

Executive Board

Annual session Rome, 23–26 June 2025

Distribution: General Agenda item 7

Date: 20 May 2025 WFP/EB.A/2025/7-E

Original: English Oversight functions

For decision

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

Annual report of the Ethics Office for 2024

Executive summary

This annual report is submitted to the Executive Board for its 2025 annual session, having been provided directly to the Executive Director.¹

The report provides an overview of the activities and achievements of the Ethics Office during the period from 1 January to 31 December 2024. It is organized according to the office's mandated areas of work, as follows:

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

In addition, the report covers the activities of the Ethics Office on the prevention of and protection from sexual exploitation and abuse. The office was WFP's organizational focal point on that subject from mid-2018 to 31 December 2024. In line with the recommendations resulting from a strategic evaluation of WFP's work on protection from sexual exploitation and abuse, effective 1 January 2025 the role of focal point was transferred, together with staff and funding, to a new unit established within the Office of the Executive Director and headed by a director reporting to the Chief of Staff. The Ethics Office is therefore no longer the organizational focal point for protection from sexual exploitation and abuse.

Focal point:

Ms D. Walker Director Ethics Office

email: deidre.walker@wfp.org

¹ Executive Director's circular ED2008/002, Establishment of Ethics Office in WFP (paragraph 6.2).

The report also contains a section on United Nations coherence and ends with observations related to the work of the Ethics Office and to ethics within WFP.

Draft decision*

The Board takes note of the annual report of the Ethics Office for 2024 (WFP/EB.A/2025/7-E).

* 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.

I. Introduction

1. This report covers the work of the Ethics Office for the period from 1 January to 31 December 2024, providing analysis and information regarding activities planned for 2025, where relevant.

- 2. The Ethics Office is required to provide an annual report on its work to the Executive Director for submission to the Executive Board.² It is also required to submit a draft of the report to the Ethics Panel of the United Nations (EPUN) for review.³
- 3. The Ethics Office is an independent office whose director is accountable to and reports to the WFP Executive Director. The office also delivers regular briefings to WFP's Executive Board and Independent Advisory Oversight Committee. All activities of the office are based on the principles of confidentiality and independence.

II. Background

- 4. The Ethics Office was established in January 2008 through Executive Director's circular 2008/002, "Establishment of Ethics Office in WFP", in alignment with the Secretary-General's bulletin ST/SGB/2007/11.4
- 5. The office nurtures a culture of ethics and accountability and is mandated to assist the Executive Director in ensuring that all WFP employees perform their functions in accordance with the highest standards of conduct, in accordance with WFP's values, the standards and principles set out in the Charter of the United Nations, the Standards of Conduct for the International Civil Service,⁵ the WFP Code of Conduct⁶ and other relevant policies and practices. Until 1 January 2025 the Ethics Office also served as the organizational focal point for protection from sexual exploitation and abuse (PSEA). In 2024 recruitment and on-boarding for two professional positions was completed such that, in addition to the Director, the office included five full-time fixed-term staff⁷ plus another approximately eight full-time equivalents of short-term staff and consultants.⁸
- 6. A new Ethics Office strategy for 2024–2026 has been endorsed by the Executive Director and presented to the Executive Board. A separate strategy on PSEA for 2021–2023 was extended into 2024 to allow for the new PSEA strategy to take into consideration the findings and recommendations resulting from a strategic evaluation of WFP's activities on PSEA,⁹ which was finalized in the first half of 2024.
- 7. Operating in high-risk environments with a diverse, dynamic and multicultural workforce across more than 120 countries and territories, WFP relies on its strong reputation and effectiveness. During periods of financial constraints and the need for cost-saving, leveraging the organization's trust and reputation is essential for maintaining its credibility and long-term sustainability. The Ethics Office is a driving force in providing relevant support

³ United Nations. 2007. *United Nations system-wide application of ethics: separately administered organs and programmes* (ST/SGB/2007/11).

⁵ International Civil Service Commission. 2013. Standards of Conduct for the International Civil Service.

² Ibid.

⁴ Ibid.

⁶ Executive Director's circular OED2022/014, WFP Code of Conduct.

⁷ Ethics Advisor (P-5), PSEA Advisor (P-4), PSEA Specialist (P-3), Administrative Associate (G-6), and Administrative Assistant (G-3).

⁸ Ethics/PSEA Officer (short-term temporary P-3), two Ethics specialists (consultants level 2), two PSEA specialists (consultants levels 1 and 2), and 1 Communications and Outreach Specialist (consultant level 2).

⁹ WFP. 2024. Strategic Evaluation of WFP's Protection from Sexual Exploitation and Abuse.

and guidance so that employees recognize and uphold WFP's ethical principles and standards.

