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Annual reports

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Annual report of the Ethics Office for 2020

Executive summary

This annual report is hereby submitted to the Executive Board at its 2021 annual session. This annual report was provided directly to the Executive Director pursuant to paragraph 6.2 of Executive Director's Circular ED2008/002 entitled "Establishment of Ethics Office in WFP".

It provides an overview of the activities of the Ethics Office (including statistical information) during the period from 1 January to 31 December 2020, by mandated areas of work, as follows:

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

Furthermore, this report includes the activities of the Ethics Office on protection from sexual exploitation and abuse (PSEA) as, since mid-2018, the Ethics Office is WFP's organizational focal point for PSEA (section IV), and a section on United Nations Coherence (section V) wherein the activities as related to the United Nations system, including the Rome-based agencies, are covered, and closing with observations related to the work of the Ethics Office and ethics within WFP (section VI).

Draft decision*

The Board takes note of the annual report of the Ethics Office for 2020 (WFP/EB.A/2021/4-B).

* 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.

Focal point:

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I. Introduction

1. This report covers the work of the Ethics Office for the period from 1 January to 31 December 2020 and provides analysis and assessments compared to previous years and relevant activities anticipated into 2021.
2. The Ethics Office is a formal independent office with the Director reporting directly to the Executive Director. All activities are based on, *inter alia*, principles of confidentiality, independence, and integrity.
3. The Ethics Office is mandated to assist the Executive Director in nurturing a culture of ethics and accountability to enable all employees to perform their functions in accordance with the highest standards of conduct – as required by WFP's values of integrity, collaboration, commitment, humanity and inclusion, standards, and principles as per the United Nations Charter, the Standards of Conduct for the International Civil Service (2013),¹the WFP Code of Conduct² and other relevant policies and practices – and to come forward without fear of retaliation.

II. Background

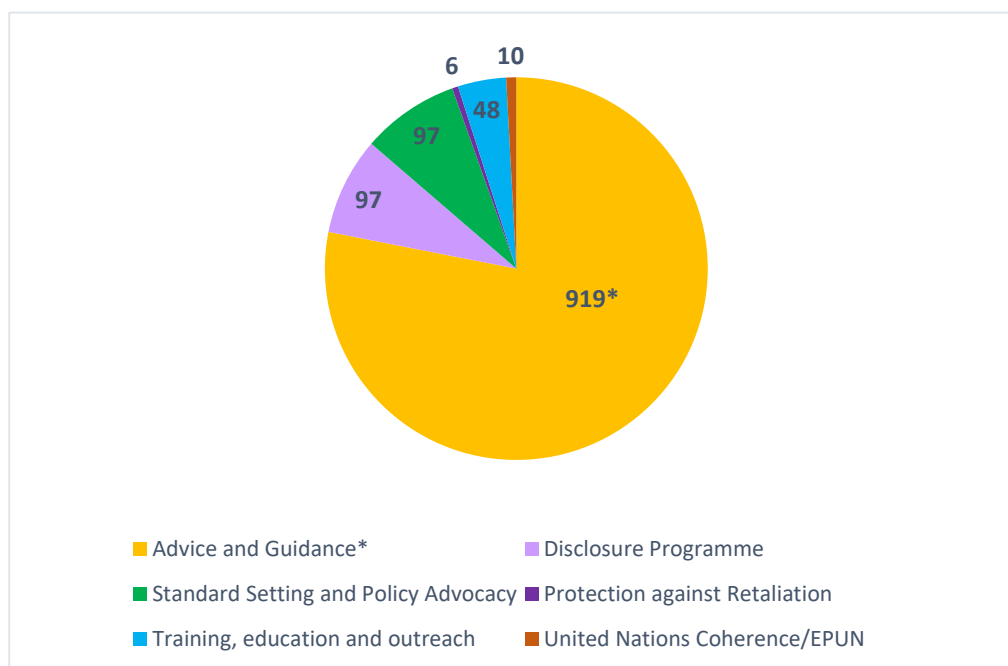
4. The Ethics Office was established in January 2008 by Executive Director Circular 2008/002 "Establishment of Ethics Office in WFP" in alignment with the Secretary-General's Bulletin ST/SGB/2007/11 "United Nations system-wide application of ethics: separately administered organs and programmes."
5. Pursuant to the Executive Director Circular 2008/002, the Ethics Office is required to provide an annual report on its work to the Executive Director for the Executive Director to submit to the Executive Board. Further, the Ethics Office is required to submit a draft annual report to the Ethics Panel of the United Nations (EPUN) for consultation. Such review does not constitute an endorsement of the contents of this report by EPUN nor any member of EPUN. Feedback from EPUN has been taken into consideration.

