



World Food Programme
Programme Alimentaire Mondial
Programa Mundial de Alimentos
برنامج الأغذية العالمي

Executive Board
Second regular session
Rome, 17–21 November 2025

Distribution: General

Agenda item 6

Date: 8 October 2025

WFP/EB.2/2025/6-B/2

Original: English

Oversight functions

For decision

Executive Board documents are available on WFP's website (<https://executiveboard.wfp.org>).

Summary report on the evaluation of WFP's 2018 enterprise risk management policy

Executive summary

The evaluation of WFP's 2018 enterprise risk management policy assessed the quality and results of the policy and the factors that enabled or hindered the achievement of those results. The evaluation aimed to support accountability and learning and to inform WFP's decisions on the future direction of the policy.

The evaluation concluded that the policy provides a firm foundation for risk management within WFP, constituting marked improvement from previous iterations. WFP's risk culture has matured, with better integration of risk management functions and sustained corporate attention to risk. These changes accelerated following high-profile incidents. There is clear evidence that WFP is moving from risk being managed by specialists to becoming "everyone's business". However, this positive shift is not yet fully reflected across all employee roles and responsibilities. Risk escalation and risk mitigation processes require further clarification. Shortcomings remain in the trust and positive incentives required to foster open and transparent risk management practices.

Guided by the enterprise risk management policy and related tools, risk-informed decision-making has improved across WFP. Even so, there are opportunities for strengthening the integration of risk management within programme planning and operational decision-making. In several operational areas, such as large-scale operations and private sector partnerships, risk considerations are clearly factored into decision-making but are not always formally documented. This relatively informal integration reflects the complex and dynamic nature of WFP's operating environments.

In line with WFP evaluation policy (2022) (WFP/EB.1/2022/4-C), to respect the integrity and independence of evaluation findings the editing of this report has been limited and as a result some of the language in it may not be fully consistent with the World Food Programme's standard terminology or editorial practices. Please direct any requests for clarification to the Director of Evaluation.

Focal points:

Ms A.-C. Luzot
Director of Evaluation
email: anneclaire.luzot@wfp.org

Ms F. Bonino
Evaluation Officer
Email: francesca.bonino@wfp.org

WFP faces challenges in ensuring that risk thinking is explicitly considered in decision-making, when balancing humanitarian principles against pressure to implement operations with finite resources. For example, synergies and trade-offs were observed when WFP had to combine comprehensive risk-informed decision-making with emergency response speed. In addition, there are disparities between corporate risk assessments and field-level risk assessments, where standardized methods might not fully capture nuanced operational realities. Although WFP currently faces a new, constrained funding environment, until 2024 the implementation of the enterprise risk management policy was sustained by stable financial resources and increasing human resource capacity – particularly thanks to the WFP’s risk network and the role of risk officers and risk focal points.

For effective risk management and operational performance, WFP must collaborate with a range of different partners. Across WFP’s partnerships, there are examples of strong collaboration on risk (such as with other United Nations entities) and a move toward greater transparency and more systematic information sharing and risk sharing with host governments and other relevant partners and donors. Challenges persist, however, with inconsistent approaches to risk sharing across partnership arrangements. Work with cooperating partners, while serving as one of WFP’s key risk mitigation strategies, is often positioned as an implicit risk transfer rather than a risk sharing arrangement. In addition, operating without a clear understanding of the risk appetite of partners (especially host governments and other relevant actors including donors) and their tolerance for residual risk after mitigation creates an asymmetric position for WFP that hinders effective decision-making, particularly in high-risk situations.

WFP has demonstrated significant commitment to and progress in embedding enterprise risk management across the organization. The evaluation highlights critical areas for continued focus and puts forward five recommendations: revise, update and consolidate the enterprise risk management policy document and accompanying guidelines while ensuring coherence with other policies and corporate documents; take steps to further strengthen WFP’s risk management culture; strengthen enterprise risk management tools to enhance their contribution to decision-making and performance – including around cross-cutting issues; enhance the clarity of risk management resourcing and capacity; and enhance mutual transparency and accountability in relation to risk management with external stakeholders.

Draft decision*

The Board takes note of the summary report on the evaluation of WFP’s 2018 enterprise risk management policy (WFP/EB.2/2025/6-B/2) and the management response (WFP/EB.2/2025/6-B/2/Add.1).

* 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.

Introduction

Evaluation features

1. This evaluation covers WFP's 2018 enterprise risk management (ERM) policy.¹ It assesses the quality of the policy, the effectiveness of measures taken to support its roll-out, the results from its implementation and the reasons why the expected results of the policy have, or have not, been achieved. The goal of the evaluation is to uphold accountability to stakeholders and to provide learning for future WFP risk management policy and systems.
2. The evaluation has a global scope and covers the period from 2018, when the policy was approved, to early 2025. It builds on evidence from assessments conducted since 2017, including a 2022 advisory assignment report on ERM commissioned by the WFP Office of Internal Audit and conducted by the firm Baldwin Global.² The evaluation did not specifically focus on WFP's global assurance project³ and could not consider in its analysis the management accountability framework⁴ endorsed in March 2025, as this was outside the evaluation timeframe.
3. The evaluation used a theory-based approach with primary and secondary data collection and analysis activities at the country, regional and corporate levels (box 1). The evaluation assessed how risks related to gender equality and women's empowerment, inclusion and the protection of vulnerable groups were considered and managed under the policy. Those aspects are reflected in the evaluation findings when relevant and when disaggregated data were available.

¹ "2018 Enterprise risk management policy" (WFP/EB.2/2018/5-C).

² WFP. 2022. *Advisory Assignment Report on Enterprise Risk Management Review and Assessment (AA-22-01)* (internal document).

³ Although not a focus of the evaluation, there are references to the global assurance project because it is part of WFP's wider risk management environment and illustrates how a proactive risk management culture, as envisaged in the ERM policy, has been realized. The project was launched in mid-2023 to support the development of the global assurance framework, which is aimed at making WFP's existing processes and systems more focused and effective and supporting the implementation of assurance actions and plans at the country office level. See WFP. 2024. Executive Director's circular OED/2024/004, [WFP Global Assurance Framework](#).

⁴ WFP. 2025. *Management Accountability Framework: Aligned to the new direction of travel* (internal document).

Box 1: Evaluation data collection and analysis

- Retrospective and participatory construction of the theory of change underpinning the policy.
- Country studies – including field missions to the Dominican Republic, Ghana, Kenya and Malawi and “desk reviews plus”⁵ covering Armenia, the Central African Republic, Colombia, Pakistan, Somalia, Ukraine and Zimbabwe.
- Desk-based analyses of WFP policies, corporate and administrative data, audits and evaluations.
- Analyses with selected comparator agencies, namely the Office of the United Nations High Commissioner for Refugees and the Food and Agriculture Organization of the United Nations.
- Key informant interviews with WFP employees at headquarters, regional bureaux,⁶ country offices, Executive Board Member States and comparator agencies.
- Analysis of selected key decisions and business processes at WFP including, but not limited to, the development of country strategic plans (CSPs), operational decision-making regarding emergency scale-up, work with partners and risk consideration in cross-cutting areas such as the humanitarian principles.
- Quantitative data analysis with regard to corporate risk indicators.

