



**WORKING PAPER**

**COUNCIL — 228TH SESSION**

**Subject No. 20: Periodic reports by the Secretary General**

**ANNUAL REPORT OF THE ETHICS OFFICER FOR 2022**

(Presented by the Secretary General)

**EXECUTIVE SUMMARY**

The ICAO Framework on Ethics approved by the Council at the sixth meeting of its 193rd Session requires the Ethics Officer to submit an annual report to the Council. The Ethics Officer, Mr. Fabio Buonomo, has prepared an annual report to the Council for the period from January to December 2022.

The Secretary General transmits herewith to the Council the Annual Report of the Ethics Officer for 2022, on which the Secretary General has no comments.

**Action:** The Council is invited to

- a) take note of the present report and express support to the work and needs of the Ethics Office; and
- b) approve the recommendation to amend the title of the “Ethics Officer” to “Ethics Advisor”.

<i>Strategic Objectives:</i>	This working paper relates to all Strategic Objectives and Supporting Implementation Strategies.
<i>Financial implications:</i>	To be determined.
<i>References:</i>	Nil.

## 1. INTRODUCTION

1.1 This report outlines the activities undertaken by the Ethics Office during the period from 1 January to 31 December 2022, on which the Secretary General has no comments.

1.2 The Ethics Office is independent from all other services and functions, while reporting administratively to the Secretary General. The Ethics Officer has both formal and informal access to the Council, the Evaluation and Audit Advisory Committee, the External Auditor, the investigative entity, and the external ethics entity.

1.3 The Ethics Office operates on the principles of independence, impartiality and confidentiality. Its activities aim to promote a culture of integrity, professionalism, accountability, transparency, and respect within ICAO. In this regard, the Ethics Office provides confidential advice and guidance to management and staff, regardless of contract type and duration. It also supports the Secretary General and the Council in nurturing a strong organizational culture of ethical behaviour and decision-making, whereby ICAO staff and management observe and perform their functions in a manner consistent with the highest standards of ethics and integrity. The Ethics Office also serves as a vital advocate of ICAO principles and values with the aim of protecting the reputation of the Organization, as well as to enable ICAO personnel to come forward without fear of retaliation.

## 2. MANDATE OF THE ETHICS OFFICE

2.1 The ICAO Framework on Ethics (Annex I to the ICAO Service Code, hereafter the “Ethics Framework”) was initially approved by the Council at the sixth meeting of its 193rd Session ([C-DEC 193/6](#)) and had subsequently been amended on several occasions. Pursuant to the Ethics Framework, the functions of the Ethics Officer include the following:

- a) providing confidential ethics advice and guidance to all staff members and protecting all confidential information received from staff and other sources;
- b) providing advice to the Secretary General and the Council on policies and procedures related to ethical issues;
- c) administering the ICAO policy for the protection of staff against retaliation for reporting misconduct and for cooperating with duly authorized audits or investigations;
- d) prevention and outreach through the development and implementation of mandatory ethics training programmes (initial and refresher) and internal communication, including contribution to ICAO’s website on the ethics function; and
- e) developing, implementing and administering ICAO’s financial disclosure and conflict of interest declaration programmes.

## 3. SUMMARY OF ACTIVITIES UNDERTAKEN IN 2022

3.1 **Advisory Services:** Through the provision of confidential, actionable, pragmatic, consistent, and timely advice and guidance, the Ethics Office fulfils a key role in sustaining and upholding ICAO ethical standards and culture. At its core, the Office’s advisory mandate assists all

ICAO personnel and management, including senior management, to make informed and appropriate decisions at both the personal and professional levels that are in the best interests of the Organization. This includes managing actual, potential or perceived conflicts of interest as well as resolving ethical dilemmas and complex workplace situations before they escalate into issues for the Organization, thereby avoiding operational and reputational damages. The Ethics Office also plays a fundamental risk management role, promoting ongoing awareness of and adherence to applicable policies, rules and standards of conduct in a consultative and trusted environment.

3.2 During the reporting period, the Ethics Office provided confidential advice and guidance on various issues, through in-person and virtual meetings or in writing. The Office received 207 requests for advice and guidance, including 117 categorised as “Individual” (queries more personal in nature), 86 as “Management” (queries by members of ICAO personnel in their official capacity), and 4 as “External” (queries from outside ICAO). In this context, the Ethics Office recorded 55 requests involving administrative-related activities, 53 outside activities<sup>1</sup>, 24 gifts, 21 standards of conduct, 21 misconduct/wrongdoing<sup>2</sup>, 17 financial disclosure programme, and 16 conflicts of interest.

3.3 Comparing the actual numbers of requests for advice and guidance received in 2021 and 2022 it is noted that there has been a considerable decrease of matters involving misconduct/wrongdoing, while the number of issues involving administrative-related matters increased (for further details see Annex A). This situation, along with the number of requests regarding standards of conduct, is considered to be a symptom of the need for the Organization to enhance its internal capability to informally address conflicts at an early stage (see below). Another interesting development is the considerable increase of requests involving outside activities and gifts received in 2022. This – in conjunction with the number of requests regarding conflicts of interest – is understood to be related to the launch of the yearly Leadership Dialogue which focused on different kinds of conflicts of interest (see below). At the same time, based on the large number and nature of requests received from the Office in this area, it appears evident that it would be in the best interest of ICAO to enhance the existing regulatory frameworks for the handling of gifts and the engagement in outside activities by its personnel.

3.4 **Policy Guidance:** International Organizations require constant monitoring and advocacy on ethical culture and accountability. In this context, a core function of the Ethics Office is to provide ethics-related advice and substantive input to the Secretary General, the Council and management to ensure that ICAO policies, rules, procedures and practices reflect, reinforce and promote ethical standards and integrity institutionally.

