



MOLDOVA

Establishing Integrity Officers in Public Administration, Public Bodies and Publicly Owned Enterprises

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Background

The National Anticorruption Centre (NAC) of Moldova has requested the Centre for Integrity in the Defence Sector (CIDS) to undertake an examination of the role played by integrity officers within public administrations. This request arises against the backdrop of a growing global trend over the past two decades, where the position of integrity officer has become increasingly prominent. The aim of the request was to contribute to the decision on whether Moldova should introduce integrity officers in its institutions, and if so, what model would be appropriate. In response, CIDS has conducted a comparative study focusing on three countries: Austria, France, and Ukraine with a view to inform a Moldovan specific design choice.

Methodological Approach

This discussion paper adopts a comparative institutional analysis methodology. Selected European models (Austria, France, and Ukraine) are examined against a set of structured design variables, including mandate, institutional positioning, reporting obligations, degree of independence, and relationship to central oversight bodies. The objective is not to provide exhaustive country studies, but to identify typologies and structural choices relevant to the Moldovan purposes. See Annex I below for a synoptic table on the comparisons.

Therefore, the paper explores several key themes arising from the experiences of Austria, France, and Ukraine, including the definitions and legal foundations underpinning the roles, the specific responsibilities and functions associated with the positions, the lines of accountability that apply, the working conditions and incentives offered, and the principal implementation challenges encountered in practice.

Recognizing the diversity of constitutional frameworks and administrative cultures, the paper does not advocate any mechanical transplant of foreign models. Instead, comparative insights are used to inform the design of a Moldova-adapted approach consistent with existing national institutions and legal competences.

Conceptual Framework: Typology of Integrity Officers

Before discussing country cases, a brief conceptual framework outlining key analytical categories may be useful. The paper distinguishes two main models—soft advisory and hard law enforcement—with some internal differences.

- 1) Soft: Advisory or ethical counsellor model, which is primarily consultative, oriented to providing ethics guidance, no compliance monitoring and no centralisation (integrity officers act only within the institution where they work).
- 2) Hard: Compliance and Control with a structured oversight model, which contains a dimension concerning law enforcement, monitoring-investigation, reporting obligations, and a centralized coordination.

Austria and France respond primarily to the first model. Ukraine leans towards the second model. The typology of integrity officers reveals key design variables that Moldovan policy makers may want to bear in mind:

- Advisory vs compliance emphasis
- Institutional internal (decentralised) vs centralised control by an external body such as a central anticorruption agency
- Preventive vs law enforcement orientation

Definitions and Legal Foundations

In Austria, the system features integrity advisors (known as *Integritätsbeauftragte*) who work in tandem with compliance officers. France employs a dual approach, appointing both *référénts déontologues* and *référénts anticorruption*, in addition to other designated agents (*référénts laïcité*, *référénts alerte*, etc.). Meanwhile, Ukraine's framework assigns a range of advisory, law enforcement, and reporting responsibilities to anti-corruption officers, who maintain some form of link with the National Agency for the Prevention of Corruption (NAPC). The purpose of this paper is to analyse and compare the similarities and differences among these models and suggest choices for Moldova.

The development of roles dedicated to upholding integrity and combating corruption is marked by significant complexity across all three national contexts. This intricacy often stems from ambiguity regarding whether these officers should be tasked primarily with law enforcement duties, advisory functions, or a combination of both. As the remit of these officers broadens, their capacity to fulfil their responsibilities effectively can become increasingly strained.

1. Austria: Integrity Officers and Compliance Officers

Integrity officers in Austria are specialists dedicated to promoting integrity, preventing corruption, and they often overlap with compliance officers. Their main responsibilities include raising awareness and giving advice to public officials at every level—federal, lander, and local. This guidance is available to civil servants, higher-ranking officials, and employees of publicly owned enterprises.

The Network of Integrity Officers (NIO) was set up in 2016 by the Federal Anti-corruption Bureau (BAK), which operates under the Federal Ministry of the Interior. The BAK, established in 2010 as a separate entity from the Directorate General for Public Security, has a legal mission to prevent and fight corruption. Its duties also involve investigating police misconduct, working with the central Public Prosecutor's Office to prosecute corruption and organised crime, and collaborating internationally with anti-corruption organisations.