III. Activities of the Ethics Office

8. Establishing and maintaining an organizational culture of ethics and integrity is essential for ensuring the success of WFP's mission. In 2024 the Ethics Office promoted awareness and provided advice on the prevention, mitigation and management of ethical and reputational risks. These efforts contributed directly to reinforcing an ethical culture while strengthening the trust and accountability essential to WFP operations to support food security – which in turn are recognized as integral to national security by stabilizing countries and empowering communities. A strong ethical culture is also key to ensuring the efficient and effective use of every resource, preventing and detecting fraud and corruption and upholding the dignity of the people that WFP serves.

A. Advice and guidance

- 9. "Advice and guidance" is a confidential service area available to all employees, including management, enabling them to navigate ethical risks and make informed ethical decisions. This function involves analysing potential conflicts of interest, identifying mitigation measures and preventing reputational risks. The office thus plays a key risk prevention and management role essential to upholding ethical standards and fostering a culture of integrity and promotes awareness of and adherence to relevant rules, policies and standards of conduct, ensuring that WFP remains trustworthy and accountable.
- 10. In 2024 the Ethics Office registered a total of 914 requests for advice and guidance (figure 1), representing a 13 percent increase from 2023, on top of an increase of nearly 35 percent in the previous year. Requests include individual requests from employees seeking advice on personal situations (48 percent) and work-related requests, including from management and Human Resources Division (HRM) colleagues (48 percent). The remaining 4 percent relate to requests from outside WFP.
- 11. This consistent annual increase in requests reflects growing confidence in the advice and guidance provided by the Ethics Office; voluntary satisfaction surveys in use since October 2022 show that 97 percent of respondents were "satisfied" or "very satisfied" with the advice received and its timeliness. The office is thus well on its way to achieving the strategic objective in its strategy for 2024–2026 that WFP employees and leadership widely recognize advice and guidance of the Ethics Office as relevant and valuable.

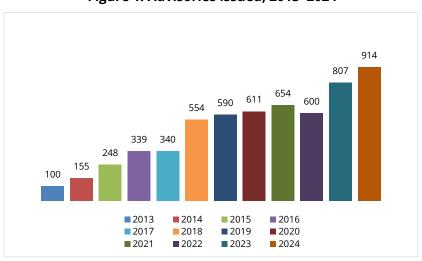


Figure 1: Advisories issued, 2013-2024*

^{*} Excluding advisories related to the annual disclosure programme and PSEA.

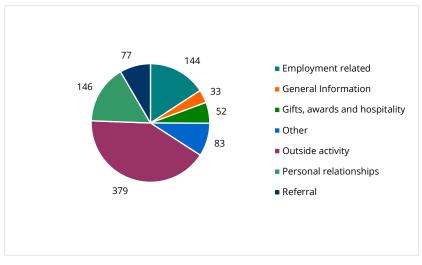


Figure 2: Requests for ethics advice by category, 2024*

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

- 12. Figure 2 summarizes requests for advice by category. As in previous years the highest number of requests (41 percent) refers to outside activities. Activities such as writing (articles, books and blogs), teaching and speaking engagements accounted for nearly a third of these requests. The second most common type of request refers to personal relationships, mainly involving disclosure of a family member most frequently a spouse working for a host government, other United Nations entity or WFP partner.
- 13. The majority of employment-related matters came from HRM and involved pre-appointment disclosure forms submitted by candidates during the recruitment process, primarily concerning the continuation of outside activities or family relationships that might entail a potential or perceived conflict of interest. The Ethics Office also continued to provide HRM colleagues with training to reinforce the correct use of the disclosure forms, including with regard to the prioritization and escalation of cases presenting the greatest risk of conflict of interest.
- 14. Demonstrating the effectiveness of its outreach and awareness, 70 percent of requests for advice in 2024 came from outside headquarters. About one third came from country offices and regional bureaux where the Ethics Office had done targeted outreach. The majority (62 percent) of individual requests came from international and national professional staff, reflecting higher involvement in writing, teaching and speaking engagements. As may be expected, a similarly high percentage of individual requests (64 percent) came from staff joining WFP in the last four years. Just over 20 percent of both individual and work-related requests came from employees who sought advice from the Ethics Office at least twice in 2024; this level of "return clients" is also an indication of continued trust in the Ethics Office.
- 15. In addition to the requests for advice and guidance, in 2024 there were 352 disclosures recorded in the electronic gift register, up from 237 in 2023.¹⁰ This shows a positive improvement in the consistent use of the register, which was introduced in 2023, as well as the impact of continuous awareness raising on the need to disclose, including through targeted awareness raising campaigns.
- 16. The electronic gift register gives the Ethics Office better comparative data to inform its targeting of awareness and outreach. As in 2023, in 2024 gifts were disclosed by employees from all global offices and regions, including those in sub-offices. Each disclosure was reviewed by the Ethics Office and appropriate guidance was provided. In accordance with

¹⁰ The 2023 annual report of the Ethics Office included an erroneous figure of 150 gift disclosures. The correct figure is 237.

established practice and in coordination with the Management Services Division gifts surrendered at headquarters were auctioned, together with other items, and the proceeds used to achieve cost savings in country offices.