3.5 In this context, in 2022, the Ethics Office provided inputs on 49 policy issues in various forms (policies, Personnel Instructions and other administrative issuances and documentations) and on a range of topics. *Inter alia*, the Ethics Office provided guidance and substantive support to update ICAO regulatory framework to better align it with the revised Ethics Framework and United Nations best practices. In this context, the Office provided substantive input to the proposed draft amendments to Staff Rule 110.1 and PI/1.6 on *Procedures in relation to the ICAO Framework on Ethics* intended to make provisions on the right of complainants to be informed about the status and outcomes of their reports of misconduct. The Ethics Office also participated in the discussions on the review of the *Policy on Secondment*, ICAO accountability framework, the revised *Guidelines for Staff Awards*, several Administrative Instructions on information security, and the adoption of a *Code of Conduct for*

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<sup>1</sup> Under the ICAO regulatory framework there is no expressed requirement for the Secretary General to request the advice of the Ethics Office before deciding on a request to engage in an outside activity, while staff may ask the Ethics Officer for confidential preliminary advice on possible future requests. This notwithstanding, it has been the consistent practice of the Secretary General to seek the Ethics Officer’s input prior to considering requests for outside occupation or employment.

<sup>2</sup> In accordance with paragraph 87 of the Ethics Framework, the advice and guidance provided involved information about the submitting in a confidential way complaints of misconduct and not the merit of possible allegations.

*conferences, meetings and events on the prevention of harassment, including sexual harassment*, in view of the 41<sup>st</sup> session of the ICAO Assembly.

3.6 The Ethics Office also submitted 15 proactive *ex officio* recommendations on different subjects, such as ethical procedures for the recording and disposal of gifts to staff and the enhancement of ICAO early informal dispute resolution mechanisms, to prevent or reduce workplace conflicts by addressing them promptly and at their source in order to avoid, to the extent possible, recourse to ICAO's formal machinery for settlements of disputes.

3.7 Comparing the actual numbers of 2021 and 2022, a considerable decrease of requests submitted by management is noted while there has been a stable provision of *ex officio* recommendations by the Ethics Office (which are almost 1/3 of the input provided during the entire year). This seems to be partially due to some confusion among management about the role of the Ethics Office, which also included efforts to involve the Office in managerial or organizational decisions contrary to its advisory role. To address this situation (which was also noted in last year's report), the Ethics Officer engaged in fruitful separate meetings with Directors and managers to better represent to them the role of the Ethics Office and the opportunity to use it as a valuable tool for discharging their responsibility to ensure and promote an ethical and harmonious workplace based on mutual respect. At the same time, it is considered that it would be beneficial in avoiding further confusion to amend the title of "Ethics Officer" so as to better reflect the current role, functions and responsibilities. Therefore, consistently with the best practices of other United Nations entities, the Ethics Office would like to recommend to change the title of "Ethics Officer" to "Ethics Advisor".

3.8 **Protection against retaliation:** Administrating the ICAO policy on protection against retaliation continues to be a key part of the mandate of the Ethics Office. The purpose of the policy is to enhance accountability within ICAO and ensure that staff members and other personnel can report irregularities and perceived misconduct without fear of being subject to retaliation. The policy protects those who report misconduct and those who cooperate with a duly authorized audit or investigation.

3.9 In 2022, the Ethics Officer reviewed and provided preliminary advice on five cases of potential or perceived retaliation. The Ethics Officer also received one formal request for protection against retaliation. After a review of the case, it was determined that the staff member's complaint did not raise a *prima facie* case of retaliation pursuant to the ICAO Ethics Framework. Subsequently, the staff concerned requested the United Nations Ethics Office (UNEO) to conduct an independent review of such determination in accordance with paragraphs 80-81 of the ICAO Ethics Framework and the *ad hoc* Agreement signed between the UNEO and ICAO in August 2022. After conducting its independent review, the UNEO concurred with the ICAO Ethics Officer's assessment that no *prima facie* case of retaliation was established and the case was closed.

3.10 **Training and outreach:** Outreach and awareness initiatives in various forms are critical for ICAO personnel to recognise their standards of conduct expectations to the Organization and thereby form an essential component of the mandate of the Ethics Office. By focusing on knowledge and skill building as related to ICAO values, principles and standards, the Office develops education and outreach initiatives which serve to assist ICAO personnel in acting in the best interests of the Organization. The relevance of outreach and awareness initiatives is particularly unique in complex and multicultural workplace environments, and initiatives must reflect these complexities so that personnel feel supported and empowered to make the right decision when faced with an ethical dilemma.

3.11 Based on proposal of the Ethics Office, ICAO signed a contract with the United Nations Staff System College (UNSSC) for the development and implementation of ten ethics training programmes over a three-year period with the support of the Bureau of Administration and Services (ADB). In this context, an *ad hoc* platform called "ICAO Ethics Learning Hub" was created, and

ICAO's first online ethics mandatory course for managers and supervisors on *Leading at ICAO with Ethics* was launched in December 2022. The Office also worked with the UNSSC on the development of three other courses on the ICAO Ethics Framework, protection against sexual harassment, and protection against retaliation, which are expected to be launched within the first quarter of 2023.

3.12 In 2022, the Ethics Office, in coordination with ADB, organized eight 90-minute webinar sessions for ICAO personnel on prevention of sexual harassment as a follow up to an initiative launched in October 2021. Overall, 25 sessions were conducted with a total of 845 participants.

3.13 In 2021, members of senior management were requested by the Secretary General to take a training course on *Introduction to Ethical Leadership*, which was developed and offered by the UNSSC. ICAO managers and supervisors were also encouraged to take the same training course. Regrettably, the initial participation in this mandatory training by senior management was limited, and in 2022 the Ethics Office made *ad hoc* recommendations to the Secretary General to address the shortcoming, with a final result of 100% compliance.

