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## Annual report of the Ethics Office for 2021

### Executive summary

This annual report is hereby submitted to the Executive Board at its 2022 annual session. This annual report was provided directly to the Executive Director pursuant to paragraph 6.2 of Executive Director's circular ED2008/002, entitled "Establishment of Ethics Office in WFP".

The report provides an overview of the activities and achievements of the Ethics Office (including statistical information) during the period from 1 January to 31 December 2021. It is organized by the office's mandated areas of work, as follows:

- A. Advice and guidance
- B. Annual conflicts of interest and financial disclosure programme
- C. Protection against retaliation – whistleblower protection policy
- D. Standard setting and policy advocacy
- E. Training, education and outreach

The report also covers, in section IV, the activities of the Ethics Office on protection from sexual exploitation and abuse because, since mid-2018, the Ethics Office has been WFP's organizational focal point for protection from sexual exploitation and abuse. The report also contains a section on United Nations coherence (section V) and ends with observations related to the work of the Ethics Office and ethics within WFP (section VI).

### Draft decision\*

The Board takes note of the annual report of the Ethics Office for 2021 (WFP/EB.A/2022/4-B).

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\* This is a draft decision. For the final decision adopted by the Board, please refer to the decisions and recommendations document issued at the end of the session.

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#### Focal point:

Ms G. Shaver  
Director a.i.  
Ethics Office  
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## I. Introduction

1. This report covers the work of the Ethics Office for the period from 1 January to 31 December 2021 and provides analysis and assessments, including comparisons with previous years and relevant activities planned for 2022.
2. The Ethics Office is an independent office whose Director is accountable to and reports to the Executive Director of WFP.<sup>1</sup> All activities of the Ethics Office are based on the principles of confidentiality and independence, among others.
3. The Ethics Office nurtures a culture of ethics and accountability and is mandated to ensure that all employees<sup>2</sup> perform their functions in accordance with the highest standards of conduct – as required by WFP’s values of integrity, collaboration, commitment, humanity and inclusion; the standards and principles set out in the Charter of the United Nations; the Standards of Conduct for the International Civil Service (2013);<sup>3</sup> the WFP Code of Conduct;<sup>4</sup> and other relevant policies and practices – and that they can come forward without fear of retaliation.

## II. Background

4. The Ethics Office was established in January 2008 by Executive Director’s Circular 2008/002 “Establishment of Ethics Office in WFP” in alignment with the Secretary-General’s bulletin ST/SGB/2007/11.<sup>5</sup>
5. Pursuant to Executive Director’s circular 2008/002, the Ethics Office is required to provide an annual report on its work to the Executive Director for submission to the Executive Board. Further, the Ethics Office is required to submit for review a draft annual report to the Ethics Panel of the United Nations.<sup>6</sup>
6. At the beginning of 2021, the Ethics Office strategy for 2021–2022 was approved by the Executive Director. Developed in line with an internal audit recommendation,<sup>7</sup> the strategy identifies and prioritizes strategic, resourcing and technical actions of the Ethics Office with the aim of achieving its vision of “a culture of ethics and accountability [that] means constantly and continuously nurturing a culture of ethics and accountability through proactive[...], preventative and supportive measures to the Executive Director, leadership and management [...]”
7. To achieve this vision, three interlinked objectives guide the implementation and monitoring of the strategy:
  - Strategic objective 1: “Use an evidenced/data-driven approach to maximize the impact of advice, education and outreach initiatives and recommendations to and on standards, policies and procedures, matters of retaliation and ethics”.
  - Strategic objective 2: “Integrate values, ethics, standards of conduct and compliance in everyday practices in a practical and relevant manner”.

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<sup>1</sup> Executive Director’s circular OED2008/002, *Establishment of the Ethics Office*.

<sup>2</sup> As of April 2022, the Ethics Office was serving 21,834 employees in 117 countries and territories with WFP operations.

<sup>3</sup> International Civil Service Commission. 2013. *Standards of Conduct for the International Civil Service*.

<sup>4</sup> Executive Director’s circular OED2014/016, *WFP Code of Conduct*.

<sup>5</sup> Secretary-General’s Bulletin. 2007. *United Nations system-wide application of ethics: separately administered organs and programmes* (ST/SGB/2007/11).

<sup>6</sup> *Ibid.*

<sup>7</sup> WFP Office of the Inspector General. 2020. *Internal Audit of Tone-at-the-Top and WFP’s Leadership Arrangements*. Internal Audit Report AR/20/01.

- Strategic objective 3: “Capacitate employees to live up to the values, principles and standards by recognizing and addressing ethical issues in the ordinary course through strengthened knowledge and skills”.
8. Through the strategy, the Ethics Office acts in accordance with the highest ethical expectations and standards while maintaining its independence and working to create an environment conducive to confidential conversations and support. Its daily work is guided by its principles: independence, confidentiality, proactivity and prevention, a focus on results, responsiveness and reliability, collaboration and inclusivity.
  9. A separate strategy on the prevention of and protection from sexual exploitation and abuse (PSEA) for 2021–2023 was also issued to identify, prioritize and contextualize strategic actions and technical interventions of the Ethics Office related to its role as the WFP PSEA organizational focal point. The vision of this strategy is that “WFP has effective prevention and protection measures that safeguard the people WFP serves enabling safe access to WFP programmes and operations without being subject to sexual exploitation or sexual abuse by WFP employees and partnership, and, if acts of exploitation and abuse are attempted or committed, WFP responds swiftly with a victim-centred approach”. Five interlinked strategic objectives guide the Ethics Office in this area of work.
  10. In 2021, the Ethics Office operated with a Director (D-1), a senior administrative assistant (G-7), an administrative assistant (G-3) and eight short-term employees. During the year, three short-term staff left the office. The Director left in July and an ad interim Director joined in September. A new Director is expected to be in place in mid-2022.
  11. The Ethics Office budget in 2021 was sufficient to cover all key activities and staff. The budget for 2022 is expected to remain stable.