B. Annual conflicts of interest and financial disclosure programme

17. The Ethics Office administers an annual disclosure programme (ADP),¹¹ which is a preventive safeguard and risk management tool that helps WFP to meet its commitment to transparency and to build public confidence. The ADP assists in identifying and eliminating or mitigating – in the best interests of WFP – personal conflicts of interest to ensure that they do not interfere, nor could be perceived to interfere, with official decision making or action. It is not, however, a tool for uncovering fraud or unjust personal enrichment.

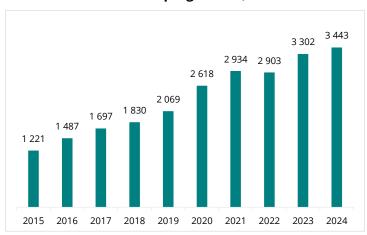


Figure 3: Employees required to participate in the annual disclosure programme, 2015–2024

- 18. The sixteenth ADP exercise was launched on 15 April 2024, with a message from the Executive Director and a video message from the Ethics Office Director sent to all eligible employees to emphasize its importance and mandatory nature, as well as WFP's commitment to upholding high ethical standards.
- 19. Some 3,443 WFP employees (14.9 percent) met the ADP criteria for eligibility and were required to complete the ADP.
- 20. After several follow-up actions, the Ethics Office provided HRM's Staff Relations Branch (HRMSR) with the names of all employees that had not submitted the required disclosure forms. HRMSR worked with the managers of these employees to issue final requests to comply. The end-of-year completion rate following these steps was 99.2 percent, and all non-compliant employees still under contract with WFP at the end of 2024 received a written reprimand for non-compliance.
- 21. As in past years the Ethics Office outsourced the review of the completed ADP questionnaires to an external company, which referred 203 of them (6 percent) for further review by the Ethics Office. The Ethics Office issued 145 advisories¹² related to potential conflicts of interest, mostly associated with outside activities (e.g. teaching, board

¹² This represents 4.2 percent of all filers. It is noted that some questionnaires did not require advice from the Ethics Office because they presented no material changes from past disclosures or because no conflicts of interest were found after receiving additional clarification.

٠

¹¹ Executive Director's circular OED2020/007, *Conflicts of Interest and the Annual Conflicts of Interest and Financial Disclosure Programme*.

participation and private business activity) and other matters linked to gifts, financial investments and personal and family relationships.

22. In 2024 the Ethics Office, with support from the Technology Division, enhanced the ADP online system to improve efficiency and the user experience and reduce manual processes. Country office and divisional ADP focal points were given the ability to modify the lists of eligible employees directly in the system, streamlining their tasks and reducing reliance on email. Some additional checks were introduced to ensure that eligible employees were properly identified. During 2024 the ADP questionnaire and guidance were reviewed, identifying some useful changes which will be made in the ADP tool during 2025.

C. Protection against retaliation - whistleblower protection policy

- 23. The primary objective of the whistleblower protection policy¹³ is to encourage employees to report allegations of wrongdoing and misconduct without fear of retaliation. The policy applies to all WFP employees (current and former, regardless of contract type) who allege that they have been subjected to or threatened with retaliation as a consequence of reporting wrongdoing or misconduct or cooperating with a duly authorized audit, inspection, investigation, proactive integrity review or evaluation. Whistleblower protection is essential to combat, among other things, fraud, corruption and gross misuse of resources. The Ethics Office has been promoting understanding of this policy in its outreach and awareness activities in order to foster a culture in which employees speak up about concerns.
- 24. The Ethics Office is responsible for conducting a preliminary review of each request for protection against retaliation to determine whether it presents a prima facie case of retaliation and, if so, referring it to the Office of Inspections and Investigations (OIGI) for investigation. Before, during and after its preliminary review, the Ethics Office may recommend interim measures to protect the affected employee, if deemed appropriate. Such measures may include reversing or amending the decisions or actions affecting the complainant, implementing measures to restore a fair working environment and facilitating resolution processes. The overarching goal is to address concerns effectively, make recommendations to remedy any harm suffered and strengthen trust in the policy.
- 25. If retaliation is substantiated by OIGI, the Executive Director, after considering any recommendations made by the Ethics Office, and in consultation with the complainant, will take appropriate redress measures. When it is determined by the Ethics Office that there is no prima facie case of retaliation, the case is not referred to OIGI and is closed. If the complainant wishes to have the matter further reviewed, he or she may request the Executive Director to refer the matter to an alternative reviewing body for a secondary review.
- 26. In 2024 the Ethics Office received 28 enquiries related to protection against retaliation. Of those, ten resulted in requests for protection against retaliation under the whistleblower protection policy. The Office determined that six did not present prima facie cases of retaliation and were closed; three were received at the very end of 2024 and were still under review at year-end; and one was determined to present a prima facie case of retaliation and was referred to OIGI for investigation.
- 27. The other 18 enquiries were requests for advice and guidance that related mostly to concerns about workplace reprisal, allegations of abusive conduct or disagreement regarding work performance and hence did not involve retaliation as defined under the whistleblower protection policy. In those instances either the complainant was provided with information on relevant internal avenues for further support, including for reporting

