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## Annual report of the Ethics Office for 2018

### Executive summary

This annual report, submitted to the Executive Board at its annual session in 2019, was reviewed by the Ethics Panel of the United Nations, in accordance with Section 5.4 of the Secretary-General's Bulletin entitled "United Nations system-wide application of ethics: separately administered organs and programmes" (ST/SGB/2007/11, as amended), and was provided to the Executive Director pursuant to paragraph 6.2 of Executive Director's Circular ED2008/002 entitled "Establishment of Ethics Office in WFP."

It provides a summary of the activities of the Ethics Office during the period from 1 January to 31 December 2018, and includes observations related to the work of the Ethics Office and ethics within WFP and the United Nations system.

### Draft decision\*

The Board takes note of the document entitled "Annual report of the Ethics Office for 2018" (WFP/EB.A/2019/4-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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## I. Introduction

1. This report covers the work of the Ethics Office in each area of its mandate for the period from 1 January to 31 December 2018, and provides analysis and assessments as compared to previous years and relevant insights anticipated into 2019. The Ethics Office conducts its activities based on, *inter alia*, principles of confidentiality, independence and integrity.
2. The Ethics Office assists the Executive Director in nurturing a culture of ethics and accountability to enable all employees (employed through all employment contract types and volunteers) to perform their functions in accordance with the highest standards of conduct and to come forward without fear of retaliation.

## II. Background

3. The Ethics Office was established in January 2008 by Executive Director Circular 2008/002 "Establishment of Ethics Office in WFP" as a result of the Secretary-General's Bulletin ST/SGB/2007/11 "United Nations system-wide application of ethics: separately administered organs and programmes." The overall objective of the Ethics Office is to assist the Executive Director in fostering an ethical environment whereby all employees observe and perform their functions with the highest standards of integrity as required by the Charter of the United Nations, the Standards of Conduct for the International Civil Service, 2013,<sup>1</sup> the WFP Code of Conduct<sup>2</sup> and other applicable policies and practices – relevant to standards of conduct for employees and those working in support of WFP's operations.
4. This report provides an overview of the activities (including statistical information) undertaken by the Ethics Office, categorized in the following mandated areas of work:
  - 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
5. This report also includes information regarding initiatives undertaken by the Ethics Office on Protection from Sexual Exploitation and Abuse (PSEA) as, in March, the Ethics Office was appointed as WFP Organization Focal Point for PSEA.
6. This report was prepared pursuant to Section 5.4 of ST/SGB/2007/11, which requires the ethics offices in the United Nations Secretariat and the separately administered organs and programmes to prepare annual reports for review by the Ethics Panel of the United Nations (EPUN or Ethics Panel).<sup>3</sup> It has been reviewed by the Ethics Panel, submitted to the Executive Director, and is hereby submitted to the Executive Board.
7. In 2018, the Ethics Office annual report was presented for the first time to the Executive Board, whereas in past years it was only provided to the Executive Board as an annex in the WFP Annual Performance Report.

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<sup>1</sup> International Civil Service Commission, 2013, *Standards of Conduct for the International Civil Service*.

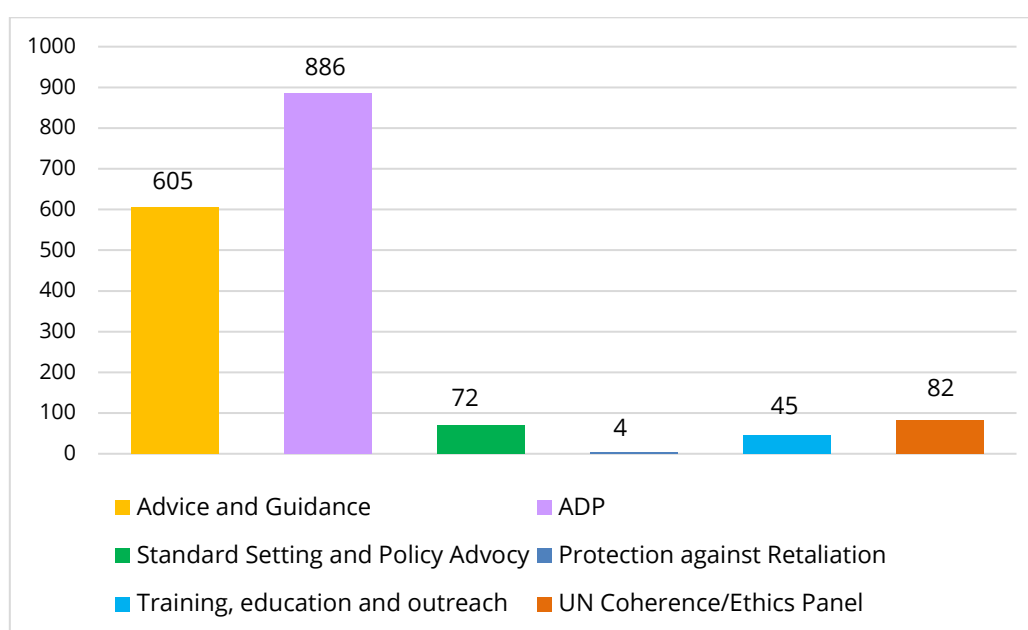
<sup>2</sup> Executive Director's Circular ED2014/016, *WFP Code of Conduct*.

<sup>3</sup> Previously called the United Nations Ethics Committee.

### III. Activities of the Ethics Office

8. The Ethics Office conducted more than 1,830 activities by all areas of the Ethics Office mandate (Figure 1) and including PSEA. By areas of the mandate, the Ethics Office conducted 1,694 activities broken down as follows: *Advice and Guidance*: 605 separately recorded matters were considered, excluding advice and guidance on PSEA and outside activities considered as a result of disclosures under the Annual Conflicts of Interest and Financial Disclosure Programme; *Annual Conflicts of Interest and Financial Disclosure Programme (ADP)* 886 submissions were flagged as possible conflicts of interest and reviewed; *Protection against Retaliation – Whistleblower Protection Policy*: four cases were considered; *Standard Setting and Policy Advocacy*: 72 reviews were conducted, some with multiple documents or multiple rounds of reviews, excluding work initiated on policies and practices of the Ethics Office; *Training, Education and Outreach*: 45 separate outreach activities were conducted directly by the Ethics Office (with additional outreach activities covered indirectly); *Ethics Panel*: 10 conference calls/meetings and 72 consultations and/or deliberations occurred. In addition, 131 gifts were disclosed and recorded into the electronic gifts register (not included in Figure 1).

**Figure 1: Summary of the work of the Ethics Office by number of activities recorded – not time, excluding PSEA**

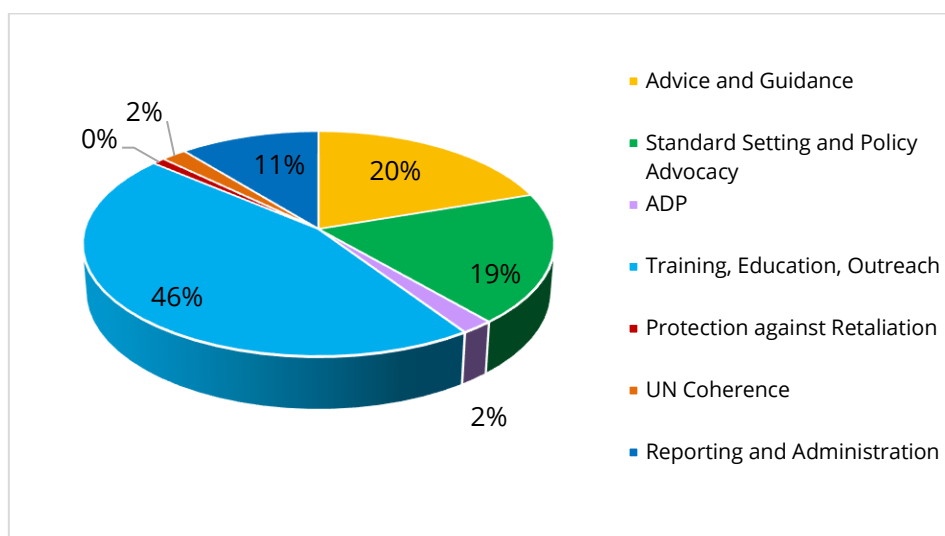


9. Figure 1 represents the number of activities recorded, not the amount of time spent, or the number of people impacted. As there is no database as related to any of the work, especially the advisories, it is the opinion of the Director, Ethics Office, that while this number represents the overwhelming amount of the work, there are other activities undertaken that remain unrecorded, such as confidential consultations by and with the Director, Ethics Office. In addition, the overview does not reflect the work undertaken by the Ethics Office as: Chair of the Ethics Network of Multilateral Organizations (ENMO) (as more fully described in Section V); member of both the Inter-divisional Standing Committee (as more fully described in paragraph 56) and the Joint Executive Board and WFP Management Working Group on Harassment, Sexual Harassment, Abuse of Power and Discrimination; and co-chair of the Sub-Working Group on safeguarding against sexual harassment and sexual exploitation and abuse (as described in Section IV). These initiatives involved a substantial amount of time. Nevertheless, the work related to ENMO resulted in

a high level of discourse on ethics – a tangible and relevant contribution by the Ethics Office to the greater United Nations and public international community, and the work related to the Executive Board Working Group and the Sub-Working Group was significant in informing the Ethics Office in understanding and advancing the ethical culture of WFP.