Context

4. WFP confronts multiple risks under a diverse range of conditions, in many cases in increasingly fragile and complex operational settings. The period 2018–2024 was characterized by escalating humanitarian needs, fluctuating funding and a growing number of people in need of assistance⁷ as a consequence of new and protracted conflicts, the global climate crisis, the economic shocks and aftershocks caused by the coronavirus disease 2019 (COVID-19) pandemic, and food and energy price inflation.⁸ Rapid growth of operations in complex contexts exposes WFP to multi-layered risks, including operational and fiduciary risks, which may affect its ability to reach the people most in need.
5. Initially devised in the private sector, ERM constitutes a systematic approach in which risk identification and assessment are used to define and develop mitigation measures in order to maximize the achievement of results. Key milestones in the adoption of ERM frameworks and approaches across the United Nations system include United Nations General Assembly resolution 61/245⁹ of 2006, by which the assembly sought to enhance the United Nations’ governance and oversight framework and the management of risks affecting the United Nations system. The assembly recognized that United Nations organizations in humanitarian, development and peacekeeping settings faced a high degree of inherent risk and had to navigate trade-offs between the needs of the people they serve and the need to mitigate potential harm to their personnel, resources and reputations. Another such milestone was the 2019 and 2020 guidance issued by the High-Level Committee on

⁵ A “desk review plus” is a desk-based analysis supplemented by key informant interviews conducted remotely.

⁶ The recent change in WFP’s organizational structure, including the names of various departments, divisions and other entities, came into effect in March 2025 (outside the temporal scope of the evaluation). This report therefore uses the previous nomenclature, including “regional bureau” rather than “regional office”.

⁷ United Nations Office for the Coordination of Humanitarian Affairs. 2023. *Global Humanitarian Overview 2024 – Abridged report*.

⁸ WFP. 2024. *Annual Review 2023* and “Annual performance report for 2023” (WFP/EB.A/2024/4-A/Rev.1).

⁹ United Nations. 2007. *Resolution adopted by the General Assembly on 22 December 2006 – Comprehensive review of governance and oversight within the United Nations and its funds, programmes and specialized agencies* (A/RES/61/245).

Management of the United Nations System Chief Executives Board for Coordination, which sought to foster coherence among ERM approaches across the United Nations system.

Subject

6. WFP's first ERM policy was adopted in 2005 and updated in 2015. Its successor, and the subject of this evaluation, was the 2018 ERM policy, which was supplemented with tools, mechanisms and guidance. The policy complements other corporate tools such as WFP's 2015 internal control framework, the 2018 oversight framework and the anti-fraud anti-corruption policy, last revised in 2021.
7. The ERM policy aims to provide a structured framework for identifying, assessing, managing and monitoring risks across WFP's programmes and day-to-day operations. It envisages that WFP will:
 - i) maintain a consistent risk management framework through which risks can be identified, analysed, addressed and escalated, and accountability can be assigned;
 - ii) achieve a common understanding of WFP's risk exposure in relation to its appetite for risk and be able to articulate its risk profile coherently as this is relevant both internally, for its own workforce, as well as externally, for its partners and stakeholders, including host governments and donors; and
 - iii) establish a culture in which risk management is linked to the implementation of WFP's strategic plan and is considered proactively in operational decision-making.
8. The main features of the policy are as follows:
 - Four risk categories,¹⁰ strategic, operational, fiduciary and financial, which are further classified into 15 risk areas and 41 specific risk types, and risk appetite statements that define acceptable levels of risk for each risk category (figure 1);¹¹
 - Outline of roles and responsibilities for ERM processes and risk management tools, and allocation to the Risk Management Division (RMD) of the responsibility to oversee the design and management of ERM systems within WFP's governance framework.
 - Risk management life cycle (figure 2), whereby risks are identified using tools such as risk reviews, planning exercises, internal incident tracking and external event analysis; assessed and, if required, escalated based on their likelihood and impact, using prioritization tools such as the risk assessment heatmap; subject to mitigation strategies according to risk appetite, whether through risk avoidance, reduction, sharing or acceptance; and monitored through performance metrics, audits and oversight mechanisms.
 - Regular reviews and assessments of risk processes¹² and reporting mechanisms to ensure alignment with evolving risks.
 - Dedicated tools and resources that support risk identification, assessment, mitigation and monitoring (figure 3).

¹⁰ Reputational risks are considered to be a consequence of risks materializing in any category.

¹¹ Risk appetite refers to the type and amount of risk that an organization is willing to accept to achieve its goals. As stated in the 2018 ERM policy, "(e)ach risk appetite statement reflects the intent to actively manage risks. The statements help WFP to share risks with partners and stakeholders and engender proactive engagement in operational decision-making".

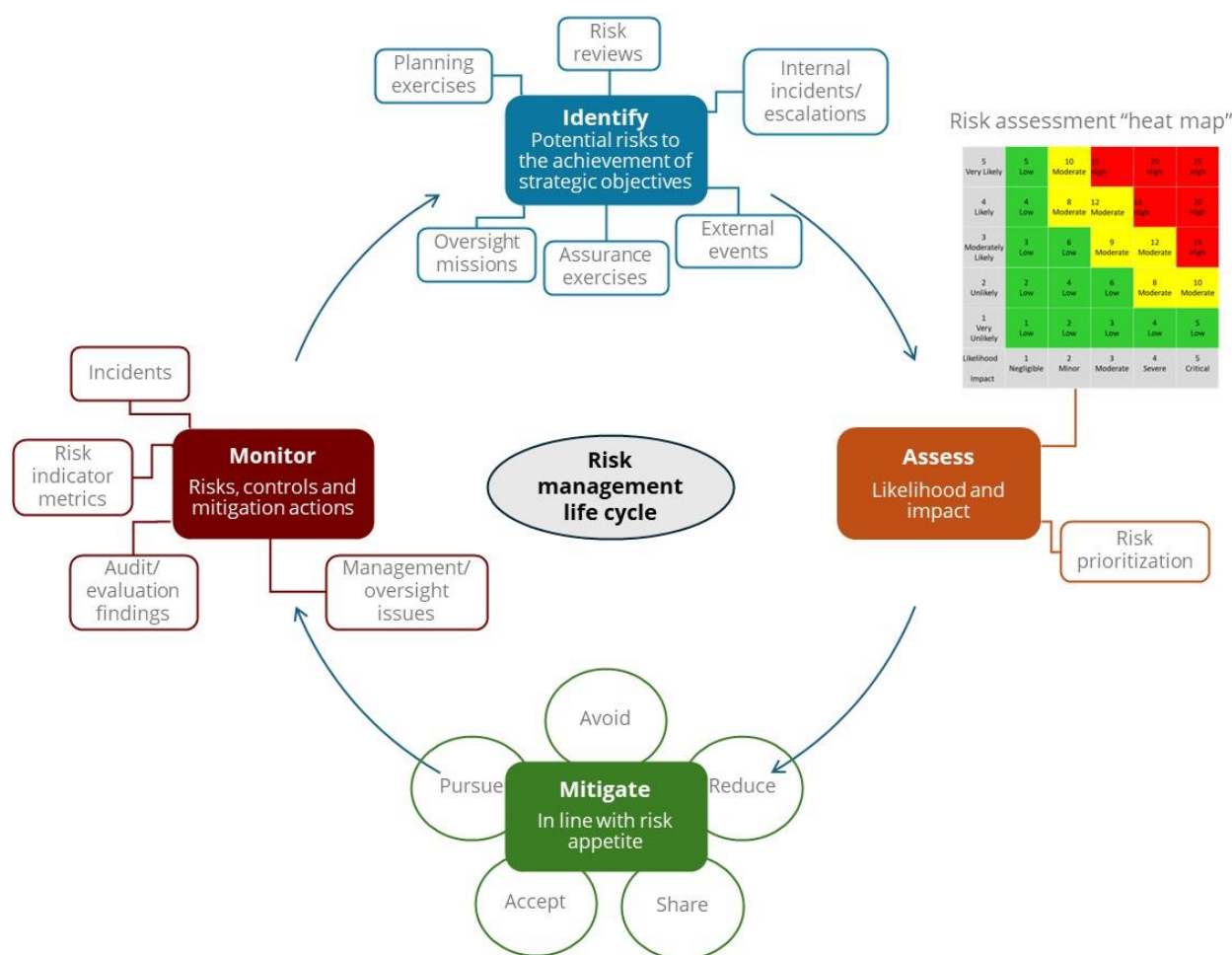
¹² These include the 2022 advisory assignment report on enterprise risk management review and assessment commissioned by the Office of Internal Audit in the Office of the WFP Inspector General, which was conducted by the firm Baldwin Global.

