



IUSS

Scuola Universitaria Superiore Pavia

**CODE OF ETHICS AND CONDUCT OF THE
UNIVERSITY SCHOOL FOR ADVANCED STUDIES
IUSS PAVIA**

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PREAMBLE

This *Code of Ethics and Conduct* sets out the fundamental values of the community that makes up the University for Advanced Studies IUSS Pavia (hereinafter, the “School”), promoting, in accordance with Article 3 of the Statute, the recognition and respect of individual rights, as well as the acceptance of duties and responsibilities towards the institution to which they belong, and defines the rules of conduct within that community (hereinafter, the “Community”).

In particular, Chapter II, *the Code of Ethics*, sets out, in accordance with the provisions of Article 2, paragraph 4, of Law No. 240 of 30 December 2010, the ethical principles and fundamental values of the Community, promoting the recognition of and respect for individual rights and freedoms, the acceptance of ethical and social duties and responsibilities towards the School, and defining the rules of conduct within the Community and towards all those who directly or indirectly come into contact with the School.

Chapter III, *Code of Conduct*, defines the minimum duties of diligence, loyalty, impartiality and good conduct that public servants are required to observe, implementing the provisions of the Code of Conduct for Public Servants issued by Presidential Decree No. 62 of 16 April 2013 (hereinafter, the “National Code of Conduct”).

The two codes are combined into a single document and coordinated with one another with a view to achieving coherent and effective integration.

CHAPTER I – GENERAL PROVISIONS

ART. 1. PRINCIPLES AND VALUES

1. In pursuing the values that underpin scientific research, teaching and other university activities, the School identifies freedom of expression and teaching, mutual respect and tolerance of diversity as the core principles of its work.

2. The School requires all members of its community, who hold different positions, roles and responsibilities within it, both individually and within collegial bodies, to respect and promote the principles set out below:

- respect for human dignity and the promotion of the person, both as an individual and as a member of the community;
- rejection of all forms of discrimination, and respect for and recognition of differences in origin, language, religion, political opinions, personal, social and economic conditions, sex, gender and sexual orientation;
- freedom of teaching and scientific research;
- responsibility and respect for the duties towards the Community;
- honesty, integrity and professionalism;
- diligence, loyalty, fairness and good faith;
- solidarity and support for the most vulnerable;
- recognition of merit, to be pursued also through an effective evaluation system;
- respect for and protection of the environment and the healthiness of living and working environments, both physically and psychologically;
- impartiality and the proper conduct of administrative action, in accordance with the principles of efficiency, effectiveness, economy and transparency;
- proportionality, objectivity, fairness and reasonableness, independence, impartiality, abstention in the event of a conflict of interest;
- the link between autonomy and responsibility.

The principles listed above form the foundations of the School's *Code of Ethics and Conduct*, compliance with which is required equally of all members of the Community, each in accordance with their own role and responsibilities.

3. The entire Community observes the Constitution, serving the Nation with discipline and honour and conducting itself, within the scope of its competence, in accordance with the principles of good governance and impartiality in administrative action. It carries out its duties in accordance with the law, pursuing the public interest without abusing the position or powers held.

4. All staff members, as part of the Community, contribute to the pursuit of the School's objectives, respecting its Statutes and Regulations, within the scope of the duties and functions assigned to them.

5. In particular, the worker:

- shall carry out their duties by ensuring that administrative action is conducted

with the utmost economy, efficiency and effectiveness. The management of public resources for the purpose of carrying out administrative activities must follow a logic of cost-containment, without affecting the quality of the results;

- during relations with the recipients of the administrative action, he/she ensures full equality of treatment on equal terms, refraining, also, from arbitrary actions which may have negative effects on the recipients of the administrative action or that may involve discrimination based on gender, nationality, ethnic origin, genetic characteristics, language, religion or belief, personal or political beliefs, membership of a national minority, disability, social or health conditions, age and sexual orientation or other factors;
- demonstrates maximum availability and collaboration in relations with other public administrations, ensuring the exchange and transmission of information and data in any form, including electronic, in compliance with current legislation.

ART. 2. SCOPE OF APPLICATION

1. The provisions of Chapter II *of the Code of Ethics* apply to all those who, in various capacities, form part of the Community, including lecturers, researchers, technical and administrative staff, trainees, students, members of statutory bodies, holders of grants for research collaboration, scholarships or research grants, and all staff working in the fields of teaching, research and administration under various types of contract.

2. The provisions of Chapter III *of the Code of Conduct*:

- a) apply to all permanent and fixed-term technical and administrative staff of the School, including managers, language and technology support staff pursuant to Article 24-bis of Law 240/2010;
- b) apply, insofar as they are compatible, to collaborators or consultants of the School, in whatever capacity, as well as to collaborators of entities carrying out works or supplying goods or services to the School.
- c) constitute principles of conduct for the remaining members of the Community, insofar as they are compatible with the provisions of their respective regulations.
- d) do not apply to pupils and students of the School.

3. The provisions of Chapter II *of the Code of Ethics* also apply to care provided at Regional Health Service facilities by:

- a) professors, researchers, assistants and administrative staff working under contract;
- b) research fellows and PhD students authorised by the health authorities to carry out clinical work;
- c) doctors undergoing specialist training;
- d) students on medical and healthcare degree programmes.

4. The Code of Conduct of the healthcare facility where the persons referred to in the preceding paragraph carry out their work, study, teaching and research activities also applies to them, without prejudice to their legal status, including the consequences provided for in the event of any breach. Such consequences may not, however, exceed the limits established by the regulations and agreements in force with the Regional Health Service. The School retains its disciplinary authority and the prerogative to assess, in accordance with its own regulations, conduct relevant under the Code of Conduct of Healthcare Facilities.

5. The persons referred to in paragraph 3, should they consider that there is a discrepancy or conflict between the Codes of Conduct of the University and the School and that this gives rise to adverse consequences, may report this to the Rector for appropriate action.

6. Breach of the provisions of this Code shall result, with reference to the year of the breach, in technical and administrative staff being denied access to the rewards linked to the Performance Measurement and Evaluation System, and in members of the Faculty being denied access to the distribution of resources to researchers and to the Classes and other forms of reward provided for.