¹³ Executive Director's circular OED2020/022, Protection against Retaliation Policy (or Whistleblower Protection Policy).

allegations of misconduct or other recourse mechanisms, or, with the complainant's consent, the matter was referred by the Ethics Office directly to the appropriate internal office.

- 28. All five requests for protection against retaliation still open at the end of 2023 were closed in 2024. Two requests were closed because no prima facie case of retaliation was established. For one of these matters management, in consultation with the Ethics Office, took corrective action to ensure the safety and security of the complainant. Two prima facie cases of retaliation referred to OIGI in 2023 for investigation were also closed because the investigations did not yield sufficient evidence to substantiate retaliation. For one of those cases the Ethics Office recommended, and the complainant was provided, a protective measure in the form of ensuring that the complainant's contract would not be terminated prior to its original end date. The remaining request did not fall under the whistleblower protection policy and was closed following coordination with HRM to address the workplace concern.
- 29. The average time taken by the Ethics Office to conduct a preliminary review was 21 working days from the receipt of all information requested. This is consistent with the 45-day timeline for the completion of a preliminary review set out in Executive Director circular 2020/022.
- 30. Awareness and training on this topic remain a standard part of the Ethics Office's outreach, with a focus on fostering collaboration with HRMSR, OIGI and the Office of the Ombudsperson and Mediation Services (OBD). This collaboration aims to help employees better understand the policy and WFP's holistic approach to protection from retaliation and reprisal, strengthening trust in its effectiveness. In addition it emphasizes the value of other resolution mechanisms, which may provide faster and more effective resolution.

D. Standard setting and policy advocacy

- 31. Providing advocacy and guidance on the incorporation of ethical standards into WFP policies, practices and standards is another way in which the Ethics Office supports WFP in fostering an ethical culture of integrity and in reinforcing WFP's transparency and accountability.
- 32. The Ethics Office plays an observer role on a number of committees and task forces, which allows the office to be aware of, and where relevant, contribute to strategic, policy and procedural developments to reinforce WFP's commitment to its values, ethical governance and effective risk management. In 2024, these included committees on risk; policy; duty of care and inclusion; private donors and partnerships; data management; and the director-level task force on PSEA.¹⁴ In 2024 the office also provided inputs and insights for other key reports and reviews, including Joint Inspection Unit evaluations, a Multilateral Organisation Performance Assessment Network review, a guide on addressing gender-based violence, a policy and guidance on substance and drug abuse, a mediation framework, the global assurance framework, a proactive integrity review of procurement and smart sourcing design and guidelines on the pro bono recruitment of government employees.
- 33. During 2024 the Ethics Office completed work on a new Executive Director's circular on outside activities, to update Executive Director's circular ED2008/004. This update clarified the disclosure and approval process for outside activities, clearly defining the roles of involved units, introducing key definitions and formalizing delegated approval authority to

¹⁴ The Ethics Office acted as the secretariat for this taskforce until that function was transferred to the new PSEA unit.

¹⁵ Executive Director's circular ED2008/004, *Disclosure of financial interests, outside activities and honours, decorations, favours, gifts or remuneration.*

managers. It also reflected good practices from across the United Nations system and addressed the topics that were the most common subjects of requests for guidance. The new circular and guidelines to support its effective interpretation and application will be issued in the first part of 2025.

34. Addressing a cross-cutting driver of its 2024–2026 strategy, the Ethics Office continued to foster and expand collaboration with key actors within WFP's internal justice system, including HRM, the Legal Office, OBD, the Inspector General and Oversight Office (OIG) and the Workplace and Management Department. This collaboration is aimed at establishing a consistent and holistic approach to informing and supporting employees in addressing matters of justice and fairness in the workplace. Strong engagement with the Risk Management Division (RMD) continued, particularly in addressing organizational conflicts of interest and reputational risks. Some examples of this collaboration include joint training sessions on PSEA with OIG, the first joint Ethics Office/OBD in-country mission (in January 2025), and a joint project proposal formulated with RMD entitled "Enhancing Risk Culture to Achieve the World Food Programme's Mandate: Improved NGO Partner Risk Management and Mitigation". 16