10. The time spent by the Ethics Office staff, other than the Director and the administrative staff is reflected below (Figure 2).<sup>4</sup> The administrative staff spent a considerable amount of time in advancing the ADP launch and follow up and tracking the work of the Ethics Office for purposes of timely follow up and accurate reporting.

**Figure 2: Time spent by Ethics Office staff (excluding the Director, administrative staff and interns) by areas of mandate**

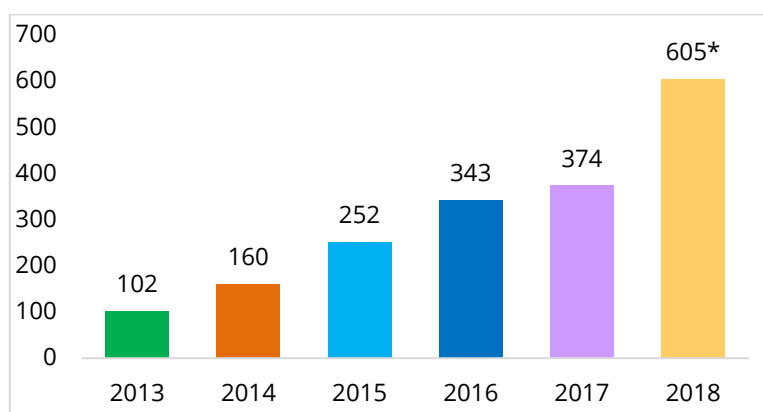


11. The area categorized as “Reporting and Administration” includes activities related to administration and infrastructure, including tracking mechanisms, which enable the Ethics Office to measure its activities. In addition, this area includes the time spent on the preparation and writing of the annual report and its abbreviated version, as well as on the tender to procure an external company to launch a “culture survey” (as more fully described in paragraph 120).
12. Work by interns consisted of: for Advice and Guidance, non-confidential mini due diligence reviews (conducting a total of 134 mini due diligence reviews); for Standard Setting and Policy Advocacy, research; and, for Education and Outreach, creating collateral and preparatory work, as well as “manning” the auction (as more fully described in Section E below).

### A. Advice and Guidance

13. The Ethics Office provided advice and guidance to employees, as individuals and as management. There was a total of 671 advisories recorded, including 66 PSEA advisories. The below chart compares the advisories less PSEA (605), by year. This number represented a 61.7 percent increase in the recorded advisories from 2017 (374); and a 493 percent increase from 2013, which were recorded at 102. (Figure 3). Advice and guidance was also provided through *ad-hoc* interactions and unrecorded.

<sup>4</sup> Figure 2 does not include time spent on PSEA-related activities.

**Figure 3: Requests for advice – 2013–2018**

\*This number does not include PSEA-related advisories.

14. Advisories recorded by category (Figure 4) were as follows: outside activities (34 percent); gifts, awards, honours, hospitality and related areas (7 percent); employment and post-employment (12 percent); standards of conduct (14 percent); and general conflicts of interest and other, including enquiries on a broad range of matters and general ethics advice (33 percent). While requests for advice and guidance continued to increase (likely) as a result of Education and Outreach (including the mandatory ethics e-learnings), the substantial increase was likely a result of the #MeToo movement, the roll-out of the revised Harassment, Sexual Harassment, Abuse of Authority and Discrimination Policy (HSHAPD Policy) and the related awareness raising initiatives and increased discourse in WFP.

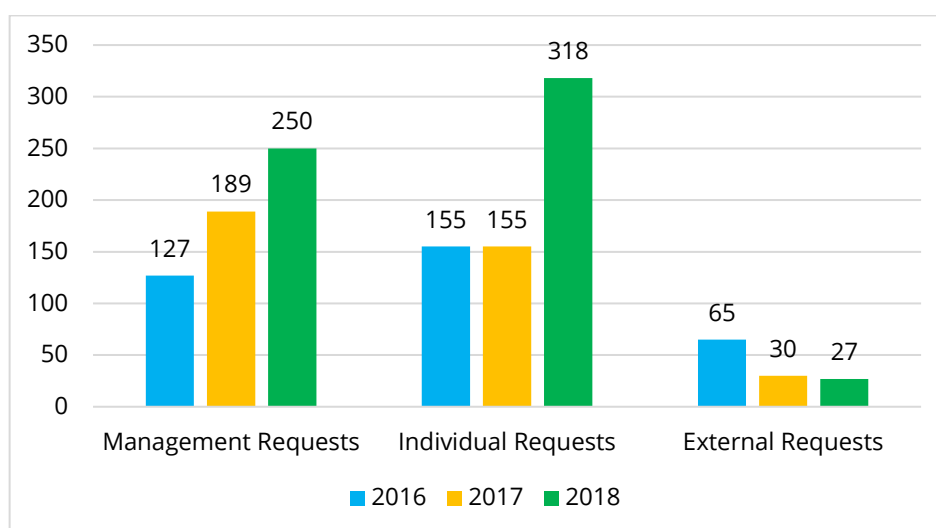
**Figure 4: Requests for advice by category**

15. Since 2014, the Ethics Office has continued to receive an increased number of queries by managers in their capacity as management. This reflects the more ingrained understanding of the value provided by experienced ethics professionals in addition to the increased visibility of the Ethics Office, the expansion of its education and outreach initiatives and the additional responsibilities of the Director, Ethics Office (including the participation in the

Executive Management Group (EMG) and other committees, such as the Inter-divisional Standing Committee, the Data Management Committee and the United Nations Global Pulse Data Privacy Advisory Working Group).

16. As a result, the Ethics Office started to track the source of the queries for advice and guidance more closely, creating three categories – “Management” (queries by a WFP employee in his/her official capacity), “Individual” (personal requests) and “External” (queries from outside WFP). In 2018, 250 requests were made by managers as management, 318 as individuals, and 27 were external (Figure 5). Moreover, there were a considerable number of requests that were spam or clearly required review elsewhere in WFP and, therefore, were not included in the total number of advisories as not material in nature. In 2018, the Ethics Office added a new category for the purpose of tracking “Organizational” requests. This category covers requests from WFP itself through any WFP Division and/or its stakeholders. There were ten requests considered “Organizational” as related to the mandate of the Ethics Office with additional matters categorised as “Organizational” as related to PSEA.