CHAPTER II – CODE OF ETHICS

SECTION I – PRINCIPLES

ART. 3. REJECTION OF ALL FORMS OF DISCRIMINATION

1. All members of the Community have the right to be treated with equal respect and consideration and not to be discriminated against, either directly or indirectly, on the basis of factors such as religion, gender, sexual orientation, personal beliefs and convictions, physical appearance and skin colour, language, ethnic origin, nationality, personal and health conditions, pregnancy, age and the role held within the School.

2. The principle of non-discrimination does not preclude the adoption of measures aimed at preventing or compensating for disadvantages or unfavourable conditions related to any of the factors mentioned in paragraph 1, with the aim of ensuring equal conditions for all individuals.

ART. 4. SEXUAL ABUSE, HARASSMENT AND ANNOYANCE

1. The School does not tolerate sexual abuse, harassment or annoyance, intended as a discriminatory conduct detrimental to the personal sense of human dignity, and ensures a prompt protection of the victims and the report of the perpetrator.

2. For the purposes of this section, sexual abuse and annoyance are understood to mean

any request for sexual favours, or service proposals for acts of a sexual nature that are unwelcome to the recipient, as well as any behaviour or verbal expression intended to humiliate, degrade or place the recipient in a position of psychological subordination, relating to the personal sphere of sexuality.

3. The existence of an asymmetrical relationship between the perpetrator of the harassment and the victim is considered an aggravating factor in sexual abuse, harassment or nuisance. In particular, given the educational role of the School, sexual abuse and harassment by teachers, researchers or technical and administrative staff towards pupils and students are considered particularly serious.

ART. 5. OTHER HARMFUL CONDUCT

1. No one may engage in discriminatory or vexatious conduct, threats, acts of moral violence or psychological persecution, nor any other behaviour likely to compromise, directly or indirectly, the health of others or their ability to carry out their studies, research, teaching or work.

2. The School acts to prevent, sanction and eliminate such conduct.

ART. 6. FREEDOM OF RESEARCH AND TEACHING

1. The School is committed to creating an environment that promotes and translates the ideals of individual freedom and autonomy into good practice in the conduct of teaching and research activities, whilst ensuring that these activities do not conflict with the development programmes decided by the School's governing and administrative bodies.

2. In exercising their freedom of research, all those working within the School are required to conduct themselves in an honest, transparent and responsible manner, including through self-regulatory mechanisms designed to explain to the scientific community and the wider public the methodologies, results and ethical implications of the research carried out.

3. In exercising their freedom of teaching, all lecturers are required to respect the individual, cultural, religious and political diversity of their students, encouraging discussion on issues involving ethically and socially sensitive topics.

4. When undertaking training or research commitments with external bodies, whether public or private, the School's governing bodies must first verify the availability of the necessary human resources.

5. In exercising their freedom of research and teaching, members of the School's academic community are required to maintain honest and responsible conduct, devoting to their institutional duties and commitments a sufficient amount of time to fulfil the responsibilities undertaken, and avoiding undue or unjustified absences or leave of

absence.

6. All members of the School are also required to maintain a collaborative and respectful attitude towards academic decisions implemented to ensure the effectiveness, efficiency, impartiality and transparency of the School's institutional activities.

ART. 7. PROTECTION OF THE SCHOOL'S INTERESTS

1. All members of the Community, in their external and internal relations, must prioritise the interests of the School over any other situation that could entail a benefit or advantage, even if only potential, for themselves or their family members. In this regard, all members of the Community must, where possible, avoid any situation of conflict and must refrain from any activity that may interfere with or hinder their ability to make decisions in the School's interest in an impartial and objective manner.

2. In order to ensure the principles of transparency and fairness, the School uses appropriate organisational measures to ensure that any situations of conflict of interest are properly managed and monitored.

3. All members of the Community, without distinction or exception, are committed to observing and ensuring compliance with these principles within the scope of their duties and responsibilities. Under no circumstances may the belief that one is acting in the School's best interests justify behaviour that contravenes these principles.

4. All members of the Community shall not use, for private purposes, the information to which they have access in the course of their duties at ; they shall avoid situations and conduct that might hinder the proper performance of their duties or harm the interests or reputation of the School. "Private purposes" include any purpose other than institutional ones and relating to their relationship with the School.

5. When management decisions concerning the School are to be made, those involved must disclose any actual or potential conflicts of interest in accordance with the procedures set out in the following paragraph. An actual conflict of interest refers to a situation in which the secondary interest (financial or non-financial) of the individual (agent) tends to interfere with the primary interest of the School, towards which the former has specific duties and responsibilities. A potential conflict of interest refers to a situation in which the secondary interest (financial or non-financial) of the agent could potentially interfere with the primary interest of the School, towards which the agent has specific duties and responsibilities.

6. The persons referred to in the preceding paragraph must disclose any actual or potential conflicts of interest in writing, specifying the nature, terms, origin and extent of their interest. In particular, should the conflict arise in the context of participation in a collegial body, the conflict must be disclosed to that body. Should the conflict, however, arise in the performance of an office, a post or a delegated function, the conflict must be disclosed:

- by professors, pupils and students to the Rector of the School;

- by the Rector to the Dean of the School;
- by the entities referred to in Article 2(2)(a) and (b), in accordance with the procedures set out in Article 26.

7. Some types of relationships that may give rise to conflicts of interest are:

- “Ambiguous” relationships: the exchange of gifts, presents and other benefits, with the exception of customary or courtesy gifts provided they are of modest value, as determined in Article 23 below;
- Relationships with third parties: the presence of third-party interests that are directly linked to the attainment of benefits;
- “Financial” or “equity” relationships: the existence of financial relationships (e.g. receivables or payables) or controlling or otherwise significant shareholdings in companies or other entities;
- “Contractual” control relationships: control of companies or entities arising from contracts or statutory provisions having as their object or effect the power to exercise management and coordination, as well as control in the form of dominant influence.
- “Family/personal” relationships: situations involving marriage, cohabitation, kinship up to the fourth degree or affinity up to the second degree;
- “Professional” relationships: professional collaboration – whether direct or indirect – of a private nature;
- “Future professional” relationships: the risk that, during their period of service, members of the Community may pre-establish advantageous work situations— — to secure professional appointments that are attractive to them;
- “Extra-institutional” relationships: the risk that, during their period of service, members of the Community may establish advantageous working arrangements to secure official or extra-institutional posts.