Figure 1: ERM policy risk categorization framework

Risk category	Strategic	Operational	Fiduciary	Financial	Reputational
Risk appetite	Risk hungry: <i>Programming in difficult contexts; need to actively manage external relationships with external stakeholders including host governments and donors</i>	Risk averse: <i>Constant improvement of internal controls</i>	Highly risk averse: <i>Recognition of duty of care to employees, obligations to stakeholders and commitment to corrective action on internal conduct</i>	Risk averse: <i>Mitigation of risk relating to cost and efficiency</i>	
Risk description	Risks that have an impact on WFP's ability to achieve its strategic goals, objectives and plans	Risks related to the implementation and execution of WFP's activities	Breaches of obligations in terms of ethics and standards of conduct by WFP and its partners; failure to implement policies; and unauthorized activities, including breaches in relation to the delegation of authority	Risks related to currency and exchange rate concerns, adverse pricing and the inefficient use or misuse of financial or other assets	<i>Consequential risk whereby risks occurring in any category could have a negative impact on WFP's reputation</i>
Risk areas	<ul style="list-style-type: none"> • Programmes • External relationships • Context • Business model 	<ul style="list-style-type: none"> • Beneficiary health, safety and security • Partners and vendors • Assets • Information technology (IT) and communications • Business processes • Governance and oversight 	<ul style="list-style-type: none"> • Employee health, safety and security • Breach of obligations • Fraud and corruption 	<ul style="list-style-type: none"> • Price volatility • Assets and investments 	

Source: Office of Evaluation, based on the ERM policy.

Figure 2: Risk management life cycle and associated tools and processes as defined in the ERM policy



Source: Evaluation team, based on the -ERM policy.

Figure 3: Overview of risk reporting mechanisms, processes and tools as set out in the 2018 ERM policy



Source: Office of Evaluation, based on the ERM policy.

- To strengthen governance and accountability, the policy incorporates the Institute of Internal Auditors' "three lines" model for risk management and addresses recommendations from a 2017 internal audit of ERM operationalization.

Evaluation findings and conclusions

10. The following section presents the five main conclusions of the evaluation and the findings that support them.

Conclusion 1: Policy quality, roll-out and support for implementation

The 2018 ERM policy provides a firm foundation for risk management at WFP, with marked improvement compared to earlier iterations. However, the links between the processes and objectives of the policy lack clarity and were not articulated in a clear theory of change. Critical gaps were noted in the definitions of risk appetite and tolerance and specific risk response mechanisms such as escalation.

11. *Strengths in policy design and roll-out.* The policy has provided WFP with a structured framework for risk management, marking significant progress compared to earlier iterations. The development of the policy was informed by evidence, and the policy clearly integrates high-priority agreed actions from relevant audits¹³ and reflects agreed actions to improve ERM leadership and governance and enhance WFP's culture of risk management. Awareness of the policy and knowledge of its contents is stronger among risk specialists and senior management than among other employees, including the heads of functional units, who play a leading role in risk management.
12. The risk taxonomy in the policy is generally robust and provides a structured framework for analysing risks, with some exceptions where risk categorization (with regard to "security", for example) is misaligned with existing framing used in day-to-day programming. Cross-cutting issues including gender, disability, inclusion and protection receive limited attention in the ERM policy document or risk taxonomy and are inadequately featured in risk assessments and risk reporting. To varying degrees, recent guidance aligned with the ERM policy has started to address this issue.
13. The policy goes beyond outlining employee responsibilities for ERM by clarifying risk management implementation arrangements at various levels. It articulates a clear vision of why and how WFP should embrace risk management by establishing a consistent risk management framework to underpin a culture that links ERM to the organization's strategic objectives and performance.
14. With regard to coherence, the ERM policy is coherent with United Nations-wide frameworks¹⁴ and relevant industry standards.¹⁵ It is well aligned with the policies categorized in the WFP policy compendium¹⁶ as "enablers and corporate policies", which reflects efforts to embed risk management in WFP's policy architecture. However, the evaluation found that the integration of ERM into policies pertaining to "cross-cutting priorities" and "principles" was more limited, which leaves a gap concerning the role of risk management in informing decisions about access, humanitarian principles and related balancing and trade-offs. The ERM policy also supported the commitments set out in WFP's strategic plan for 2017–2021 to

¹³ WFP. 2017. *Internal Audit of the Operationalization of WFP's Enterprise Risk Management*.

¹⁴ United Nations. 2017. *Report of the Secretary General – Shifting the management paradigm in the United Nations: ensuring a better future for all* (A/72/492).

¹⁵ In particular, the 2017 enterprise risk management framework by the [Committee of Sponsoring Organizations of the Treadway Commission](#), which consists of an integrated framework for internal controls.

¹⁶ The compendium arranges policies in four categories: drivers of food and nutrition insecurity; principles and approaches; strategic outcomes and cross-cutting priorities; and enablers and corporate policies. "[Compendium of policies relating to the strategic plan](#)" (WFP/EB.2/2024/4-F).

enhance capacity for effective risk management, which the strategic plan for 2022–2025 takes even further.

15. *Areas of weakness.* The ERM policy introduced greater detail on roles and responsibilities for risk management, including in response to agreed audit actions. However, normative gaps and limited clarity – partly due to the absence of a theory of change underpinning the policy¹⁷ – are found in the following areas:
 - the division of ERM responsibilities between headquarters in Rome, regional bureaux and country offices and practical implications for carrying out the responsibilities set out in the policy;
 - risk escalation protocols – the policy and guidance clearly prescribe when risks should be escalated but do not specify how the process should be formalized or how accountability is affected, except in the case of emergency response;¹⁸
 - the role of ERM in incident management, considering that the current ERM policy focuses only on risks before they materialize; and
 - implementation of control mechanisms for high-risk settings as called for in the global assurance project and subsequently the global assurance framework.
16. *Policy roll-out and implementation.* ERM has been supported through the establishment of a dedicated function at headquarters in Rome. The ERM reporting structure shifted in February 2024, moving from the Chief Financial Officer to the Deputy Executive Director/Chief Operating Officer. ERM human resources significantly increased at the regional and country levels during the period under evaluation. Specifically, between 2018 and 2024:
 - the programme support and administrative (PSA) budget for RMD as a proportion of the total headquarters PSA budget remained stable, at between 1.4 percent and 1.6 percent; and
 - the risk network, consisting of risk officers and focal points, was expanded from 65 risk focal points in 2019 to 163 in 2024 with the aim of supporting policy implementation and accelerating the uptake of ERM processes and related tools (figure 4).
17. Currently, the majority of high-risk profile country offices have full-time risk management employees, and between 2022 and 2024, 21 full-time risk officers increased capacity in twelve high-risk profile country offices (table 1).

