion);⁷
- specific obligations on those in certain (higher risk) roles within the Assembly, including:
 - rapporteurs, the President and Vice-Presidents of the Assembly, and chairpersons and vice chairperson of committees and sub-committees (who have, for example, a duty of neutrality, impartiality, objectivity, discretion);⁸
 - those with roles in the Monitoring Committee or on an ad hoc committee for election observation (who have, for example, certain prohibitions from having close links with the relevant country).⁹

4. Potential gaps within the Assembly's existing system for managing conflicts of interest

19. One necessarily needs to adapt traditional public-sector conflict-of-interest management guides to the situation of parliamentarians, and to the specific situation of parliamentarians operating in a parliamentary assembly of an international organisation. For example:

- there are fewer risks relating to finance given the limited role of the Parliamentary Assembly in procurement or significant budgetary or financial considerations, but greater risks concerning country-specific interests;
- there are specific but limited risks relating to sectoral knowledge (for example, legal expertise is helpful when looking at rule-of-law issues, but at what stage might being a legal professional hinder one's objectivity?);
- there is a careful balance to be struck between ordinary political activity and fostering interests.

20. As compared to the international standards set out above, the Assembly largely meets those standards as concerns the following:

- the Assembly has a clear system for declaration interests that has been recently reviewed and updated to be tailored to the risks and specificities of the Assembly ([Resolution 2596 \(2025\)](#) "Respect for the Rule of Law and the fight against corruption within the Council of Europe"¹⁰);
- the Assembly is, through developments in [Resolution 2596 \(2025\)](#), recently strengthening the system for reviewing and verifying declarations of interests, whilst acknowledging that this is somewhat limited given the dual mandate nature of members of the Assembly and that significant disclosure issues should be picked up primarily at the national level;
- there are clear obligations on members to resolve potential, actual or perceived conflicts of interest in favour of the public interest;
- the Assembly has enhanced conflict of interest management systems for areas of higher risk (for the Assembly this is predominantly country-specific work, rapporteur roles, election observation roles, or other roles such as President or Vice-President of the Assembly, or chairperson or vice-chairperson of a committee, sub-committee, network, alliance, platform or political group).

5. Paragraphs 5.6, 9, 10 and 18 to 21 of the Code of Conduct for members of the Parliamentary Assembly (set out in Appendix II to the Rules of Procedure).

6. Paragraphs 22.1.1, 40.1.1 of the code of conduct, and paragraphs 20 and 21 of the guidelines for the observation of elections by the Parliamentary Assembly (set out in Appendix XIII to the rules of Procedure).

7. Paragraphs 1, 5.1, 5.2, 5.3, 5.4, 5.5, 5.6, 7, 8, 11, 12, 13, 14, 15, 16 and 17 of the code of conduct.

8. Paragraphs 22 and 40 to 43 of the code of conduct.

9. Paragraphs 8 to 13 of [Resolution 1115 \(1997\)](#) (set out in Appendix VIII to the Rules of Procedure): and paragraphs 13, 15, 17, 19, 21, 35, 36 and 38 of the guidelines for the observation of elections by the Parliamentary Assembly.

10. See also the report by Mr Franck Schwabe (Germany, SOC), [Doc. 16138](#).

21. However, as compared to the international standards identified above, there are areas where the Assembly's framework could benefit from further scrutiny or improvement:

- the Assembly could benefit from clearer, common, conflict-of-interest definitions for its purposes, perhaps drawing inspiration from either the definition from the Council of Europe's internal documents or the United Kingdom National Audit Office's documents, as set out above;
- the notions of "family" or "close connection" for the purposes of declaring and managing conflicts of interest are complex and vary significantly across different public organisations and States. At present, the Assembly takes a somewhat flexible approach, but perhaps clearer guidance could be given to members in determining who falls within these definitions;
- the Assembly does not have clear guidance to assist members in identifying and managing conflicts of interest, including as to the options available for resolving conflict of interest situations;
- the Assembly does not have a named adviser to assist members in navigating a potential conflict of interest situation.