Department 2 of the BAK focuses on prevention, education, and partnerships with international anti-corruption bodies. One of its key tools is the NIO, whose participants come from every federal ministry, as well as regions, municipalities, universities, public enterprises, the Austrian Association of Cities and Towns, and the Court of Audit. Currently the NIO has some 200 members.

While the roles may sometimes overlap, integrity officers and compliance officers remain operationally distinct in Austria. Compliance officers are based within the Federal Chancellery and throughout individual ministries and institutions.

The responsibility for preventing corruption assigned to integrity officers centres on providing advice, training and raising awareness regarding the core principles and values

of integrity, objectivity, discretion, trust, and appreciation. The recipients are managers and ordinary civil servants as well as the civil society.

2. France: deontology counsellors and anti-corruption agents

The *référént déontologue* (integrity officer or ethics counsellor) position was established by Law 83-634 in 1983, granting all civil servants the right to consult an ethical adviser. Law 2016-483 of 2016 and Decree 2017-519 further defined its role and appointment. Effective 1 January 2025, the General Code of the Civil Service (Articles L-124.2 through L-124.12) consolidates these provisions, requiring all civil service authorities to offer ethical guidance to civil servants regarding their legal responsibilities and the ethical standards applicable to the performance of their duties, especially concerning the values of the public service: impartiality, integrity, laicity, and the limits of the hierarchical obedience. The ethical counsellor works to prevent corruption by sharing information that upholds public service values and principles.

Every public institution must include an ethical advice function, either internally or jointly with others, to 1) advise on conflicts of interest; 2) offer guidance on ethical standards; and 3) address issues like post-public employment (revolving doors), multiple activities, and accepting gifts or personal benefits.

Only institutions governed by the Civil Service General Code must appoint ethical counsellors, as integrity advisers are required by the Code. Other institutions should create reliable systems to address integrity issues and support employees in handling ethical dilemmas such as codes of conduct, internal whistleblowing reporting channels, internal controls, corruption risks maps, etc.

The French Anti-corruption Agency (AFA), under the Ministry of Justice and the Ministry of the Budget, does not oversee integrity advisors directly. However, under the 2016 Law on Transparency, Fight Against Corruption and Modernisation of Economic Life (*Loi Sapin II*), the AFA assesses institutions' integrity mechanisms, including the presence and independence of integrity counsellors, the clarity of their responsibilities, the documentation of advice, and coordination with anticorruption and legal units.

Unlike the *référént déontologue*, the “*anticorruption référént*” is not established under French law and its appointment is not mandatory; however, entities subject to Article 17 of the Sapin II Act¹ must implement an anticorruption compliance programme, which in practice requires assigning internal responsibility for its arrangements and implementation. The AFA recommends, on a voluntary basis, appointing an individual or unit to promote anticorruption policies (they are known as *référénts anticorruption*). These agents should manage anticorruption risk assessments, update codes of conduct,

¹ Law on Transparency, the Fight Against Corruption and Modernisation of the Economic Life, known as Loi Sapin II, was promulgated on 9 December 2016. It is a comprehensive anti-corruption statute law requiring large French companies (500+ employees, €100M+ turnover) and groups to implement strict compliance measures, including a code of conduct, risk mapping, and whistleblower protection systems, under the supervision of the Agence Française Anticorruption (AFA). It targets bribery, influence peddling, and other financial misconduct both in France and abroad.

oversee whistleblower internal reporting channels, participate in disciplinary follow-up, and coordinate internal services including HR, Legal, Finance, procurement, and internal control.

3. Ukraine: Anticorruption Officers (AC)

The anticorruption officer is a short name for two different agents, which were established by the Law on Corruption Prevention of 2014. Even if they have different legal guarantees and obligations, in practice these two agents are difficult to distinguish: 1) “authorised personnel for corruption prevention and detection” (they usually hold a civil servants’ status) and 2) “authorised personnel for anticorruption program implementation” (they are labour law employees). The functions of both types of AC officers are almost the same and differ mostly in the procedures for performing their duties, appointment, and dismissal. Guarantees of independence are stronger for those holding the civil service status than for those with a labour law status.

AC officers work on corruption prevention and detection in key state bodies (including ministries), regional administrations and local municipalities, state-owned legal entities, and other areas.