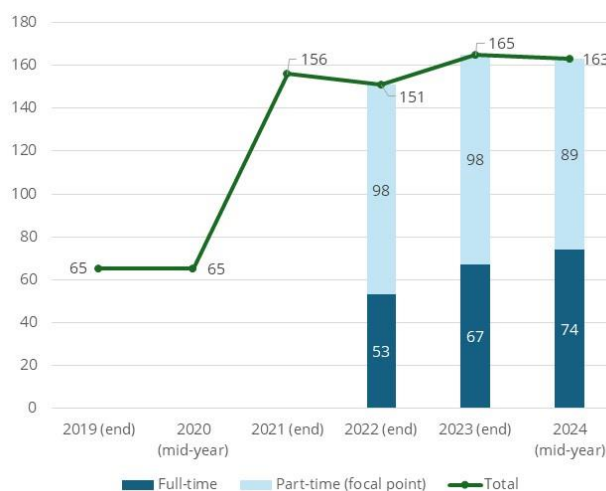
¹⁷ When the 2018 ERM policy was being developed there was no formal requirement to include theories of change in WFP policies. The practice has since evolved, and evidence and lessons on policy quality underscore the importance of theories of change. See WFP. 2018. *Top 10 Lessons for Policy Quality in WFP* (internal document) and WFP. 2020. [Synthesis of evidence and lessons from WFP's policy evaluations \(2011–2019\)](#).

¹⁸ WFP. 2018. *Emergency activation protocol for L2 and L3 emergencies* (not available online). Revised in 2023.

Table 1: Increase in the number of full-time risk officers in WFP operations, 2022–2024

WFP country office	2022	2024	Increase
Yemen	3	6	3
Somalia	1	4	3
Democratic Republic of the Congo	1	3	2
Cameroon	1	3	2
Mali	1	3	2
Haiti	0	2	2
South Sudan	2	3	1
The Sudan	1	2	1
Syrian Arab Republic	2	3	1
Burkina Faso	1	2	1
Lebanon	1	2	1
Pakistan	1	2	1
The Niger	1	2	1
Total			21

Note: Red denotes country offices with high-risk operations in 2024; yellow indicates country offices with medium-risk operations in 2024.

Figure 4: Expansion of WFP's risk network, 2020–2024

Note: Data disaggregated by part-time vs. full-time status from 2022 onwards.

Source: Risk Management Division annual reports for 2019–2020; country risk profile reports for 2022–2024.

18. During the period under evaluation, financial resources remained relatively stable, reflecting continuing organizational support for ERM. Future financial prospects for risk management may be uncertain, however, including as a result of the expiry in December 2024 of a trust fund dedicated to risk management.¹⁹
19. Finally, core to policy roll-out, the use of ERM-related tools such as risk registers, a risk catalogue and risk appetite statements has been hindered by fragmented guidance, gaps in policy dissemination and uneven uptake of online training. Delays in establishing a dedicated ERM IT system – which are currently being addressed – have also limited policy implementation, creating an additional administrative burden.

Conclusion 2: ERM and risk culture at WFP

Several factors have helped to enhance risk culture at WFP, including increasingly well-established risk categorization and framing, better-integrated risk management functions, and sustained attention from senior leadership placing ERM high on the corporate agenda. There is evidence that WFP is gradually moving from ERM implemented by specialists towards risk management becoming “everyone’s business”. However, this progress is not yet reflected in employee roles and responsibilities, including for example in employee performance management processes. Shortcomings in relation to trust and the positive incentives needed to foster open and transparent risk management practices also remain.

¹⁹ The trust fund was established by the United States Agency for International Development Bureau for Humanitarian Assistance.

20. *Corporate prioritization.* ERM has become a higher priority on the corporate agenda. Buy-in from senior management at all organizational levels appears to have increased since 2022, principally due to actions taken following high-profile incidents and in the context of the global assurance project.
21. *Responsibilities for risk management.* The adoption of ERM responsibilities has steadily advanced throughout the organization. While RMD has led their roll-out, and risk specialists in the field generally fulfil their roles as outlined in the ERM policy, additional efforts are needed to underpin a transparent and actively engaged ERM culture beyond risk specialists.
22. Across WFP, significant progress has been made in embedding a culture of risk management, which has been reinforced by the use of platforms for risk discussions at the operational and country levels, such as risk management committees (for example in Kenya); the regularity and depth of collaboration between risk specialists and non-risk specialists; and the capacity and resources for ERM available to country offices. Risk specialists are increasingly recognized as trusted advisors, moving beyond a role focused solely on risk management compliance and oversight. However, there is also the occasional misperception that beyond advising on risk management, it is the responsibility of risk officers to also manage risks, even if they are not embedded in business processes or programming decisions. This misperception exists even though employees across functions and organizational levels are aware of the risk exposure associated with individual roles, tasks and programming and there has been clear communication on the need to routinely identify and take steps to manage risk.
23. The evaluation identified opportunities to strengthen the promotion of ERM and include it more systematically in employee core competencies and individual performance objectives and appraisals. Moreover, additional attention could be paid to issues related to incentives and the under-reporting of risk, considering that WFP's corporate culture of "getting things done" and "coming up with solutions, not problems" can discourage risk reporting, escalation and at times mitigation. WFP employees must have trust in the organization if they are to retain the level of autonomy and resilience expected of them while also engaging in open and transparent risk management.

Conclusion 3: Achievement of policy implementation results

Guided by the ERM policy and its tools, risk-informed decision-making has improved across WFP. However, there are opportunities to enhance the link between risk management, programme planning and operational decision-making and to strengthen the management of risk escalation.

24. *Effectiveness and use of key ERM processes.* The ERM policy envisions the implementation of a risk management framework that supports risk-informed decision-making, consisting of processes, tools and structures, including the four-step risk management life cycle (see paragraph 8) and a three-line approach to risk functions. By the end of 2024, this ambition had largely been fulfilled, thanks in particular to improvements in the consistency, coverage and clarity of risk identification, risk assessment and risk monitoring. Some improvements in risk mitigation were also noted, but challenges regarding risk escalation persisted.
 - i) *Risk identification* at WFP is generally comprehensive and well established, supported by the extensive use of risk registers. The risk areas identified vary according to the ERM responsibilities of headquarters in Rome, regional bureaux and country offices. While clear efforts have been made to improve risk and incident identification, some country and regional operational risk registers have gaps in key risk areas prioritized by WFP, such as fraud and corruption. Nonetheless, risks relating to fraud and

corruption, employee health, safety and security represent the most frequently identified risks at the country office level.