8. In cases of actual or potential conflict of interest, the parties involved are required to refrain from participating in processes aimed at concluding the transactions in question. In particular, parties in a conflict of interest – in addition to expressly declaring their *status* – are required to abstain from deliberations relating to the transaction in respect of which the conflict, even if only potential, exists.

9. Where the persons referred to in the fifth paragraph have an interest which, when assessed according to the criteria set out in the preceding paragraphs, does not conflict with the School’s interests but which nevertheless remains relevant to the School’s management decisions, such persons are required to disclose the interest in question in accordance with the procedures set out in the sixth paragraph. In this case, with regard to collegial bodies, the body itself shall decide by majority vote on the need for its member to abstain, assessing whether the secondary interest is consistent with and compatible with the School’s primary interest. Where, however, the relevant secondary interest arises in the performance of an office, a post or a delegated function:

- with regard to lecturers, pupils and students, the Rector shall decide on the obligation to abstain;

- with regard to the Rector, the Dean shall decide on the obligation to abstain;
- with regard to the persons referred to in Article 2, second paragraph, letter *a)* and *(b)*, the head of the relevant office shall decide.

ART. 8. PROTECTION OF INTELLECTUAL PROPERTY AND EXPLOITATION OF RESEARCH RESULTS

1. The author of an intellectual work belonging to the School is required not to use it for private purposes and to maintain confidentiality regarding the results achieved until the time of its official publication, subject to normal informal dissemination within the relevant scientific community.
2. The coordinators of collective research activities undertake, in the relevant publications, to specify which authors and collaborators are responsible for individual sections, and in any case ensure that all research participants are acknowledged.
3. The coordinator of a research group shall foster conditions that enable each participant to work with freedom, integrity and professionalism; shall encourage dialogue, constructive criticism, and the development of ideas and personal skills; and shall recognise individual talents and merits regardless of the participants' academic and professional qualifications and the roles they hold within the School.

ART. 9. NEPOTISM AND FAVOURITISM

1. The School rejects all forms of nepotism and favouritism and requires all members of its academic community to refrain from such behaviour.
2. Nepotism occurs when a professor or a researcher or a member of the technical and administrative staff, directly or indirectly, uses their position or authority to grant benefits, favour recruitment, appointments or calls, or influence the entry or career progression within the School of their family members, including their spouse or partner, relatives up to the fourth degree and relatives by marriage up to the second degree.
3. The prohibition on all forms of nepotism and favouritism also applies to the admission and assessment tests of students of any study level.
4. The School urges you to report such conduct to the Rector without delay.
5. Should one of the applicants intending to join the call for applications be a relative within the fourth degree or an in-law up to the second degree of a professor, a researcher or a member of the technical-administrative staff, he/she must report this condition when enrolling for the aforementioned procedure.

ART. 10. ABUSE OF POWER

1. No member of the Community is permitted to use, directly or indirectly, the authority of their position to gain personal advantage or to force other members of the Community to perform duties or services that do not fall within the normal scope of their duties.

ART. 11. GIFTS AND BENEFITS

All members of the Community must refrain from soliciting, requesting or accepting offers of gifts or benefits that could directly or indirectly influence the performance of the duties for which they are responsible.

ART. 12. USE OF SCHOOL RESOURCES

1. All members of the Community must use the School's resources in a responsible, diligent and transparent manner; they must justify and document expenses where requested by the Administration.
2. No member of the Community is permitted to use the School's equipment, premises, human resources, or material or financial resources for personal purposes or for purposes other than those pursued by the institution, nor is it permitted to allow third parties to use such resources unless expressly authorised to do so.

ART. 13. PROTECTION OF THE SCHOOL'S NAME AND REPUTATION

1. All members of the Community are required to respect the School's name and to refrain from engaging in conduct that could damage its reputation, including through the disclosure of internal information.
2. It is not permitted to make public statements expressing personal views and opinions whilst presenting them as the School's official position.
3. Unless specifically authorised by the School, it is not permitted to:
 - a) use the School's name and logo;
 - b) use the School's reputation in connection with professional activities, employment, appointments or other external activities, even if unpaid.

ART. 14. USE OF ARTIFICIAL INTELLIGENCE

1. The School promotes, including through dedicated training activities, the use of artificial intelligence resources as a tool to support study, research, teaching and administrative decision-making processes, in full compliance with the principles, rights and duties enshrined in this Code, as well as with national, European and international regulations. Under no circumstances must the use of these technologies undermine or replace the processes of decision-making, creativity, study, critical analysis, research and scientific production, nor may it lead to the loss of specialist skills or jeopardise the rights and dignity of the university community.
2. The use of AI must always be complementary and not a substitute, ensuring that intellectual autonomy and critical thinking remain at the heart of academic activities.
3. Without prejudice to compliance with the obligations laid down by law, the School's use of Artificial Intelligence systems is carried out in accordance with the principles of transparency, accountability, security, environmental sustainability, non-discrimination and the protection of personal data privacy.
4. In any case, the School promotes and implements tools and processes to monitor the use of artificial intelligence and to protect the university community from any potential misuse or distortion thereof.
5. All members of the IUSS community are required to use artificial intelligence tools ethically and to comply with the relevant policies approved by the competent bodies.