III. Activities of the Ethics Office

6. The Ethics Office recorded 1,177 activities (Figure 1) – including PSEA advisories, as follows: *Advice and Guidance*: 919 separate matters were recorded; *Annual Conflicts of Interest and Financial Disclosure Programme (Disclosure Programme)*: 97 submissions from the conflicts of interest questionnaires were initially flagged as possible conflicts of interest and reviewed as part of Advice and Guidance (and analysed in more detail below); *Protection against Retaliation*: six cases were considered; *Standard Setting and Policy Advocacy*: 97 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*: 48 separate activities were recorded; *United Nations Coherence*: nine standard conference calls/meetings were attended and one case as EPUN Alternate Chair was reviewed. Different from last year, the Ethics Office did not separately track the interactions with EPUN (emails, additional calls/meetings, input to the annual reports and on appeals) for the purpose of calculating the total activities. In addition, 97 gifts were disclosed through and recorded into the electronic gifts register.

¹ International Civil Service Commission, *Standards of Conduct for the International Civil Service* (2013).

² Executive Director's Circular OED2014/016, *WFP Code of Conduct*.

Figure 1: Summary of activities recorded

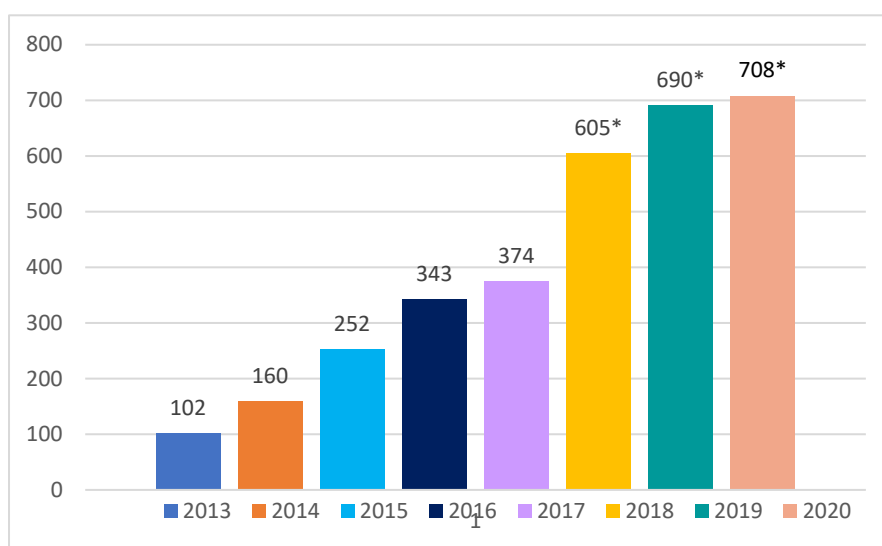
*PSEA advisories (308) included and Disclosure Programme-related advisories excluded as part of Advice and Guidance, as noted separately under Disclosure Programme in this Figure 1.

7. Figure 1 represents the number of activities recorded, not the amount of time spent by the Ethics Office, nor the number of people impacted. While it is difficult to record every consultation (as some are *ad hoc* in nature or arise during missions/other meetings), this number represents the overwhelming amount of work, although other activities remain unrecorded or covered separately herein.

A. Advice and guidance

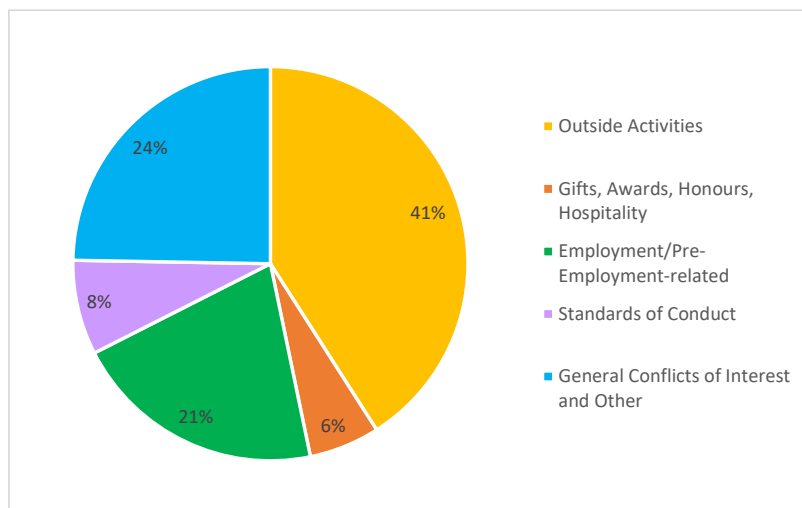
8. Providing confidential advice and guidance is at the core of the work of the Ethics Office and is viewed as an opportunity to help prevent wrongdoing while simultaneously increasing knowledge for employees to make ethical decisions and take ethical actions. Whatever the issue, employees can and do rely on professional, practical, and timely advice from the Ethics Office.
9. As reported in previous annual reports, sustained growth in advisories is considered a success of the professionalization of the office and a reliable indicator of the confidence in the office, and the substantive contributions to all employees, including advice on management issues. This trend continued despite the challenging and unprecedented onset of the COVID-19 pandemic. (See annex).
10. There were 1,016 matters reviewed and recorded as Advice and Guidance, including 97 matters reviewed as a result of the Disclosure Programme and 308 related to PSEA. This means an increase of 19.3 percent with respect to 2019 (851). (See section B). Advisories recorded by year and source of query are outlined in Figures 2, 3 and 4.