### **III. Activities of the Ethics Office**

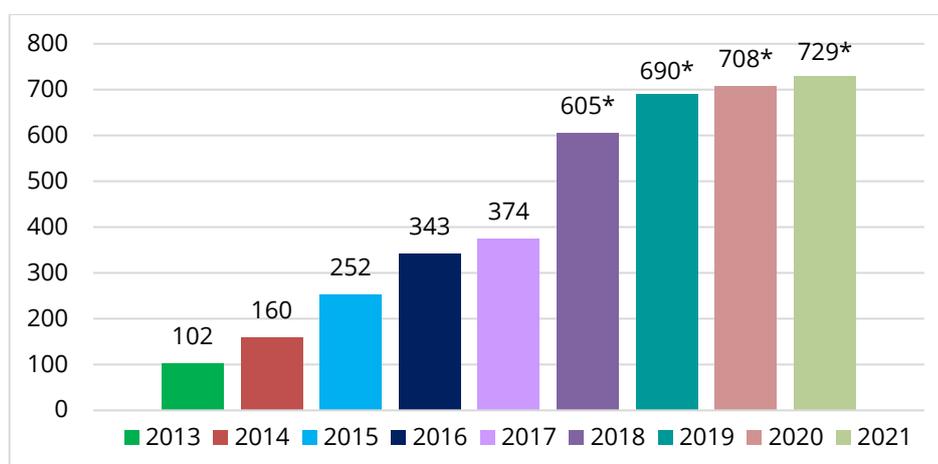
12. During the COVID-19 pandemic in 2020, the Ethics Office ensured minimal disruption to the delivery of its services by quickly transitioning to online platforms for training, advice, consultations and policy discussions. This remained the case in 2021, and notable results were achieved across all mandated areas.

#### **A. Advice and guidance**

13. WFP’s ethical culture drives how its employees regulate their conduct, how decisions are made and how WFP is perceived by government partners, donors, the public and the people it serves. It is therefore vital that WFP demonstrate a positive ethical culture and its commitment to fairness, accountability and transparency and that the organization hold itself and its employees to the highest standards of integrity.
14. Through the provision of confidential ethics advice and guidance to all employees, the Ethics Office plays a critical role in sustaining WFP’s ethical culture. In alignment with Strategic Objectives 2 and 3, every advisory issued by the Ethics Office is an opportunity to educate employees, including management and senior management, to make informed ethical decisions both personally and professionally, and to act ethically and in the best interest of WFP, while simultaneously helping the organization to prevent wrongdoing and strengthen decision making based on its values and interests and in support of its mandate.
15. This includes managing potential conflicts of interest and resolving complex workplace situations before they escalate into issues, thereby avoiding operational and reputational damage. In this way, the Ethics Office also plays a fundamental risk management role, promoting awareness of and adherence to applicable rules, policies and standards of conduct. Serving as a trusted consultative resource available for all employees, the Ethics Office also provides a confidential space in which to raise concerns and seek guidance.

16. Noting that the willingness of employees to approach the Ethics Office is dependent on receiving timely, pragmatic and action-oriented guidance, the Ethics Office aims to provide same-day acknowledgments of all requests for advice and issues clear and practical ethics advisories within five days of receiving all required information.
17. Demonstrating the effectiveness of the Ethics Office's commitment to providing timely and quality advice, the number of employees seeking advice and guidance has risen significantly since 2013. In 2021, the Ethics Office received a record number of requests for advice. The Ethics Office registered a total of 729 advisories (figure 1) including 654 requests submitted directly by employees and 75 advisories related to the disclosure programme as outlined in paragraph 32 below. This was a 3 percent increase from the total number of advisories registered in 2020 (708).

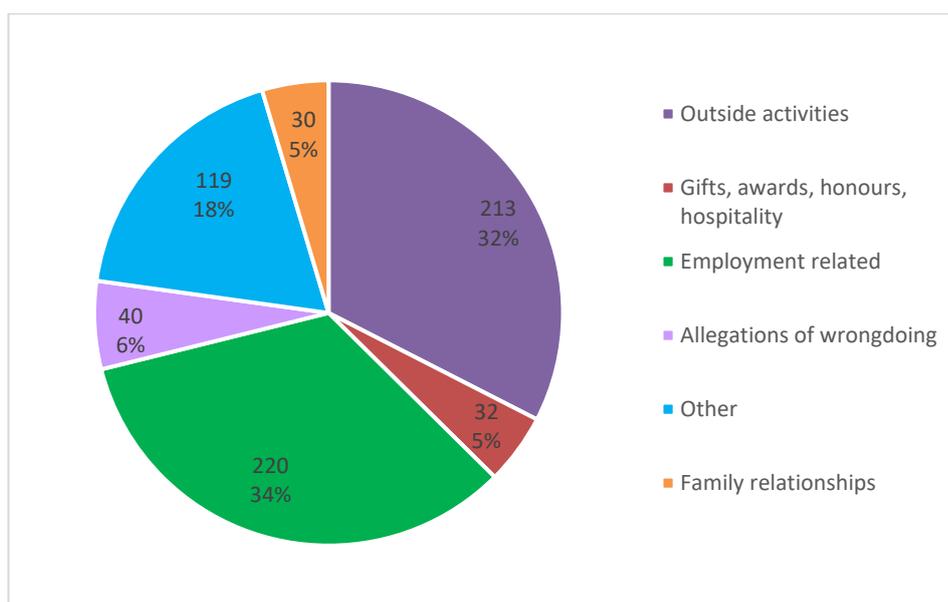
**Figure 1: Advisories issued, 2013–2021**



\* Excluding PSEA-related advisories.

18. Figure 2 summarizes advisories by category; advisories by location are reported in the annex to this report.

**Figure 2: Advice by category\***



\* Excluding the disclosure programme and PSEA-related advisories.