**Figure 5: Requests for advice by source of queries – 2016–2018**

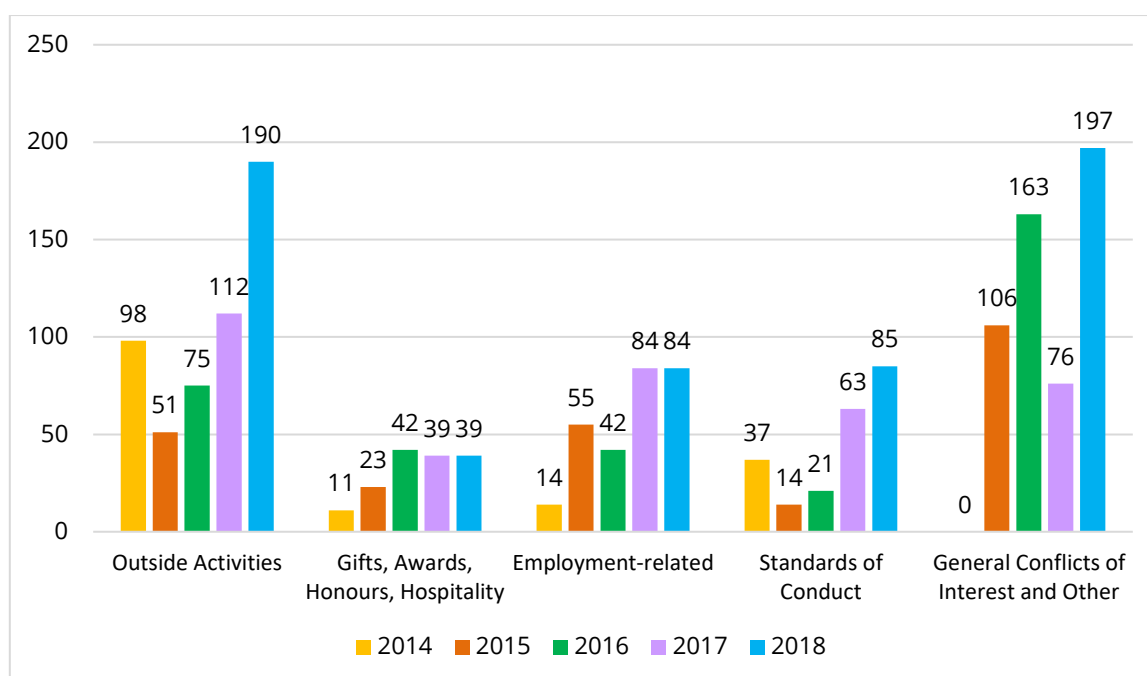


17. The Ethics Office continued to advise on personal, institutional/organizational and functional conflicts of interest, meaning instances in which WFP and/or its employees may be faced with a conflict of interest as a result of their official function. Advice was also provided on institutional/organizational conflicts of interest and the Ethics Office was tasked with leading the mapping of organizational conflicts of interest under the Joint Inspections Unit (JIU) Report on the “Review of mechanisms and policies addressing conflict of interest in the United Nations system.” This initiative will continue into 2019.
18. As anticipated in the 2017 annual report, the Ethics Office started updating the Executive Director’s Circular 2008/004 covering conflicts of interest<sup>5</sup> for the purpose of making the Circular current and addressing conflicts of interest more comprehensively (as more fully described in paragraph 42).

<sup>5</sup> Executive Director’s Circular ED2008/004, *Disclosure of financial interests, outside activities and honours, decorations, favours, gifts or remuneration*.

19. In 2017,<sup>6</sup> an electronic gifts register was instituted. The substantial increase of gifts disclosures continued in 2018 with 131 gifts disclosed through the electronic gifts register. In 2017, there were 98 disclosures through the electronic gifts register. In addition, gifts of nominal value are turned over into regional bureaux and country offices and distributed or used through fair and transparent processes. While both - the disclosures through the electronic gifts register and in regional and country offices were increased - the number of actual disclosures seemed relatively low to the employee population. It is worth noting that these disclosures are separate from advice on gifts, which were tracked through Advice and Guidance (as reflected in paragraph 14).
20. Per request of the Resource Management Division, the Ethics Office proposed the implementation of the option to make disclosures of offers of gifts in addition to the actual receipt of gifts. The Ethics Office is hopeful the Technology Division will implement this update in 2019 prior to the end-of-the-year awareness campaign on gifts in order for the Ethics Office to be able to provide guidance and awareness of this additional disclosure.

**Figure 6: Requests for advice – categories, 2014-2018**



21. The comparison of the actual numbers of 2017 to 2018 (Figure 6) showed a substantial increase of requests classified as “Outside Activities”. In 2017 and 2018 respectively, the actual numbers were 112 and 190. The Ethics Office attributed this substantial increase to several factors, most notably: outside activities were covered under the second module of the mandatory e-learning, rolled out in December 2017 for completion in 2018 (as more fully described under Section E); education and outreach activities, including those being conducted by the HR Staff Relations Branch; increased transparency on investigations including the failure to disclose outside activities; and the increased disclosures under the ADP (as more fully described in paragraph 39).

<sup>6</sup> Executive Director’s Circular OED2017/002, *Disclosure of Gifts*.

22. There was also a substantial increase of matters recorded as “General conflicts of interest and other”. The actual numbers were 197 and 76, in 2018 and 2017, respectively. Out of 197 requests, 20 concerned different sorts of complaints that warranted referral (directly or by advice) elsewhere. The Ethics Office attributed this substantial increase of general advisories to high-profile standards of conduct discourse in WFP and within the public domain.
23. There was an increase under the “Standards of Conduct” category which may also have been a result of the discourse and the education and outreach initiatives. The actual numbers were 85 in 2018 and 63 in 2017. The Ethics Office will continue to monitor this category for drawing insights.
24. The substantial increase in “Employment-related” advice and guidance in 2017 (as explained in the 2017 annual report) did not continue forward into 2018. This Ethics Office finds this curious considering the increase in the employee population.
25. The number of “Gifts-related” requests remained steady, despite the increase in the number of gifts disclosures through the electronic gifts register (as more fully described in paragraph 19).
26. Of note, the Ethics Office continued to update its categories to reflect the areas of advice and guidance and to inform other actions, like Education and Outreach. Related, the Ethics Office started working on a case management system to improve the tracking mechanism of Advice and Guidance matters. This work will continue for completion in 2019.
27. Lastly, as requested by one Executive Board Member, the Ethics Office created a feedback survey for the purpose of assessing employee satisfaction. The implementation of the feedback survey for matters categorized as “Management” and “Organizational” is anticipated in 2019.

## **B. Annual Conflicts of Interest and Financial Disclosure Programme**

28. The Executive Director’s Circular on the Annual Conflicts of Interest and Financial Disclosure Programme (ADP)<sup>7</sup> was adopted in April 2008 and was first implemented in 2009. The ADP reflects WFP’s commitment to transparency and public confidence-building; it acts as a safeguard and risk management tool for employees and WFP. It is not a tool to uncover fraud or unjust personal endorsement. The Ethics Office is mandated to administer the ADP<sup>8</sup> to assist WFP in identifying and addressing personal conflicts of interest for the purpose of mitigating or eliminating conflicts of interest in the best interest of WFP.
29. A new ADP application was launched in 2017 to be more user-friendly and with greater functionality. No changes were made to the ADP application in 2018. As in past years, data continued to be transmitted and maintained in a technologically secure and confidential manner, provided through the oversight of the Technology Division.
30. The tenth annual ADP exercise was launched on 9 April 2018. In 2017, the Ethics Office instituted a completion deadline of six weeks and this practice continued in 2018. In 2018, the Director, Ethics Office, made an appeal to the EMG to accelerate the completion rate of the ADP. The first deadline was routinely extended to 29 June 2018, which is considered the deadline for purposes of compliance. Despite communications on the

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<sup>7</sup> Executive Director Circular ED2008/004, *Disclosure of financial interests, outside activities and honours, decorations, favours, gifts or remuneration*.

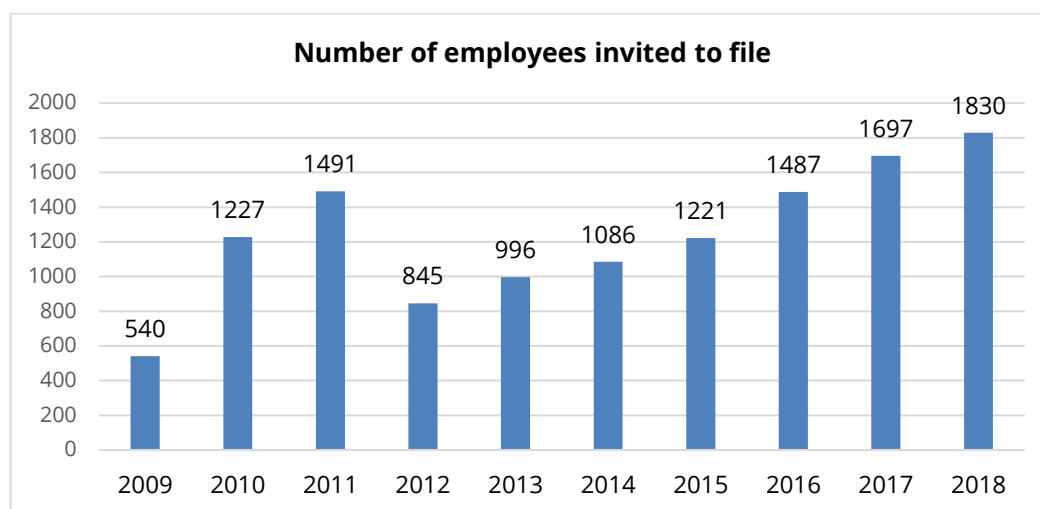
<sup>8</sup> The Secretary-General’s bulletin ST/SGB/2007/11, *United Nations system-wide application of ethics: separately administered organs and programmes*.



expectations of timely completion, at the extended deadline the completion rate was a meagre 70 percent.

31. For the fifth time since the initial implementation of the ADP, the compliance completion rate reached 100 percent; yet, this was only achieved in February 2019. Many factors contributed to this paltry result and reflected poorly on “tone from the top”.
32. A total of 1,830 employees out of a total employee population of 16,290<sup>9</sup> was identified to participate. This represented 11.2 percent of the total employee population and an increase of 7.8 percent over the 2017 ADP population. (Figure 7).