Figure 2: Advice, 2013–2020*



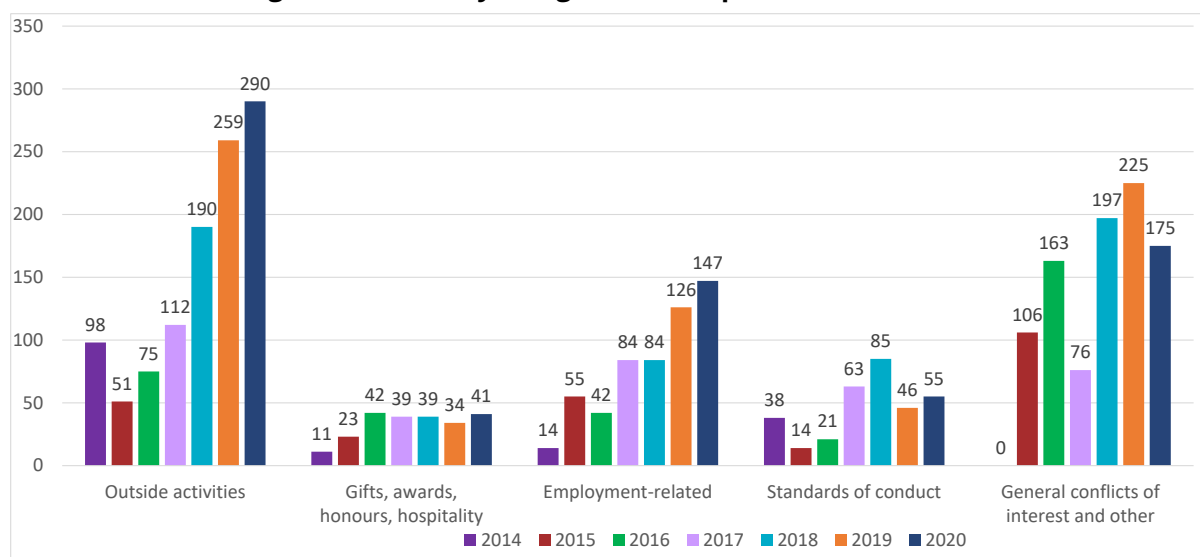
* PSEA-related advisories not included.

Figure 3: Advice by category*



* PSEA-related advisories not included.

Figure 4: Advice by categories – comparison 2014–2020*

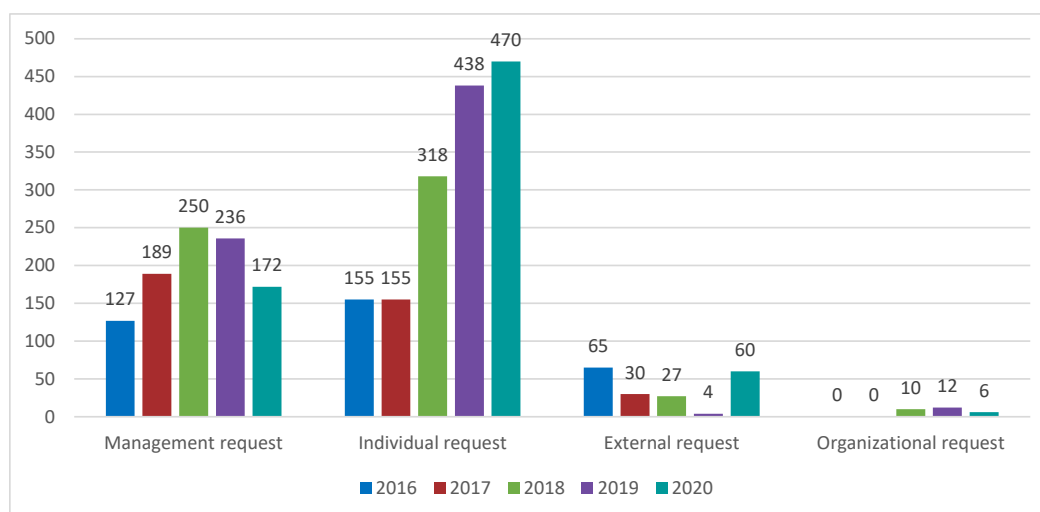


* PSEA-related advisories not included.