22. There are further areas, where I do not presently consider that further work is needed, but which it could be useful to keep under review, to reflect on whether the Assembly has struck the correct balance:

- the Assembly has only limited restrictions as concerns employment before, during and after being an Assembly member. The European Parliament, for example, has come under considerable recent criticism for its flexible approach to MEPs taking on side-jobs, notably those that could seem to give rise to a conflict of interest with their role within the European Parliament.¹¹ Given that a member's role as a member of the Assembly is part of their dual mandate as a national parliamentarian, the current approach seems proportionate, in that it is focussed on the main risk which relates to lobbying and the fostering of interests. I therefore do not consider it necessary for the Assembly to develop strict rules with regard to employment, but these risks and interests should be included within any guidance produced for members on managing conflicts of interest;
- the approach to "gifts" has recently been updated following [Resolution 2596 \(2025\)](#) and members should not accept any gifts that are not within the boundaries of normal parliamentary protocol. Moreover, members should declare any gifts over 200 Euros that they do receive. However, few, if any, such gifts are declared. This could be kept under review to ensure the gifts policy is being followed and corresponds to public expectations;
- once a review has been taken of the conflict-of-interest risks to the Assembly, it may be necessary to review other parts of the ethics system, for example whether it should be necessary to declare the ownership of real estate in a given country if that might then be perceived as affecting one's objectivity in relation to that third country (if not declared and made transparent). Those matters seem to be of particular relevance to (1) members of an ad hoc committee for the observation of elections; and (ii) rapporteurs for country-specific reports (such as co-rapporteurs in the Monitoring Committee).

5. The sorts of situations that might arise for members of the Assembly

23. In developing any guidance for identifying or managing conflicts of interest for Assembly members, it is first necessary to identify the sorts of perceived, potential or actual conflict-of-interest situations that might arise for members of the Assembly. In such guidance it will be helpful to identify cases where conflict of interest concerns arise, as well as those where questions might be raised as to whether or not something does raise a conflict of interest query. These include (i) situations of professional expertise where questions could arise as to a perceived or potential conflict of interests; (ii) situations where links to a given country could be perceived as a potential conflict of interest; and (iii) situations where the role of a member or of a close connection (e.g. a family member) may give rise to a perceived or actual conflict of interest. I have included in the appendix to this explanatory memorandum, in a table form, some indications of the sort of approach I propose be given to the conflict of interest queries that are likely to arise.

24. I consider that it is important that any guidance cover not only situations where there is or could be a conflict of interest but also those where there is no such conflict, but where greater clarity would benefit members, the secretariat and the public. For example, it is sensible and valuable to have a rapporteur with real expertise and insight into a given field. This can ensure the report is credible, insightful and has real-world

11. EU Today, "[European Parliament faces persistent ethics challenges over conflicts of interest](#)", 16 December 2024; Transparency International "[TI EU analysis exposes conflict-of-interest risk in European Parliament](#)", 7 September 2023.

practical expertise backing up its recommendations. On the other hand, for certain specific topics the rapporteur may have perceived or actual financial interests at stake in a given report. It is important to clearly identify the risks and ensure that helpful advice and guidance is provided for distinguishing between positive expertise, and more risky conflicts of interest. Further it is necessary to ensure there is practical advice on how to manage any potential risks.

25. I consider that it would be helpful for guidance to explore these issues to assist members in identifying potential conflicts and what potential options are available for managing those conflicts – whilst emphasising that the presence of a conflict is not necessarily a problem; in general, it merely needs to be adequately managed.