**Figure 7: Annual Conflicts of Interest and Financial Disclosure Programme participation, 2009–2018**



33. Through an extensive process, starting with data feeds from the Human Resources Division, the Ethics Office compiled and distributed separate lists of eligible participants for review by management. Input from management was essential to identify relevant participants; and, management fulfilled this responsibility based on the policy criteria.
34. The policy criteria captured employees at D-1 and D-2 levels; all country directors, deputy country directors and heads of offices/sub-offices; all oversight – audit/investigations, inspections – and investment – treasury, procurement and legal officers, with the exception of the Employment and Administrative Law Branch; those whose occupational duties included procurement authority to release purchase orders of any type (those who have authority to release only micro purchase orders are excluded); those who had regular access to confidential procurement information; and, members of vendor management committees.
35. The ADP was again comprised of three parts: conflict of interest (COI) questionnaire, eligibility questionnaire, and financial disclosure statement.
36. Of the 1,830 employees identified to participate, 37 were exempted mainly because of separation, including retirement and extended leave. As a result, 1,793 employees completed the COI questionnaire. The COI questionnaire required disclosures related to relationships of employees and their dependent family members with governments, vendors and partners, and required disclosure of outside activities, receipt of gifts or awards, family relations in the United Nations, landlord/tenant relations, etc. Of the total

<sup>9</sup>Total number of WFP employees as of 31 March 2018.

COI questionnaires reviewed, 449 submissions (some of which had multiple disclosures) were flagged as possible conflicts of interest and reviewed. In 2017, 397 COI questionnaires were flagged – making the questionnaires flagged roughly consistent to the total ADP population.

37. The eligibility questionnaire combined with the process of granting exemptions further reduced the number of participants completing the financial disclosure statements to 1,435. Based on experience and as validated, the Ethics Office is of the opinion that the COI questionnaire supports the intended purpose of the ADP and, with few modifications, the separate financial disclosure statement can be eliminated. It was the intention of the Ethics Office to implement these changes in 2018, however challenges with technology and the update of the Executive Director Circular 2008/004 (as more fully described in paragraph 42) moved this transformation to 2019.
38. The financial disclosure statement required disclosure of assets, profits, income, supplements, liabilities and other financial interests of employees and their dependent family members, and whether such interests were with WFP vendors/partners, etc. Of the total financial disclosure statements reviewed, 437 submissions (some of which had multiple disclosures) were flagged as possible conflicts of interest and reviewed. This number represents a substantial increase to the number reported in the 2017 annual report and an even more substantial increase to 2016. In 2016 and prior years, the disclosures flagged as a result of having bank accounts were not included in the annual reports. This changed in 2017 as a consequence of the updated questions instituted in 2017 and continued forward into 2018. Backing out the number of disclosures for bank accounts with vendors resulted in 85 flagged disclosures.
39. During the ADP review, 51 outside activities were identified for complete reviews through the Ethics Office standard practices. There were 34 outside activities disclosed in 2017.
40. In implementing the 2018 ADP, the Ethics Office also responded to a large number of email messages (including reminders), queries by phone and direct office visits with respect to the administration of the ADP. In addition, all relevant disclosures were reviewed against the vendor list.
41. Since 2014, the Ethics Office has tracked the number of submissions with no financial information reported. In the 2018 exercise, 229 submissions had no financial information reported. While in the previous two years the percentages of such submissions (15.5 percent) remained steady, a slight decrease (12.5 percent) was registered in 2018. As in past years, the Ethics Office sought confirmation of the accuracy of these submissions directly via email. The Ethics Office is of the opinion that reports of no financial information is understandable considering the minimum thresholds in reporting (i.e., USD 10,000). In addition, the Ethics Office anticipates that the participant population will continue to grow because of the consequences of decentralization, for example, related to procurement committees.
42. The Ethics Office continued to work on revising the Executive Director's Circular 2008/004 for the purpose of separating it into different Executive Director Circulars including one covering conflicts of interest and the ADP. The completion of this latter Executive Director Circular is anticipated in 2019.

### **C. Protection against Retaliation – Whistleblower Protection Policy**

43. It is the duty of all employees to report breaches of WFP's regulations and rules to those with responsibility to take appropriate action, and to cooperate with the oversight functions. The primary objective of the Whistleblower Protection Policy is to ensure that employees

can report misconduct and cooperate with audits and investigations without being subject to retaliation.<sup>10</sup> As of 2017, this also included Proactive Integrity Reviews in practice.

44. The Ethics Office administers the Whistleblower Protection Policy and determines whether there has been a *prima facie* case of retaliation, and if substantiated, the matter is then referred to the Office of Inspections and Investigations (OIGI) for investigation, unless there is a conflict of interest in making a referral to OIGI. In such an instance, the matter is referred directly to the Executive Director for action. The Ethics Office also provides advice and guidance on whistleblower protection matters, tracked through the tracking mechanisms for Advice and Guidance.
45. Four cases of protection against retaliation were considered: one case continued from 2017 and there were three new cases. For one of the new cases, no *prima facie* was established, but protection measures were provided during the *prima facie* review. In another case, the complainant did not provide complete information and, therefore, the review was not completed. The third new case was still under review by the Ethics Office into 2019. Lastly, the review on the case carried forward from 2017 was also not completed because the complainant did not provide complete information.
46. As anticipated in the 2017 annual report, the Ethics Office continued to work on an updated Whistleblower Protection Policy, which was originally promulgated in 2008, for the purpose of reflecting relevant practices and in consideration of the United Nations system-wide review, as well as pertinent recommendations from the Joint Inspection Unit Report<sup>11</sup> in 2018. While the drafting of a revised Whistleblower Protection Policy and various consultations with interested internal stakeholders started at the end of 2018, the adoption of the updated ED Circular is anticipated in 2019.

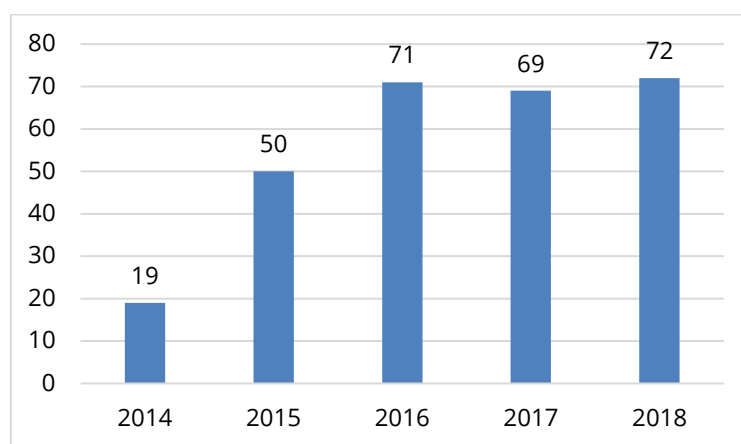
#### **D. Standard Setting and Policy Advocacy**

47. Fostering an organizational culture of ethics, transparency and accountability requires frequent and consistent advocacy. To operationalize ethics and compliance, the Ethics Office continued to provide guidance to management on the incorporation of ethical standards in various policies, practices and processes, which was well received and well appreciated.
48. The Ethics Office recorded requests for input to 86 separate policies (22 received as part of the Director's role on the EMG and 64 as the Chief Ethics Officer and Director, Ethics Office), in various forms – circulars, policies, guidance and other administrative issuances and documentation – and on a range of topics. Of the 86 recorded requests, the Ethics Office reviewed 72 of them, some with multiple documents or multiple rounds of reviews.
49. In 2017, the Ethics Office recorded consultations on 87 policies, providing inputs on 69 of them, while the Ethics Office provided input on approximately 71 and 50 policies in 2016 and 2015, respectively, and reported a total of 19 policies reviewed in 2014 (Figure 8).
50. The number of consultations conducted by the Ethics Office remained consistent in large part due to capacity. Consultations in the ordinary course and through requests by oversight and other discrete areas continued and are considered a reflection of the confidence of the value of the Ethics Office.

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<sup>10</sup> Executive Director's Circular ED2008/003, *Protection against retaliation for reporting misconduct and for cooperating with duly authorized audits and investigations (WFP "Whistleblower" Protection Policy)*.

<sup>11</sup> Joint Inspections Unit, [Review of the whistleblower policies and practices in the United Nations system organizations](#).