11. While in the first half of 2020, the Ethics Office observed a decrease in the number of advisories, likely because of the confinement measures related to COVID-19, when COVID-19 restrictions eased somewhat and behaviours adapted, advisories increased substantially. For instance, in September 2020, the Ethics Office recorded 73 advisories. (See annex). This was the highest number recorded in a single month for any year.
12. The pandemic affected not only the volume but also the nature of the queries received, with several employees seeking advice on the possibility to volunteer with local activities/entities in their communities or participate in fundraising activities as a result of COVID-19 – both of which are areas on which the Ethics Office traditionally advises. Public discourse, including *#BlackLivesMatter*, and other activities as related to combatting racism and the distinction between political activities and civic activities resulted in advisories.
13. The comparison of the actual numbers of 2019 to 2020 (Figure 4) showed a decrease of matters categorized as “general conflicts of interest and other”, probably due to a reduction in education and outreach (as more fully described below). On the contrary, matters categorized as “outside activities” increased despite the restrictions throughout the world during the pandemic (see paragraph 12).
14. There was an increase of matters categorized as “employment-related”, likely due to changes in the contracts and Human Resources Division (HRM) processes, including greater awareness on conflicts of interest during the recruitment process as a result of the guidance provided by the Ethics Office to HRM, resulting in more HRM consultations with the Ethics Office.
15. The number of “standards of conduct” and “gifts-related” queries remained relatively stable. As in past years, consultations on recognition seemed appreciably low in comparison to the entire employee population. The 2021 work plan is anticipated to include the revision of the remainder of Executive Director’s Circular 2008/004³ with corresponding awareness campaigns.
16. Advisories on gifts are separate from disclosures, which are required through the electronic gifts register. Since its implementation,⁴ gifts disclosure continued, although the number of gifts disclosed through the gifts register seems appreciably low to the employee population. In 2020, 97 disclosures of gifts were made through the gifts register.
17. Since the inception of the gifts register, the Ethics Office has raised concerns to management about the online tool – regarding its usefulness for compliance, the absence of disclosures of offers of gifts, and the tracking of actual gifts by management. The Ethics Office requested assistance from the Technology Division in 2017 to revise the online form to disclose offers of gifts and for enabling reporting to management. It is worth noting that while the Ethics Office advises on the appropriateness of receiving gifts and related conflicts of interest, the administration and management of gifts are outside its mandate. This concern remains unresolved.

³ Executive Director’s Circular ED2008/004, *Disclosure of financial interests, outside activities and honours, decorations, favours, gifts or remuneration*.

⁴ Executive Director’s Circular OED2017/002, *Disclosure of Gifts*.

Figure 5: Advice by source of queries, 2016–2020*

* PSEA-related advisories not included.

18. Figure 5 outlines advisories categorized by “Management” (queries by a WFP employee in his/her official capacity), “Individual” (queries more personal in nature, like outside activities, as opposed to WFP official work), “External” (queries from outside WFP) and “Organizational” (queries from WFP itself through any division/unit and external stakeholders). Advisories categorized as “External” considerably increased, likely due to an increase in requests from the external website. Nevertheless, the majority of these requests did not pertain to the Ethics Office’s mandate and were referred elsewhere as appropriate. “Management” queries likely decreased because of the absence of direct interactions, which lead to *ad hoc* consultations. It is worth noting that advisories categorized as “Organizational” included consultations with Executive Board members, multilateral organizations, such as the Multilateral Organisation Performance Assessment Network and the Organisation for Economic Co-operation and Development (OECD)/Development Assistance Committee (DAC).
19. The implementation of a case management system has enabled the Ethics Office to have more efficient and accurate reporting (see annex) and nuanced analysis of advisories through various lenses – for example, by region and location, identifying risks, trends and opportunities to fill knowledge gaps/weaknesses and planning and prioritizing preventative actions and outreach initiatives (as described under the Observations).
20. Lastly, the Ethics Office continues to survey satisfaction of advisories, specifically with respect to the timeliness, clarity and usefulness of the advice as related to matters official in nature. While the number of responses received remained relatively few, the ratings continued to be satisfactory and very satisfactory.