6. Conclusions

26. Establishing and maintaining an adequate conflict-of-interest management system within the Assembly is vital for maintaining public trust in Europe's democratic institutions and ensuring the credibility of the actions of the Assembly. The Assembly already has a well-established (and recently further developed) system for declaring interests, it could however, benefit from:

- improved definitions identifying what is a “conflict of interest” and what is a “close connection” for the purposes of the Rules of Procedure and the Code of conduct for members of the Assembly (to be supplemented with explanations in the guidance);
- clear guidance for identifying potential, perceived or actual conflicts of interest and for suggesting ways of managing conflicts of interest (including using examples likely to arise in the work of the Assembly);
- a named person that members can turn to for confidential advice for assisting them in identifying and managing conflicts of interest.

6.1. Definitions and clarity of provisions relating to conflicts of interest

27. At present there is no clear definition of a “conflict of interest” although there are various related obligations on members, as set out above.¹²

28. Following the section of the code relating to declarations of interest (paragraph 18-21), I propose to insert a new section which should contain relevant definitions for “conflict of interest”, drawing on the definitions set out above.¹³

29. I propose that paragraph 9 of the Code of conduct for members of the Parliamentary Assembly be deleted (it will now be contained in a new section) and after paragraph 21 of the code of conduct a new section is inserted as follows:

“Managing potential conflicts of interest

1. For the purposes of this code, the following definitions shall apply:

1.1. a personal “interest” is something that could lead to a personal advantage to oneself or one’s close connections. The interest can arise in relation to one’s occupation, finances, business interests, relationships (family and friends), liabilities or other interests.

1.2. close connections” includes one’s household, and close friends and family members.

1.3. a “conflict of interest” can be actual, perceived or potential. It is a situation where a person:

- has a personal interest;*
- which is such as to influence or appear to influence;*
- the impartial and objective performance of their duties.*

2. In their declarations of interest, members shall identify any actual, perceived or potential conflicts of interest between their personal interests and the public interest in the work of the Assembly. In doing so, special regard should be paid to that member’s particular roles within the Assembly (e.g. President or Vice-President of the Assembly; chairperson or vice-chairperson of a committee, sub-committee,

12. See, for example, paragraphs 5.2, 5.6, 9, 18, 22.1.1., and 40.1.1. of the code of conduct.

13. Council of Europe intranet “How we manage our conflicts of interest”; National Audit Office, “[Managing conflicts of interest](#)”; and [Recommendation No. R\(2000\)10](#) on codes of conduct for public officials, op. cit.

network, platform, alliance or political group; rapporteur (including co-rapporteur, general rapporteur and youth rapporteur) or member of an ad hoc committee for the observation of elections), with a separate entry included in their declaration identifying any potential, perceived or actual conflicts of interest for each role.

3. Once an actual, potential or perceived conflict of interest has been identified, a member shall set out in their declaration of interest, remedial steps that will be taken to avoid that conflict unduly affecting their work in the Assembly. Remedial steps can include, for example:

- disclosure;*
- third-party involvement;*
- stepping back or Recusal;*
- refusal;*
- avoidance.*

4. Advice may be sought from the Council of Europe Ethics Officer who can provide confidential advice to members, tailored to the context of parliamentarians exercising their functions within the Assembly, to assist them in identifying and managing potential conflicts of interest. Advice may also be sought from the Secretary General of the Parliamentary Assembly. It remains the responsibility of the member to declare any interests and to identify and appropriately resolve any conflicts of interest. Conflicts of interest should be resolved in favour of the public interest and must be disclosed.”

30. I further propose that the relevant provisions relating to rapporteur, bureaux and observation of election roles also be amended accordingly. Such that:

31. Paragraph 22.1.1 be replaced with:

“Obligation to update their declaration of interests to declare any interests relevant to that role, to identify any potential, perceived or actual conflicts of interest and to record how any such conflicts will be managed”

32. Paragraph 40.1.1 be replaced with:

“Obligation to update their declaration of interests to declare any interests relevant to that role, to identify any potential, perceived or actual conflicts of interest and to record how any such conflicts will be managed”