The National Agency for Corruption Prevention (NACP) oversees and supports AC officers, conducts analyses of their work, and monitors asset declarations, political party financing, lobbying, and anticorruption law enforcement. NACP provides explanations, manuals, education, and other support materials on key issues related to anticorruption policies and procedures. It manages whistleblower complaints and protections. Until June 2025, NACP had a department dedicated to AC officer coordination; now, these functions are handled by various departments within the agency.

Functions and Responsibilities

1. Austria: Advice, training and awareness raising

Integrity officers’ main tasks are:

- Acting as a contact for integrity promotion, corruption prevention, and compliance inquiries for all staff.
- Advising senior officials on developing and implementing anti-corruption measures like compliance programs, codes of conduct, ethics guidelines, and training initiatives.
- Monitoring and assessing indicators and corruption risk factors.
- Raising awareness within departments through seminars, anti-corruption trainings, information campaigns, and supporting training efforts.
- Providing staff with relevant information and guidance.

2. France: Advice and training

Ethical counsellors' main task consists of providing useful advice and guidance on the obligations and ethical principles derived from the legislation on civil service, displayed especially in articles L-121 to L-124 of the General Civil Service Code. The themes on which the advice is expected are the following:

- Dignity, impartiality, integrity and probity
- Neutrality and laicity
- Prevention of conflicts of interest
- Observance of professional confidentiality and discretion
- Releasing information to the public
- Duty of hierarchical obedience
- Obligation of declaration of interests and assets prior to taking certain job positions
- Obligation of withdrawing from the management of personal financial interests prior to taking certain positions (through trust funds or other instruments)
- On the rules concerning the compatibility with external employment

In addition, the ethical counsellor at a ministry may be entrusted with the procedures of gathering and treating the information provided by whistle blowers, but not with their protection.

The ethical counsellor does not offer legal advice to civil servants regarding matters such as recruitment, career development, or disciplinary actions, nor does the counsellor act as a mediator between the civil servant and their employing institution. Staff adherence to ethical principles is the responsibility of the head of unit, not the ethical counsellor.

While the legislation does not explicitly mandate ethical counsellors to conduct training, offering such instruction is central to promoting respect for, and adherence to, public service ethical principles and values.

3. Ukraine: integrity promotion, detection of possible misconduct, reporting of corruption, protection of whistle-blowers and controlling lobbying

The main functions of AC officers are as follows:

- development, organisation, and control over the implementation of anticorruption measures, developing anticorruption policies and procedures
- organising work on assessing corruption risks in the activities of the respective entity, preparing measures to eliminate them, and submitting relevant proposals to the head of such entity
- providing methodological and consulting assistance on anticorruption legislation for the staff
- taking measures to identify a conflict of interest, facilitate its resolution, inform the head of the relevant entity (in some cases also the NACP) about the identification of a conflict of interest and measures taken to resolve it

- verification of the fact of submission of assets declarations by declarants and notification to NACP on any related offences
- monitoring compliance with anticorruption legislation, including consideration of reports of violations and due diligence of the counterparts
- ensuring the protection of employees who have reported violations in accordance with the legislation on the protection of whistleblowers
- informing the head of the relevant body, the NACP, or other specially authorised entities in the field of combating corruption about the facts of violation of anticorruption legislation
- taking measures to identify violations of the requirements of the legislation on lobbying and reporting the identified violations to the NACP

This list of main functions is not exhaustive and may include additional tasks defined in the legislation.

Working Conditions, Incentives and Accountability

In Austria and France, integrity officers take on these responsibilities in addition to their usual duties, whereas in Ukraine, "integrity officer" is a separate job title with its own distinct role.

In Austria and Ukraine there are no additional incentives or bonuses for the performance of functions of integrity officers. In France, the *référénts déontologues* are entitled to an indemnity of 750 euros per month (Decision of the Ministry of the Interior of 11 June 2025, Official Journal Num 0140 of 18 June 2025).

In the three countries, integrity officers are recruited by and assigned to a ministry, or public body or public enterprise and they report to the head of that ministry, to whom they are accountable. For certain cases, AC officers shall also report in Ukraine to the NACP.

There are no prior requirements to be appointed as an integrity officer, except in France, where integrity officers shall be civil servants of category A holding a position equal or higher than that of head of unit (*chef de bureau*).

In France, the ministerial ethical counsellor presides over and is assisted by a restricted ministerial committee, whose role is to examine draft recommendations, draft pieces of advice, the annual report and the working plan for all ethical counsellors within the network of the ministry. An enlarged ministerial committee examines all questions concerning ethics and the issue of guidelines and exchanges of experience in this matter (Decision of 21 January 2019, Official Journal Num 0021 of 25 January 2019).