3.14 In 2022, the annual ICAO Leadership Dialogue was launched. The topic – *Conflicts of Interest – Why Do They Matter?* – focused on the importance of maintaining public trust through the mitigation of risks that can arise from personal interests. This initiative – which requires managers to engage in conversations with their direct reports on the shared responsibility to create a more effective and trustworthy work environment - was positively welcomed by ICAO personnel and management. The Ethics Office received input and several suggestions from the participants on various sessions, and will prepare an *ad hoc* report to the Secretary General, including findings and recommendations.

3.15 Regarding outreach initiatives, the Ethics Office maintained and updated a dedicated intranet site for the benefit of all ICAO personnel. The site includes information on the different areas of the mandate of the Ethics Office, a range of multi-media tools to communicate ICAO's principles and values, and dedicated pages on important topics such as standards of conduct, protection against retaliation, conflicts of interest, outside activities, and the promotion of a positive workplace.

3.16 The Ethics Office issued ethical messages and guidance to staff to raise awareness on standards of conduct as well as on the work of the Ethics Office in general. The Office also issued gift advisory messages reminding staff about the importance of always being mindful of their independence and impartiality as international civil servants and not to create an impression that a gift, favour or benefit could improperly influence their professional actions or decisions.

3.17 In 2022, the Ethics Officer visited the Eastern and Southern African (ESAF) and South American (SAM) regional offices along with the Ombudsperson. Outputs of the visits included workshops for the staff and confidential consultations with staff and Regional Directors. The Ethics Officer also held dedicated sessions with various ICAO offices on thematic ethical matters, as well as courtesy meetings with the newly elected members of the Council. In addition, the Office contributed to the online and in-person orientation courses organized by ADB during the reporting period.

3.18 The Office also implemented the Council's decision to make public the Annual Report of the Ethics Officer as a means to enhance outreach, and strengthen organizational transparency and public trust (C-DEC 225/3 refers). Mindful of the fact that multilingualism is a fundamental principle to achieve ICAO's objectives, the report is now accessible in English, French, Spanish, Russian, Arabic and Chinese on both ICAO internet and intranet websites.

3.19 **Financial Disclosure programme:** The Ethics Office also administers the ICAO annual financial disclosure and conflict of interest declaration programme (FDP), which is designed to assist ICAO and its personnel in identifying, resolving and mitigating actual, potential or perceived

conflicts-of-interest risks arising from staff's personal financial interests, affiliations, relationships, or outside activities. The primary purpose of the programme is to ensure independence and impartiality are preserved in official decision-making, and to promote accountability, institutional transparency and public confidence in ICAO and its personnel. Financial disclosure is a well-established practice in the United Nations system, governments and other public and private sector organizations.

3.20 In 2022, the Secretary General approved the proposal submitted by the Ethics Officer to increase the categories of ICAO personnel required to participate in the FDP, to also include staff members concerned in safety and security audits and Field Operations Officers. *Inter alia*, this action is expected to make the FDP a more effective tool to identify, mitigate, manage and resolve conflicts of interest in the best interests of the Organization<sup>3</sup>. The new agreed eligibility criteria resulted in an increase of the number of participants in the FDP by almost 17%, i.e., from 162 staff in the 2021 FDP to a total of 190 personnel requested to participate in the 2022 FDP, including staff members, consultants and secondees.

3.21 With the benefit of a temporary Administrative Assistant (Consultancy), the Ethics Office successfully launched, administrated and finalized the 2022 FDP with 100% compliance by participants, including the President of the Council and Secretary General. *Inter alia*, the Office was able to contact and liaise with all eligible personnel through individual confidential communications. It is worth noting that the direct contact between the Ethics Office and participants is an important development in the process, as in the past eligible personnel were requested to participate in the FDP through their respective Directors/Regional Directors, which created delays, difficulties in following up on compliance as well as mistrust in the independence of the process.

3.22 In addition, the Ethics Officer reviewed all Declaration regarding Conflict of Interest statements submitted by the required staff and, in accordance with the existing ICAO regulatory framework, selected randomly for assessment and verification several of the Financial Disclosure statements received. Where deemed necessary, individuals were contacted and advised on appropriate mitigating actions. Eventually this verification phase was finalized with no cases of conflicts of interest that needed to be reported for action. Finally, the Ethics Office confidentially filed all the documentation received and submitted an *ad hoc* report to the Secretary General including relevant information on compliance, statistics on the returns filed and reviewed actions.

3.23 Unlike most United Nations entities, the ICAO FDP is a paper-based exercise, which is a source of concern with regard to the secure transmission and storage of the confidential information disclosed by FDP participants. In this regard, during the reporting period the Ethics Officer explored different options to address this matter, including, but not limited to, the possibility to have ICAO join a platform run by another International Organization. However, this last option was unsuccessful due to different constraints, such as incompatibility between regulatory frameworks, security issues or liability concerns. Consequently, in coordination with Procurement and other relevant offices of the Secretariat, the Ethics Officer engaged in advanced discussions with the United Nations International Computing Centre (UNICC) for the development of a secure and reliable electronic platform for the submission and storage of confidential information associated with the FDP. The ongoing negotiations between ICAO and UNICC are expected to be finalized in the first quarter of 2023. The Ethics Office also intends to explore the possibility to engage the services of an external reviewer to conduct a comprehensive verification process, in which case sufficient resources and funds would need to be assigned.