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

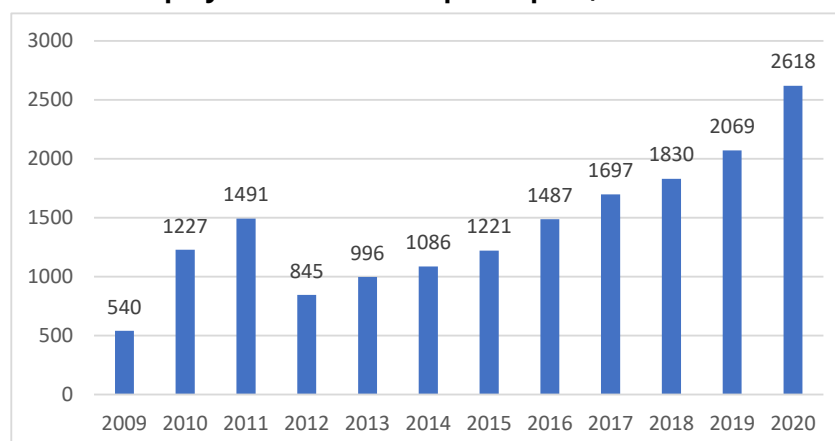
21. The Ethics Office is mandated to administer the Disclosure Programme⁵ to assist WFP in identifying, recording and addressing personal conflicts of interest for the purpose of mitigating or eliminating conflicts of interest in the best interest of WFP. The Disclosure Programme reflects a commitment to transparency and public confidence-building and acts as a safeguard and risk management tool for WFP and employees. It is not a tool to uncover fraud or unjust personal enrichment.
22. The twelfth Disclosure Programme exercise was launched on 5 May 2020 with an initial deadline of six weeks – this was originally implemented in 2017 to accommodate the priority of WFP operations. At the six-week deadline (12 June 2020), the completion rate was 75 percent. Due to the extraordinary circumstances of COVID-19, the initial deadline was extended further than in previous years to 11 September 2020. The completion rate was 87 percent. In 2019 and 2018, respectively, the completion rates were 87 and 99 percent at the extended deadline, making 2019 consistent with 2020 and, presumably attributable to the increase of the Disclosure Programme population, as a result of the expanded eligibility criteria under the revised Circular⁶ (see paragraph 29). This notwithstanding, at the end of the calendar year, the completion rate was 99 percent, as in 2019.
23. Continuing a practice established in 2019, the Ethics Office condensed the escalation process to HRM for follow-up with those employees who were not compliant by the extended deadline. Following additional outreach by the Ethics Office, 46 employees were escalated to HRM in December 2020, as per established protocols. The Disclosure Programme closed at 100 percent compliance in January 2021.
24. Out of a total employee population of 18,994,⁷ 2,618 employees were identified to participate in the 2020 exercise. This represented 13.7 percent of the total employee population and an increase of 26.5 percent from the 2019 Disclosure Programme population. (Figure 6).

⁵ Secretary-General's bulletin ST/SGB/2007/11, *United Nations system-wide application of ethics: separately administered organs and programmes*. Executive Director's Circular OED2020/007, *Conflicts of Interest and the Annual Conflicts of Interest and Financial Disclosure Programme*.

⁶ Executive Director's Circular OED2020/007, paragraph 3b.

⁷ Total number of employees as of 30 April 2020.

**Figure 6: Disclosure Programme:
employees identified to participate, 2009–2020**



25. The substantial increase in the total Disclosure Programme population was a result of the expanded eligibility criteria under the revised Circular OED2020/007, implemented in 2020. As the Disclosure Programme includes an obligatory certification to the WFP Code of Conduct, more than 2,500 employees, including the most senior employees of WFP, read and attested to compliance to the Code of Conduct.
26. Through a labour-intensive process, starting with data feeds from HRM, the Ethics Office compiled and distributed separate lists of eligible participants for review by management. Input from management was (and remains) essential to identify relevant participants against the circular criteria and management seemed to fulfil this responsibility in good faith and overwhelmingly timely.
27. Of the 2,618 employees identified to participate, 56 were exempted mainly because of separation, including retirement and extended leave. As a result, 2,562 employees completed the Disclosure Programme. Of the total submissions, 97 submissions were flagged as possible conflicts of interest and reviewed by the Ethics Office (categorized as 61 outside activities, 3 gifts, and 33 conflicts of interest otherwise). Four additional submissions were flagged but not reviewed because additional information requested was not submitted by the relevant participants. These submissions were eventually escalated to HRM in addition to the escalation covered in paragraph 23. Some submissions did not warrant the provision of advisories as, for example, they presented no material change from past disclosures. As such, 24 written advisories were provided by the Ethics Office (11 on outside activities and 13 on conflicts of interest otherwise). The number of reviews was constant to 2019 despite the population increase.
28. While the Ethics Office has adopted a continuous improvement approach, taking advantage of new technologies for implementing efficiencies, the Disclosure Programme continued to have a large administrative component including an extensive number of emails to achieve full compliance.
29. As mentioned above, the Executive Director Circular 2020/007⁸ resulted in a consolidated questionnaire with no separate Financial Disclosure Statement. This change was based on experiences and an external assessment. Among others, the consolidated questionnaire led to the elimination of financial information unnecessary to the objective and made it easier

⁸ Executive Director's Circular OED2020/007 amends paragraphs 1–3 and supersedes paragraphs 5–13, and 25–27 of Executive Director's Circular ED2008/004.

(and streamlined) for employees to participate. These changes also aimed to result in a reduction of privacy and security risks – particularly of information financial in nature.

30. Following the concerns raised during the 2019 External Audit on Fraud and Corruption,⁹ the Ethics Office recommended that the Disclosure Programme be brought entirely “in-house”. This has been proposed to management and through the proposed Ethics Office Resource Plan.
31. In this regard, the Ethics Office continued working on its own “back-of-the-house” of the database, which would enable the Ethics Office to have direct access to its own data, produce its own reports and relevant analytics to spot trends and identify risks. While the Ethics Office started working on the “back-of-the-house” in May 2018, technical issues arose which could not be sorted by the Technology Division. Further, although the database was implemented in 2019, the database has now been deemed to be outdated by the Technology Division, resulting in an unexpected and appreciable increase of costs. Work on the database will continue in 2021.