In Ukraine, the role of the NAPC can impact on the workings of integrity officers. The NAPC provides methodological support and guidance to prepare corruption risk assessments and other assignments, it must authorise the dismissal of the head of an authorised unit on corruption prevention and detection within a national-level body, it assesses the effectiveness of the authorised personnel on corruption prevention and

detection, and interacts with AC officers in different tasks and spheres (conflict of interest, declaration of assets, whistleblowers protection, etc)

Implementation Challenges

Ukraine's two types of Anticorruption Officers, with differing status and guarantees, create confusion. Debate continues over whether these officers should remain employees of the bodies they oversee or be seconded from the NAPC. The demanding and complex responsibilities, combined with understaffing and limited resources in anticorruption units—especially regionally and locally—may reduce their effectiveness.

In France, *référénts déontologues* face significant challenges such as maintaining complete independence and impartiality from their superiors, guaranteeing strict confidentiality, and handling complex conflicts of interest. Shifting from a role of oversight to one focused on support and practical guidance—by educating agents about ethical practices—is a difficult endeavour. Ethical counsellors are often consulted on sensitive and intricate issues like secularism, conflicts of interest, holding multiple positions, and upholding confidentiality. Insufficient resources can further complicate their ability to perform effectively.

Austria's approach is simpler than Ukraine's and France's. Integrity officers advise on ethical issues with support from the BAK and their network, focusing mainly on raising awareness and providing training to public administration and civil society. A key challenge for them has been securing resources to meet the growing demand for basic integrity and anticorruption training. Separating the roles of integrity officers from compliance officers is not always straightforward.

The Situation of Moldova

1. Positioning Moldova within the comparative spectrum

The preceding comparative analysis shows that integrity officer models in Europe vary along a spectrum. At one end are advisory-focused approaches (e.g., Austria and France), centered primarily on ethical guidance and consultation. At the other end is the compliance-oriented model institutionalized in Ukraine, characterized by structured monitoring, reporting obligations, and centralized methodological coordination.

In considering the possible introduction of integrity officers in Moldova, the question is therefore not whether such a function should exist *in abstracto*, but how it should be positioned within this spectrum, considering Moldova's existing legal framework and institutional architecture and past developments. Moldova has developed a comprehensive integrity legal framework over the past decade. This includes:

- Integrity Law No. 82/2017;
- Law No. 132/2016 and Law No. 133/2016 governing asset and interest declarations under the supervision of the National Integrity Authority (NIA);

- Law No. 165/2023 on whistleblower protection;
- Law No. 325/2013 on institutional integrity assessment, implemented by the National Anticorruption Center (NAC);
- The gifts regime under the Integrity Law and Government Decision No. 116/2020.

Taken together, these instruments establish a dense regulatory environment. The principal challenge is therefore not normative absence, but rather: fragmentation of integrity-related responsibilities among and within institutions; uneven implementation capacity, particularly in smaller public authorities; and limited coordination between internal preventive mechanisms and external oversight bodies.

Accordingly, the introduction of integrity officers in Moldova should not be conceptualized as the creation of an additional enforcement layer. Rather, it could be viewed as a potential instrument for strengthening institutional integrity culture which would facilitate coherence of already existing integrity obligations.

The Moldovan context suggests that a purely advisory model, like the Austrian or French approaches, may not sufficiently address existing implementation gaps, even if the basic question could be whether integrity officers should and are able to fill those gaps or, on the contrary, other institutional mechanisms are needed.

At the same time, replicating the full Ukrainian compliance architecture would risk institutional duplication, particularly considering the established verification competences of the NIA and the preventive and investigative mandate of the NAC.

Within this comparative framework, Moldova seems to be best suited to a prevention-oriented model, positioned somewhere between the purely advisory ethics frameworks of Austria and France and the Ukrainian-type compliance-control architectures. Such a model would seek to:

- provide advice and ethical guidance
- contribute to internal integrity coordination and compliance mechanisms.
- delimit clear institutional boundaries with external oversight bodies.
- ensure feasibility considering Moldova's administrative capacity.