SECTION II – MONITORING COMPLIANCE WITH THE PRINCIPLES AND SANCTIONS

ART. 15. TRUSTED COUNSELLOR

1. In accordance with the provisions of European Parliament Resolution A3/0043/94, adopted on 11 February 1994, the post of Trusted Counsellor is hereby established.
2. The Trusted Counsellor is appointed every three years, with a renewable term, by the Rector, after consultation with the Equal Opportunities Committee, from among those deemed suitable by the Academic Senate. The requirements for assessing suitability are the possession of personal and professional qualities and a well-known sense of justice, as well as a high level of competence in relation to the duties assigned. The Academic Senate identifies suitable candidates on the basis of a specific public selection procedure involving the assessment of qualifications and an interview; those who are members of the School in any capacity, or who have held any position—including on an occasional basis—conferred by the School in the preceding five years, are not eligible to participate.
3. The Trusted Counsellor:
 - a) provides assistance and a listening ear to protect those who consider themselves victims of conduct that violates the principles set out in Articles 3, 4, Article 5 by

another member of the Community, or by any other person working on behalf of the School, and endeavours to find an amicable and mutually agreed resolution to the matter, ensuring confidentiality and without initiating the formal procedure for breach of this Code provided for in Article 16 below;

- b) is responsible for monitoring any situations of risk, carrying out activities to identify problems, including through the organisation of specific group and individual meetings with the various members of the School community, whilst ensuring anonymity;
- c) has access to the administrative documents relating to the case brought to their attention, subject to the obligation to safeguard the right to confidentiality of the individuals involved.

4. The University, by resolution of the Academic Senate, may decide to share the duties performed by the Trusted Counsellor with other affiliated university and research institutions or those operating in the city of Pavia, identifying appropriate forms of coordination and shared responsibility regarding the resources necessary to ensure the proper performance of the service.

5. The Trusted Counsellor is assigned an indemnity established by the Directorial and Supervisory Board and shall be provided with the necessary resources to carry out their institutional duties.

6. Confidential information and news of which the Trusted Counsellor becomes aware in the course of their duties may not be used by said Counsellor in order to lodge a formal report pursuant to Article 17 below.

7. The intervention of the trusted Counsellor does not preclude the person concerned from making a formal report at any time in accordance with Article 16.

8. The Trusted Counsellor cannot be appointed to the Watchdog Committee provided for in Article 18.

9. The Trusted Counsellor shall report annually, in confidence, to the Rector on the activities carried out.

ART. 16. CONFIDENTIAL COUNSELLORS

1. The role of Confidential Counsellors is hereby established.

2. The Rector shall appoint three confidential Counsellors from among the School's professors, including those who have retired. The term of office shall be three years and may be renewed.

3. Anyone who, within the context of academic life, is experiencing a difficult situation within the School or considers themselves a victim of misconduct by another member of the School, or by another person working on behalf of the School, may approach the

confidential Counsellors. Without the need for any formalities, the Confidential Counsellors provide their assistance and a listening ear to help resolve the issues that have arisen.

4. Situations that may be brought to the attention of the Confidential Advisers include conflicts with colleagues, excessive work-related stress, unmet expectations, bullying, unfair behaviour or treatment, and poor management of resources. Particular attention will be paid to listening to pupils and students, especially regarding matters concerning their training and research activities.

5. Confidential Counsellors shall endeavour to facilitate clarification between the parties concerned and to reach an amicable and mutually agreed resolution of the issues. All this shall be done whilst ensuring discretion and confidentiality.

6. Confidential information and news of which the Counsellors become aware in the course of their duties may not be used by the Counsellors themselves to make a formal report pursuant to Article 17.

7. In carrying out their duties, the Confidential Counsellors have access to administrative documents relating to the case brought to their attention, subject to the obligation to ensure the right to confidentiality of the parties involved.

8. Confidential Counsellors are entitled to an allowance set by the Directorial and Supervisory Board and are provided with the necessary resources to carry out their institutional duties.

9. The involvement of the confidential Counsellor does not prejudice the right of the person concerned to submit a formal report at any time in accordance with Article 17.

10. Each Confidential Counsellor reports annually, in confidence, to the Rector on the activities carried out to monitor any risk situations and prevent potential causes of distress.

ART. 17. REPORTS, INITIATION OF PROCEEDINGS, TIME LIMITS

1. Any person with a legally relevant interest may report to the School any matter deemed to be in breach of this Code. To be admissible, the report must:

- a) be made in writing;
- b) contain details useful for identifying the incident and any other relevant information;
- c) include the name of the person making the report and their signature, either handwritten or digital.

2. The report is registered and brought to the attention of the Rector.

3. The Rector shall notify the parties involved in writing of the initiation of proceedings as soon as they have been identified.

ART. 18. WATCHDOG COMMITTEE AND PRELIMINARY PHASE

1. The Rector is assisted during the preliminary investigation phase by a Watchdog Committee comprising the r three delegates of the Rector appointed in accordance with Article 9, paragraph 6, of the Statute.
2. Once proceedings have commenced, the Watchdog Committee shall carry out any preliminary investigations deemed necessary, in accordance with the principle of adversarial proceedings and the rights of the parties concerned.
3. Firstly, the Watchdog Committee shall summon the parties concerned to appear before it, giving reasonable notice, so that each may present their own account of the facts separately. The parties concerned are, however, entitled to submit a written statement. Furthermore, the Watchdog Committee is entitled to summon and hear, either jointly or separately, any member of the Community involved in the events and anyone with knowledge of them, whilst respecting the dignity and privacy of individuals. Every member of the Community is obliged to cooperate with the preliminary investigation and to ensure free and timely access to all documentation deemed useful. Failure to cooperate constitutes an ethical breach.
4. The investigation shall be concluded, within 90 days of the report being registered, with a report to be sent to the Rector for his decisions pursuant to Art. 19.

ART. 19. RECTOR'S DECISION ON REPORTS

1. Should a case of possible disciplinary relevance arise during or at the conclusion of the investigation, the Rector shall forward the documents to the competent disciplinary authority in accordance with the specific regulations.
2. If, however, no disciplinary issues have emerged at the conclusion of the preliminary investigation, the Rector, having considered the elements set out in the report of the Watchdog Committee:
 - a) if the report is clearly unreliable and unfounded, he may close the proceedings by issuing a decision to dismiss the case; or
 - b) it shall forward the case file to the Senate together with its proposal (for dismissal or for a sanction) for the final determination of the proceedings, within the time limit set out in Article 20, and any sanction, in accordance with Article 21.
3. The Senate, having assessed the evidence set out in the Rector's proposal and any evidence provided by the person concerned, shall, within the time limit laid down in Article 20, rule on the facts, ordering the dismissal of the proceedings or the imposition of sanctions in accordance with Article 21.
4. Should the person concerned cease to be a member of the University during the proceedings, the Senate, having consulted the Director General, shall declare the

proceedings closed, unless there are grounds for concluding them by dismissal.