**Figure 8: Recorded reviews of policies and standards, 2014–2018**

51. The Ethics Office maintained a proactive engagement with management, including through the proactive provision of recommendations for new and updated policies and standards. This included, for example, conflicts of interest in various forms. In this regard, the Ethics Office initiated the creation of guidance on a general pre-employment vetting process and as related to the recruitment of employees who remain government employees for pension purposes. The finalization of this guidance, which would also satisfy recommendations under the JIU “Review of mechanisms and policies addressing conflict of interest in the United Nations system,”<sup>12</sup> are anticipated in 2019.
52. Following the issuance of the JIU “Review of mechanisms and policies addressing conflict of interest in the United Nations system” and the “Review of whistleblower policies and practices in United Nations system organizations”, the Ethics Office, as represented by the Director, Ethics Office, has remained the subject matter expert on following up within WFP and to the Executive Board.
53. Of note, for the first time, the Director, Ethics Office was also interviewed by the Multilateral Organisation Performance Assessment Network (MOPAN) and received positive feedback that the interview helped to expand MOPAN’s understanding of the Ethics Office and its work supporting appropriate standards of behaviour in WFP and as related to PSEA.
54. In line with its holistic approach, the Ethics Office continued to work collaboratively with other divisions and departments, providing, for example, inputs to the Human Resources Manual provisions related to outside activities and special leave without pay and as related to WFP’s Environmental and Social Standards.
55. The Ethics Office was an active participant on the working group that contributed to updating the Policy on Protection from Harassment, Sexual Harassment, Abuse of Authority (HSHAPD Policy). The updated HSHAPD Policy was released in March 2018 and the Ethics Office conducted education and outreach initiatives (including the creation of “train the trainer” materials) to help promote the understanding of the new HSHAPD Policy (as more fully described in Section E).

<sup>12</sup> Joint Inspection Unit, *Review of mechanisms and policies addressing conflict of interest in the United Nations system*.

56. In addition, the HSHAPD Policy led to the establishment of an Inter-divisional Standing Committee (IDSC), tasked with advising the Executive Director, as and when appropriate, on addressing abusive conduct and promoting the prevention of and prompt response to abusive conduct<sup>13</sup>. The IDSC is chaired by the Director, Human Resources Division and comprised of the Chief Ethics Officer, the General Counsel, the Inspector General and the Ombudsman.
57. In May 2018, WFP established a dedicated Joint Executive Board and WFP Management Working Group on Harassment, Sexual Harassment, Abuse of Power and Discrimination – the first such joint body in the United Nations system. The Working Group is an *ad-hoc* body, co-chaired by the Assistant Executive Director, Operations Services Department, and consisting of ten representatives of the Executive Board and representatives from WFP Management and independent offices, including the Director, Ethics Office. The Working Group serves as a forum to exchange information and discuss methods, lessons learnt and best practices to address i) protection of employees from harassment, sexual harassment, abuse of authority, and discrimination; ii) protection of beneficiaries from Sexual Exploitation and Abuse (SEA); and iii) whistleblower protection. The Working Group was also tasked with defining strategies and identifying measures that would support WFP in ensuring the most effective protection of employees and beneficiaries, with a particular focus on awareness-raising, prevention measures, and reporting mechanisms. (More information is provided in Section F).

### E. Training, Education and Outreach

58. To mark the 10th anniversary of the Ethics Office, the Ethics Office planned and executed an awareness campaign on the WFP Code of Conduct, focusing on separate principles covered by WFP's Code of Conduct and in coordination with relevant divisions and leaders (Figure 10). Moreover, the Ethics Office prepared and distributed toolkits with several communication materials for use by regional directors, country directors, division directors and directors of liaison offices. While the Ethics Office had intended to conduct the campaign every month, other priorities made it necessary to reduce the plan. Despite this, the awareness campaign was extremely well received with positive feedback coming from all levels of staff.

**Figure 9 – 2018 Awareness campaigns by month and topic**

| Month    | Topic  |
|----------|--|
| January  | Standards of Conduct and United Nations Charter                      |
| February | Protection and Accountability to Affected Populations                |
| March    | Protection from Sexual Exploitation and Abuse (PSEA)                 |
| April    | Humanitarian Principles  |
| May      | Harassment, Sexual Harassment, Abuse of Authority and Discrimination |
| June     | Accountability at WFP  |
| July     | Speaking-Up/Listening Culture  |
| November | Executive Director's Message on Ethics                               |
| December | Gifts and Anti-Fraud and Anti-Corruption                             |

<sup>13</sup> Executive Director's Circular OED2018/007, *Protection from Harassment, Sexual Harassment, Abuse of Authority and Discrimination*.

59. Of note (as reflected in Figure 9), the Executive Director sent an annual ethics message to all employees, accompanied by a user-friendly abbreviated version of the 2017 Ethics Office annual report. This practice started in 2015 and will continue in 2019.
60. Related to awareness campaigns, again, the Ethics Office launched an end-of-the-year awareness campaign focusing on policies and practices on gifts, linked with anti-fraud and anti-corruption messaging. The Ethics Office provided sample messages to country directors, division directors and liaison offices for distribution to local partners. A joint Ethics Office/Supply Chain Division communication was sent to aviation vendor partners (106) managed directly through Supply Chain Division at headquarters. The awareness campaign also included a communication, translated into Italian, sent directly to Italian suppliers (527). Additional messages were sent directly by country directors, for example by the country directors of Uganda, Mauritania, Republic of the Congo, the Islamic Republic of Iran and the United Republic of Tanzania. This initiative will continue in 2019.
61. As in the past years, in December, the Ethics Office organized an internal auction of gifts. As in 2017, the Ethics Office added an "open house" event to the on-site auction at headquarters to raise awareness of the Ethics Office mandate and its work. Due to the inability to implement the online auction through a more user-friendly platform (than the platform used in 2017), there was no online version. Proceeds of the on-site auction were allocated to the operations in Madagascar.
62. While the infrastructure established in 2014, when the auction was resurrected, enabled again an efficient implementation of the on-site auction, the auction remained time-consuming for the Ethics Office staff with more than 160 hours spent in its preparation and implementation. At the same time, interest seems to have waned over the years. As a result, the Ethics Office is considering whether it is cost effective to hold an auction in 2019, as the primary goal of the auction is awareness raising.
63. Appreciative acknowledgments regarding the awareness campaigns, its tools and their usefulness were received. Unfortunately, voluntary *ad-hoc* reporting does not provide the Ethics Office the ability to extract empirical data on the extent to which the awareness campaigns and materials were cascaded. Nevertheless, education and other outreach initiatives conducted by the Ethics Office resulted in additional advice and guidance (as more fully described in Section A), thus showing their effectiveness and success.
64. The third and last module of the mandatory e-learning developed in response to a recommendation received from an internal justice system review in 2014, was rolled out in December 2018, as planned. Translated versions in French, Arabic, and Spanish are anticipated in the first quarter of the year and no later than April 2019.
65. As mentioned in past annual reports, the first module of the e-learning focused on foundational values, principles and standards and it was rolled out in December 2016. The second module concentrated on employees' practical responsibilities, for example, conflicts of interest (including outside activities), confidentiality, discretion, and responsible use of WFP assets and IT resources.
66. The third module focused on addressing misconduct, protection against retaliation, fundamental values, like respect, reinforcement of the Humanitarian Principles, and the prevention of and protection from sexual exploitation and abuse of those we serve. Administratively, every e-learning launch comes with technical queries. Nevertheless, the e-learning resulted in requests for advice and disclosures as related to the topics covered in the e-learning. This is an encouraging indicator of the effectiveness of the e-learning.

67. The mandatory completion of the ethics e-learning is integrated in the personal Performance and Competency Enhancement Assessments (PACE) of all employees and is part of new employee onboarding during probation. As of 31 December 2018, 4,509 employees completed the third and newly launched module of the e-learning, comprising 26.5 percent of the total WFP population of 17,013.<sup>14</sup> A total of 14,014 and 12,063 employees have completed the first and second modules of the ethics e-learning, respectively, comprising 82.3 and 70.9 percent of the total employee population.
68. The Ethics Office reached more than 1,000 employees through training sessions and presentations conducted directly (Figure 10).

**Figure 10 – Summary of trainings/sessions conducted directly or indirectly by the Ethics Office – 2018**

| Number of employees reached  | Type of training/session  | Topic  | Number of training(s)/session(s) |
|--|---|--|----------------------------------|
| 176  | Briefings at headquarters <sup>15</sup>   | Ethics, Standards of Conduct   | 3                                |
| 72   | Training to Nicaragua country office  | Ethics, Standards of Conduct   | 1                                |
| 130  | Training to El Salvador country office  | Ethics, Standards of Conduct   | 2                                |
| 110  | Training to regional bureau Johannesburg  | Ethics, Standards of Conduct   | 1                                |
| 70   | Training to African Risk Capacity   | Ethics, Standards of Conduct   | 1                                |
| 102  | Remote sessions during the AFAC workshop to Nigeria and South Sudan country offices | Ethics   | 2                                |
| 279  | Headquarters Induction session  | Ethics, Standards of Conduct   | 19                               |
| 24   | RWAs/Ethics Ambassadors Basic "Train the Trainer" training                          | Ethics, Foundational Principles  | 1                                |
| 40   | RWAs/Ethics Ambassadors "Train the Trainer" training                                | HSHAPD Policy  | 5                                |
| <b>1,003 total number of employees trained directly by the Ethics Office staff</b> |   | <b>33 direct trainings/sessions conducted by the Ethics Office staff</b> |                                  |
| 83   | Indirect training sessions conducted through the RWAs/Ethics Ambassadors            | Foundational Principles  | 4                                |
| 149  | Indirect training sessions conducted through the RWAs/Ethics Ambassadors            | HSHAPD Policy  | 2                                |
| 60   | Sharing of training materials electronically  | HSHAPD Policy  | 1                                |
| 239  | Induction briefings in Ankara area office and Pakistan country office               | Ethics, Standards of Conduct   | 18                               |
| <b>531 Total number of employees trained indirectly</b>                            |   | <b>25 indirect trainings/sessions</b>                                    |                                  |

<sup>14</sup> Total WFP active users in the WeLearn platform as of 31 December 2018.