E. Training, outreach and awareness raising

- 35. Training, outreach and awareness raising is an essential area of the mandate of the Ethics Office, through which the office delivers on its strategic objective, ensuring that employees are equipped with the understanding and knowledge to uphold an organizational culture in which ethical behaviour is the norm and that they act in accordance with WFP's code of conduct. Through these efforts, the Ethics Office can embed ethical principles at the heart of WFP's operations, empowering employees to understand their responsibilities and uphold the highest standards of ethics in their daily work with confidence and commitment.
- 36. With a focus on both cost and operational effectiveness, the office continued to enhance its approach to outreach and training through proactive, targeted and customized outreach.
- 37. This effort was supported by two key tools: an ethics risk map and an anonymous employee survey. Developed with assistance from the Innovation and Knowledge Management Division, the ethics risk map is a weighted risk model that incorporates both quantitative and qualitative variables to identify country offices and regional bureaux most vulnerable to ethical challenges. Complementing this, a short confidential survey was distributed to employees in country offices to gather insights on key ethical concerns and areas of interest. This information, along with priorities set by the country directors, facilitated the planning of outreach and training so that they were relevant and responsive to the needs of WFP employees. In addition the Ethics Office used the ethics risk map, which included risk considerations such as information from WFP's global assurance project, to prioritize its outreach efforts.
- 38. As part of its efforts to further expand its outreach coverage, the Ethics Office conducted more than 50 multilingual training sessions across 17 country offices spanning all regional bureaux. Over the past two years the office successfully engaged with 68 percent of those country offices identified as high-risk operations in the global assurance project. Several of those country offices operate in emergency or conflict settings, which makes the allocation of employee time for outreach more complicated. The Ethics Office continues to target the remaining offices for 2025, as well as planning to return to those where more time has passed since the last outreach.

.

¹⁶ Funding for this was cancelled in 2025.

39. In-person training remained a preferred tool (in terms of effectiveness) for raising awareness of ethics and familiarizing employees with the Ethics Office's services and engaging directly on ethics-related concerns. In-person training was provided in eight country offices,¹⁷ including sub-offices. However, where it was not possible to conduct in-person missions, mainly due to scheduling and timing limitations, and occasionally because of security concerns, training sessions were conducted virtually in several languages, including for 14 country offices¹⁸ and five regional bureaux.

- 40. The training sessions focused on WFP's code of conduct, conflicts of interest, the whistleblower protection policy and the ethical use of social media alongside additional topics requested or prioritized by the country offices.
- 41. The active participation by employees during the ethics sessions served as an indicator of their success. A rise in ethics-related inquiries following training and anonymous feedback from surveys about the effectiveness of the delivery and content also gave positive indications. Notably, 80 percent of post-training survey respondents indicated that they felt more knowledgeable about the topics covered after the sessions, and 70 percent felt that the content was relevant to their jobs. As part of continued efforts to embed an ethical culture across WFP, the Ethics Office also developed and launched various outreach tools and campaigns throughout the year to reinforce employees' understanding of WFP's code of conduct and its ethical principles and standards. These included intranet articles, videos, all-staff emails and e-learning courses thus ensuring widespread engagement.
- 42. The mandatory e-learning course "Ethics at WFP" continued to play a crucial role in reaching all employees to reinforce ethical awareness and expectations and the message that ethical integrity is directly linked to ensuring that WFP operations remain transparent, impartial and aligned with WFP's humanitarian mission. Launched in 2023, the course must be retaken every three years. Completion of this course is integrated with the employees' personal performance and competency assessments and probationary processes so supervisors are aware of and can address any non-compliance. By 31 December 2024, 97 percent of employees had completed it, reflecting a strong commitment to ethical learning across the organization.
- 43. To further enhance understanding and support employees in ethical decision making on matters related to conflicts of interest and the interpretation of neutrality and impartiality, the Ethics Office developed a series of mini e-learning courses addressing frequently raised concerns based on the most common inquiries from employees. These courses cover topics such as running a private business; protests and demonstrations; running for local elections; romantic relationships; personal relationships; teaching and speaking; and writing for publications. The design and development of the tools was completed in 2024, and they will be made available and promoted through various channels and campaigns in 2025.
- 44. Reinforcing neutrality and impartiality remains a priority, particularly in politically sensitive environments. The Ethics Office proactively monitored the scheduling of national elections and provided country directors with a dedicated toolkit on political activities to help teams navigate ethical considerations in these circumstances. Shared well in advance of elections, this resource enabled employees to uphold WFP's commitment to ethical conduct during elections. In 2024 the toolkit was distributed to 20 country offices, with many seeking additional support from the Ethics Office in effectively communicating the relevant principles to their teams.

¹⁸ In Burkina Faso, Cambodia, Cameroon, Chad, Eswatini, Guinea-Bissau, Haiti, Mauritania, Nigeria, South Sudan, the Syrian Arab Republic, Türkiye, Ukraine and Yemen.