- ii) While *risk assessment* is becoming more systematic and precise, notable discrepancies exist between risk assessment trends at the country and corporate levels. Gaps noted in risk assessment include lack of differentiation between short-, medium- and long-term risk and omission of the concept of “risk velocity”.²⁰ Both issues can reduce the utility of the corporate risk register as a strategic tool.
 - iii) *Risk mitigation* has become more systematic and increasingly embedded across WFP programme functions and business processes. Good examples include mitigation strategies implemented for risks related to funding shortages and workforce planning and staffing. However, mitigation actions are rarely costed, and when implemented, they are often not documented. This can lead to missed opportunities for exchange and learning, particularly at the regional level. The alignment between minimum controls and mitigation actions varies, and minimum controls are not always effectively adapted to different settings.
 - iv) *Risk escalation* remains a challenge, as highlighted in internal and external audits.²¹ Despite an increase in the use of key risk indicators (see paragraph 26), inadequacies in the timeliness and effectiveness of escalation processes remain, compounded by confusion about why and how to escalate and who is responsible and accountable for risk escalation and post-escalation action. Triggers for escalation are often unclear due to a general lack of defined country-specific risk appetites and a lack of distinction between risk appetite and residual risk tolerance.²² Furthermore, once escalated, risks and incidents do not always receive a useful or timely response.
25. *Effectiveness and use of ERM tools.* WFP maintains timely risk registers, although the proportion of divisions and offices maintaining an operational risk register at headquarters in Rome is lower than in regional and country offices. With some variation, the quality of country office risk registers has improved markedly in terms of detail and analysis. Generally, country offices with high levels of risk capacity, formalized structures for consultation and strong buy-in from leaders maintain better risk registers. At the corporate level, updates to the corporate risk register have improved its utility and actionability.
26. *Key risk indicators* – risk monitoring tools that define escalation thresholds – are increasingly being used. This also responds to the need, identified in internal audits, to enhance the quality of escalation processes, even if there continues to be substantial variation in regional uptake and use of such processes.
27. *Main challenges to the effective uptake of ERM.* The evaluation identified the following main challenges to ERM uptake:
- Limited collaboration in ERM across functional areas, which constrains effective risk-related decision-making, impedes common understanding of cross-cutting risks and can dilute accountability, hindering shared risk mitigation and response efforts.

²⁰ Defined as the time between a risk event materializing and its impact(s) being experienced by the organization.

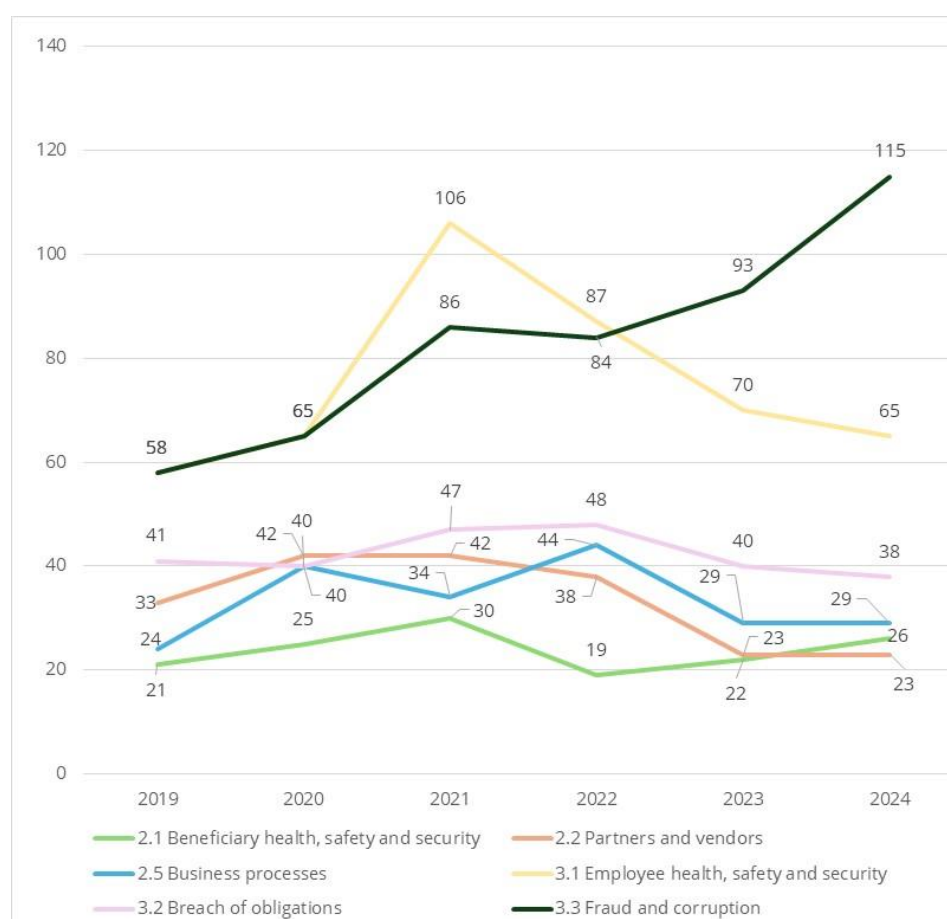
²¹ See for example the 2023 “[Annual report of the Inspector General](#)” (WFP/EB.A/2024/6-D/1).

²² Risk appetite is an expression of the types and amount of risk, on a broad level, that an organization is willing to accept in pursuit of value. Risk tolerance identifies the limit of the type and amount of residual risk that an organization can accept, including potential losses, after risk mitigation measures are implemented (that may include a response/action and internal escalation).

- Missed opportunities to better integrate risk analysis into country strategic planning.
- Lack of a centralized ERM IT system, creating administrative burdens and complicating reporting processes.

28. In the management of out-of-appetite risks, country offices sometimes lack support for their mitigation efforts. Overall, mitigation actions, controls and changes in circumstance were found to bring back risk within acceptable levels (i.e., “within appetite”) in most categories. However, while the number of out-of-appetite risks relating to employee health and safety decreased following the COVID-19 pandemic, the number of out-of-appetite fraud and corruption risks has grown dramatically since 2019 (figure 5). This trend could reflect increased reporting but also suggests that mitigation actions and controls are not yet sufficient to bring these risks within WFP's risk appetite. Other risk areas where WFP struggles to mitigate longstanding challenges are those relating to insufficient funding, and workforce planning and staffing (for example, a skills shortage or mismatch).

Figure 5: Number of out-of-appetite risks at WFP country offices



Source: Risk Management Division data (extracted in November 2024).

Conclusion 4: Contribution of ERM to enhanced WFP performance

Whereas corporate and strategic planning processes emerged as highly-risk informed, there is a need to improve the link between risk management and performance management.

In several policy and programme areas and business processes such as operational scale-up and private sector partnerships, there is evidence that risk thinking is clearly factored in and decision-making is guided by risk considerations, although this is not always documented. It may be noted in this regard that the nature of WFP's work and the circumstances in which it operates call for an approach to risk management that draws upon both formalized risk processes and more implicit risk management practices.