5. Sanctions shall be determined on the basis of the evidence emerging from the preliminary investigation and in accordance with the principles of legality, proportionality and graduality.

6. In the case provided for in the first paragraph, if the disciplinary proceedings conclude without any sanction, the proceedings for breach of the Code of Ethics may continue, unless the disciplinary proceedings have established that the alleged offence did not occur or that the accused did not commit it.

7. Should the Rector be accused of a breach of the provisions of this Code, all functions performed by the Rector in the breach proceedings shall be performed by the Dean.

ART. 20. DUE PROCESS

1. The procedure for ascertaining ethical breaches and imposing sanctions shall be conducted in accordance with the principle of 'due process' and the other principles set out in Law No. 241 of 7 August 1990. The proceedings shall be concluded within a mandatory period of 6 months from the date of registration of the report or, if initiated following disciplinary proceedings concluded without sanctions, from the date of the dismissal order or other similar document. The suspension of the time limit is permitted in the cases provided for by law.

ART. 21. SANCTIONS

1. Without prejudice to civil, criminal, administrative and accounting liabilities, the sanctions for breaches of this Code, to be applied in accordance with criteria of gradation and proportionality, are:

- a) confidential reprimand;
- b) public reprimand;
- c) disqualification and/or exclusion, for a period of up to three academic years, from bodies, committees and other posts;
- d) exclusion, for a period of up to three academic years, from the allocation of internal research funds or financial grants disbursed through the School.

2. Sanctions decided by the Academic Senate are enforced by the Rector.

ART. 22. RELATIONSHIP BETWEEN PROCEEDINGS FOR BREACHES OF THE CODE OF ETHICS AND DISCIPLINARY PROCEEDINGS

1. Where the same conduct constitutes a breach of the provisions of this Code and of disciplinary obligations, the disciplinary proceedings shall take precedence over the proceedings for breach of this Code, subject to the provisions of Article 19, paragraph 6.
2. Disciplinary proceedings shall be conducted before the competent disciplinary authorities and in accordance with the rules laid down in the specific regulations, which vary depending on the parties concerned (teaching or research staff, technical and administrative staff or managers, pupils and students).

CHAPTER III - CODE OF CONDUCT

ART. 23. GIFTS, REMUNERATION AND OTHER BENEFITS

1. An employee shall not ask for or solicit, for themselves or for others, gifts or other benefits.
2. Employees shall not accept, for themselves or for others, gifts or other benefits, except for those of modest value given occasionally in the context of normal courtesy and in accordance with international custom. In any case, regardless of whether the act constitutes a criminal offence, employees shall not solicit, for themselves or for others, gifts or other benefits, even of modest value, as consideration for performing or having performed an act in the course of their duties from persons who may derive benefit from decisions or activities relating to their office, nor from persons in respect of whom they are required to perform or exercise activities or powers inherent in the office held.
3. The employee shall not accept, for themselves or for others, from a subordinate, either directly or indirectly, gifts or other benefits, except those of modest value. The employee shall not offer, either directly or indirectly, gifts or other benefits to a superior, except those of modest value.
4. For the purposes of this article, gifts or other benefits of modest value are understood to be those of a value not exceeding, as a guideline, 150 euros, including in the form of a discount. This limit applies to the calendar year for all gifts (gifts, financial benefits or other benefits) attributable to each employee. An employee may not receive, for themselves or for others, any gift in the form of cash or any other means of payment in lieu of cash (vouchers, top-ups, prepaid cards, phone cards, etc.).
5. The employee must notify the Head of the Corruption Prevention and Transparency of the receipt of gifts and other benefits, except in cases permitted by this Code. Such notification must be made promptly, in writing, within eight days.
6. Gifts and, where possible, other benefits received outside the permitted limits, and

where it is not possible to return them, shall be handed over by the employee to the School no later than eight days after receipt. In the case of books, catalogues, video and audio material, these shall be added to the School Library's collection.

7. The employee shall not accept collaborative assignments from private entities which have, or have had in the two years prior to the employee's appointment to their post, a significant interest, not merely financial, in decisions or activities relating to the employee's post. For the purposes of this article:

- "collaborative assignments" means assignments of any kind and in any capacity (including, but not limited to, assignments as a consultant, expert, arbitrator, auditor, attorney, etc.);
- "private entities" means any private body, including non-profit organisations, with the exception of private bodies included in the List of public administrations (included in the consolidated income statement as identified pursuant to Article 1(3) of Law No. 196 of 31 December 2009), entities in which a public administration holds a majority stake, as well as legal entities established in the context of technology transfer activities.

8. The Corruption Prevention and Transparency shall ensure the correct application of this article.

ART. 24. MEMBERSHIP OF ASSOCIATIONS AND ORGANISATIONS

1. In accordance with the current regulations governing the right of association, employees shall promptly notify the head of their department of their membership of or affiliation with associations or organisations, regardless of whether they are confidential or not, whose areas of interest may interfere with the department's activities. This paragraph does not apply to membership of political parties or trade unions. The notification, which must contain the essential details regarding the association and the reasons for the potential interference, shall be made in writing within fifteen days:

- a) from the date of recruitment, the assignment of duties or a transfer to another office;
- b) from joining the organisation and becoming aware of any potential interference that may arise with the activities of the department to which the employee is assigned;

Upon initial application, the notification referred to in this paragraph must be made within 60 days of the entry into force of this Code.

2. The employee shall not compel other employees to join associations or organisations, nor shall they exert pressure to that end, by promising benefits or raising the prospect of career disadvantages.