¹⁷ In Algeria, Bangladesh, Chad, Mali, Nigeria, South Sudan, the Syrian Arab Republic and Türkiye.

45. Strong ethical leadership is essential in setting the tone for an organization-wide culture of ethics and integrity. Working in coordination with HRM to encourage management to lead by example and promote a respectful and harmonious workplace, the Ethics Office conducted a training session entitled "Tone at the Top: Leading Ethically" as part of the annual induction programme for country directors and deputy country directors. Real-life case studies were used to explore how to navigate complex ethical dilemmas in country office settings and illustrate the role of the Ethics Office in providing guidance on making ethically sound decisions. A similar session was also held for heads of field offices in two regional bureaux, complemented by structured learning to further strengthen ethical leadership at all levels of WFP.

46. The Ethics Office conducted its annual end-of-year awareness campaign on policies and practices related to the handling of gifts, providing guidance to prevent conflicts of interest when employees are offered or accept gifts. The campaign reminded employees that they are required to decline any gift promptly and reminded partners about that obligation, encouraging them not to offer gifts to WFP or its employees. The campaign included sample communications for country and division directors to share with local partners; an all-staff email sent by the Director of the Ethics Office; and emails sent jointly by the Ethics Office and the Supply Chain Operations Division to thousands of business partners worldwide and to local partners at headquarters. In addition, localized awareness campaigns targeting country offices ahead of other traditional gift-giving periods were launched and well received by country directors.

IV. Protection from sexual exploitation and abuse

- 47. As the organizational focal point for PSEA, the Ethics Office in 2024 continued to strengthen risk reduction, support safe programming and uphold ethical conduct at WFP. In line with a recommendation resulting from the strategic evaluation of PSEA, as further described below, WFP established a dedicated PSEA unit within the Office of the Executive Director and appointed a PSEA director reporting to the Chief of Staff. As of 1 January 2025, the role of organizational focal point for PSEA, along with the related staff and budget, was transferred from the Ethics Office to the new PSEA unit.
- 48. Adopting a victim-/survivor-centred approach, in 2024 the Ethics Office worked with country offices to identify and address risk factors contributing to sexual exploitation and abuse (SEA), with the aim of ensuring a sustainable and long-term response to SEA. Efforts were further focused on creating safer environments for the people WFP serves, through SEA risk mitigation measures and stronger adherence to ethical standards across WFP operations.
- 49. A strong policy and strategic framework underpin WFP's commitment to PSEA. In May 2023 the Ethics Office issued an updated Executive Director's circular on PSEA¹⁹ to strengthen organizational guidance. In 2024 the strategic evaluation of PSEA was completed. This assessed efforts, standards, effectiveness, partnerships and factors influencing WFP's PSEA activities and provided recommendations. Management accepted all six recommendations and, since then, the organization has been implementing a comprehensive action plan with 45 specific measures to address the challenges and opportunities identified. The Ethics Office coordinated all relevant parties involved in the preparation of a management response to the evaluation and agreed to lead periodic updates on the implementation of agreed actions for the Executive Board. A more detailed report on WFP management's response to the PSEA evaluation is provided separately.²⁰

¹⁹ Executive Director's circular OED2023/011, Protection from Sexual Exploitation and Abuse (PSEA).

²⁰ "Annual update on progress in implementing the recommendations from the strategic evaluation on WFP's work on protection from sexual exploitation and abuse" (WFP/EB.A/2025/9-A).

50. In January 2024 the Executive Director assumed the Inter-Agency Standing Committee (IASC) Championship on Protection from Sexual Exploitation and Abuse and Sexual Harassment (PSEAH), reinforcing WFP's commitment to strengthening global efforts to address SEA risks. Through this leadership role, WFP has been driving collaboration within the IASC, integrating best practices and promoting scalable frameworks to ensure more coordinated and sustainable humanitarian responses.