3.24 **United Nations Coherence:** The Ethics Office continued its active involvement in the Ethics Network for Multilateral Organizations (ENMO), which is an important forum to promote

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<sup>3</sup> The proposal of the Ethics Officer was also based on experiences, lessons learned and recommendations included in the Joint Inspection Unit reports JIU/REP/2017/9 on *Review of mechanisms and policies addressing conflict of interest in the United Nations system* and JIU/REP/2021/5 on *Review of the ethics function in the United Nations system*.

system-wide collaboration on ethics-related issues, with a specific focus on the exchange of practices and information for the coherent application of ethical standards and policies within the United Nations system. In this context, the Ethics Officer served as a member of the *ad hoc* Working Group which reviewed the ENMO Charter, and is a member of its Governance Committee. He also actively participated in the 2022 ENMO Annual Conference, which focused, *inter alia*, on latest trends in encouraging internal whistleblowing and providing protection, conflicts of interests and outside activities, ethics of artificial intelligence, best practices and innovation in prevention, and training in a hybrid environment. The Office also established constructive bilateral relations with the Ethics Offices of other International Organizations. Finally, the Ethics Officer continued to represent ICAO on the United Nations Chief Executives Board for Coordination (CEB) task force on sexual harassment.

#### 4. OBSERVATIONS AND CONCLUSION

4.1 In terms of available resources under the ICAO Regular Programme Budget, the situation of the Ethics Office remained stable if compared with the information included in last year's report<sup>4</sup>. Actually, the Council's request that the allocation of resources to the Ethics Office to be duly considered during the preparation of the 2023-2025 triennial budget (C-DEC 225/3 refers) did not yield to substantive changes for the Office. Consequently, the Ethics Office continues to rely on the "voluntary" support from other bureaus and offices as well as the *ad hoc* assignment of funds, mainly through exceptional funding from the limited carry over budget. This situation creates a perception of limited independence because of budget constraints, and it also has an impact on the ability of the Office to properly plan activities for an effective implementation of its mandate. Concerns about the current level and sustainability of the resources allocated to the Ethics Office have also been reported by the ICAO Office of Internal Oversight (OIO)'s *Internal Audit Report on Ethics Framework*, in which it is recommended that the "*Secretary General, in consultation with the Ethics Office, should ensure that the Ethics Office is provided adequate resources to be able to achieve its mandate/activities*"<sup>5</sup>. In this context, a State Letter for a Junior Professional Officer opportunity for the position of an Associate Ethics Officer was issued in December 2022 (for which no expressions of interest have been received, yet), while further options to assist the Ethics Office are expected to be explored in 2023.

4.2 As mentioned above, the analysis of the emerging trends related to the requests for advice and guidance received from the Ethics Office in 2022 highlighted the need for ICAO to review and align its existing rules on outside activities and the handling and disposal of gifts with the best practices in the United Nations system. *Inter alia*, this would avoid risks of unintended perception of divided loyalties among staff which may impact their integrity, impartiality and independence.

4.3 Another important indicator from the review of the significant number of advisory services and policy guidance provided by the Ethics Office in 2022 is the urgent need for ICAO to increase its internal capability for early informal conflict resolution mechanisms. In this context, the Ethics Office welcomes the appointment of the first Alternate Ombudsperson in 2022 as well as the ongoing considerations on the establishment of a network of volunteer Respectful Workplace Advisors, which would act as a neutral resource and provide colleagues with initial support when experiencing a workplace conflict. At the same time, it would be of key importance for ICAO to reinforce the existing

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<sup>4</sup> Specifically, it was reported that ICAO Regular Programme Budget only included two lines directly associated with the Ethics Office: a) 60% of the Ethics Officer position; and b) travel (see paragraph 4.1 of C-WP/15330).

<sup>5</sup> See paragraphs 52-56 of the report (IA/2022/4) where it is also recommended the development of a "*resource gap analysis of the Ethics Office [to] identify potential sources of funding for reallocation to the Office*". The report also noted that "[i]f the approved draft budget for 2023-2025 shows a budgetary allocation of CAD 3.2 million to support different elements of the Framework making strengthened adherence and compliance by staff to ethics principles and values one of the Transformational Objectives (TO 2) with dedicated one-off funding, however, this does not involve the Ethics Office directly".

rules on the roles and responsibilities of Directors, managers and supervisors in this area. In fact, those who are in positions of leadership have special obligations to promote a safe and harmonious work environment as well as to prevent and respond to prohibited conduct<sup>6</sup>. However, there is a perception among many colleagues who had approached the Ethics Office on this topic that some managers and supervisors are reluctant to play an active role in conflict resolution, with the inevitable consequence that many operational, managerial or administrative-related situations escalate and become objects of formal complaints. For this reason, it is recommended to review the existing rules in order to enhance the responsibilities of Directors, managers and supervisors in proactively and preventively addressing such situations, as soon as they become aware of the same. In this context, it would also be important to review the existing performance appraisal systems in order to be used by supervisors as an effective tool to monitor and assess the behaviour of their direct reports.

4.4 The role of managers and supervisors should also be reviewed to decrease the existing perception among some staff (in particular those with less stable contractual relations with the Organization) that their future career depends on personal allegiance to those who are in positions of leadership. In this context, the existing *Guidelines for Staff Awards* are a source of particular concern. Specifically, the fact that the Advisory Board is mainly composed of the same Directors who had already established the lists of nominations for individual and team awards not only gives raise to perceived conflicts of interest but it also creates the perception of more loyalty to Directors rather than to the Organization. Regrettably, the recent changes in the *Guidelines* did not fully address such concerns. At the same time, it is noted with appreciation that the SAM Regional Office proactively created a system where the nominations are decided by the staff (and not the Director) through a confidential on-line survey, and it is recommended that such best practice is followed by all the ICAO Bureaus and Offices.

4.5 In last year's report, the Ethics Office suggested – and the Council took note – that the existing ICAO due diligence process regarding relationships with external third parties (especially those involving private sector partnership) would benefit from a review. While no major developments were recorded in this area during the reporting period, the Ethics Office is planning to contribute to this topic in 2023 by undertaking a mapping exercise of the Organizational Conflicts of Interest within ICAO. This action is also meant to implement an *ad hoc* pending recommendation included in the Joint Inspection Unit report on *Review of Mechanisms and Policies Addressing Conflict of Interest in the United Nations System* (JIU/REP/2017/9).