ART. 25. DISCLOSURE OF FINANCIAL INTERESTS

1. Without prejudice to the transparency obligations laid down by law or regulation, the employee shall inform, in writing, the head of their department and the Corruption Prevention and Transparency of any direct or indirect collaborative relationships with private entities, whether remunerated in any way, that they currently have or have had in the last three years, specifying:

- a) whether they, their relatives up to the fourth degree or relatives by marriage up to the second degree, their spouse or cohabiting partner still have financial dealings with the party with whom they have had the aforementioned collaborative relationships;
- b) whether such relationships have existed or currently exist with parties having an interest in activities or decisions relating to the office, limited to the cases entrusted to him.

The declaration shall be made in accordance with the terms and procedures set out in the preceding article. For the definition of private individuals, please refer to Article 23, paragraph 7.

ART. 26. DUTY OF ABSTENTION: CONFLICT OF INTEREST AND RELEVANT INTERESTS

1. The employee shall refrain from making decisions or carrying out activities relating to their duties in situations of conflict, even potential, of interest with personal interests, or those of their spouse, cohabiting partners, relatives up to the fourth degree, or relatives by marriage up to the second degree. The conflict may concern interests of any nature, including non-financial interests, such as those arising from the intention to yield to political, trade union or hierarchical pressure. Some of the relationships that may give rise to a conflict are set out in Article 7, paragraph 5, above.

2. The employee shall also refrain from participating in decision-making or activities that may involve significant personal interests, or those of relatives up to the fourth degree, relatives by marriage up to the second degree, a spouse or cohabiting partner, or persons with whom they have regular contact, or of individuals or organisations with whom they or their spouse have a pending legal case, serious animosity, or significant credit or debt relationships; or of individuals or organisations for which they act as guardian, curator, attorney or agent; or of bodies, associations (including unrecognised ones), committees, companies or establishments of which they are a director, manager or executive. The employee shall abstain in any other case where there are serious grounds of expediency. All this is subject to the provisions of the fourth paragraph.

3. An employee shall notify the head of their department and the anti-corruption officer whenever they consider that grounds for recusal exist. Such notification shall be made promptly in writing and shall contain all information necessary to assess the relevance of

the grounds for recusal.

4. In the case provided for in the second paragraph, the head of the relevant department shall decide on the recusal.

ART. 27. PREVENTION OF CORRUPTION

1. For the purposes of Article 8 of the National Code of Conduct, the employee shall comply with the measures necessary to prevent unlawful conduct within the administration. In particular, the employee shall comply with the provisions contained in the corruption prevention plan and may report to the School any instances of unlawful conduct of which they become aware. Such a report, for the purpose of activating the system of guarantees for the protection of confidentiality, assured to the whistleblower by the provisions of Article 54-bis of Legislative Decree No. 165/2001, as amended and supplemented, may also be made via the so-called whistleblowing system. This is without prejudice to the possibility of forwarding the report to the National Anti-Corruption Authority (ANAC) and, where the necessary conditions are met, of reporting the matter to the judicial and/or accounting authorities.

2. The report is exempt from the access provided for in Articles 22 et seq. of Law No. 241/1990, as amended and supplemented, and from the general right of public access referred to in Article 5(2) of Legislative Decree No. 33/2013, as amended and supplemented.

3. The Head of Corruption Prevention and Transparency, having obtained summary information:

- a) if he or she considers the report worthy of further investigation, shall forward the documents within five days to the competent disciplinary authority and to the Rector and shall take any other necessary measures, including those to protect the employee who made the report;
- b) if he or she considers the report not to warrant further investigation, he or she shall notify the employee who made the report.

ART. 28. TRANSPARENCY AND TRACEABILITY

1. The employee shall conduct their work in accordance with principles of transparency and ensure maximum traceability in decision-making processes, both for the purposes of complying with regulatory obligations and to ensure the satisfaction of end-users.

2. The employee shall be familiar with and comply with current legislation and the School's Integrated Activity and Organisation Plan, with particular regard to the section on Corruption Risks.

3. The traceability of decision-making processes is ensured through adequate documentary support, which allows for reproducibility at all times.

ART. 29. CONDUCT IN PRIVATE DEALINGS

1. Employees must not misuse their position at the School, even in their private dealings with public officials in the course of their duties. To this end, employees may not use the School's name, trademark or logo except for activities related to their duties at the School.
2. In all their private activities, employees shall take particular care not to damage the School's reputation.

Art. 30. CONDUCT AT WORK

1. Unless there is a valid reason, the employee shall not delay or behave in such a way as to cause other employees to carry out tasks or make decisions that are their own responsibility.
2. The employee shall ensure their actual presence at work, in accordance with Article 55-*quinquies* of Legislative Decree No. 165 of 30 September 2001, through the correct and diligent use of the attendance recording systems made available by the School.
3. The employee shall use the premises, furniture, materials, IT equipment and telephones made available by the School with particular care and diligence and in accordance with the prescribed procedures. The employee shall use any means of transport provided by the School exclusively for the performance of official duties.
4. An employee representing the School in judicial and extrajudicial disputes, including where delegated by the State Legal Service, is required to comply with the relevant legislation.
5. An employee carrying out an activity that may be subject to protection as an intellectual creation shall promptly inform the head of the department or the scientific director, providing whatever is necessary for any such protection.
6. Employees who use instruments, machines or other equipment are required to comply with the specific regulations, instructions for use and all necessary precautions to prevent risks to their own health or that of third parties (Legislative Decree 81/2008).
7. Any employee who receives goods from the School or from other bodies with which the School has a contract or agreement for use in the course of their duties shall assume the obligations of safekeeping and protection provided for by the applicable regulations. The employee shall not transfer the aforementioned goods to third parties, even temporarily, except in cases provided for by law.
8. The employee shall take particular care and diligence in safeguarding IT equipment, as

well as the login credentials for the information systems made available by the School, not least to avoid compromising IT security.