- 51. Throughout 2024 the Ethics Office led the work on the Championship's deliverables and supported the Executive Director in delivering on the three identified priorities: operationalizing a victim-centred approach; promoting organizational culture change through leadership and partnerships; and supporting continued capacity strengthening across the sector. The Executive Director extended her role as Champion for another year, allowing WFP to build on the progress made and further advocate a unified, long-term approach to PSEA across the humanitarian sector.
- 52. Recognizing that SEA challenges are widespread, WFP through the implementation of the management response to the PSEA evaluation, combined with the momentum from the Executive Director's role as IASC Champion for PSEAH, has reinforced its commitment to ethical and risk-informed programming, emphasizing that food is dignity and that WFP's operations must be grounded in the highest standards of integrity and behaviour, upholding the PSEA principles and standards in all WFP's actions.
- 53. There was a significant increase in PSEA-related advisory requests in 2024, with over 500 inquiries received. This represented a 25 percent increase from 2023, reflecting a growing demand for support spurred by the extensive PSEA outreach and capacity-building done by the Ethics Office throughout the organization. The office continued to respond promptly to all incoming requests, which, as in previous years, covered a wide range of needs including capacity building support, the provision of training tools and resources, guidance on managing SEA incidents and providing victim assistance and assistance to country offices with drafting and reviewing policy-related documents such as standard operating procedures and country office PSEA workplans.
- 54. Preventing SEA remained at the core of the Ethics Office's strategy, with a focus on capacity and knowledge building for WFP employees and cooperating partners.
- 55. In 2024 targeted training and engagement efforts expanded across all regions, ensuring that regional bureaux, country offices and all employees, including senior management and PSEA focal points, were equipped to uphold the highest ethical standards. The office conducted more than 150 multilingual training sessions for employees in 34 country offices and four regional bureaux. Strengthening PSEA awareness in the field not only reinforced a culture of accountability but also reduced operational risks, safeguarding the integrity of WFP's mission.
- 56. Throughout the year, coordination and outreach efforts intensified through sustained engagement with a growing network of more than 600 PSEA focal points located in every country office and regional bureau. The Ethics Office continued to provide onboarding sessions, awareness-raising initiatives and tailored guidance to address specific challenges. Regional workshops were organized with three regional bureaux, serving as pivotal platforms for knowledge exchange and capacity building aimed at ensuring that best practices are standardized and SEA risks mitigated efficiently. Additional guidance documents are expected to be developed in 2025 to further support the PSEA focal points, providing clear direction on emerging challenges and reinforcing the focal points' role in implementing WFP's PSEA commitments.
- 57. Strong leadership is fundamental in shaping WFP's response to SEA. Leaders and managers at all levels must demonstrate a clear commitment to PSEA, fostering a culture of zero tolerance, including for inaction. To strengthen leadership accountability, the Ethics Office

continued to conduct interactive, scenario-based training tailored to senior management in country offices, including in regional country director meetings in several regional bureaux,²¹ as well as in the induction training for new country directors and deputy country directors organized by HRM. By equipping leaders with the knowledge and tools to address SEA risks effectively, WFP reinforces ethical leadership and proactive risk management.

- 58. It is critical that WFP maintain an unwavering focus on and commitment to confronting SEA and mainstreaming prevention throughout its operations and programmes. To that end, the office supported country offices in integrating PSEA into the design and drafting of country strategic plans and annual country reports submitted to headquarters, ensuring that SEA risks, challenges and achievements were systematically documented and addressed. To standardize this integration, the office has been developing and updating guidance documents, including by contributing to the revision of the country strategic plan framework template to ensure that PSEA considerations remain a mandatory component, aligning with the management response to the strategic evaluation of PSEA. Assessment and prioritization of risks and capacity to meet PSEA commitments have also been key priorities. A PSEA country office self-assessment checklist became a mandatory part of the annual Executive Director assurance exercise in 2024. This tool was rolled out with multilingual webinars globally.
- 59. Strengthening SEA risk management among cooperating partners remained another key priority, with a focus on enhancing their capacity to ensure safe programming. These efforts not only safeguarded affected populations but also reinforced WFP's operational efficiency and credibility in delivering life-saving assistance. To that end WFP updated its field-level agreement template to align with the new PSEA circular. The Ethics Office, in coordination with the Operational Partnerships Unit, conducted webinars and information sessions to familiarize WFP employees and cooperating partners with these critical updates.
- 60. Through the Ethics Office WFP continued to play a lead role in the inter-agency roll-out of a United Nations implementing partners PSEA capacity assessment. Since its launch this assessment has enhanced engagement with more than 590 cooperating partners, providing training on the assessment process and guiding the development of PSEA capacity strengthening implementation plans across multiple country offices. Lessons learned throughout 2024 have shaped resource development and capacity building efforts, supporting WFP's phased global roll-out. By the end of 2024 more than 50 country offices had received support from the Ethics Office in implementing the PSEA capacity assessment and strengthening process, and more than 1,900 WFP employees received training on the PSEA capacity assessment. In-person support missions to high-risk areas have further strengthened outreach, with more missions planned for 2025 should funds allow.
- 61. WFP continued to play an active role in the inter-agency Implementing Partner Protocol Working Group under the United Nations protocol on allegations of SEA involving implementing partners, contributing to training efforts through more than 30 inter-agency training sessions for more than 2,000 United Nations employees, including over 300 PSEA network members in high-risk locations. In addition WFP has joined another newly established working group on PSEA and commercial partners, contributing to the development of resources for United Nations entities to use in engaging effectively with private sector entities.

-

²¹ Asia and the Pacific, Eastern Africa, Latin America and the Caribbean, and Western Africa.