19. In 2021 the Ethics Office reviewed the categories used to record its advisories: the category “standards of conduct” was replaced by “allegations of wrongdoing”. This category includes guidance provided by the Ethics Office to individuals inside or outside WFP who report alleged wrongdoing or misconduct. Based on the circumstances of each request, the Ethics Office refers each matter to the appropriate office and/or informs the person seeking advice of WFP reporting channels.
20. The Ethics Office also created a new category, “family relationships”, in order to track advisories provided to employees on conflicts of interest arising from personal relationships with outside parties including family members, friends, community members, vendors and partners.
21. *Outside activities requests.* This category<sup>8</sup> covers questions concerning external employment, occupation and other outside activities that might interfere with employees’ ability to serve WFP. It represents the largest category of advisories, although the Ethics Office registered a 14 percent decrease in this type of request in comparison to 2020 (290 advisories). This decrease could be attributed to the implementation of the pre-appointment conflict of interest disclosure form, through which candidates are required to disclose outside activities prior to their appointment at WFP.
22. *Employment-related requests.* This category relates to advisories provided with regard to outside interests identified at the recruitment stage. The Ethics Office registered a 33 percent increase in this category compared with 2020 (147 requests). It is most likely that this trend was driven by the use of the pre-appointment conflict of interest disclosure form, which represented an important improvement in the early detection and management of potential conflicts of interests and incompatibility of selected candidates, thus facilitating the management or mitigation of most conflicts.
23. *Requests related to gifts, awards, honours and hospitality.* This category includes advice provided to employees on how to conduct themselves when offered gifts, favours, remuneration, honours, awards or hospitality by external sources in the course of their official duties or in relation to their WFP status, while also clarifying WFP’s disclosure procedure and practice in such cases.
24. Advisories on gifts are separate from disclosures, which are required to be made through the electronic gifts register.<sup>9</sup> In 2021, 212 disclosures of gifts were made through the gifts register. This number continues to appear low in comparison to the size of the workforce. In addition to advising on the appropriateness of receiving gifts and related conflicts of interest, the Ethics Office continued to administer and manage gifts in 2021, even though this task is outside its mandate.
25. The Ethics Office continued to collaborate with the Technology Division on revising the online form used to disclose gifts and gift offers and enable reporting to management. An updated form for disclosing gifts through the WFP self-service portal will be implemented in 2022.
26. I-Sight, a new case management system, has given the Ethics Office access to more accurate and timely data (see the annex to this report) regarding the queries it receives. As a result, and with the objective of using an evidence- and data-driven approach that will maximize the impact of its advice, the Ethics Office has been analysing advisories through various lenses (by category of request, frequency of certain questions, location of the requester, etc.), planning measures to fill knowledge challenges and prioritizing prevention and

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<sup>8</sup> Most common activities include writing-related activities, outside teaching and lecturing, speaking engagements, membership in external boards, part-time employment, ownership and participation in personal or family businesses.

<sup>9</sup> Executive Director’s circular OED2017/002, [Disclosure of Gifts](#).

outreach initiatives. Likewise, the Ethics Office has begun to analyse the most frequent queries from various offices and divisions in order to proactively address areas of confusion and ensure the provision of fair and consistent guidance. For example, data showed that most requests received in 2021 were from headquarters and that only a few requests were received from one regional bureau. As a result, in 2022 the Ethics Office plans to proactively target its outreach and awareness-raising efforts to the field.

27. Lastly, advisories continued to be rated as “satisfactory” in Ethics Office surveys of client satisfaction, specifically regarding the timeliness, clarity and usefulness of the advice provided.

**B. Annual conflicts of interest and financial disclosure programme (Disclosure Programme)**

28. The Ethics Office is mandated to administer a disclosure programme<sup>10</sup> to assist WFP in identifying, recording and addressing personal conflicts of interest in order to mitigate or eliminate such conflicts in the best interests of WFP. The disclosure programme reflects a commitment to transparency and public confidence-building and acts as a safeguard and risk management tool for WFP and eligible employees. It is not a tool for uncovering fraud or unjust personal enrichment.
29. The thirteenth disclosure programme exercise was launched on 12 April 2021 with an initial deadline of 21 May 2021. At this six-week deadline, the completion rate was 77 percent. At the extended deadline of 18 June 2021, the completion rate was 87 percent; this was consistent with response rates in 2019 and 2020. However, in 2021 more employees were covered by the disclosure programme as a result of the expanded eligibility criteria introduced through a revised circular<sup>11</sup> (see paragraph 31 below). Despite this change, at the end of the calendar year the completion rate was 100 percent, compared with 99 percent in 2019 and 2020.
30. To ensure full compliance, the Ethics Office continued to collaborate with the Human Resources Division (HRM) to follow up with employees who had not submitted the required questionnaires by the extended deadline. Sixty-seven employees were accordingly escalated to HRM in October 2021, resulting in 100 percent compliance by December 2021.
31. Of 20,429 WFP employees,<sup>12</sup> 2,934, or 14 percent, were required to participate in the 2021 exercise. This represented an increase of 12 percent over 2020 (figure 3).

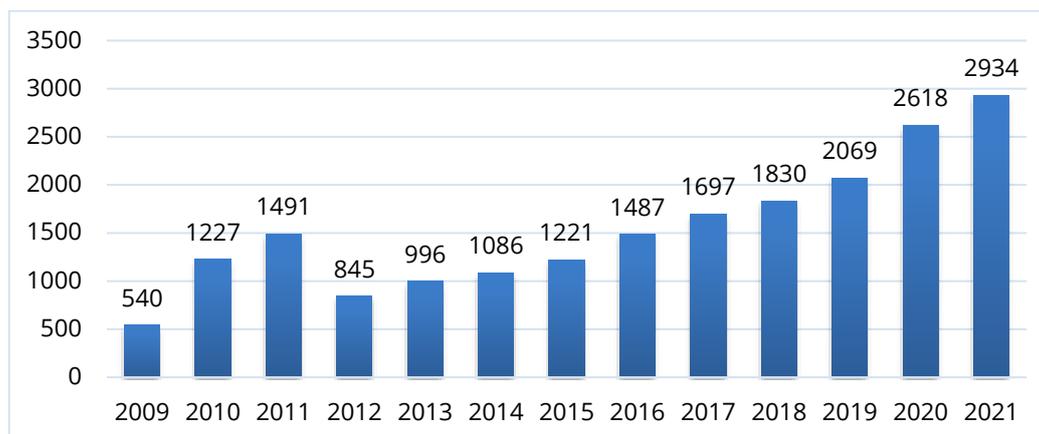
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<sup>10</sup> Secretary-General's bulletin. 2007. *United Nations system-wide application of ethics: separately administered organs and programmes* (ST/SGB/2007/11). Executive Director's circular OED2020/007, *Conflicts of Interest and the Annual Conflicts of Interest and Financial Disclosure Programme*.