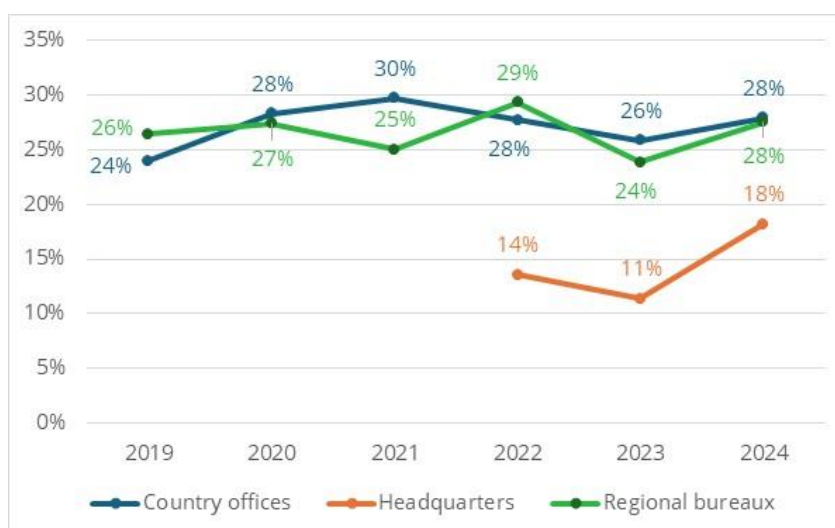
29. *Corporate strategic processes.* During the period under evaluation, overall corporate and strategic planning processes were increasingly risk-informed.
- Corporate management plans integrate risk considerations in resource allocation processes and priorities are also informed by analysis of the corporate risk register and complemented by highlights from operational risk registers.
 - WFP's regular three-to-five-year strategic workforce planning process is also risk-informed, responding in part to workforce misalignment identified as a risk in corporate analysis²³ and operational risk registers.
30. *Country strategic planning processes.* Risk management is formally integrated into CSPs, although with missed opportunities to improve how the analysis of operational risk registers could feed into CSP development. This is due to several factors:
- Activities (under the CSP) and risk categories (under the risk register) are developed and based on different frameworks, which does not facilitate clear links between them.
 - There is currently no standard IT tool for connecting risks, CSP outcomes and performance metrics.
 - Since 2020 the operational risk register template allows country offices to tag a particular risk to a CSP activity, but this functionality is not consistently used.
31. The role of risk officers emerged as very important for enhancing risk-informed decision-making – for example through their contributions to the development of CSPs and participation in targeting decisions. However, in some situations consultation between risk and non-risk specialists is perceived as ineffective and siloed between roles and functions. For example, in some cases risk discussions were separate from programmatic decisions, with risk management committees (if established) engaged only after decisions were made.
32. *Programmatic and operational decision-making processes.* Evidence from several programme areas and key business processes indicates that risk-related considerations are clearly factored into decision-making. For example, in decisions and processes relating to operational scale-up, this aspect was often formalized in specific guidance and provisions, while in other areas, such as private sector partnerships, risk-informed inputs are provided in a less formal but nonetheless effective manner.
33. *Context-specific considerations.* The ERM policy features corporate risk appetite statements for each risk area, which are expected to be relevant across the range of settings in which WFP works. However, WFP has to balance the need for standardization with the need to adapt to the situation in each country. Variations were noted in the relevance and interpretation of risk categories in different contexts – particularly where WFP confronts risks relating to host government engagement and where its programming is mainly oriented towards strengthening national capacity. An emerging, albeit limited, practice has seen some country offices, at their own initiative, developing country-level risk appetite statements in order to better reflect the specific circumstances of their country-level operations. However, due to varying risk appetites among external stakeholders, including host governments and donors, and tolerance for risk after mitigation (i.e., residual risk), which can also change over time, the evaluation found persistent challenges in WFP's management of risk escalation and out-of-appetite risks²⁴ (see conclusion 5).

²³ "Management review of significant risk and control issues, 2023" (WFP/EB.A/2024/6-E/1) and the Executive Director's assurance exercise of the same year.

²⁴ Out-of-appetite compared to the definition found in corporate risk appetite statements.

34. *Risk exposure in relation to risk appetite.* Where risks are poorly defined at the country level, and in cases where even after risk mitigation residual risk is high, WFP often pursues activities defined as out-of-appetite²⁵ by its corporate risk appetite statements. The evaluation analysed cases of continued delivery of assistance and implementation of programme activities despite high residual risks (for example, in Zimbabwe during the COVID-19 pandemic, and in Ukraine during the scale-up in response to the outbreak of conflict in 2022). These actions were taken in order to achieve WFP's objectives to reach beneficiaries and deliver assistance in a principled manner (see paragraphs 42–44). Data show that the extent of out-of-appetite risks reported by country offices is generally higher than the thresholds set in corporate risk appetite statements (figure 6).
35. There is also evidence of cases where out-of-appetite activities were ultimately discontinued, suspended or profoundly altered. This has been the case, for example, following allegations of a cooperating partner engaging in political campaigning while distributing assistance; where the level of risk exposure was too high for people targeted by specific activities; or where the risk of fraud and corruption in food distribution was also too high.

Figure 6: Out-of-appetite risks²⁶ as a proportion of total risks reported, by organizational level



Source: Risk Management Division data (extracted in November 2024).

Conclusion 5: ERM, WFP's external partners and consideration of humanitarian principles

For effective risk management that translates into risk-informed decision-making and enhanced performance, WFP needs to collaborate with a range of different partners. This requires balancing the following: WFP's commitment to delivering on its mandate within finite resources; attention to humanitarian principles; and efforts to address gaps and imbalances with regard to the sharing of information on risk. There are missed opportunities to enhance WFP's engagement in risk management with diverse partners including host governments and donor partner countries. The external funding situation, the volatility of operating environments and varying levels of information and risk-sharing with partners are also key factors with a bearing on the effectiveness of ERM and, consequently, on WFP's ability to secure the confidence of donors.

²⁵ As defined by corporate risk appetite statements.

²⁶ Out-of-appetite risks are defined as "high" (15+ seriousness) operational and financial risks, and "moderate" or "high" fiduciary risks.

36. With an unprecedented gap between operational needs and available funding, WFP is required to do more and do to better with less. This creates pressure to maintain the confidence of donors, government partners and other external stakeholders by managing effective but at times costly risk practices at all levels while also balancing demands to reduce costs and enhance efficiency.
37. *ERM and WFP's external partners.* WFP interacts with many different kinds of stakeholders – including host governments, donors and cooperating partners. WFP shares risks with these partners to varying degrees, in some cases managing risks together and sharing responsibilities for risk management. However, WFP's detailed guidance on sharing risk with different types of partners is unevenly used across the organization.
38. *Risk management and cooperating partners.* In operational settings, working with cooperating partners – including local NGO partners – is one of WFP's key risk mitigation strategies, and there is specific guidance covering this type of engagement.²⁷ The effectiveness of risk management practices between WFP and cooperating partners is mainly determined by the type of partner involved, their capacity²⁸ and the extent to which risk-related exchanges with cooperating partners feed into risk identification and assessment. Whereas risk management practices – particularly with regard to risk information sharing – are relatively well established at the level of individual projects and programmes, cooperating partners are not consistently consulted on country-level risk management issues, despite their key role in WFP's risk mitigation approaches and strategies. This shortcoming fosters the perception that WFP, as a mitigation measure, transfers risks to cooperating partners rather than sharing risks with them, while at the same time tightening its controls on their work (for example, through more frequent spot checks).
39. *Risk management and host governments.* Host governments play a key role as strategic and sometimes operational partners of WFP and, in some cases, are also WFP donors. However, risk sharing with host governments is not consistently formalized in partnership agreements. This presents challenges in relation to the following:
- risk-related information sharing – while WFP publishes its risk category and area-specific²⁹ appetite statements in the ERM policy, the exchange of information between WFP and governments on their respective risk appetites is more limited;
 - formalization of risk-related arrangements – whereas programme-specific agreements with host governments are informed by and feature detailed risk-related information, country-level partnership agreements (for example through memorandums and letters of understanding signed by country directors and government ministers) are not always explicit about risk sharing or risk tolerance.
40. *Risk management and other United Nations entities.* Although the ERM policy and related guidance do not include specific risk-sharing provisions between WFP and other United Nations entities, WFP often shares risks effectively with its United Nations partners. In these partnerships, such as with the Office of the United Nations High Commissioner for Refugees, mutual consultations are systematic, open and often formalized and are characterized by peer-to-peer communication and real-time sharing of risk information.