<sup>15</sup> This included: briefing to the finance regional officers, the Emergency and Preparedness and Support Response Division (OSE) and to the Office of Internal Audit (OIGA) and the Office of Inspections and Investigations (OIGI) during a Rome-based agencies seminar.

69. As anticipated in the 2017 annual report, the Ethics Office expanded direct trainings at the field level, conducting briefings in El Salvador and Nicaragua country offices, regional bureau Johannesburg and to the African Risk Capacity (Figure 10). Furthermore, two presentations were also delivered remotely to Nigeria and South Sudan country offices during the Anti-Fraud and Anti-Corruption (AFAC) workshops organized by the Enterprise Risk Management Division. As a follow-up to some trainings, the Ethics Office sent separate follow-up communications highlighting key information and clarifying questions emerged during the live trainings. The Ethics Office plans to continue and expand such a practice in 2019, while also increasing its missions to regional bureaux and country offices.
70. The Ethics Office continued to conduct the headquarters Ethics induction briefing, which was created in 2016 and rolled out for the first time in January 2017. The briefing is considered compulsory (yet 100 percent compliance is not achieved) and is for employees new to WFP headquarters (whether completely new or re-assigned to WFP headquarters).
71. Related, the Ethics Office also created two induction briefings for country offices, akin to the Ethics induction briefing at headquarters, covering fundamental expectations of conduct and tailored to specific country needs. Presentations were delivered in the Ankara area office and Pakistan country office.
72. In addition, the Director, Ethics Office continued to conduct induction briefings for new Executive Board Members, reaching approximately 130 Board Members through two sessions.
73. Of note, the Director, Ethics Office was invited to participate on a panel to the Geneva Group with the Under-Secretary-General for Management, United Nations, and Chair, CEB Task Force on Addressing Sexual Harassment within the organizations of the United Nations System and the Ethics Advisor, UNFPA on "Applying an ethical framework to tackle sexual harassment and sexual exploitation and abuse". Feedback from this session was quite positive, furthering the understanding of the role of the ethics offices of the United Nations in fostering an ethical culture.
74. Respectful Workplace Advisors (RWAs) are employees, nominated by their colleagues to work in coordination with the Office of the Ombudsman and Mediation Services, with a focus on preventing or reducing workplace conflicts at the field level. Since 2012, RWAs have been designated as "Ethics Ambassadors". In this capacity, RWAs assisted the Ethics Office and WFP in raising awareness on ethics and standards of conduct.
75. In collaboration with the Office of the Ombudsman and Mediation Services, one basic training session was organized for 24 RWAs, representing 15 countries. The Ethics Office trained RWAs on their role and expectations as "Ethics Ambassadors", facilitated informative sessions and train the trainer sessions to enable the RWAs to fulfil their role as "Ethics Ambassadors" and as RWAs, generally.
76. As a result of "train the trainer" sessions on foundational aspects of the WFP Code of Conduct, the RWAs reached directly 83 employees in one country office, one area office and two sub-offices, representing three different countries and two regional bureaux. As a general practice, the Ethics Office prepares and provides translated versions of the materials prepared.
77. In follow-up to the release of the HSHAPD Policy and the related awareness campaign (Figure 9), the Ethics Office created and trained 40 of the total 118 RWAs through five "train the trainer" sessions on the HSHAPD Policy. As a result, the RWAs reached directly 149 employees in one country office and one sub-office, representing two different countries and two regional bureaux. Electronic materials were provided to another 60 employees across one country office.



78. Contrary to previous years, the Ethics Office did not conduct trainings covering AFAC as the Enterprise Risk Management Division is now responsible for education and outreach on AFAC. Regardless, the Ethics Office has remained available to share its past initiatives and lessons learnt.
79. In addition, the Ethics Office was consulted on two initiatives led by the Human Resources Division: the creation of a global onboarding programme for new hires at headquarters, which was rolled out in July, and a country director/deputy country director induction programme. It is anticipated that the Ethics Office will continue contributing to the latter induction programme and an induction programme for supervisors in 2019.
80. Lastly, the Ethics Office provided an advisory role to the "Respect Each Other" campaign organized by the Communications, Advocacy and Marketing Division and its input was well received. The Ethics Office also supported other divisions at headquarters, such as the Human Resources Division, by providing materials, collateral and visibility items.

#### **IV. Protection from Sexual Exploitation and Abuse (PSEA)**

81. In March 2018, the Ethics Office was tasked with being WFP Organizational Focal Point for PSEA, facilitating a multi-disciplinary approach to PSEA, including working collaboratively with other United Nations agencies and entities to reinforce WFP's approach on PSEA.
82. A fully dedicated PSEA consultant was hired in May 2018 to work with the Ethics Office at the technical level to support and strengthen the approach to PSEA.
83. The Ethics Office held more than 40 consultations with key stakeholders, including in headquarters, all six regional bureaux and several country offices, as well as external consultations with the Inter-Agency Standing Committee (IASC) PSEA Task Team Coordinator, the Office of the Special Coordinator on improving United Nations response to sexual exploitation and abuse, other United Nations agencies and NGOs, for the purposes of identifying challenges and gaps in the implementation of effective PSEA measures and initiatives as well as identifying priority areas for the way forward.
84. The Ethics Office also assumed the administration of the PSEA Focal Points network, currently consisting of 278 main focal points and alternates in country offices and regional bureaux. The Ethics Office also started the creation of the first ever e-learning for PSEA Focal Points, which will be launched in 2019.
85. As part of the analysis conducted by the Ethics Office, an online survey was distributed to all PSEA Focal Points. The survey received a 50 percent response rate and provided valuable insights into challenges that Focal Points face to support PSEA efforts in their operations.
86. Moreover, the Ethics Office convened a PSEA Advisory Group for the purpose of providing a learning and knowledge sharing opportunity and promoting peer-learning to enhance the PSEA Focal Points capabilities to fulfil their roles. Advisory Group members consist of PSEA Focal Points and key PSEA stakeholders from country offices with strong experience and expertise in integrating PSEA into operations. In addition, a number of deputy regional directors and regional Humanitarian Advisors have been included, as well as key PSEA stakeholders in headquarters.
87. The first consultation of the PSEA Advisory Group was held in September 2018 in Rome and it provided a critical platform for understanding PSEA strengths and challenges. The PSEA Advisory Group consultations and outputs have been integrated into a PSEA Strategy and detailed implementation plan. It is anticipated that such Strategy and Implementation Plan will be submitted to the EMG in 2019.

88. Based on a near unanimous request from the Advisory Group, the Ethics Office also started reviewing and updating the PSEA Focal Points Terms of Reference, in consultation with the Human Resources Division, Legal Office and the Office of Inspections and Investigations.
89. Other key initiatives were undertaken in 2018 by the Ethics Office. These included chairing a successful half-day session on PSEA at the Annual Partnerships Consultation in December. Of a total 93 NGOs invited, 57 participated. During the event, panel discussions of depth were moderated by WFP Assistant Executive Director, Operations Services Department, and featuring speakers from key NGOs, NGO consortiums, and the IASC, and focused on collaboratively raising awareness in communities, creating opportunities to report SEA, and ensuring accountability to people affected by SEA.
90. Through the Ethics Office and since May 2018, WFP has become more active participating in the IASC Senior Focal Point Meetings and *ad-hoc* technical-level calls, as well as in the monthly meetings of the IASC PSEA/AAP Task Team. Furthermore, in May 2018, WFP joined the United Nations SEA Working Group and has been actively engaging in bi-weekly calls. Of note, in August 2018, the Executive Director was officially invited to the United Nations High-level Steering Group on SEA.
91. In addition, the Director, Ethics Office attended a donor-led event on PSEA, where representatives from NGOs, United Nations and multilateral organizations, private sector suppliers, donors, governments, as well as survivors of SEA, along with more than 400 participants, convened to make commitments to better prevent, listen and respond to, and learn from sexual exploitation, sexual abuse and sexual harassment in the aid sector. WFP, through the Ethics Office and other units, participated in other PSEA related events led by donors and others.
92. It is worth mentioning that the activities led and coordinated by the Ethics Office as related to PSEA cover all relevant areas of its mandate. Related, the Ethics Office continued to provide PSEA-related advice and guidance and has been receiving an increased number of such requests since being delegated as the PSEA Organizational Focal Point. Specifically, the Ethics Office received 66 PSEA-related requests for advice and guidance: 46 requests were made by managers as management, and 20 were organizational.
93. Lastly, in addition to being a member of the Joint Executive Board and Management Working Group on harassment, sexual harassment, abuse of power and discrimination (as more fully described in paragraph 56), the Director, Ethics Office was appointed as co-chair of one of its two sub-working groups – the sub-working group on safeguarding against sexual harassment and sexual exploitation and abuse. The work of such sub-working group is continuing into 2019.