<sup>11</sup> Executive Director's circular OED2020/007, *Conflicts of Interest and the Annual Conflicts of Interest and Financial Disclosure Programme*, paragraph 3 b).

<sup>12</sup> Total number of employees as of 31 March 2021.

**Figure 3: Disclosure programme:  
employees required to participate, 2009–2021**



32. Of the 2,934 participating employees, 49 were exempted, mainly because of separation, including retirement or extended leave. As a result, 2,885 employees completed the disclosure programme exercise. Of the questionnaires submitted, 132 were flagged as revealing possible conflicts of interest and were reviewed by the Ethics Office (77 related to outside activities, 5 to gifts and 50 to other conflicts of interest). Upon review, the Ethics Office provided advice on 75 questionnaires (36 related to outside activities and 39 to conflicts of interest). Some questionnaires did not warrant the provision of advice because, for example, they presented no material change from past disclosures or no conflicts of interest were found after additional clarification by the employees concerned.
33. In 2021, the external vendor supporting the Ethics Office with the initial review of disclosure programme questionnaires ceased to do business. In response, the Ethics Office worked closely with its counterpart at the International Fund for Agricultural Development to issue a joint tender and hire a common service provider to support the two agencies' annual disclosure programmes. The WFP Ethics Office also continued to recommend that the disclosure programme be managed in-house.
34. The Ethics Office continued to work with the Technology Division on the construction of a "back of the house" database for administering the disclosure programme more efficiently, producing reports and ensuring direct access to its own data and analytics so that it can identify trends and risks.
35. Lastly, the Ethics Office is exploring the possibility of revising the disclosure programme conflicts of interest questionnaire for the 2023 exercise, with the objective of further clarifying the information requested from participants and streamlining the disclosure process.

### **C. Protection against retaliation: whistleblower protection policy**

36. The primary objective of WFP's whistleblower protection policy<sup>13</sup> is to ensure that employees can report allegations of wrongdoing and misconduct without fear of retaliation.
37. The whistleblower protection policy applies to all WFP employees (current and former) who allege that they have been subjected to or threatened with retaliation as a consequence of reporting alleged wrongdoing or misconduct or for cooperating with a duly authorized audit, inspection, investigation, proactive integrity review or evaluation.

<sup>13</sup> Executive Director's circular ED2020/022, *Protection against Retaliation Policy (or Whistleblower Protection Policy)*.

38. Under the policy, the Ethics Office is responsible for conducting a review of each complaint to determine whether there has been a *prima facie* case of retaliation and, if so, referring the matter to the Office of Inspections and Investigations (OIGI) for investigation. Before and during the *prima facie* review, the Ethics Office may recommend interim protective measures to protect the complainant or other affected employee.
39. During the reporting period the Ethics Office received 17 new enquiries related to protection against retaliation. Of these, five cases translated into formal requests for protection against retaliation under the whistleblower protection policy: three of these cases were closed at the request of the complainants due to material changes in their offices, one was closed because no *prima facie* case was established, and one remained open after being referred to OIGI for investigation.
40. The remaining 12 enquiries were requests for advice and guidance that did not warrant full *prima facie* review but nevertheless required thorough assessment.
41. In addition, three formal cases were carried over from 2020: one was closed because no *prima facie* case was established; one was referred to OIGI and subsequently closed; and one was investigated by OIGI and resulted in the Ethics Office confirming that retaliation had taken place and making recommendations to the Executive Director in accordance with the whistleblower protection policy.
42. Following the roll-out at the end of 2020 of the revised whistleblower protection policy, the Ethics Office created standard operating procedures for reviewing requests for protection against retaliation and revised the form used to facilitate the *prima facie* assessment. As these are living documents, the Ethics Office plans to further revise its internal procedures and the form in 2022.
43. To support the achievement of Strategic Objectives 2 and 3, the Ethics Office has taken action to promote enhanced clarity regarding what constitutes a protected activity and retaliation under the whistleblower protection policy compared with other forms of reprisal such as abuse of authority and/or harassment, setting out this information in the Executive Director's circular "Prevention and Response to Abusive Conduct".<sup>14</sup> The new material also aims at clarifying the differences in the complaint process and the roles of the various stakeholders.
44. To this purpose, the Ethics Office has also been collaborating with the Staff Relations Branch (HRMSR) to ensure that the difference between retaliation and other forms of reprisal is clear not only in the Executive Director's circular on prevention and response to abusive conduct but also in the "Speak up against abusive conduct" training material. As part of these efforts, the office also started regular interactions with HRMSR and continued to engage with the interdisciplinary committee<sup>15</sup> to coordinate, raise awareness of and refer cases that did not involve retaliation as defined in the whistleblower protection policy but did raise issues of abusive conduct or disagreement on work performance, which are not typically considered retaliation under the whistleblower protection policy but rather matters to be addressed in the context of performance management through available recourse mechanisms.

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<sup>14</sup> Executive Director's circular OED2022/004, [Prevention and Response to Abusive Conduct \(Harassment, Sexual Harassment, Abuse of Authority and Discrimination\)](#).