4.6 As mentioned above, the Ethics Office in coordination with ADB is expected to implement an ambitious project for the development of ten corporate ethical training courses over a three-year period. This is essential for ICAO personnel to understand and uphold the Organization's values, principles and standards. At the same time, to ensure full compliance with such training modules, it would be advisable to link the latter with the finalization of staff performance assessment systems.

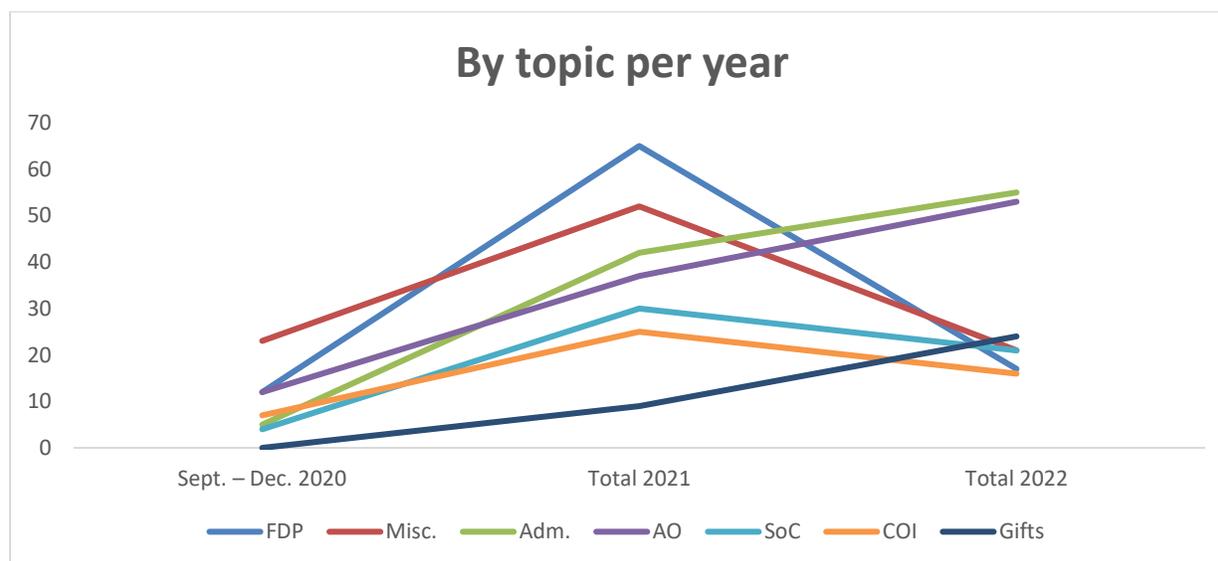
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<sup>6</sup> See in particular paragraphs 31 and 92 of the ICAO Ethics Framework.

APPENDIX A

**Advice and Guidance**<sup>7</sup>



<b><u>Topic</u></b>	<b><u>Sept. – Dec. 2020</u></b>	<b><u>Total 2021</u></b>	<b><u>Total 2022</u></b>
<i>FDP</i>	12	65 <sup>8</sup>	17
<i>Misc.</i>	23 <sup>9</sup>	52 <sup>10</sup>	21 <sup>11</sup>
<i>Adm.</i>	5	42	55
<i>AO</i>	12	37	53
<i>SoC</i>	4	30	21
<i>CoI</i>	7	25	16
<i>Gift</i>	0	9	24
<b><i>Total</i></b>	<b>63</b>	<b>260</b>	<b>207</b>

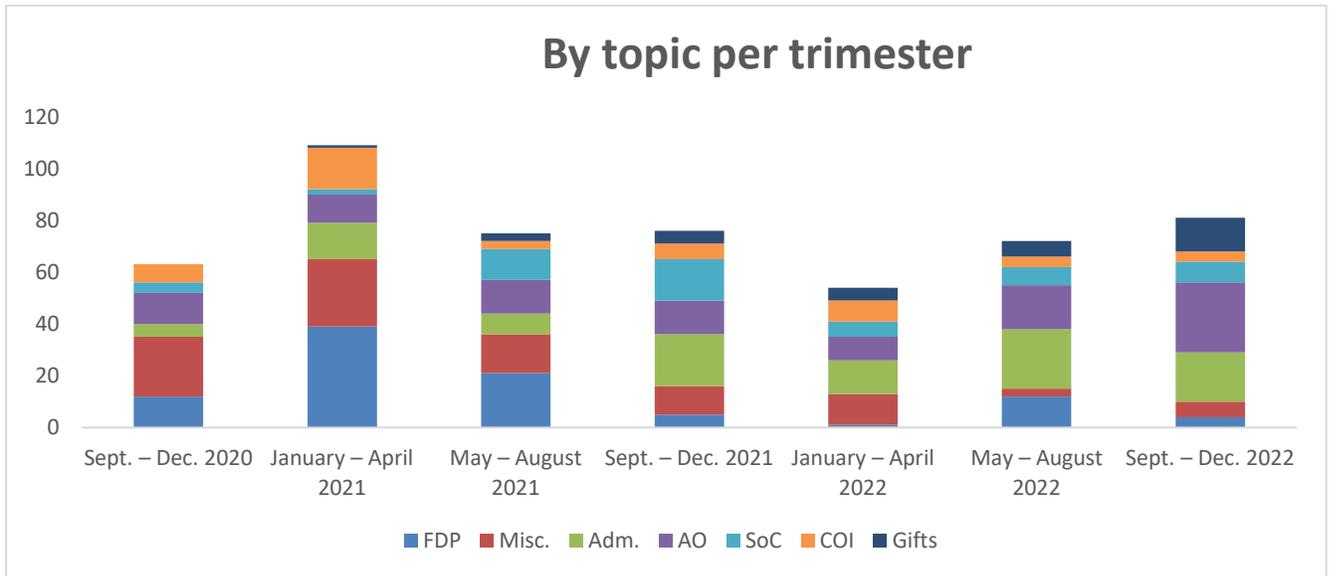
<sup>7</sup> For the purpose of the present Appendix, the following acronyms are used: “FDP” for “Financial Disclosure programme”; Misc. for “misconduct/wrongdoing”; “Adm.” for “administrative-related inquiries”; “AO” for “outside activities”; “SoC” for “standards of conduct”, and “CoI” for “conflicts of interest”.