C. Protection against retaliation – Whistleblower Protection Policy

32. The primary objective of the Whistleblower Protection Policy is to ensure that employees can report alleged wrongdoing and misconduct without fear of retaliation.¹⁰
33. Under the Whistleblower Protection Policy, the Ethics Office is responsible for conducting a review of a complaint to determine whether there has been a *prima facie* case of retaliation and, if so determined, the matter is then referred to the Office of Inspections and Investigations for investigation. Before and during the *prima facie* review, the Ethics Office may recommend *interim* protective measures to protect the complainant (or affected employee).
34. Six cases of protection against retaliation were considered: one case continued from 2019 and five new cases arose. Two of the new 2020 cases were closed as no *prima facie* was established. Three of the new 2020 cases remained open into 2021. Moreover, one of the six cases was appealed to and reviewed by the United Nations Ethics Office, in its role as Chair of EPUN, and the no *prima facie* determination was affirmed.
35. The Ethics Office is also responsible for providing advice and guidance on whistleblower protection matters. In 2020, there were three advisories, which seems substantially low relative to the concerns regarding retaliation raised under the 2018 global staff survey (GSS) and the 2019 *safe and harmonious workplace survey* (hereafter workplace survey).¹¹ Related, the Ethics Office conducted a thorough analysis of the responses to the retaliation questions of the workplace survey to make recommendations on actions in 2021.
36. As anticipated in past annual reports, the Ethics Office continued to work on an updated Whistleblower Protection Policy, which was originally promulgated in 2008, to reflect relevant practices, lessons learned and the United Nations system-wide review by the Joint Inspection Unit (JIU)¹² conducted in 2018. Following extensive analysis and a robust and lengthy consultative process, in December 2020 the updated Whistleblower Protection Policy was promulgated. The revised policy: i) expands the scope of protected activities reporting misconduct and cooperating with duly authorized audits and investigations to reporting misconduct and cooperating with duly authorized audits, inspections, investigations, proactive integrity reviews and evaluations; ii) enhances when protection

⁹ Report of the External Auditor on fraud prevention, detection and response, WFP/EB.A/2019/6-F/1, 8 May 2019.

¹⁰ Executive Director's Circular ED2020/022, *Protection against retaliation Policy (or Whistleblower Protection Policy)*.

¹¹ Annual report of the Ethics Office for 2019, WFP/EB.A/2020/4-B, 12 June 2020.

¹² JIU, *Review of the whistle-blower policies and practices in the United Nations system organizations*, 2018, recommendations 1, 2, 3, 6, 7 and 8.

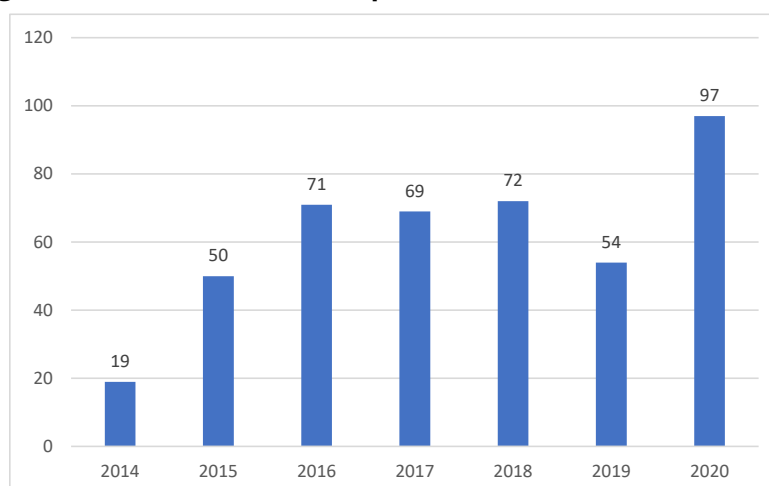
measures can be sought and taken, including in instances where there may be an identified risk of retaliation; iii) more explicitly covers “appellate rights” and circumstances in which the Director, Ethics Office, deems there to be a conflict of interest in the Ethics Office conducting the *prima facie* review; and iv) generally clarifies the roles and responsibilities in maintaining a workplace free from any form of retaliation.

37. Related, the Ethics Office created formalized standard operating procedures on requests for protection against retaliation, revised the form used to facilitate the *prima facie* review, and developed awareness-raising tools, targeting various audiences (including vested divisions/offices) to launch a thematic awareness campaign on the updated policy in 2021.
38. Lastly, prompted by comments received from the Union of General Service Staff on the draft Whistleblower Protection Policy, the Ethics Office recommended the Executive Director to revise the Executive Director’s Circular on Protection from Harassment, Sexual Harassment, Abuse of Authority and Discrimination¹³ to more explicitly cover acts of retaliation that are not covered by the Whistleblower Protection Policy, which covers acts of retaliation that are considered “whistleblower” in nature, only.