²² The United Nations Implementing Partner PSEA Capacity Assessment is a screening tool for partner organizations, developed by WFP, the United Nations Population Fund, the United Nations Children's Fund and the Office of the United Nations High Commissioner for Refugees in coordination with the IASC and members of the United Nations working group on SEA. It is aimed at strengthening the accountability and capacity of cooperating partners and ensuring that they have sufficient mechanisms in place to prevent and respond to SEA.

62. As part of its deliverables for the IASC Championship, the Ethics Office began the development of an internal learning course on United Nations implementing partner protocol processes, with a focus on a PSEA module on the United Nations Partner Portal, as well as an external-facing learning course targeting non-governmental organizations and other civil society organizations. WFP also led consultations within the IASC to promote the use of the non-mandatory PSEA assessment tool for financial service providers, which will assess the PSEA capacity of such providers and support enhanced accountability in the implementation of cash programmes in humanitarian settings through them.

- 63. As another key initiative under WFP's Championship, a global learning workshop on PSEA in partnerships was organized, bringing together United Nations entities, inter-agency PSEA coordinators and non-governmental organization representatives from 17 countries to enhance PSEA mechanisms in partnerships, driving stronger safeguards and accountability.
- 64. Lastly, WFP, through its Executive Director, remained engaged in the high-level steering group on SEA, thus contributing to the promotion of stronger system-wide responses to SEA across the United Nations system. WFP also contributed to other United Nations and inter-agency initiatives including the IASC PSEA Advisory Group, the United Nations SEA working group and the reference group of the Development Assistance Committee of the Organisation for Economic Co-operation and Development, also adhering to the latter's recommendations.²³

V. United Nations coherence: the Ethics Panel of the United Nations and the Ethics Network of Multilateral Organizations

- 65. A core function of the Director of the Ethics Office is to engage with other ethics offices across the United Nations system for sharing best practices and promoting coherence and cooperation on ethics and to be a member of EPUN. EPUN comprises the heads of the ethics offices of the United Nations Secretariat and separately administered organs and programmes and is chaired by the Director of the Ethics Office of the United Nations Secretariat.
- 66. The Director of the WFP Ethics Office engages with EPUN by contributing to its monthly meetings, consultation on shared issues and contested whistleblower protection cases; and co-leading a working group on EPUN's internal guidance on practices related to gifts and outside activities aimed at ensuring greater consistency in its application across EPUN members. The Ethics Office also was an active member of the EPUN subgroup dedicated to enhancing collaboration in communication, outreach and training and optimizing the use of resources.
- 67. The Ethics Office remained active in the Ethics Network of Multilateral Organisations (ENMO), which comprises ethics officers from United Nations system entities, affiliated international organizations and international financial institutions. ENMO is a forum for exchanging information, good practices for professional development and benchmarking, whose objective is promoting system-wide collaboration on ethics issues. The Ethics Office contributed to ENMO's development of guidance materials related to the establishment and working methods of ethics functions, contributed to panel discussions and presented new initiatives and approaches being developed during the ENMO annual conference, and assumed the role of alternate ENMO representative on the United Nations mental health strategy implementation board, comprising representatives from all United Nations organizations and key stakeholders.

-

²³ Development Assistance Committee of the Organisation for Economic Co-operation and Development recommendation on ending sexual exploitation, abuse and harassment in development cooperation and humanitarian assistance.

VI. Observations and conclusions

68. In 2024 the Ethics Office began to implement its 2024–2026 strategy with renewed vigour and commitment and prioritizing the needs of country offices. The office also took the lead on major PSEA efforts, including the IASC Championship on PSEAH – one of the Executive Director's highest priorities.

- 69. The Ethics Office confirms that its organizational independence was maintained throughout the reporting period and that it was able to perform its activities free from interference. The office's budget for 2024 was sufficient to cover its key activities and staffing costs associated with carrying out its responsibilities during the reporting period.
- 70. In view of the increasing needs and the overall funding challenges faced by WFP the Ethics Office focused its efforts on directly supporting the country offices in meeting the needs of the people that WFP serves and continually reviewing its practices and systems to find further cost efficiencies and seek alternative funding options. As WFP and the broader humanitarian sector are being called upon to reassess how to meet the increasing demands amid shrinking funding, the work of the Ethics Office remains key in risk prevention, keeping WFP's values and code of conduct at the forefront of how it operates and ensuring that it is trusted and capable of delivering on its life-saving and life-changing mandate.

Acronyms

ADP annual disclosure programme

ENMO Ethics Network of Multilateral Organizations

EPUN Ethics Panel of the United Nations

HRM Human Resources Division

HRMSR Staff Relations Branch

IASC Inter-Agency Standing Committee

OBD Office of the Ombudsperson and Mediation Services

OIG Inspector General and Oversight Office

OIGI Office of Inspections and Investigations

PSEA protection from sexual exploitation and abuse

PSEAH protection from sexual exploitation and abuse and sexual harassment

RMD Risk Management Division

SEA sexual exploitation and abuse