## V. Ethics Panel of the United Nations and the Ethics Network for Multilateral Organizations; Rome-based Agencies

94. The Ethics Panel of the United Nations (Ethics Panel or EPUN) was instituted in 2007<sup>16</sup> with the adoption of the Secretary-General's bulletin "United Nations system-wide application of ethics: separately administered organs and programmes"<sup>17</sup> to help ensure coherent application of ethical standards within the United Nations.
95. The Ethics Panel is comprised of the heads of the ethics offices of separately administered organs and programmes of the United Nations: the Ethics Office of the United Nations Secretariat (chair), the United Nations Development Programme, the United Nations Children's Fund, the United Nations Population Fund, the United Nations Office for Project Services, WFP, the United Nations Relief and Works Agency for Palestine Refugees in the Near East and the Office of the United Nations High Commissioner for Refugees.<sup>18</sup>
96. The Director, Ethics Office, continued to be actively engaged with the Ethics Panel, participating in all ten standard conference calls/meetings, and recording consultations/deliberations on 72 issues of common interest, including political activities, outside activities, gifts, conflicts of interest, policies and practices for protection against retaliation, and real-time interactions on other ethical considerations.
97. While the work of the Ethics Panel is reflected in the Report of the Secretary-General to the General Assembly, it is worthy of noting that the Ethics Panel conducts reviews of non-*prima facie* findings of the member Ethics Offices. This requires a thorough review of extensive documentation. In 2018, there were ten such reviews.
98. In support of the Secretary-General's promotion of system-wide collaboration on ethics-related issues within the United Nations extended network, an Ethics Network for Multilateral Organizations (ENMO) was established in 2010. ENMO is comprised of multilateral inter-governmental institutions.<sup>19</sup> The most senior professionals responsible for the ethics functions of the member organizations of ENMO participate in the annual ENMO conferences, providing a forum to exchange information, relevant practices, and enable collaboration on issues of common interest and applicability to the ethics functions of the ENMO membership.
99. The Director, Ethics Office, was appointed ENMO Chair for 2017–2018. As Chair, the Director, Ethics Office advocated for an expanded three and a half day agenda for the 2018 Annual Conference to commemorate the 10-year anniversary of ENMO Annual Conference hosted by the United Nations Ethics Office and held in New York City for the first time. The expanded agenda enabled participation by distinguished guest speakers and additional panels. The Annual Conference was opened by United Nations Under-Secretary General and Chef de Cabinet, who delivered the Secretary-General's message to the ENMO Conference. In his statement, the Secretary-General highlighted the crucial role of ENMO in nurturing a culture of ethics, integrity and accountability to ensure "that international civil servants uphold the highest

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<sup>16</sup> The Ethics Panel was originally known as the United Nations Ethics Committee and renamed in April 2013.

<sup>17</sup> Secretary-General's bulletin, ST/SGB/2007/11, *United Nations system-wide application of ethics: separately administered organs and programmes*.

<sup>18</sup> Executive Directors Circular 2008/002; Secretary-General's bulletin, ST/SGB/2007/11.

<sup>19</sup> Members of the ENMO include ethics officers and related professionals from the United Nations Secretariat, United Nations funds, programmes, specialized agencies and international financial institutions, including the World Bank, the International Monetary Fund and other multilateral entities.

ethical standards”, while highlighting the great work made by ENMO in promoting institutional collaboration on ethical issues of common concern.

100. Of note, the Under-Secretary-General for Management, United Nations, and Chair, CEB Task Force on Addressing Sexual Harassment in the United Nations System, led a session on Taking Action on Sexual Harassment; the Victims’ Rights Advocate, United Nations, led a session on Improving United Nations Response to Sexual Exploitation and Abuse; and the Inspector, Joint Inspection Unit, led a session on the Review of Whistleblower Policies and Practices in United Nations System Organizations. These sessions enabled ENMO the opportunity to dialogue on these critical issues to WFP, the United Nations and staff.
101. Additional topical areas covered included: conflicts of interest, whistleblower protection policies and practices, United Nations reforms, mediation skills, ethics as related to principles of law and justice, and more.
102. The ethics officers of the three Rome-based agencies continued *ad-hoc* sharing of best practices and knowledge with increased interaction, especially with the Director, Ethics Office, IFAD on common issues of PSEA, for example.

## **VI. Observations, recommendations and conclusions**

103. Since 2014, the Ethics Office has implemented infrastructure to support the mandate – and to initiate the development of standard operating procedures to operate more efficiently and with consistency – also, to delegate projects and establish tracking mechanisms for metrics and enhanced reporting, whilst meeting the needs of the increased workload. The tracking mechanisms continued to demonstrate a noticeable increase in workload over the last number of years – which has been viewed as a positive outcome of the activities and relationships cultivated by the Ethics Office service-oriented approach. Such tracking mechanisms, however, remained insufficient for the workload, resulting with excessive time on manual inputs and verifications. In particular, the Ethics Office continued to avail itself of an excel spreadsheet to track requests for advice and guidance, making reporting labour-intensive. In December, after a full year of pursuit, a case management system was identified for implementation in 2019.
104. As a result of the increased work volume of advice and guidance, a staff member at the P-4 level with ethics and compliance experience knowledge was recruited. In September 2018, the Ethics Office recruited another staff member at the P-4 level, responsible for standard setting and policy advocacy and, in particular, for revising and, as necessary, creating and implementing policies and practices related to the Ethics Office.
105. The Ethics Office has been proactive on outreach to management. Conversely, management has been proactively seeking advice from the Ethics Office. Since 2016, when the Ethics Office started to track management queries, such queries have grown from 127 to 250 in 2018. Such outreach has been welcome, and advice has been provided thoughtfully and practically. This type of advice and guidance is arguably the most valuable advice possible from experienced ethics professionals – enabling managers to make good decisions and avoid misconduct and mishaps – and are an example of preventative advice, as opposed to advice that is reactionary in nature.
106. As well, during its initial years, the Ethics Office focused largely on advice and guidance related to individuals rather than management as managers and as the personification of WFP and, therefore, the Ethics Office was not consulted on institutional integrity risks. This has evolved over the last number of years and, the Ethics Office – in particular, the Director, Ethics Office – has been receiving concerns from managers on institutional conflicts

- of interests and other ethical concerns, for example, as related to initiatives with data use implications and parameters as related to creating relationships with partners.
107. To address the lack of timeliness of completion and follow-up in the ADP, the Ethics Office introduced a firmer deadline and a more immediate escalation process. Nevertheless, the completion rate at the second extended deadline remained 70 percent and some submissions of the 2018 ADP exercise remained outstanding until 2019. The Ethics Office considers this unacceptable and a poor reflection on accountability, including when compared to ADP compliance rates of EPUN members. To address this issue and the amount of time working on the roll-out and implementation of the annual ADP exercise, the Ethics Office is considering changes to the administration of the ADP in the future.
  108. Additionally, based on a thorough analysis of the ADP as related to its purpose, the Ethics Office proposed a change to the ADP structure, eliminating the separate financial disclosure statement in favour of a conflicts of interest questionnaire only. While the Ethics Office had anticipated introducing a revised ADP in 2018, challenges in reviewing the database and the Executive Director's Circular resulted in postponement of implementation.
  109. Providing input to standards and policies, as well as guidance/practices/processes – in other words, operationalizing ethics and compliance - are activities which are preventive in nature. With the addition of an Ethics Officer designated to standard setting and policy advocacy – in particular, to updating the Whistleblower Protection Policy, the Conflicts of Interest Policy, and others – the Ethics Office anticipates increased input otherwise. This is particularly important in frontier areas entertained by WFP, like digitization that implicates the ethical use of data, drones, use of artificial intelligence, digitizing countries – all of which implicate ethical considerations.
  110. Furthermore, as anticipated in the previous annual report, the Ethics Office policies<sup>20</sup> are dated and require revisions. Toward this end, the Ethics Office started working on the update of the Circular on Conflicts of Interest and the Annual Conflicts of Interest and Financial Disclosure Programme and on the WFP Whistleblower Protection Policy. Completion and implementation are expected in 2019. The other policies under the purview of the Ethics Office are anticipated to be revised and implemented over 2019 and 2020.
  111. The Director, Ethics Office continued to solely administer the Whistleblower Protection Policy through 2018. The complexity and voluminous supporting documentation and investigation reports meant the *prima facie* reviews and related work were time consuming. For the same reasons, protection measures were also time consuming. The Ethics Officer designated to standard setting and policy advocacy is anticipated to assume a role in the *prima facie* reviews whilst establishing standard operating procedures related to the revised Whistleblower Protection Policy.
  112. In addition to conducting the *prima facie* reviews, the Ethics Office provides advice to employees on retaliation and whistleblower protection matters as part of the Advice and Guidance area of its mandate. Few requests for advice on retaliation and whistleblower protection were received though it seems that the Office of the Ombudsman is providing advice on whistleblower retaliation matters, about which the Ethics Office has raised concerns.
  113. The Ethics Office considers Education and Outreach in various forms and through all offices, including (or especially) sub-offices to be critical for employees (and partners) to understand