D. Standard setting and policy advocacy

39. Fostering an organizational culture of ethics and accountability requires frequent and consistent advocacy. To integrate ethical considerations institutionally, the Ethics Office continued to provide input to existing standards, policies, practices, processes, and recommendations for establishing new and revised standards, policies, practices. Feedback was positive and welcome.
40. The Ethics Office recorded requests for input to 105 separate policies/standards (37 received as part of the role on the Oversight and Policy Committee and 68 as the Ethics Office), in various forms – circulars, policies, guidance and other documentation – and on a range of topics. For example, the Ethics Office was involved in several consultations regarding the implementation of the Comprehensive Action Plan, the draft People Policy, the proposed updated leadership framework and was an active member of the working group to revise the Harassment, Sexual Harassment, Abuse of Authority and Discrimination Policy, all of which the Ethics Office considers components to support a positive cultural transformation. The Ethics Office was also consulted on the revamped Anti-Fraud and Anti-Corruption Policy and the draft investigation guidelines.
41. Of the 105 recorded requests, the Ethics Office reviewed 97 of them (Figure 7).

¹³ Executive Director’s Circular ED2018/007, *Protection from Harassment, Sexual Harassment, Abuse of Authority and Discrimination*.

Figure 7: Recorded reviews of policies and standards, 2014–2020

42. Of note, the Ethics Office responded to the questionnaire on the *Review of the current state of the ethics function in the United Nations system* and participated in an interview conducted by the JIU. The Ethics Office was also interviewed as part of the *WFP's Integrity and Ethics Maturity Assessment*, conducted by the Office of Internal Audit. Both reports are expected to be released in 2021 and they will be carefully reviewed and considered by the Ethics Office with the former being used to inform the updates to Circular ED2008/002.¹⁴
43. As anticipated in the 2019 annual report, the Ethics Office created a disclosure form and corresponding guidance for pre-employment vetting of conflicts of interest. This satisfies a 2017 JIU recommendation¹⁵ to have measures for the purpose of identifying and mitigating actual, perceived or potential conflicts of interest in an efficient and timely way during the pre-employment stage, thus enabling informed decisions to be made by management and the candidate. The materials were created for use by HRM practitioners in mid-April 2019 and were piloted by HRM in 2020 and adjusted accordingly. A series of webinars for the Ethics Office to educate HRM is to be scheduled in 2021 by HRM with materials prepared by the Ethics Office.
44. As part of the update to Circular ED2008/004 and in line with an Office of Internal Audit recommendation, the Ethics Office proposed a definition for organizational conflicts of interests based on research in the United Nations, consultations, and relevant experiences. At the same time, the Ethics Office submitted a "Guidance Note on Organizational Conflicts of Interest" with a focus on private partner relationships and made recommendations to integrate organizational conflicts of interest into procedures to vet private sector partners as part of the due diligence conducted by the Legal Office and as part of the Due Diligence Committee, including options for management to consider in addressing organizational conflicts of interests and creating minimum ethical standards for private sector partners.

¹⁴ Executive Director's Circular ED2008/002, *Establishment of the Ethics Office in WFP*.

¹⁵ JIU, *Review of mechanisms and policies addressing conflict of interest in the United Nations system*, 2017, JIU/REP/2017/9.

45. Related to organizational conflicts of interest and in furtherance to another JIU recommendation,¹⁶ the Ethics Office initiated an exercise to map the most common occurrences of organizational conflicts of interest, understand the risks within WFP and, where necessary and practical, make recommendations and, as appropriate, directly develop tools to address or mitigate such risks. The Ethics Office worked (and continues to work) in close collaboration with the Enterprise Risk Management Division (ERM) for seamless and efficient integration of the results into current and future risk mapping and mitigation efforts.
46. As recommended by the joint Board/management working group on harassment, sexual harassment, abuse of power and discrimination, the Ethics Office initiated a review of WFP's Code of Conduct and, in order for the process to be inclusive and participatory, created a working group with vested stakeholders representing the Inter-divisional Standing Committee (IDSC) members, ERM and the Office of the Assistant Executive Director, Workplace Culture Department. The draft created by the working group resulted in rather extensive feedback from the IDSC, which led to rather extensive revisions. Additional work on the revised Code of Conduct ensued. The revised Code of Conduct and Circular¹⁷ are expected to be promulgated in 2021.
47. Lastly, as anticipated in last year's annual report, the Ethics Office concluded its work as co-chair of the sub-working group on safeguarding against sexual harassment and sexual exploitation and abuse (SEA), leading two workshops focusing on sexual harassment and SEA to produce recommendations to be presented to management. The recommendations have been considered as part of the development of PSEA workplans and activities.