ART. 31. RELATIONS WITH THE PUBLIC

1. The employee shall maintain appropriate conduct and professionalism in dealings with the public and users, being aware that they represent the School.
2. Staff members dealing with the public shall identify themselves by clearly displaying the badge or other form of identification provided by the administration, unless otherwise specified in service regulations, and, taking into account staff safety, shall act in a spirit of service, fairness, courtesy and helpfulness; when responding to correspondence, telephone calls and emails, they shall do so as fully and accurately as possible, and, in all cases, shall conduct themselves with a view to user satisfaction. Should they lack the necessary expertise due to their position or the subject matter, they shall refer the person concerned to the relevant official or department within the same administration. In carrying out tasks and processing files, the employee shall, unless otherwise required by service needs or a different order of priority established by the administration, follow chronological order.
3. Without prejudice to the right to express opinions and disseminate information in defence of trade union rights, the employee shall refrain from making public statements that are offensive to the School or that may harm the prestige, dignity or image of the School to which they belong or of the public administration in general.
4. Only authorised persons may issue public statements on behalf of the School.
5. The employee must be clear and comprehensive when providing responses to the various enquiries received; if the enquiry is submitted electronically, the employee undertakes to use the same means by which it was sent, ensuring that the response is prepared within a timeframe commensurate with the nature of the enquiry and, in any case, in line with efficiency standards. All elements necessary for identifying the person responsible for the reply must also always be clearly indicated. Replies, provided they do not trigger administrative proceedings, are normally sent within thirty days of receipt of the enquiry, unless there is a justified reason.
6. In carrying out their duties, staff shall ensure compliance with the timeframes set out in the service charter and with quality standards, where applicable.
7. Employees shall not make commitments or prejudge the outcome of decisions or actions taken by themselves or others in connection with their duties, except in cases where this is permitted. They shall provide information and updates regarding administrative acts or procedures, whether ongoing or completed, in the circumstances provided for by the relevant laws and regulations on access to information, whilst always informing those concerned of the option to contact the Public Relations Office. They shall issue copies and extracts of acts or documents within their remit, in accordance with the procedures laid

down by the rules on access and the regulations of their own administration.

8. The employee shall observe official secrecy and the regulations governing the protection and processing of personal data and, should they be asked verbally to provide information, records or documents that are not accessible and are protected by official secrecy or by the provisions on personal data, shall inform the applicant of the reasons preventing the request from being granted. Where the employee is not competent to deal with the request, they shall ensure, in accordance with internal provisions, that it is forwarded to the competent office within the same administration.

ART. 32. SPECIAL PROVISIONS FOR MANAGERS

1. Without prejudice to the application of the other provisions of the Code, the rules of this article apply to managers, including those holding office pursuant to Article 19(6) of Legislative Decree No 165 of 2001. In particular, the manager shall observe and ensure compliance with the rules on discipline, transparency and anti-corruption, as well as those concerning absence and leave, incompatibility, and the holding of multiple posts and employment contracts by the employees of the unit for which they are responsible.

2. In particular, the manager shall diligently perform the duties assigned to them under the terms of their appointment, pursue the objectives set, and adopt an appropriate organisational approach to the fulfilment of their duties.

3. He or she shall also ensure a fair distribution of workloads within the organisation; organise regular meetings to optimise work through dialogue and discussion; and monitor and rectify any imbalances in workloads resulting from the negligence of certain employees.

4. Before taking up their duties, they shall notify the School of any shareholdings and other financial interests that may place them in a conflict of interest with the public office they hold, and shall declare whether they have relatives up to the fourth degree of kinship or relatives by marriage up to the second degree, a spouse or cohabiting partner who carry out political, professional or economic activities that bring them into frequent contact with the office they are to head, or who are involved in decisions or activities relating to that office.

5. The manager shall act with loyalty and transparency and conduct themselves in an exemplary manner, demonstrating integrity, impartiality, good faith and fairness, equal treatment, equity, inclusion and reasonableness in their dealings with colleagues, staff and those affected by administrative decisions. The manager shall also ensure that the resources allocated to their office are used exclusively for institutional purposes and, under no circumstances, for personal needs.

6. The manager shall, subject to the availability of resources, foster the professional development of staff, encouraging training opportunities and promoting development opportunities both within and outside the organisation for which they are responsible.

7. The manager shall, subject to available resources, organisational well-being within the structure for which they are responsible, fostering the establishment of cordial and respectful relationships among staff, as well as relationships, both within and outside the structure, based on loyal cooperation and mutual trust, and takes initiatives aimed at the circulation of information, staff training and development, and the inclusion and promotion of diversity in terms of gender, age and personal circumstances.
8. The manager assigns the processing of cases on the basis of a fair distribution of the workload, taking into account the skills, aptitudes and professionalism of the staff at their disposal. The manager assigns additional tasks on the basis of professionalism and, as far as possible, according to rotation criteria.
9. The manager carries out the appraisal of staff assigned to the unit under their responsibility impartially and in accordance with the prescribed guidelines and timelines, assessing the achievement of results and organisational behaviour.
10. The manager shall promptly take the necessary steps should they become aware of any misconduct; where competent, they shall initiate and conclude disciplinary proceedings, or promptly report the misconduct to the disciplinary authority, providing their cooperation where requested, and shall ensure that a prompt report is made to the criminal judicial authority or a referral is made to the Court of Auditors in accordance with their respective jurisdictions. Should the manager receive a report of an offence from an employee, they shall take all legal precautions to ensure that the whistleblower is protected and that their identity is not unduly disclosed during the disciplinary proceedings, in accordance with Article 54-bis of Legislative Decree No. 165 of 2001.
11. The manager, within the limits of their ability, shall prevent the spread of false information regarding the organisation, its activities and public servants. They shall promote the dissemination of knowledge of good practices and positive examples in order to strengthen trust in the School.

ART. 33. CONTRACTS AND OTHER LEGAL TRANSACTIONS

1. When concluding agreements and negotiations and entering into contracts on behalf of the School, as well as during the performance of such contracts, the employee shall not use the services of third-party intermediaries, nor shall they pay or promise any benefit to anyone by way of commission, or for facilitating or having facilitated the conclusion or performance of the contract. This paragraph shall not apply to cases in which the School has decided to use the services of a professional intermediary.
2. An employee shall not, on behalf of the School, enter into contracts for works, supplies, services, financing or insurance with companies with which they have entered into contracts in a private capacity or received other benefits during the preceding two-year period, with the exception of those concluded in accordance with Article 1342 of the Civil Code. In the event that the School enters into contracts for works, supplies, services,

financing or insurance with companies with which the employee has entered into contracts in a private capacity or received other benefits in the preceding two years, the employee shall refrain from participating in decision-making and in activities relating to the performance of the contract, drawing up a written record of such abstention to be kept on the office's records.