<sup>8</sup> It is worth noting that in 2021 the Ethics Office led two separate FDP paper-based exercises and numerous staff expressed concerns and difficulties in submitting the necessary documentation during a pandemic.

<sup>9</sup> This includes the provision of preliminary advice on 3 cases of potential/perceived retaliation.

<sup>10</sup> This includes the provision of preliminary advice on 5 cases of potential/perceived retaliation, and 3 cases of wrongdoing.

<sup>11</sup> This includes the provision of preliminary advice on 5 cases of potential/perceived retaliation, and 3 cases of wrongdoing.



<b><u>Topic</u></b>	<b><u>Sept. – Dec. 2020</u></b>	<b><u>Jan. – Apr. 2021</u></b>	<b><u>May – Aug. 2021</u></b>	<b><u>Sept. – Dec. 2021</u></b>	<b><u>Jan. – Apr. 2022</u></b>	<b><u>May – Aug. 2022</u></b>	<b><u>Sept. – Dec. 2022</u></b>
<i>FDP</i>	12	39	21	5	1	12	4
<i>Misc.</i>	23 <sup>12</sup>	26 <sup>13</sup>	15 <sup>14</sup>	11 <sup>15</sup>	12 <sup>16</sup>	3 <sup>17</sup>	6 <sup>18</sup>
<i>Adm.</i>	5	14	8	20	13	23	19
<i>AO</i>	12	11	13	13	9	17	27
<i>SoC</i>	4	2	12	16	6	7	8
<i>CoI</i>	7	16	3	6	8	4	4
<i>Gift</i>	0	1	3	5	5	6	13
<b><i>Total</i></b>	<b>63</b>	<b>109</b>	<b>75</b>	<b>76</b>	<b>54</b>	<b>72</b>	<b>81</b>

<sup>12</sup> This includes the provision of preliminary advice on 3 cases of potential/perceived retaliation.

<sup>13</sup> This includes the provision of preliminary advice on 3 cases of potential/perceived retaliation, and 2 cases of wrongdoing.

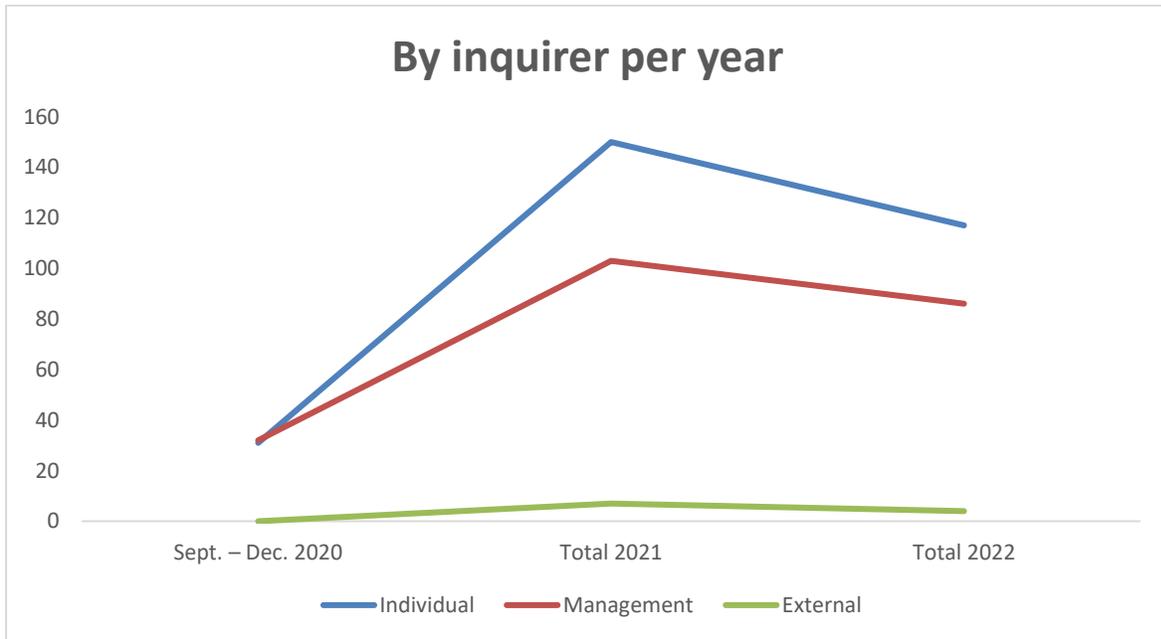
<sup>14</sup> This includes 1 case of wrongdoing.

<sup>15</sup> This includes the provision of preliminary advice on 2 cases of potential/perceived retaliation.