Drawing selectively on the compliance orientation observed in Ukraine, the model could incorporate internal monitoring and reporting elements, while clearly limiting the role to preventive functions, not law enforcement. In this manner, it would contribute to the implementation of the existing integrity framework without generating institutional overlaps, excessive bureaucratization or risky law enforcement, which would remain elsewhere in the system.

Under this approach, the role would be conceptualized as an Internal Corruption Prevention Coordinator, which could be referred to as the “integrity officer”.

2. Mandate and Core Features in the Moldovan Context

2.1 Coordination of institutional integrity mechanisms

In contrast to advisory models centered primarily on individual ethical consultation, the Moldovan integrity officer would focus on system-level advice and coordination. Core responsibilities may include:

- Maintaining and periodically updating institutional integrity or anti-corruption plans.
- Monitoring implementation of recommendations resulting from institutional integrity assessments or inspired by international anticorruption bodies.
- Reporting periodically to the institutional leadership on implementation progress.

The emphasis would remain on coordination and follow-up rather than substantive control or verification.

2.2 Ensuring procedural compliance with integrity obligations

Reflecting the compliance-oriented dimension identified in the Ukrainian model, the Moldovan integrity officer may oversee formal compliance processes within the institution, including:

- Monitoring adherence to deadlines for submission of asset and interest declarations (without assessing their content).
- Ensuring that internal procedures concerning conflicts of interest and incompatibilities are operational.
- Supervising the maintenance of gifts registers and related documentation.

Substantive verification and enforcement would remain within the exclusive competence of the NIA, the NAC, and other legally mandated authorities.

2.3 Coordinating whistleblowing mechanisms

Consistent with Law No. 165/2023, the integrity officer may ensure that:

- Internal reporting channels are functional and accessible.
- Confidentiality and procedural guarantees are respected.
- Reports are appropriately routed to competent authorities where legally required.

As in comparative advisory models, the function would remain preventive and procedural rather than investigative.

2.4 Providing training and awareness-raising

A preventive dimension – characteristic of the Austrian and French experiences – may be retained through:

- Introductory briefings for newly appointed staff.
- Targeted training for high-risk functions (e.g., procurement, inspections, licensing, personnel recruitment).
- Development of practical internal guidance materials.

This element reinforces institutional capacity and complements procedural compliance coordination.

2.5 Acting as institutional liaison

The integrity officer may also serve as:

- A prevention contact point for NAC.
- A coordination interface with NIA on systemic compliance matters, excluding intervention in individual case assessments.

2.6 Delimitation of competences

The comparative analysis presented above highlights the necessity of precisely defining mandates to prevent institutional overlap. This issue is especially pertinent in Moldova, considering the existing authorities and roles of the NAC and NIA. Such delimitation preserves the institutional balance between internal preventive coordination and external oversight. Clear legal definition of competences would be essential to prevent overlaps and ensure coherence within the Moldova's integrity framework.

Accordingly, the integrity officer would not exercise the following functions:

- Conducting investigations.
- Performing integrity testing or covert control measures.
- Substantively verifying assets and interest declarations.
- Imposing disciplinary sanctions.
- Replacing internal audit functions.
- Exercising law-enforcement or quasi-investigative powers.

2.7 Institutional positioning and safeguards

Comparative practice shows that integrity officers' effectiveness relies on both their mandate and their position within the administrative hierarchy. Effective prevention models require adequate structural safeguards. In the Moldovan context, this may include:

- A direct reporting line to the head of the institution.
- Legal definition of the mandate in primary legislation or a dedicated regulatory framework.
- Guarantees supporting functional independence, including protection against arbitrary dismissal.
- Minimum qualification standards and clearly defined training requirements.

Including these elements would bolster the role's credibility and effectiveness as an internal coordination mechanism, rather than leaving it merely formal. Without proper safeguards, the role risks becoming marginal or symbolic in practice.

2.8 Role of the Moldovan NAC

If Moldova adopts a prevention-oriented model, NAC could assume a central methodological coordination role in relation to integrity officers, drawing on some elements of centralized coordination observed in the Ukrainian experience.

Such a role may include:

1. Developing standardized templates for integrity plans and reporting
2. Providing training-of-trainers programs
3. Establishing a professional network of integrity officers
4. Issuing preventive guidance
5. Aggregating anonymized reporting to identify systemic integrity risks.

At the same time, the preventive character of the role should be preserved. Integrity officers would remain internal coordination mechanisms and should not be transformed into extensions of investigative or enforcement structures.