33. Paragraph 20 of the Guidelines on the Observation of Elections by the Parliamentary Assembly (contained in Appendix XIII of the Rules of Procedure) be replaced the paragraph with the following (noting that this will supersede the amendments to this paragraph contained in [Resolution 2596 \(2025\)](#)):

“All candidates for membership of an ad hoc committee, at the time of putting forward their candidacy, shall make a written declaration of interests in connection with the country concerned by an election observation; this declaration shall be added to their declaration of interests published on the Assembly website, and shall identify any conflicts of interest (as defined in the Code of conduct for members of the Parliamentary Assembly), and any remedial steps in relation to those interests and the work of the ad hoc committee for observing those elections. Political groups shall not submit the candidatures of members with unmanaged conflicts of interest in respect of a particular country.”

6.2. Guidance

34. The current explanatory note¹⁴ for completing declarations of interest was unanimously approved by the Rules Committee on 15 May 2018 and revised in December 2018. It is updated with relevant dates each year, but has not been substantively modified since then. It is currently being revised in light of the need to place all declarations of interest in one place following the amendments brought in by [Resolution 2596 \(2025\)](#). The Assembly does not yet have clear guidance to assist members in identifying or managing conflict of interest situations, including as to the options available for resolving conflict of interest situations.

35. It is important that members of the Assembly are given sufficient clarity and support in declaring their interests, in identifying conflicts of interest, and in managing potential, perceived or actual conflicts of interest. Practical guidance notes both on making declarations of interest, and on identifying and managing conflicts of

14. [Explanatory Note](#) available on the “transparency and integrity” webpage of the Assembly’s website.

interest are a key tool in this respect. It is important that these guidance notes are tailored to the Assembly context, reflect a common understanding as to the sorts of situations where a perceived, potential or actual conflict of interest might arise and how to resolve it. In its discussions, the Rules Committee considered it important that the guidance make clear that a member would lack the necessary objectivity to be a rapporteur for a report focussing on their own country.

36. The guidance for completing declarations of interest and the guidance for managing conflicts of interest both necessarily need to be reviewed and updated on a regular basis as new issues or risks arise that could benefit from clarity in the two sets of guidance. I therefore propose that this guidance is not adopted in a Resolution (which would require a Resolution to amend it). Instead, I propose that the General Rapporteur on ethical standards and anti-corruption prepare a draft of both sets of guidance, and that the guidance be approved by the Rules Committee. Both sets of guidance should be adopted and published so as to be available before the January 2026 part-session. I encourage the General Rapporteur and the Rules Committee to regularly review and update both sets of guidance, are required, ensuring at least one review every 2 years.

6.3. Advice

37. It is best practice, within any system, for individuals to have access to – generally confidential – advice when identifying, considering, and managing potential conflict of interest situations. This does not shift the responsibility for the accuracy of any declarations of interest or for managing any conflicts appropriately – it remains the responsibility of members for declaring their interests and for appropriately resolving any conflict of interest situation. However, members should be able to avail themselves of relevant expertise as to how to identify a potential, perceived or actual conflict of interest, and how to react to, or manage, that situation.

38. Within the Council of Europe, the Council of Europe Ethics Officer provides confidential advice to members of the secretariat and others operating within the auspices of the Council of Europe in relation to ethical matters and can provide such advice to members of the Assembly. The Assembly does not presently have a named adviser to assist members in dealing with a potential conflict of interest situation. During the hearing in the Rules Committee on 5 September 2025, this issue was discussed and the importance of an independent source of advice was highlighted.

39. The Ethics Officer of the Council of Europe is a trusted expert in relation to conflicts of interest, who has the relevant expertise, suitability, independence and availability for providing this advice. The Ethics Officer is available for such advice under that role's current remit (which has functional independence within the Council of Europe). However, the current code of conduct does not expressly refer to the role of the Council of Europe Ethics Officer. The current Ethics Officer has presented her work to the Rules Committee twice in the last year and is increasingly familiar with the specificities of parliamentary work and the role of the Assembly. The Ethics Officer is also involved in conferences organised as part of the project "Strengthening integrity and ethics in parliaments".