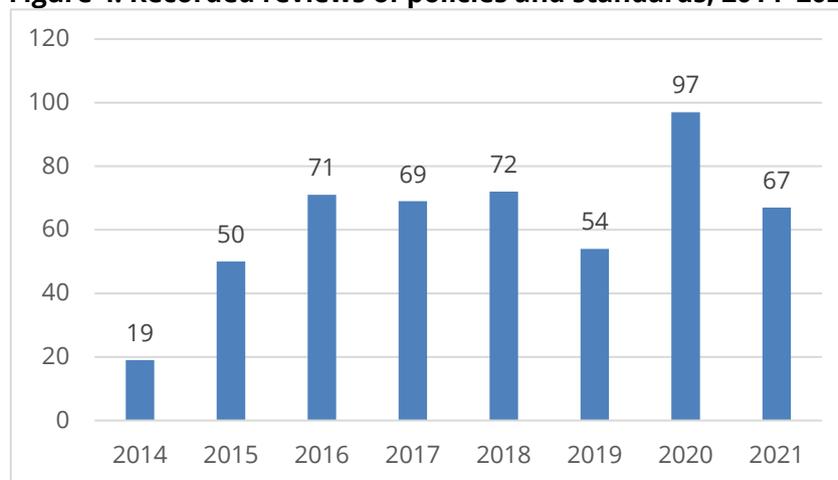
<sup>15</sup> Formerly known as the Inter-Divisional Standing Committee.

45. In addition, the Ethics Office enhanced its dialogue with the HRM Learning Team to incorporate case studies into training programmes in order to help managers better understand retaliation and how performance management can be used (or perceived to be used) to retaliate, while also developing sensitivities needed to avoid the perception of retaliation as part of performance appraisal. This work will continue in 2022.

#### **D. Standard setting and policy advocacy**

46. Fostering an organizational culture of ethics and accountability requires frequent and consistent advocacy. To integrate ethical considerations institutionally and achieve Strategic Objectives 2 and 3, the Ethics Office continues to provide input related to existing standards, policies, practices and processes and makes recommendations for developing new and revised standards, policies and practices.
47. In 2021 the Ethics Office supported policy development through its membership on the Oversight and Policy Committee (OPC) and by responding to multiple policy and process review requests received from management and various units and offices.
48. The Ethics Office recorded requests for input related to 88 separate policies and standards (43 received through the OPC and 45 directly by the Ethics Office). Of the 88 recorded requests, the Ethics Office reviewed 67 (figure 4). Among the documents reviewed by the Ethics Office in 2021 were draft Executive Director circulars on a new promotion system for international professional staff and directors in rotational positions, on guidelines for cooperation with the private sector and on a WFP staffing framework and several internal audit reports.

**Figure 4: Recorded reviews of policies and standards, 2014–2021**



49. The Director of the Ethics Office was a fully engaged member of the interdisciplinary committee that coordinates efforts to promote a respectful, diverse and inclusive workplace for all WFP employees. Matters brought to the attention of the committee by its members are reviewed confidentially and actions are considered with the aim of safeguarding the safety, security and well-being of the parties involved and the interests of WFP.
50. In support of corporate policy and programming development, the Ethics Office was engaged in several consultations related to the WFP people policy and the corporate risk register and risk appetite report. The office made several proactive recommendations to HRM, including with regard to amendments to the HRM manual to ensure consistency with the provisions of the Executive Director's circular OED2020/007<sup>16</sup> concerning the advisory

<sup>16</sup> Executive Director's circular OED2020/007, *Conflicts of Interest and the Annual Conflicts of Interest and Financial Disclosure Programme*.

role of the Ethics Office with regard to outside activities and the restrictions placed on consultants regarding outside activities.

51. In addition, the Ethics Office was consulted on and responded to Joint Inspection Unit (JIU) questionnaires concerning the review of the internal pre-tribunal stage appeal mechanisms available to staff members in the United Nations system organizations and the review of measures and mechanisms for preventing and addressing racism and racial discrimination in the institutions of the United Nations system. The office also reviewed and provided comments on JIU draft reports on the review of the current state of the ethics function in the United Nations and the review of the management of implementing partners in United Nations system organizations.
52. The Ethics Office created a disclosure form and corresponding guidance for use by HRM practitioners to vet conflicts of interest at the pre-employment stage. This satisfies a 2017 JIU recommendation<sup>17</sup> to have measures in place for identifying and mitigating actual, perceived or potential conflicts of interest in an efficient and timely way, thus enabling informed decisions to be made by management and the candidate. After piloting the form and the guidance, in 2021 the Ethics Office trained more than 230 HRM staff on how to review the disclosure form. The office collected lessons learned and plans to review the form and corresponding guidance in 2022.
53. In response to another JIU recommendation,<sup>18</sup> the Ethics Office continued working on understanding and mapping the most common organizational conflicts of interest, registering the related risks within WFP and, where necessary and practical, developing tools to address or mitigate such risks. The Ethics Office worked with the Enterprise Risk Management Division (ERM) and, after consultations with regional bureaux, launched an online survey targeting more than 250 employees across WFP, seeking inputs from all regional bureaux and country office directors, as well as from selected regional bureau and headquarters division employees. In 2022, the Ethics Office will organize briefing sessions with the Office of Internal Audit and the Legal Office and will receive support from the Innovation and Knowledge Management Division to analyse the questionnaire results. The Ethics Office expects to complete this analysis by the second quarter of 2022 and will present its recommendations to the leadership group on how to mitigate the conflicts of interest that emerge from the analysis.
54. Lastly, the Ethics Office continued its review of the WFP Code of Conduct.<sup>19</sup> The draft was created in 2020 by a working group composed of stakeholders representing interdisciplinary committee members, ERM and the Office of the Assistant Executive Director, Workplace Culture Department. The review generated extensive feedback, and the draft was revised in the first half of 2021. Comments were then sought from the heads of the divisions of the interdisciplinary committee, ERM and other colleagues including from the WFP Environmental Unit, the Gender Office and the staff associations. After consolidating preliminary input, the Ethics Office circulated the draft Code of Conduct and circular to OPC members. The final version of the Code of Conduct and circular is expected to be promulgated in 2022.

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<sup>17</sup> Joint Inspection Unit. 2017. *Review of mechanisms and policies addressing conflict of interest in the United Nations system* (JIU/REP/2017/9).