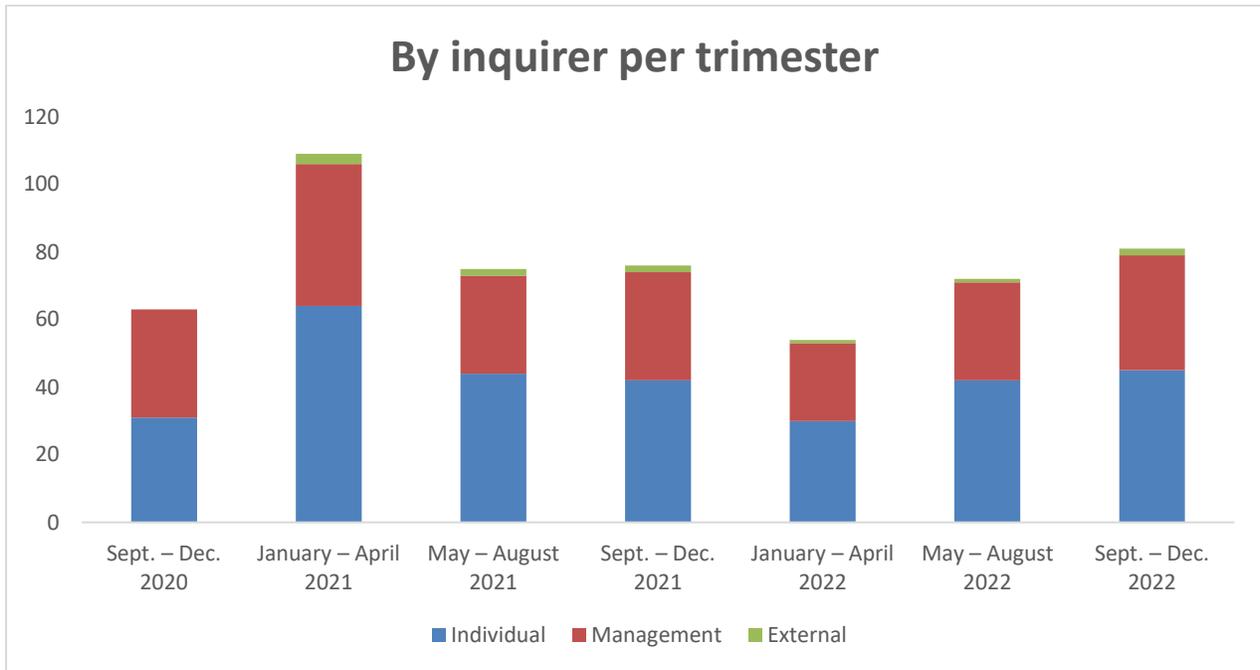
<sup>16</sup> This includes the provision of preliminary advice on 3 cases of potential/perceived retaliation.

<sup>17</sup> This includes the provision of preliminary advice on 1 case of potential/perceived retaliation, and 1 case of wrongdoing.

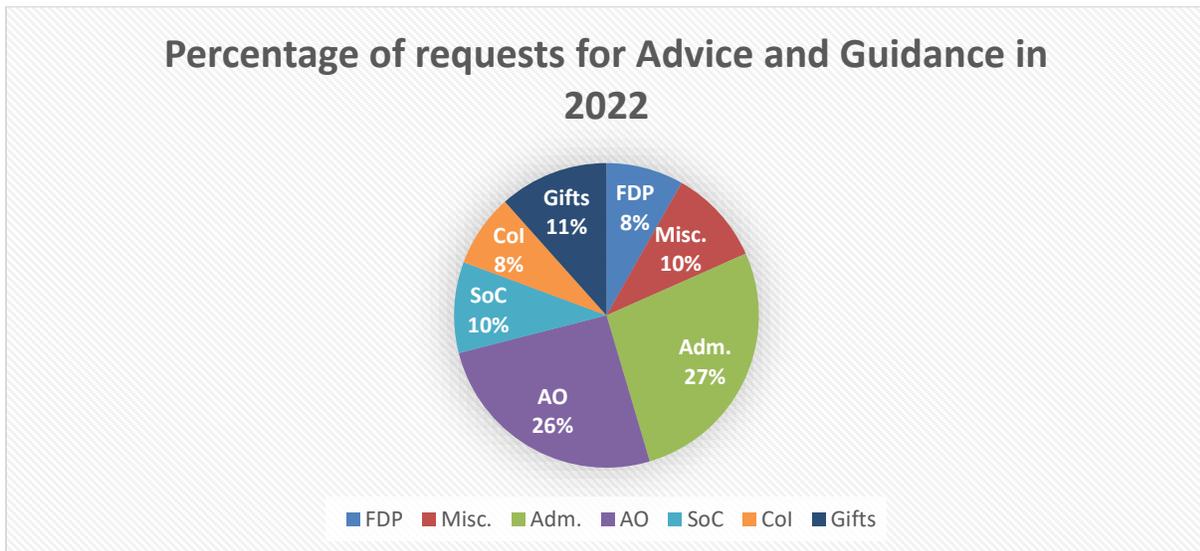
<sup>18</sup> This includes the provision of preliminary advice on 1 case of potential/perceived retaliation, and 2 cases of wrongdoing.



	<b><u>Sept. - Dec. 2020</u></b>	<b><u>Total 2021</u></b>	<b><u>Total 2022</u></b>
<i>Individual</i>	31	150	117
<i>Management</i>	32	103	86
<i>External</i>	0	7	4
<b>Total</b>	<b>63</b>	<b>260</b>	<b>207</b>
<i>Ex Officio</i>	0	7	7