²⁷ WFP's guidance on WFP management of NGO partnerships (not available online).

²⁸ This is also discussed in the 2024 [Synthesis of evidence and lessons on WFP's cooperating partners from centralized and decentralized evaluations](#).

²⁹ There are 15 risk areas, and they cover specific themes or specific areas of operation, namely, programme; external relationship; context; business model; beneficiary health, safety and security; partners and vendors; assets; information technology and communications; business process; governance and oversight; employee health, safety and security; breach of obligations; fraud and corruption; price volatility; and assets and investments.

41. *Risk management with donors.* Risk sharing with WFP Member States as donors is inherent to WFP's work. Given that WFP's funding base is voluntary and that donors (which include – but are not limited to – government actors) entrust their financial resources to WFP, donors may indirectly incur some of the financial and reputational risks run by WFP. Moreover, the evaluation notes the implicit assumption that WFP and its donor base share a common interest in saving lives and avoiding loss while upholding humanitarian principles and that historically donors have been aligned with the view that WFP faces higher risk exposure than other organizations because of the humanitarian component of its mandate.
42. Against this backdrop, there is evidence of improvement in WFP's interactions with Member States on ERM:
- lessons learned from past cases of aid diversion (for example, in Ethiopia in 2023³⁰) prompted WFP to provide more frequent updates to external stakeholders, including donors, about its operational risks and challenges, thus increasing transparency and encouraging dialogue on risk management;
 - WFP has increased the regularity and clarity of its communication with external stakeholders, including donors, regarding emergency situations in which the "no regrets" approach is expected to help in the swift mobilization of resources to address immediate humanitarian needs despite uncertainty – which calls for a higher risk appetite by both WFP and external stakeholders, including donors;
 - there is a greater focus on accountability and transparency in risk management practices, as reflected in third-party monitoring agreements (for example with regard to operations in Ukraine); and
 - there are examples (albeit infrequent) of official, transparent and detailed agreements on risk sharing between WFP and donors (including – but not limited to – government actors), that encompass information about their risk tolerance and that have decisively supported WFP's operational decision-making in complex situations such as drought and acute food insecurity in Somalia in 2023.
43. Persistent challenges in WFP's engagement in ERM with donors mainly relate to the following:
- navigating the tension between WFP's operational requirements, the need to secure donors' confidence and funding, and the inherent aversion to loss shared by all parties involved in operational response; and
 - operating in challenging high-risk situations without a clear prior understanding of the risk appetite of external stakeholders, including donors, and what residual risks they are ready to tolerate after relevant risks have been mitigated.³¹ This was found to put WFP in an asymmetric position with its stakeholders, which in turn affects WFP's ability to take risk-informed decisions based on more comprehensive risk information.
44. *Principled humanitarian action and risk management.* The ERM policy highlights the need to balance risk management and adherence to humanitarian principles. The evaluation found that when WFP operates in a risk-informed manner, there can be a tension – although no outright contradiction – between humanitarian principles and the pressure to reduce risk. While adherence to humanitarian principles can contribute to risk reduction, WFP routinely grapples with the trade-offs between agile delivery, the pressure to get things done and compliance with ERM requirements. This challenge is particularly notable in emergency

³⁰ WFP. 2023. [Widespread food diversion impacts WFP food distributions across Ethiopia](#).

³¹ This is also referred to as "residual risk" (see footnote 22).

response settings, where risk management processes can lengthen WFP's response times if additional requirements are placed on decision-makers.

45. Moreover, gaps are noted between how risks materialize in operational settings and how they are defined and catalogued at the corporate level. The standardized approach to ERM at WFP is seen, in some cases, as failing to capture the nuanced and immediate risks faced in the field, both strategically and operationally. This is particularly challenging in politically sensitive environments where ERM approaches need to be combined with other factors such as emergency protocols, conflict sensitivity frameworks and the "do no harm" principle when WFP is faced with complex operating environments and strives to adhere to humanitarian principles.
46. The evaluation found evidence of mutual reinforcement between adherence to humanitarian principles, a "no regrets" approach to operations,³² and risk mitigation. The evaluation underscores that the no regrets approach – in line with ERM and with WFP's 2024 emergency activation protocol – is a risk-informed approach. The evaluation also revealed a perspective expressed both at headquarters in Rome and at the country level whereby the principle of humanity was often associated with acting on the basis of no regrets. Challenges in balancing risk management and adherence to the humanitarian principles in increasingly complex operating environments nevertheless persist. In particular, tensions between ERM and the neutrality, impartiality and operational independence principles were found to require further guidance.
47. *Resourcing challenges.* A constrained funding environment may pose challenges to WFP's ability to sustain ERM practices, as risk mitigation measures can be expensive. For example, human and financial resource constraints may limit WFP's ability to systematically assess and monitor risks based on relevant, sufficient and high-quality data. The risk mitigation measures required by donors (which include – but are not limited to – government actors), can also be costly, sometimes disproportionately so. Declining funding levels also appear to reduce WFP's risk appetite, because financial losses (and reputational risk) become more consequential. Moreover, the evaluation noted concerns by country offices and regional bureaux that human resource requirements for risk management could end up competing with requirements for more operationally focused personnel, particularly in smaller country offices.
48. When fewer financial resources are available, and particularly given high levels of earmarking of contributions, WFP must strike a balance between addressing operational needs in a principled manner and responding to risk management requirements, particularly in high-risk settings. As resources shrink, tension between maintaining controls and mitigation measures in line with corporate and donor risk appetite and tolerance and preserving WFP's ability to deliver can be expected to intensify. Consideration of both balance and the sustainability of ERM requirements and resourcing will therefore be essential going forwards.

Recommendations

49. The table below presents the recommendations stemming from the evaluation of WFP's 2018 ERM policy, along with the proposed WFP entities responsible for implementing them, the priority of each recommendation and a target date by which each recommendation should be addressed.

³² The Inter-Agency Standing Committee adopts a forward-leaning "no regrets" approach to preparedness action, especially once thresholds that have been identified through risk analysis are met. Inter-Agency Standing Committee. 2012. *Humanitarian System-Wide Emergency Activation: definition and procedures*.