<sup>18</sup> *Ibid.*

<sup>19</sup> Executive Director's circular OED2014/016, *WFP Code of Conduct*.

**E. Training, education and outreach**

55. Training, outreach and awareness-raising are critical components of the Ethics Office mandate. Employees need to know what conduct is expected of them; by delivering training on standards of conduct and reinforcing WFP's core ethical values, the Ethics Office empowers employees to make ethical decisions and conduct themselves in the best interests of the organization, while also working towards Strategic Objective 3 of its own strategy.
56. As WFP works in high-risk environments and has a diverse and multicultural workforce, the maintenance of its good reputation and effective service delivery depends on all employees understanding and adhering to the organization's unified set of ethical principles and expectations, which are the same for all WFP contract holders across all duty stations. Understanding expectations and how to make sound decisions became even more important in the context of the COVID-19 pandemic, when employees spent long periods working remotely and making decisions outside of their usual office workspace. Outreach, awareness and education initiatives in various forms and forums are critical to enhancing knowledge and nurturing a culture of ethics.
57. Internal communication campaigns are a key component of the Ethics Office's work and are central to nurturing an organization-wide ethical culture. As part of this work, the Director of the Ethics Office sent a message to all regional directors at the start of 2021, reminding them of the importance of continuing to act ethically and with integrity and asking them to represent tone at the top. Furthermore, the Ethics Office conducted what has become an annual end-of-year awareness campaign focusing on policies and practices related to gifts. The campaign included sample communications (in Arabic, English, French and Spanish) for country/division directors to share with local partners; an all-staff email sent by the Director of the Ethics Office; and thousands of emails sent jointly by the Ethics Office and the Supply Chain Operations Division to business partners worldwide managed directly through the Supply Chain Operations Division at headquarters and to partners local to headquarters. The campaign aims to ensure employees understand their responsibilities and business partners understand WFP's expectations of them related to gifts. This was the seventh year of this initiative, which is scheduled to continue in 2022.
58. In-person training initiatives serve as a crucial means of enhancing understanding of ethics and the role of the Ethics Office, especially its advisory function, as well as nurturing a culture of ethics. While the pandemic continued to affect the ability of the Ethics Office to provide face-to-face briefings, through increased use of video conferencing platforms the office was able to remain engaged and promoted ethical awareness through online sessions and presentations, reaching more than 500 employees directly.
59. One notable example was a scenario-based session for 20 HRM officers and heads of unit and field offices in the Colombia country office. Conducted in Spanish, the session covered how to understand and address conflicts of interest, preparing managers to be role models and manage conflicts of interest within their teams.
60. The Ethics Office was also invited by the Staff Wellness Division to conduct training sessions for newly appointed wellness support volunteers in country offices in Ethiopia, the Sudan and Zimbabwe. The training reminded colleagues of the role of the Ethics Office as a valuable internal support resource and ultimately reinforced synergies between the Staff Wellness Division and the Ethics Office.
61. Using a virtual format, the Ethics Office continued to deliver the headquarters ethics induction briefing, which is considered compulsory for employees new to headquarters (whether completely new or reassigned). The Director of the Ethics Office also continued her quarterly reporting to the Executive Board and the Independent Oversight Advisory Committee.

62. The Ethics Office participated in regular teleconferences for respectful workplace advisors (RWAs), who since 2012 have also served as ethics ambassadors (EAs).<sup>20</sup> The office briefed approximately 145 RWAs/EAs from every region through two series of webinars on the revised whistleblower protection policy and conflicts of interest. The Ethics Office also participated in four virtual sessions to train 60 new RWAs/EAs in English and French on ethics and how to fulfil their roles. Feedback from the RWAs/EAs was positive. Going forward, the Ethics Office will provide additional resources and tools to facilitate the work of the RWAs/EAs, especially at the country office level.
63. Ethical leadership training encourages management to think about and promote positive and harmonious workplace behaviour and business practices. In this regard, the Ethics Office was invited to participate in the induction programme for country directors and deputy country directors organized by HRM. The office led a session on the expected conduct of country directors and their deputies as they set the tone at the top in their country offices; the session also addressed the challenges and pressures they may face and how the Ethics Office can provide support.
64. Throughout the year, the Ethics Office continued with more traditional training sessions. Mandatory ethics e-learning courses are available in English, French, Spanish and Arabic and are integrated into the personal performance and competency enhancement assessments of all employees and probationary processes. As of 31 December 2021, 95 percent of the workforce<sup>21</sup> had completed the first module of the course, 94 percent had completed the second and 94 percent had completed the third. In alignment with Strategic Objective 1, the Ethics Office plans to work with regional bureaux, country offices and headquarters and liaison offices that have low completion rates or fell below the organizational target of 95 percent and to engage with internal stakeholders on how to work together to improve completion rates. In 2022, the Ethics Office plans to review the modules and develop refresher e-learning content as the mandatory ethics e-learning courses were released between 2016 and 2018 and policies and procedures have changed since then.

#### **IV. Protection from sexual exploitation and abuse**

65. As the organizational focal point for PSEA, the Ethics Office takes a holistic approach to addressing protection from and prevention of sexual exploitation and abuse (SEA), working internally and externally on making a difference at the field level to the people WFP serves.
66. The volume of PSEA work continued to increase throughout 2021. In alignment with its PSEA strategy, the Ethics Office adapted to continue providing support and responding effectively to the challenges caused by COVID-19, while also leading on PSEA matters at the United Nations and inter-agency levels as well as through bilateral and multilateral collaboration with humanitarian and development partners.
67. It is the obligation of every WFP employee to report all observed or suspected instances of SEA. To enhance such reporting and prevent acts of SEA, the Ethics Office continued to focus on capacity building and to equip employees with PSEA knowledge and skills through ongoing and project-based initiatives.
68. In this regard, the Ethics Office continued work on the PSEA “at the frontline” project, a field-focused interactive multilingual outreach package for often overlooked frontline workers who are in direct contact with beneficiaries such as drivers, contractors (including financial service providers), enumerators and small non-governmental organization (NGO)

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<sup>20</sup> RWAs are employees who work in coordination with the Office of the Ombudsman and Mediation Services on preventing or reducing workplace conflicts at the field level. Since 2012, RWAs have been designated “ethics ambassadors”. In this capacity, they are trained to raise awareness of ethics and standards of conduct.