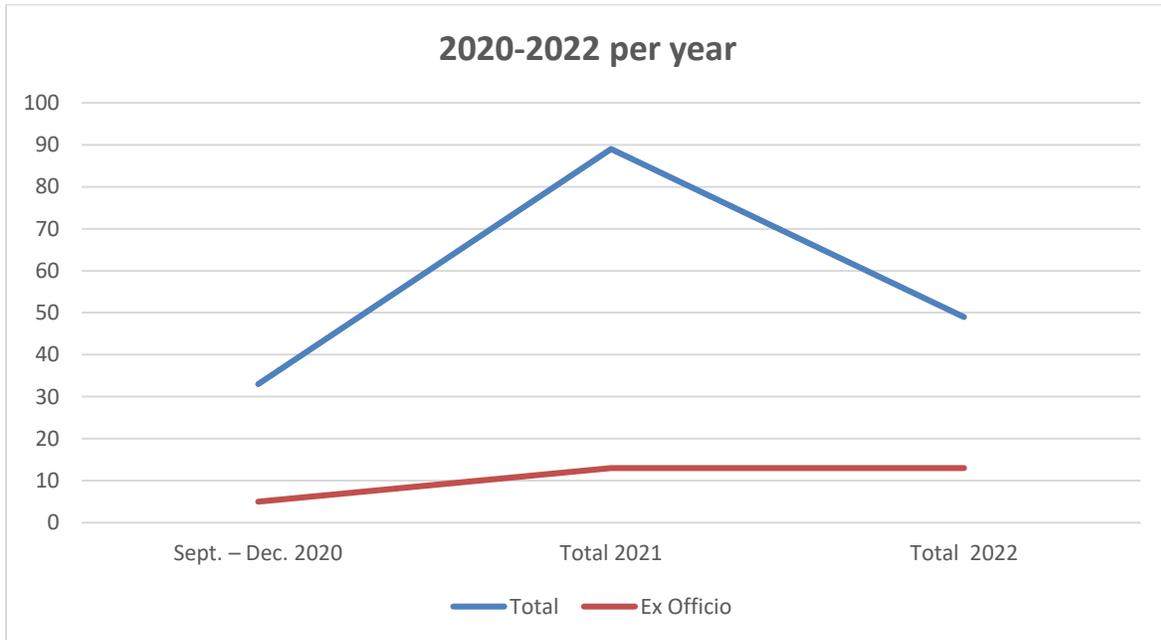


	<u>Sept. – Dec. 2020</u>	<u>Jan. – Apr. 2021</u>	<u>May – Aug. 2021</u>	<u>Sept. – Dec. 2021</u>	<u>Jan. – Apr. 2022</u>	<u>May – Aug. 2022</u>	<u>Sept. – Dec. 2022</u>
<i>Individual</i>	31	64	44	42	30	42	45
<i>Management</i>	32	42	29	32	23	29	34
<i>External</i>	0	3	2	2	1	1	2
<b>Total</b>	<b>63</b>	<b>109</b>	<b>75</b>	<b>76</b>	<b>54</b>	<b>72</b>	<b>81</b>
<i>Ex Officio</i>	0	1	2	4	1	2	4

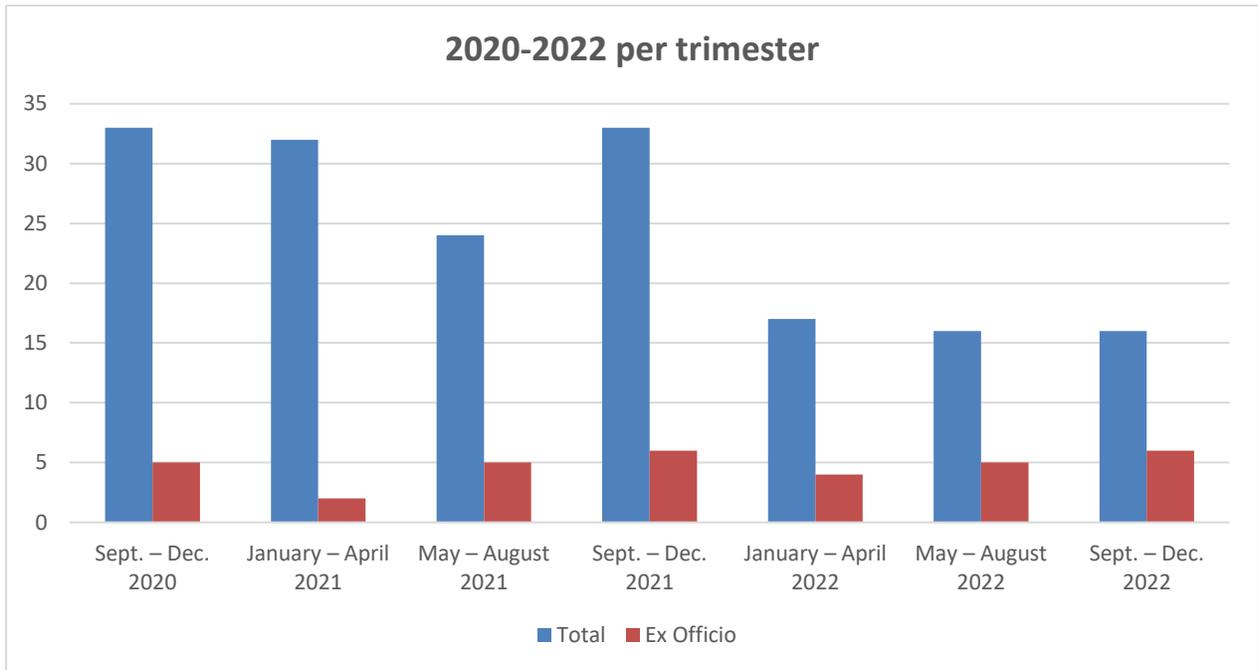


APPENDIX B

**Policy guidance**



	<b><u>Sept. - Dec. 2020</u></b>	<b><u>Total 2021</u></b>	<b><u>Total 2022</u></b>
Total	33	89	49
<i>Ex Officio</i>	5	13	15



	<u>Sept. – Dec. 2020</u>	<u>Jan. – Apr. 2021</u>	<u>May – Aug. 2021</u>	<u>Sept. – Dec. 2021</u>	<u>January – Apr. 2022</u>	<u>May – Aug. 2022</u>	<u>Sept. – Dec. 2022</u>
Total	33	32	24	33	17	16	16
<i>Ex Officio</i>	5	2	5	6	4	5	6

— END —