2.9 Tailored flexible design

Moldova's administrative landscape requires differentiation rather than uniformity. Comparative experience also underscores the importance of proportionality in designing integrity officer frameworks.

Given the diversity of Moldova's public administration, a uniform model may not be suitable. A tiered approach could therefore be considered, including:

- Large or high-risk institutions (e.g., central authorities, major state-owned enterprises, entities managing substantial procurement budgets): designation of a dedicated full-time integrity officer or a small compliance unit.
- Medium-sized institutions: appointment of a part-time integrity officer with a formally protected time allocation.
- Small local public authorities: shared or inter-municipal arrangements to ensure feasibility and resource efficiency.

Such a tailored flexible model would mitigate the risk of excessive administrative burden and reduce the likelihood of purely formal or symbolic compliance.

How the Moldovan Model Would Compare with Austria, France and Ukraine?

The Moldovan model would differ from the Austrian, French, and Ukrainian approaches discussed above. While it draws selectively on elements of each, it does not replicate any of the three models in full. Its positioning reflects an attempt to adapt comparative experience to Moldova's specific institutional and administrative context.

1. Comparison with Austria

In Austria, integrity officers operate primarily as advisory and awareness-raising actors, with a strong emphasis on ethics guidance, internal consultation, and the promotion of a preventive culture. The model is decentralized and relies significantly on soft coordination mechanisms and professional networks.

The proposed Moldovan approach departs from this framework by assigning integrity officers clearer procedural compliance coordination responsibilities. In addition to advisory support, the Moldovan integrity officer would assume structured duties related to monitoring implementation of integrity plans, coordinating whistleblowing procedures, and tracking compliance with formal obligations.

At the same time, the Moldovan model retains the preventive character of the Austrian experience by avoiding the attribution of investigative or enforcement competences.

2. Comparison with France

The French *référént déontologue* model centres on individual ethical advice and the right of civil servants to confidential consultation. While the broader French integrity framework includes institutional compliance mechanisms, the *référént déontologue* primarily functions as a counsellor on deontological matters.

By contrast, the proposed Moldovan model extends beyond individualized ethical consultation to encompass system-level coordination of integrity mechanisms. Although advisory functions remain present, the Moldovan integrity officer would be expected to oversee the functioning of internal compliance procedures in a more structured and documented manner.

3. Comparison with Ukraine

The Ukrainian model, coordinated by the NACP, establishes mandatory authorized anti-corruption units or officers with formalized compliance, monitoring, and reporting obligations. The model is strongly compliance-driven and embedded within a centralized oversight architecture.

The proposed Moldovan approach is closer to this compliance orientation than to the advisory models observed in Austria and France. It incorporates structured coordination, monitoring, and reporting elements and envisages a methodological role for the NAC.

However, it does not advocate replication of the full Ukrainian architecture. In light of Moldova's smaller administrative scale and the established competences of the NIA, the integrity officer would not exercise investigative, verification, or enforcement functions. The role would remain prevention-oriented and internally focused.

Recommendations for Moldova

1. Moldova could choose not to appoint integrity officers at all and instead rely on current institutional managerial structures to enforce anticorruption laws

and promote public integrity. Given the already dense anticorruption legal framework existing in Moldova, this choice should not be discarded.

2. Should Moldova establish integrity officers, it should adopt an approach as simple and easy to manage as possible, while relying to the extent possible on existing organisational or institutional arrangements.
3. Integrity officers should be specifically designed as instruments for the development of a culture of integrity in all spheres of public life, including public administration, all kind of public bodies and publicly owned enterprises.
4. Integrity officers should focus on raising awareness and providing training via public events and education courses, as well as by advising public authorities and employees, rather than acting as law enforcement or compliance agents.
5. When setting up integrity officers, clearly outline their duties, authority, accountability, and working conditions.
6. Moldova's administrative culture may tend to favour Ukraine's strict compliance model over the softer approaches used in Austria and France. However, for Moldovan civil servants and public employees, an advisory role that promotes public integrity may be more needed within the administration and public bodies, since disciplinary rules and the penal code already enforce compliance.