<sup>21</sup> Total number of active WFP employees as of 31 December 2021 was 21,259.

partners. The project aims to equip them with knowledge and skills to recognize and respond to SEA in the communities WFP serves. This is an inter-agency project undertaken in partnership with the International Organization for Migration and Translators without Borders; it is expected to be launched in 2022, and the package will be shared with the Inter-Agency Standing Committee, the United Nations and NGO partners for global inter-agency usage.

69. As a follow-up to the “Speak Up” awareness-raising initiative led by HRMSR, the Ethics Office and HRMSR have been developing a “Speak Up” training session on addressing sexual misconduct (SEA and sexual harassment) at WFP. The training session was piloted at headquarters with selected offices and divisions and in the field with the Democratic Republic of the Congo and Mozambique country offices. The training will be rolled out globally in 2022 at all-staff sessions, starting with identified high-priority offices.
70. Awareness raising for WFP employees continued to be one of the priorities of the Ethics Office through all-staff meetings and PSEA “train-the-trainers” sessions conducted in country offices across all regions, including in the Central African Republic, the Philippines, Rwanda, Uganda and Zimbabwe.
71. The Ethics Office continued to strengthen PSEA coordination and outreach through active and proactive engagement with the network of around 400 PSEA focal points (located in every country office and regional bureau), who play a critical role as part of WFP’s first line of defence against SEA. The office provided prompt support on PSEA matters through awareness-raising work, onboarding sessions for new focal points and regular interactions and responses to queries.
72. The number of PSEA-related advisories remained stable in 2021, with approximately 300 requests received. These included requests for capacity building support, training tools and resources; guidance on SEA incidents and victim assistance; and requests for support in drafting and reviewing policy-related documents such as standard operating procedures and country office PSEA workplans.
73. In coordination with the NGO Partnerships Unit, the Ethics Office finalized enhancements in the online training course for PSEA focal points, introducing new downloadable tools and a comprehensive toolkit composed of practical resources for cooperating partners and cooperating partners’ management staff as well as material for PSEA focal points to help them conduct awareness-raising and outreach sessions in their country offices and regional bureaux. The course will be rolled out in the first quarter of 2022 and further expanded through the development of a short executive version for director-level PSEA focal points and refresher training modules.
74. As part of efforts to strengthen the understanding of PSEA in country offices, the Ethics Office has been supporting selected country office initiatives, including the development of beneficiary sensitization material, and partner training. For example, country offices in Burkina Faso, Eswatini, Mali and the Bolivarian Republic of Venezuela have developed new activities in this area that will continue in 2022. In addition, as WFP has been expanding its assistance into urban and peri-urban areas, the Ethics Office has been helping relevant country offices such as those in Myanmar and Zimbabwe to navigate PSEA challenges in these areas and identify opportunities to address them.
75. The Ethics Office continued to work with the Technology Division on a PSEA digitalization project, which seeks to leverage the use of technology to enhance the victim-centred approach to PSEA through safe and accessible reporting and assistance services while also improving information analysis to facilitate evidence-based prevention, detection, response and mitigation of SEA. The project will be piloted in 2022.

76. Policy and strategy form the overarching framework for PSEA work at WFP. In 2021, the Ethics Office began to update the Executive Director's circular, "Special Measures for Protection from Sexual Exploitation and Sexual Abuse", which was issued in 2014. Since then, PSEA policies, procedures and other applicable standards have been updated. The Ethics Office considers it good practice to reflect recent updates in the circular in order to support effective administration, compliance and oversight and promote accountability and transparency across WFP. The Ethics Office completed an initial draft in consultation with internal stakeholders (such as OIGI, the Legal Office and HRM) as well as colleagues from other United Nations entities. As part of the final review and finalization process, the Ethics Office will continue to engage with other WFP offices and will include field perspectives gained through consultations with regional humanitarian advisors.
77. PSEA continued to be mainstreamed across WFP's initiatives and operations. In coordination with ERM, the Emergencies and Transitions Unit, the NGO Partnerships Unit and the Ethics Office updated the PSEA self-assessment checklist, which accompanies the Executive Director's assurance statement each year and can be used as a tool for identifying risk and internal control issues that merit escalation to senior management and require focused attention or systemic solutions. A guidance note on how to use the PSEA self-assessment checklist was also released.
78. The Ethics Office continued to be actively involved in inter-agency collaboration. For example, the Ethics Office and the NGO Partnerships Unit represented WFP in establishing an inter-agency task force aimed at implementing the United Nations implementing partner protocol and developing resources package to help and guide WFP and United Nations country offices carrying out United Nations implementing partner PSEA capacity assessments. At WFP, pilot projects started in 2021 in the Democratic Republic of the Congo and Colombia country offices and will continue throughout 2022. A dedicated PSEA and partnership consultant is expected to be recruited in 2022 and will be tasked with developing a WFP-wide implementation plan for the PSEA capacity assessment and providing dedicated support for its roll-out and for the operationalization of the United Nations implementing partner protocol.
79. Lastly, WFP, through its Executive Director, continued to be a member of the High-level Steering Group on SEA, enabling the Executive Director, the Deputy Executive Director and other leaders to be directly involved in the strengthening and alignment of the system-wide response to SEA; WFP was also represented in the Inter-Agency Standing Committee Champions on PSEA and other technical groups.