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<sup>20</sup> Executive Director Circular ED2008/002, *Establishment of the Ethics Office in WFP*; Executive Director Circular ED2008/004, *Disclosure of financial interests, outside activities and honours, decorations, favours, gifts or remuneration*; Executive Director's Circular ED2008/003, *Protection against retaliation for reporting misconduct and for cooperating with duly authorized audits and investigation (WFP "Whistleblower" Protection Policy)*.

the values, standards and principles of WFP and to understand how to live them - indispensable to fostering and maintaining a strong ethical culture. Despite a sizeable concentration of time and effort on Education and Outreach and the success of the annual awareness campaign in recognition of its 10th Anniversary, the Ethics Office was unable to fully meet the demand of requests in this mandated area. In particular, the Director, Ethics Office could not meet the expectations for field outreach. While the increase in requests from the field is considered a positive indicator of how the Ethics Office is being valued in WFP, lessons learnt will be taken into consideration in the planning and implementation of the 2019 education and outreach initiatives, specifically, in upscaling field missions.

114. In 2018, the Ethics Office hired an intern dedicated to contributing to create additional communication materials for internal and external audiences. In this regard, the Ethics Office updated and successfully implemented changes to the internal website. The Ethics Office also recommended updates to the external website to well represent the extensive work taken on by the Ethics Office as related to standards of conduct and PSEA. To date, the external website remains a poor reflection to the public of the depth of WFP's commitment in these areas.
115. As part of fostering United Nations coherence, the Ethics Office was successful in strengthening the Rome-based agencies collaboration, initiating more regular interactions, more similar to the collaboration with members of ENMO. Related, the 10th Anniversary of ENMO was held for the first time at the United Nations headquarters in New York and it was ambitious and rewarding. In addition, required input as a member of the EPUN increased, while informal interactions remained substantial.
116. In 2018, the regulations for the Audit Committee were updated to require the Ethics Office to report into the Audit Committee more substantially and in a structured manner. The Ethics Office, therefore, started reporting on its strategy and work plan (as more fully described in paragraph 117) and will continue to do so going forward. This is in addition to the Ethics Office reviewing various ethical issues as part of now regularized reporting and reporting to the Audit Committee as part of the internal justice system of WFP.
117. In the 2015 annual report, the Ethics Office noted its commitment to developing an overall strategy plan to be implemented in alignment with and in furtherance of the WFP Strategic Plan (2017–2021). In 2016, the Ethics Office procured an ethics and compliance consultant to assist the Ethics Office for an Ethics Office Strategy (2017-2021), which was created in 2017, after consultations with management. In 2018, the Ethics Office Strategy was presented to the EMG and the Audit Committee. The EMG prioritised the proposed actions and the Ethics Office continued to report to the Audit Committee on progress as related to the Strategy. The Ethics Office will also report on the status of the work associated with the Ethics Office Strategy as part of its informal consultations to the Executive Board, which are being instituted in 2019.
118. As reported in the 2017 annual report, the Ethics Office has continued to work collaboratively with the Supply Chain Division on various ethical issues and by request, started creating a robust session for a workshop to employees who will be leading procurement committees at the field level. The session is expected to sensitize employees to fundamental values, standards and principles, and the most common conflicts of interest that may arise on personal and institutional levels and employees' responsibilities for disclosures and mitigation. The workshop is slated to be implemented in all regions in 2019.
119. The Ethics Office was part of the Data Management Committee and provided extensive input to the Technology Division and other divisions spearheading initiatives relevant to ethical use of data. As in 2017, the Ethics Office advocated for sufficient resources to ensure

the implementation of robust and sufficiently independent data governance to consider ethical use of data and data implications in initiatives otherwise. The Ethics Office also advocated for the Due Diligence Committee to thoroughly consider the ethical ramifications of information sharing with third parties – in addition to the privacy, data protection and security considerations. Ethical use of data in digitization remains of relevance to WFP and should be prioritized accordingly as part of making decisions on making commitments on digitization initiatives.

120. As noted in the past three annual reports, the Ethics Office advocated for a separate “culture survey” and dedicated resources to create a multi-year action plan to address the results of the 2018 Global Staff Survey (GSS), as well as past GSS results, particularly as related to protection against retaliation. The 2012, 2015 and 2018 GSS results related to ethics and standards of conduct were below global norms where these existed, including with respect to fear of retaliation and trust in WFP, as well as perceptions about the ethical commitment of WFP, its leadership and Management. Management made the decision to conduct a “deeper dive” survey. As the Ethics Office had recruited an experienced ethics and compliance professional, it volunteered to lead the tender and it was successful in procuring an external company to launch a “culture survey,” (separate from the 2018 GSS) for a deeper understanding of WFP’s culture for the purpose of taking action, as necessary. This work will continue in 2019.
121. As highlighted in the 2017 and 2016 annual reports, the Ethics Office continued to recommend that WFP re-emphasize fundamental values, principles and standards. In 2017 and 2016, the Ethics Office observed a receptive attitude to embrace a strong ethical culture based on the standards, principles and values of WFP and the United Nations, particularly from live presentations and other trainings conducted by the Ethics Office. However, institutionally the Ethics Office observed some apparent erosion of consideration of ethical conduct by and in WFP. For example, ethics and standards of conduct were still not included in the measures of the performance tool, known as PACE, and in vacancy announcements. The vacancy announcements were updated in 2018 and the Ethics Office started working with the Human Resources Division to incorporate ethics and standards of conduct into existing or new training initiatives. The current spirit of collaboration by Human Resources, as anticipated in the 2017 annual report, and the tone set by the Director, Human Resources Division, and the other colleagues of the Inter-divisional Standing Committee have enabled efficient collaboration, supporting practical cooperation and enhanced ethical awareness.
122. Lastly, in the 2017 and 2016 annual reports, the Ethics Office recommended having a functional leader with dedicated resources to work on matters related to PSEA. In March 2018, the Ethics Office was tasked to be that leader and appointed WFP Organizational Focal Point for PSEA. The Ethics Office embraced this work through three main workstreams: development of a PSEA Strategy and Implementation Plan, administration and capacity building of global PSEA Focal Points; and creation and administration of a PSEA Advisory Group to help inform the work from an operational and field perspective whilst stepping up to meet the needs and demands within WFP, by the United Nations, the IASC and other stakeholders. These initiatives and others (as more fully described in Section IV above) will continue in 2019. The volume of the work on PSEA was much greater than anticipated. The Ethics Office values this work and, based on feedback from leadership and staff, it is valued by WFP. The Ethics Office considers it a moral imperative to prevent sexual exploitation and abuse of those WFP serves and to do so with care for any victim, addressing reports of sexual exploitation and abuse – whether substantiated or not.

## Acronyms used in the document

|       |  |
|-------|--|
| ADP   | Annual Conflicts of Interest and Financial Disclosure Programme      |
| AFAC  | Anti-Fraud and Anti-Corruption                                       |
| COI   | conflict of interest   |
| EMG   | Executive Management Group   |
| ENMO  | Ethics Network of Multilateral Organizations                         |
| EPUN  | Ethics Panel of the United Nations                                   |
| GSS   | Global Staff Survey  |
| HSAPD | Harassment, Sexual Harassment, Abuse of Authority and Discrimination |
| IASC  | Inter-Agency Standing Committee                                      |
| JIU   | Joint Inspection Unit  |
| NGO   | non-governmental organization  |
| OIGI  | Office of Inspections and Investigations                             |
| PSEA  | Protection from Sexual Exploitation and Abuse                        |
| RWA   | Respectful Workplace Advisor   |
| SEA   | Sexual Exploitation and Abuse  |