Annex I: Comparative Matrix: Integrity Officer Models

<i>Design Variable</i>	Austria	France	Ukraine	Proposed Moldova Model
Legal Basis	Administrative regulations and ministerial frameworks establishing integrity officers within federal ministries.	Codified within the General Civil Service Code (<i>référént déontologue</i>).	Statutory framework mandating authorized anti-corruption units/officers coordinated by the National Agency on Corruption Prevention (NACP).	To be defined in primary legislation or dedicated regulation within Moldova's integrity framework.
Nature of Designation	Designated within institutions; not uniformly mandatory across all entities.	Mandatory access to a <i>référént déontologue</i> ; designation required within civil service bodies.	Mandatory establishment of authorized anti-corruption units or officers across public institutions.	Structured designation, potentially tiered according to institutional size and risk profile.
Primary Orientation	Advisory and preventive (ethics-focused).	Advisory and deontological guidance.	Compliance-control model with structured monitoring and	Prevention-Oriented Coordination Model.

			centralized oversight.	
Core Functions	Ethics advice; awareness-raising; participation in professional networks; internal consultation.	Confidential ethical consultation; guidance on conflicts of interest.	Monitoring implementation of anti-corruption programs; compliance reporting; risk assessment; liaison with NACP.	Coordination of integrity plans; procedural compliance monitoring; whistleblowing coordination; training and awareness; liaison with NAC and NIA.
Investigative Powers	None.	None.	No criminal investigative powers, but structured compliance oversight functions.	None. Explicit exclusion of investigative, verification, or enforcement competences.
Verification of Asset Declarations	Not applicable.	Not applicable.	Integrated into broader compliance monitoring architecture.	No substantive verification: competence remains with the National Integrity Authority (NIA).
Disciplinary Authority	None.	None.	May trigger internal compliance procedures but not criminal investigations.	None. No disciplinary powers.
Central Coordination Mechanism	Soft coordination; professional networks at federal level.	Institutional coordination within administrative hierarchy.	Strong centralized methodological and reporting coordination by NACP.	Methodological coordination by the National Anticorruption Center (NAC), limited to guidance, training, templates, and aggregation of anonymized information (no investigative supervision).
Reporting Obligations	Limited formal reporting; advisory activity-based.	Limited; primarily consultative.	Structured reporting to central authority on compliance implementation.	Internal reporting to head of institution; possible aggregated anonymized reporting to NAC.
Degree of Institutional Independence	Embedded within institutional hierarchy; varies by ministry.	Embedded within hierarchy; confidentiality safeguards emphasized.	Defined by law within institutional compliance structures.	Legally defined mandate; direct reporting line to institutional leadership; basic functional independence safeguards recommended.
Implementation Model	Integrated within existing administrative roles.	Integrated within civil service structures.	Mandatory compliance units/officers across institutions.	Possible tiered and proportionate/flexible model: full-time in high-risk institutions; part-time or shared

				arrangements in smaller entities.
Risk of Institutional Overlap	Low (advisory focus).	Low (advisory focus).	Moderate (depending on coordination with other oversight bodies).	Mitigated through explicit legal delimitation from NAC and NIA competences.
Overall Model Characterization	Advisory / Ethics-Counsellor Model.	Advisory / Deontological Guidance Model.	Compliance-Control Model with centralized oversight.	Prevention-Oriented Coordination Model adapted to Moldova's institutional scale and legal framework.

Note:

The comparative matrix presented above is intended as an analytical tool to facilitate structured comparison across selected jurisdictions. It does not seek to provide an exhaustive account of each national system, nor does it imply full functional equivalence between institutions operating in different constitutional and administrative contexts.

Several methodological limitations should be noted:

1. Contextual differences

Integrity officer models operate within distinct legal traditions, administrative cultures, and governance structures. Institutional competences that appear similar in formal description may differ substantially in practice.

2. Scope of comparison

The matrix focuses on selected design variables relevant to the policy discussion in Moldova (e.g., mandate, independence, reporting obligations, central coordination). It does not capture all operational, political, or cultural factors influencing effectiveness.

3. Dynamic institutional evolution

Integrity frameworks in the examined jurisdictions continue to evolve. Legislative amendments, administrative reforms, or shifts in institutional practice may alter the scope and functioning of integrity officers over time.

4. Transferability constraints

Comparative models cannot be transposed mechanically. The purpose of the comparison is to identify design elements and structural choices rather than to recommend replication of any single national model.

Accordingly, the proposed Moldovan model should be understood as an adaptation informed by comparative experience, rather than as a direct transplantation of foreign institutional arrangements.