40. I therefore propose that the Code of conduct for members of the Assembly be amended to make clear who members can go to for confidential advice in considering how to handle a matter of either declaring an interest, identifying a conflict, or managing a conflict. I consider that it is important that this person be independent from political groups and from the Council of Europe hierarchy. The Council of Europe Ethics Officer (a person who is appointed on a fixed, non-renewable mandate) has this expertise and functional independence and is therefore well suited to this role. It is important, however, that this advice be suitably tailored to the context of parliamentarians exercising their functions within the Assembly. It goes without saying that conflict of interest considerations for members of the secretariat are necessarily somewhat different to conflict of interest considerations for parliamentarians, given the different nature of these roles.

41. I consider that at present, the role should be purely advisory and confidential. In some systems there can be an obligation on individuals to follow advice, however, I do not consider that it is necessary or appropriate to put in place such a structure at present and it is appropriate that it remains the responsibility of members of the Assembly. Ultimately if members fail to declare matters which they should declare, or fail to identify or manage conflicts of interest, then it is their responsibility that is engaged – through, for example, an investigation for a breach of the code of conduct.

42. I propose including a reference in the code of conduct to the possibility of seeking confidential advice on identifying and managing conflicts of interest from the Ethics Officer. It also remains possible for members to seek such advice from the Secretary General of the Assembly given that paragraph 4 of the code of conduct provides:

“The application of this code shall be a matter for the Assembly. Guidance of all matters covered by this code of conduct and situations which may arise from its application may be sought from the Secretary General of the Parliamentary Assembly”.

6.4. Further suggestions

43. In the interests of concise drafting and to make the relevant provisions of the code easier to read, I propose that work be done to reduce the repetitions in the code of conduct and in particular, as between the general principles and the rules of conduct, for example by drafting the general principles so that relevant details in the rules accompany the core relevant principles.

Appendix – Indicative examples for conflict of interest guidance for members of the Assembly

Interest	Likelihood of conflict	Potential remedial action
A parliamentarian who is a former police officer seeks appointment as rapporteur on law enforcement matters.	No actual conflict, unless very specific circumstances apply (e.g. if looking into a matter where the rapporteur is a close contact of those involved in matters under investigation). Any perceived conflict can normally be addressed through transparency and declaring.	Transparency (e.g. declare past expertise and experience; declare any close contacts (if applicable) relevant to any matters that are the focus of the report). Only in rare circumstances would further remedial action be required – to be discussed with the Council of Europe Ethics Officer (hereafter “the Ethics Officer”) and the secretariat.
A parliamentarian who is a lawyer or judge being appointed as rapporteur on a report relating to the profession of lawyer, or to the functioning of the justice system.	No actual conflict, unless very specific circumstances apply (e.g. if the report covers a case or matter that they were previously involved in as a lawyer or judge). Any perceived conflict can normally be addressed through transparency and declaring.	Transparency (e.g. declare past expertise and experience; declare involvement in any related cases or matters; declare any close contacts (if applicable) relevant to any matters that are the focus of the report). Only in rare circumstances would further remedial action be required – to be discussed with the Ethics Officer and the secretariat.
A member who is a medical professional seeks appointment as a rapporteur for a report relating to healthcare in general or a report within their specific field of medical expertise.	No actual conflict, unless very specific circumstances apply (e.g. if the report involves promoting a particular institution in which the individual has a professional or business interest). Any perceived conflict can normally be addressed through transparency and declaring.	Transparency (e.g. declare past expertise and experience; declare any relevant professional or business interests; declare any close contacts (if applicable) relevant to any matters that are the focus of the report). Only in rare circumstances would further remedial action be required – to be discussed with the Ethics Officer and the secretariat.
A member who has significant financial interest (whether controlling shares, or adviser) in a company advising on artificial intelligence seeks appointment as chair of the sub-committee on artificial intelligence.	There is a potential conflict of interest depending on the topic covered in sub-committee Perceived conflicts can normally be addressed through transparency and declaring, as well as recusal if certain topics arise on the agenda of the sub-committee.	Transparency (e.g. declare business and financial interests; and any close contacts (if applicable) relevant to any matters. In the interests of full transparency, it could be necessary to do this both in the written declaration and orally when relevant matters arise in the work of the sub-committee. Recusal if particular topics so require, such that the sub-committee chair would stand aside to let the first vice-chair take the chair for those items – in order to demonstrate objectivity (even if the conflict was only potential or perceived). It could be useful to ensure clarity as to when and how to deploy remedial action– to be discussed with the Ethics Officer and the secretariat.
A member from a country involved in a conflict, seeks a role that could touch on matters relating to that conflict. e.g. a member from Armenia seeks to be appointed as rapporteur for a report relating to the Nagorno-Karabakh conflict. e.g. a Ukrainian member seeks to be appointed rapporteur on a report relating to the Russian Federation’s war of aggression against Ukraine.	There is a potential, perceived and likely actual risk of a conflict of interests.	It could depend on the exact circumstances, and the first step in any conflict analysis is transparency and to declare and interests and to seek advice (e.g. from the Ethics Officer and the secretariat). However, bearing in mind the duties on a rapporteur of objectivity and neutrality, for example, it seems unlikely that such a rapporteur could be considered to be sufficiently removed from the situation so as to remove all risks of criticism of having a conflict of interest or a lack of objectivity. The appointment of such a rapporteur therefore could risk undermining the reputation of the Assembly in respect of that report.