Recommendations and sub-recommendations	Priority	Lead entity	Supporting entities	Deadline for completion
Recommendation 1: Revise, update and consolidate the ERM policy document and accompanying guidelines, ensuring adequate dissemination and communication.		RMD		
<p>1.1 Revise the ERM policy, ensuring that it clarifies and strengthens WFP's approach to ERM at all levels.</p> <p>At a minimum, when revising the policy, WFP should consider developing a theory of change.³³ The updated policy should also include the following elements:</p> <ul style="list-style-type: none"> • a vision for ERM; • the mission of the ERM policy; • the mandate of RMD; • the contours of the ERM system, namely: <ul style="list-style-type: none"> • the three lines model and the roles to be performed; • the five basic steps of the risk management life cycle; • the principles and framework governing risk escalation; and • the concepts of stages of risk realization and risk velocity; • the principles guiding the implementation of the policy, distinguishing between: <ul style="list-style-type: none"> • corporate risk appetite statements for risk areas before treatment;³⁴ and • corporate risk tolerance statements for risk areas after treatment 	High	RMD	Programme Policy and Guidance Division, Security Division	Fourth quarter 2027
<p>1.2 Strengthen mechanisms and guidance and their dissemination to support implementation of the revised ERM policy throughout WFP.</p> <p>At a minimum, the following issues should be covered:</p> <ul style="list-style-type: none"> • protection from sexual exploitation and abuse, security, privacy and data protection, in line with the revised ERM policy update related guidance; • the five steps of the risk management life cycle and their components, as well as ongoing controls, as a guiding framework for employees; 	High	RMD	Emergency Preparedness and Response Service, Strategic Coordination and Assistant Executive Director Office (POC), Security Division, Global Privacy Office,	First quarter 2028

³³ The full evaluation report includes a fully fledged theory of change that was developed as part of the evaluation process in order to make explicit the intended pathways along the results chain set out in the policy. The theory of change was reviewed and discussed with RMD employees as well as with regional risk officers and advisors and could serve as a basis for developing a theory of change to inform the ERM policy revision process.

³⁴ Risk treatment can involve "accepting", "avoiding", "mitigating", or "transferring" risks.

Recommendations and sub-recommendations	Priority	Lead entity	Supporting entities	Deadline for completion
<ul style="list-style-type: none"> the roles, responsibilities and accountability for ERM beyond RMD, particularly in terms of ERM's contribution to enhanced decision-making and programming; guidance on how to assess risk exposure, how to identify risk realization and how to assess risk velocity; the types of mitigation measures; a step-by-step guide on the process of risk escalation; and guidance on residual risk after treatment. 			Protection from Sexual Exploitation and Abuse Unit	
<p>1.3 Ensure that the revised ERM policy facilitates greater policy coherence.</p> <p>At a minimum, following the approval of the revised ERM policy, a mechanism should be set up to ensure that all drafts of new or updated WFP policies and corporate documents are reviewed from a risk-management perspective. The mechanism should:</p> <ul style="list-style-type: none"> propose ways in which corporate documents should explicitly refer to the ERM policy in force; propose a taxonomy and terminology to support risk management across WFP's policy and programme areas and business processes; and clarify responsibilities and accountability relating to risk management for decision-making processes in the most critical policy and programme areas; these should also be in line with the 2025 management accountability framework. 	High	RMD	Office of the Deputy Executive Director and Chief Operating Officer	Fourth quarter 2027
Recommendation 2: Take steps to further strengthen the ERM culture within WFP.		RMD		
<p>2.1 Take steps to promote and encourage ERM, thereby fostering broad ownership and detailed understanding of the strategic significance and programmatic implications of risk management across WFP.</p> <p>Practical steps should include – but not be limited to – the following:</p> <ul style="list-style-type: none"> reflect ERM in development and learning programmes designed for risk specialists and all other employees; expand the coverage and encourage the uptake of ERM training updated to reflect the new ERM policy and guidelines; and establish explicit targets for increasing the coverage of ERM training across WFP. 	Medium	RMD	Human Resources Division	First quarter 2028

Recommendations and sub-recommendations	Priority	Lead entity	Supporting entities	Deadline for completion
Recommendation 3: Strengthen ERM tools to enhance the contribution of risk management to decision-making and performance – including with regard to cross-cutting issues.		RMD		
3.1 Develop a secure online platform for risk management that can work in an integrated fashion with other WFP systems. Ensure that risk information and reporting are easily accessible and consolidated throughout, considering factors such as data protection and privacy requirements.	Medium	RMD	Technology Division, Management Services Division, Global Privacy Office	Third quarter 2026
3.2 Update the risk catalogue to focus it more explicitly on – and give more visibility to – managing risks relating to sexual exploitation and abuse, protection, gender issues and security across more than one risk category.	Medium	RMD	Gender, Protection and Inclusion Service; Protection from Sexual Exploitation and Abuse Unit, Security Division	Fourth quarter 2027
Recommendation 4: Enhance the clarity of risk management resourcing and capacity.		RMD		
<p>4.1 Strengthen and harmonize the allocation of human and financial resources to risk management, considering the broader corporate context of constrained resources and organizational realignment.</p> <p>To achieve this, the following actions should be considered:</p> <ul style="list-style-type: none"> • developing criteria to determine the necessary risk management resources and capacity at various levels of the organization; • advising directors so that ERM focal points and full-time risk officers in country offices have clear individual performance objectives and appraisals that are aligned with the revised ERM policy; and • identifying the circumstances under which the appointment of a risk focal point in a country office (where risk officers are not present) or in functional units at headquarters in Rome should be strongly recommended. 	High	RMD	Human Resources Division, Programme Policy and Guidance Division	Third quarter 2026

Recommendations and sub-recommendations	Priority	Lead entity	Supporting entities	Deadline for completion
Recommendation 5: Take steps to enhance mutual transparency on risk management with external stakeholders.		Partnerships and Innovation Department		
<p>5.1 Facilitate dialogue with external stakeholders, including donors and key cooperating partners, in particular with regard to risk appetite and residual risk tolerance. This should include the development of mechanisms, accompanied by supporting guidance and templates, for country office coordination and dialogue with donors and government partners on context-specific risk appetite and residual risk tolerance, with a view to informing and supporting mutual understanding regarding risk appetite in various settings and risk tolerance after mitigation while acknowledging that in WFP's operating environments, risks can be mitigated but not totally eliminated.</p> <p>These mechanisms should help to inform and focus WFP's engagement with partners, covering the following issues:</p> <ul style="list-style-type: none"> • risk identification and assessment; • clear and distinct risk appetite statements and risk tolerance after mitigation; • proposed mitigation measures, their costs and other implications and an assessment of their cost/benefit ratios; and • explicit agreements on mitigation measures that result in risk sharing with cooperating partners. 	High	Partnerships and Innovation Department	RMD, POC	Fourth quarter 2026
<p>5.2 Establish channels to ensure regular discussions with host governments on risk appetite and residual risk tolerance as part of mutual accountability.</p> <p>This should include the following:</p> <ul style="list-style-type: none"> • consultation with government partners on risks of strategic importance; and • provisions to ensure that regular discussions take place and that a record is kept of risk-related issues (particularly around risk mitigation) for which there can be interdependencies between WFP and government partners. 	Medium	RMD	POC	Fourth quarter 2026

Acronyms

COVID-19	coronavirus disease 2019
CSP	country strategic plan
ERM	enterprise risk management
IT	information technology
POC	Strategic Coordination and Assistant Executive Director Office
PSA	programme support and administrative (budget)
RMD	Risk Management Division