## **V. United Nations coherence: Ethics Panel of the United Nations and the Ethics Network for Multilateral Organizations; Rome-based agencies**

80. The Director of the Ethics Office continued to engage with the Ethics Panel of the United Nations, participating in monthly conference calls and meetings and providing expertise for consultations and deliberations on issues of common interest. Composed of the heads of the ethics offices of the United Nations Secretariat and separately administered organs and programmes and chaired by the Director of the Secretariat Ethics Office, the Ethics Panel of the United Nations is mandated to establish a unified set of ethics standards and policies and to consult on complex ethics matters that have system-wide implications.
81. The Director of the Ethics Office also remained an active member of the Ethics Network for Multilateral Organizations, which comprises ethics officers from United Nations system entities, affiliated international organizations and international financial institutions and was created in support of the Secretary-General's promotion of system-wide collaboration on ethics-related issues within the United Nations system. The network serves as a forum

for exchanging information, good practices for professional development and benchmarking.

82. Throughout 2021, the Director of the Ethics Office continued to work with the ethics officers of the other Rome-based agencies to enhance their sharing of best practices and knowledge.

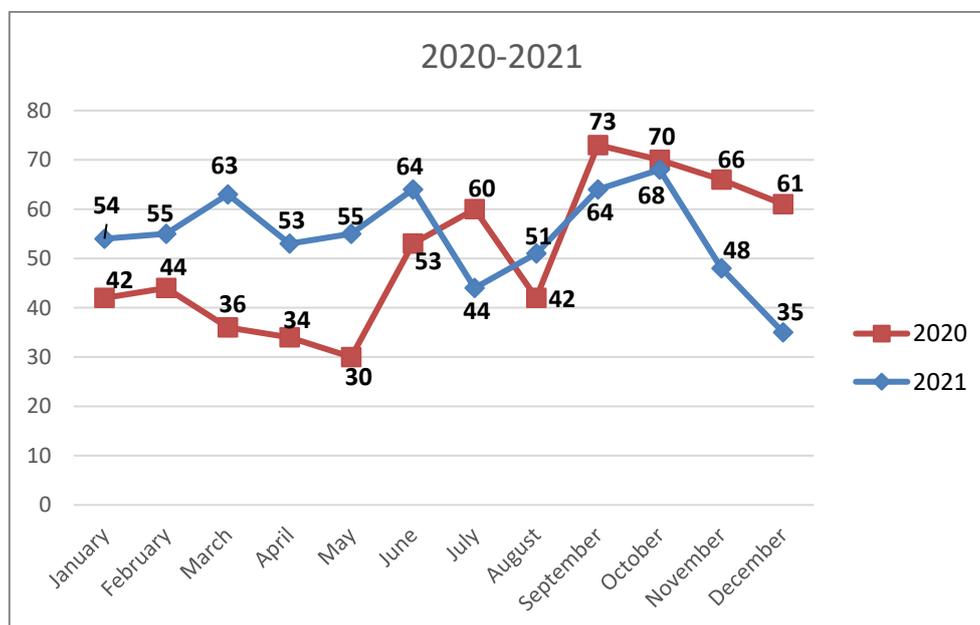
## **VI. Observations and conclusions**

83. Despite the pandemic and human resources changes, the Ethics Office remained fully responsive to employees' requests and proactive in the development and delivery of high-quality activities thanks to its dedicated staff and strengthened internal partnerships and collaboration.
84. While progress was made in all areas of its mandate, the Ethics Office has been working towards a more preventive and proactive approach to addressing and resolving emerging ethical issues. In 2022, this will require working in close coordination with other units and divisions to focus on early interventions while continuing to help WFP identify and mitigate risks and ensuring that employees understand their ethical obligations and their central role in fostering an ethical culture. Education and outreach initiatives continued not to meet the expectations of the Ethics Office itself; as a result, the office – in alignment with its strategic objectives – has been shifting its approach from one that has been ad hoc, reactive and demand-driven to one that is proactive, needs-specific and targeted, while also undertaking a thorough analysis of its training resources, tools and available data with a view to proactively increasing its outreach to field colleagues through a structured, data-driven plan that targets areas of highest risk or concern and offices that have not thus far made much use of ethics services.
85. By detecting and preventing conflicts of interest from materializing and alerting WFP to major risks and by preventing SEA and allegations of retaliation, the Ethics Office plays a critical role in helping employees to make good decisions and navigate ethical challenges, in their daily work and the complex world, when values, principles and standards are in tension or threatened. Ethics is about doing the right thing at the right time for the right reasons, especially when no one is watching. Ethical decisions and ethical operations ensure a trustworthy, credible and reputable organization and help WFP to fulfil its mandate to save lives and change lives.

## ANNEX

## Additional information on advice and guidance trends and analysis

Figure A-1: 2020–2021 advisories by month\*



\* Excluding advisories related to PSEA and the disclosure programme.

TABLE A-1: ADVICE BY LOCATION AND CATEGORY\*

	Headquarters/ Liaison offices	Regional Bureau for Asia and the Pacific	Regional Bureau for the Middle East, Northern Africa and Eastern Europe	Regional Bureau for Western Africa	Regional Bureau for Southern Africa	Regional Bureau for Eastern Africa	Regional Bureau for Latin America and the Caribbean
<b>Total**</b>	<b>226</b>	<b>88</b>	<b>90</b>	<b>33</b>	<b>69</b>	<b>76</b>	<b>58</b>
Employment-related	56	44	27	6	27	29	31
Gifts, awards, honours, hospitality	15	2	1	3	3	6	1
Outside activities	90	24	26	11	28	20	14
Family relationships	8	7	5	3	2	2	3
Other	55	6	20	4	5	10	6
Allegations of wrongdoing	2	5	11	6	4	9	3

\* Excluding advisories related to PSEA and the disclosure programme.

\*\* Although 654 advisories were registered in 2021, table A-1 shows 640. This is due to the impossibility of tracking the location of some requests, especially those from external sources such as non-WFP employees.

## Acronyms

EA	ethics ambassador
ERM	Enterprise Risk Management Division
HRM	Human Resources Division
HRMSR	Staff Relations Branch
JIU	Joint Inspection Unit
NGO	non-governmental organization
OIGI	Office of Inspections and Investigations
OPC	Oversight and Policy Committee
PSEA	protection from sexual exploitation and abuse
RWA	respectful workplace advisor
SEA	sexual exploitation and abuse