Interest	Likelihood of conflict	Potential remedial action
A member seeking to be appointed as rapporteur for a country-specific report (e.g. in the Monitoring Committee) or on an ad hoc committee for the observation of elections in a given country, where they or a family member has close ties to the country. For example: e.g. A member whose wife has a representative role on behalf of Türkiye seeking appointment as co-rapporteur for Türkiye in the Monitoring Committee.	There is a potential, perceived and perhaps an actual conflict of interests.	It could depend on the exact circumstances, and the first step in any conflict analysis is transparency and to declare and interests and to seek advice (e.g. from the Ethics Officer and the secretariat). However, bearing in mind the duties on a rapporteur of objectivity and neutrality, it seems unlikely that such a rapporteur could be considered to be sufficiently removed from the situation so as to rule out all risks of criticism of having a conflict of interest or a lack of objectivity. The appointment of such a rapporteur therefore could risk undermining the reputation of the Assembly in respect of that report.
A member whose partner is Serbian is seeking appointment as co-rapporteur in respect of Serbia in the Monitoring Committee.	There is a potential or perceived conflict of interest, which can be largely managed through transparency.	Transparency (e.g. declare nationality of partner and any relevant links of the member and/or their close connections). Only in specific circumstances (e.g. if the partner and/or close connections have specific politically active positions in Serbia) would further remedial action be required – to be discussed with the Ethics Officer and the secretariat.
A member whose daughter owns property in Romania seeking appointment as co-rapporteur for Romania in the Monitoring Committee.	There is a potential or perceived conflict of interest, depending somewhat on the scale of the property interest, which can be largely managed through transparency.	Transparency (e.g. declare daughter's ownership of property and any other related risks). Only in rare circumstances (e.g. if there were efforts to link the daughter's property or business activities in Romania to the work of the report) would further remedial action be required – to be discussed with the Ethics Officer and the secretariat. It would be important that there be no explicit or implicit links made between the two interests by any interlocutors otherwise action would need to be taken.
A member whose son-in-law owns a business in Albania seeking appointment as co-rapporteur for Albania in the Monitoring Committee.	There is a potential or perceived conflict of interest, depending somewhat on the scale of the business interest, which can be largely managed through transparency.	Transparency (e.g. declare son-in-law's business interests and any other related risks). Only in rare circumstances (e.g. if there were efforts to link the son-in-law's business activities in Albania to the work of the report) would further remedial action be required – to be discussed with the Ethics Officer and the Secretariat. It would be important that there be no explicit or implicit links made between the two interests by any interlocutors otherwise action would need to be taken.
A member whose husband is Polish, who wishes to chair an ad hoc committee for the election observation in Poland.	There is a potential or perceived conflict of interest, which can be largely managed through transparency.	Transparency (e.g. declare nationality of husband/partner and any relevant links of the member and/or their close connections). Only in specific circumstances (e.g. if the husband/partner and/or close connections have specific politically active positions in Poland) would further remedial action be required – to be discussed with the Ethics Officer and the secretariat.