3. An employee who enters into agreements or negotiations or concludes contracts in a private capacity, with the exception of those concluded pursuant to Article 1342 of the Civil Code, with private natural or legal persons with whom he or she has, in the preceding two years, concluded contracts for works, supplies, services, financing and insurance on behalf of the School, shall inform the head of the office in writing.

4. If the head of the office finds themselves in the situations referred to in paragraphs 2 and 3, they shall inform the Director-General in writing.

5. Any employee who receives, from natural or legal persons participating in negotiation procedures to which the School is a party, oral or written complaints regarding the conduct of the office or that of their colleagues, shall immediately inform their line manager or functional superior, as a rule in writing.

ART. 34. MONITORING AND TRAINING ACTIVITIES

1. Officials holding managerial positions shall oversee the application of this Code and the National Code of Conduct. As part of its fact-finding and supervisory activities, even prior to the formalisation of charges, the Disciplinary Authority shall have access to all documents and may obtain any relevant information.

2. The Corruption Prevention Officer is responsible for drafting information notices and circulars, organising refresher seminars for staff, and any other initiative useful for the dissemination and implementation of this Code. They monitor its implementation annually.

3. Training activities on transparency and integrity are provided for employees, enabling them to gain a full understanding of the contents of the Code of Conduct, as well as an annual and systematic update on the measures and provisions applicable in these areas. These also include training courses on public ethics and ethical conduct, which are compulsory both upon recruitment and in all cases of promotion to higher roles or functions, as well as staff transfers, the duration and intensity of which are proportionate to the level of responsibility.

4. In order to prevent and combat instances of corruption, to follow up on the obligations arising from the abstention of an employee in a conflict of interest, and to ensure compliance with the principles of efficiency and effectiveness in administrative action, the School may undertake collaborative initiatives with other public bodies.

ART. 35. USE OF INFORMATION TECHNOLOGY

1. The School, through its Area Managers, is authorised to carry out the necessary checks and adopt any measures necessary to ensure the security and protection of IT systems, information and data. The procedures for carrying out such checks are established by guidelines adopted by the Agency for Digital Italy, after consultation with the Data Protection Authority. In the event of the use of personal electronic devices, Article 12, paragraph 3-bis of Legislative Decree No. 82 of 7 March 2005 applies.
2. The use of institutional accounts is permitted solely for purposes connected with or attributable to work and must not in any way compromise the security or reputation of the School. The use of personal email accounts is generally avoided for work-related activities or communications, except where necessary to use SPID (Public Digital Identity System) authentication, as well as in cases of force majeure arising from circumstances in which the employee, for any reason, cannot access their institutional account.
3. The employee is responsible for the content of messages sent. Employees must comply with the procedures for signing work-related emails as specified by their relevant administration. Each outgoing message must allow for the identification of the sending employee and must include an institutional contact address at which they can be reached.
4. Employees are permitted to use the IT tools provided by the administration to carry out personal tasks without having to leave the workplace, provided that such activity is limited in duration and does not interfere with institutional duties.

It is prohibited to send emails, either within or outside the School, that are offensive, discriminatory or that may in any way give rise to liability on the part of the administration.

ART. 36. USE OF MEDIA AND SOCIAL MEDIA

1. While respecting personal freedom, when using their own social media accounts, employees shall exercise every precaution to ensure that their opinions or judgements on events, matters or individuals are in no way directly attributable to the public administration to which they belong.
2. In any event, employees must refrain from any action or comment that could damage the reputation, dignity or image of their own organisation or of the public administration in general.
3. In order to ensure the necessary levels of confidentiality, communications relating directly or indirectly to the service shall not, as a rule, take place through public conversations using digital platforms or social media. Activities or communications for

which the use of social media meets an institutional requirement are excluded from this restriction.

4. The Employee is required to ensure that their conduct on such platforms complies with the 'Social Media Policy' adopted by the School.

5. Without prejudice to the cases of prohibition provided for by law, employees may not disclose or disseminate, for reasons unrelated to their employment relationship with the administration and in breach of the provisions of Legislative Decree No. 33 of 13 March 2013 and Law No. 241 of 7 August 1990, any documents, including preliminary documents, or information to which they have access.

ART. 37 PROCESSING AND MANAGEMENT OF PERSONAL DATA

1. Persons designated or appointed to process personal data must observe security rules and the principles of confidentiality and secrecy in processing operations, complying with all technical and organisational measures implemented by the data controller or data processor to ensure a level of security appropriate to the risk.

2. The employee in charge shall monitor and safeguard records and documents containing personal data entrusted to them for the performance of their duties and shall take the necessary measures to prevent unauthorised persons from accessing them.

3. In the case of any paper documentation containing personal data located on the office premises, it is the responsibility of the designated employee to ensure that such documentation is stored in such a way that unauthorised persons cannot access it.

4. The employee responsible for processing personal data using electronic means shall take the necessary precautions to ensure the confidentiality of access credentials and the diligent safekeeping of devices in their possession and for their exclusive use.

ART. 38. LIABILITY ARISING FROM A BREACH OF THE DUTIES UNDER THE CODE OF CONDUCT

1. Pursuant to the provisions of Article 16 of the National Code of Conduct, breach of the obligations set out therein, as well as those set out in this Section and in the Three-Year Corruption Prevention Plan, constitutes conduct contrary to official duties and gives rise to disciplinary liability, in accordance with the principle of graduality and proportionality of sanctions as provided for in Legislative Decree 165/2001 and in the National Collective Labour Agreements where applicable.

2. Breach of the aforementioned obligations may also give rise to criminal, civil, administrative or financial liability on the part of the employee.

3. This is without prejudice to any further obligations and the consequent cases of

disciplinary liability of public employees provided for by law, regulations or collective agreements.

CHAPTER IV – FINAL PROVISIONS

ART. 35. DISSEMINATION

1. The School undertakes to promote the widest possible dissemination of this Code through publications, communications, seminars and conferences, and any other means deemed appropriate for this purpose.