Interest	Likelihood of conflict	Potential remedial action
A member of Georgian origin who wishes to be part of an ad hoc committee for election observation in Georgia.	There is a potential, perceived and perhaps an actual conflict of interests.	It depends on the exact circumstances, and the extent of the links. The first step in any conflict analysis is transparency and to declare any interests and to seek advice (e.g. from the Ethics Officer and the secretariat). However, bearing in mind the prohibition on members “observing elections in their own country” (paragraph 13 of the guidelines on the observation of elections by the Parliamentary Assembly) this prohibition should cover nationals and those with close ties, but not those who, for example, merely have a historic genealogical link to a country. The appointment of a member with close links could be seen to undermine the objectivity of a mission, and could therefore risk undermining the reputation of the Assembly in respect of that mission. Advice should be sought from the Ethics Officer and/or the secretariat.
A French member who is a dual national of Moldova seeks appointment on an ad hoc committee for election observation in Moldova.	There is a potential, perceived and perhaps an actual conflict of interests.	The first step in any conflict analysis is transparency and to declare any interests and to seek advice (e.g. from the Ethics Officer and the secretariat). However, bearing in mind the prohibition on members “observing elections in their own country” (paragraph 13 of the guidelines on the observation of elections by the Parliamentary Assembly) this prohibition should cover nationals and those with close ties, but not those who, for example, merely have a less direct link to a country. The appointment of a member who is a national of that country could be seen to undermine the objectivity of a mission, and could therefore risk undermining the reputation of the Assembly in respect of that mission. Advice should be sought from the Ethics Officer and/or the secretariat.
A chairperson of a committee realises that a matter specific to their country of nationality arises in a discussion in committee.	There is a potential, perceived and perhaps an actual conflict of interests.	Transparency is always the first recourse, – not only through the written declaration of interests, but also orally in committee. If the matter relates solely to that chairperson's country of nationality, then the correct approach is for the chair to recuse themselves for that item and to be replaced by the vice-chair. This is important to demonstrate objectivity (even if the conflict was only potential or perceived). Recusal could be particularly important (i) if the matter relates solely to that country; (ii) if the matter relates to a conflict (or post-conflict situation) concerning that country; or (iii) if the matter is highly politically controversial. A mere glancing reference to a given country, amongst others, and if the matter is not highly polemical need not require recusal for that item. Guidance can be sought, as required, from the Ethics Officer and/or the secretariat.

Interest	Likelihood of conflict	Potential remedial action
A chairperson of a committee realises that a matter specific to their partner's country of nationality arises in a debate.	There is a potential or perceived conflict of interest, which can be largely managed through transparency.	Transparency (e.g. declare nationality of partner and any relevant links of the member and/or their close connections) – ideally both in writing and orally if relevant matters arise. Only in specific circumstances (e.g. if the husband/partner and/or close connections have specific politically active positions in that country, or if the issue is highly polemical or related to a conflict) would further remedial action be required, such as recusal for that item. Guidance can be sought, as required, from the Ethics Officer and/or the secretariat.