E. Training, education and outreach

48. In any organization, employees must be knowledgeable about expectations of conduct to abide by them. In WFP, the high-risk contexts and its diverse and multicultural workforce in a decentralized structure necessitate thoughtful and relevant actions for knowledge and skill-building – essential for employees to understand and uphold WFP's values, standards, and principles. Outreach, awareness, and education initiatives in various forms and *fora* are critical to enhancing knowledge and, thus, compliance.
49. Internal communication campaigns are a key component of the Ethics Office's work and are central for an organization-wide ethical and a "speak-up/listen" culture. As such, the Ethics Office conducted what has become an annual end-of-the-year awareness campaign focusing on policies and practices on gifts. The campaign included: sample communications for country/division directors/liaison offices for local partners; an all-staff email sent by the Director, Ethics Office; and more than 3,000 emails sent jointly by the Ethics Office and the Supply Chain Operations Division to business partners worldwide managed directly through the Supply Chain Operations Division at headquarters and to partners local to headquarters. The purpose of this internally and externally focused campaign remained to ensure employees understand their responsibilities and business partners understand WFP's expectations of them related to gifts. This was the sixth year of this initiative and it is scheduled to continue in 2021.

¹⁶ *Ibid.*.

¹⁷ Executive Director's Circular OED2014/016.

50. As mentioned in past annual reports, the Ethics Office does not have empirical data on the extent to which materials have been cascaded as part of organization-wide campaigns and, despite not implementing the level of campaigns as in 2018, the Ethics Office continued to receive positive feedback from employees, country directors and partners, thus reflecting some level of effectiveness and success in the awareness conducted by the Ethics Office in 2020.
51. Related, the newly implemented case management system database (paragraph 19) enabled the Ethics Office to extract data and implement an enhanced evidence-based approach to plan its outreach work (and activities in other areas of its mandate), including targeted campaigns and creating targeted materials, and seeking more regular entry points for feedback. This information has been used for formulating the 2021 education and outreach workplan and other outreach activities.
52. Throughout the year, the Ethics Office continued with more traditional training sessions. The mandatory ethics e-learning courses were developed in response to a recommendation received from an internal justice system review in 2014 and were released in three modules in December 2016, 2017 and 2018, respectively. For the purpose of compliance, as recommended by the Ethics Office, the ethics e-learning courses are available in English, French, Spanish and Arabic and are integrated in the personal Performance and Competency Enhancement Assessments of all employees and the probation process of relevant employees. As of 31 December 2020, 95, 94 and 93 percent of the total employee population of 19,954¹⁸ completed the first, second and third modules, respectively. Feedback on the modules has been positive. As the employee population is not stagnant and the categories of participants cover all employees – including “When Actually Employed”, the Ethics Office considers a 90 percent completion rate at any given time to be reasonable and appropriate. It is envisioned that these modules will be refreshed in the coming years.
53. In addition to its online courses, in-person training initiatives serve as a crucial means to enhance understanding of ethics and the role of the Ethics Office, most especially its advisory function, as well as with respect to nurturing a culture of ethics and promoting the highest standards of integrity and WFP’s values. While the pandemic impacted the ability of the Ethics Office to provide anticipated face-to-face trainings/briefings, through increased use of video conferencing platforms and by leveraging the use of available online tools, the Ethics Office was able to remain engaged and promoted ethical awareness through online sessions and presentations, reaching 512 employees directly.
54. Of note, one example of targeted outreach was the robust training session created to support a procurement partner and focused on ethics and expectations of conduct, including conflicts of interest and other related ethical issues in food procurement.
55. In this regard, the Ethics Office created a consolidated outline of expectations of conduct oriented toward third parties (suppliers/vendors/partners/business partners). It is anticipated that this tool will be distributed to relevant internal stakeholders for circulation with appropriate external parties.
56. Through online means, the Ethics Office continued to deliver the Headquarters Ethics Induction Briefing, which was (and remains) considered compulsory (yet 100 percent compliance is not achieved) for employees new to headquarters (whether completely new or re-assigned). Likewise, the Director, Ethics Office continued conducting induction sessions for new Executive Board members and reporting quarterly to the Executive Board and the Audit Committee.

¹⁸ Total number of active WFP employees as of 31 December 2020.

57. The Ethics Office participated in the respectful workplace advisors/ethics ambassadors (RWAs/EAs)¹⁹ regular teleconferences and briefed 112 RWAs/EAs on relevant ethical topics, such as outside activities linked to COVID-19 (e.g. volunteering, fundraising, etc.). Furthermore, the Ethics Office participated in three virtual training sessions, where 52 new RWAs/EAs were trained on how to fulfil the ethics ambassador role. This included RWAs/EAs appointed anew at headquarters. Of note, for several years the Ethics Office has been advocating for a way to vet any conflicts of interest as related to RWAs/EAs. With the agreement of the Office of the Ombudsman and Mediation Services (OBD), a form was created and administered in 2020 and will continue to be used for new RWAs/EAs.
58. The Ethics Office maintained its proactive development and distribution of ethics information and guidance materials. Taking advantage of reduced travels, existing materials were updated, and new materials were created to help educate employees on ethics in WFP and the role of the Ethics Office, including but not limited to the “Ethics in WFP” booklet.
59. As indicated in past annual reports, the Ethics Office has made considerable efforts, including dedicated resources, to have the external webpage on ethical standards of conduct and PSEA updated to reflect WFP’s commitments more accurately in these areas. After some challenges encountered in past years, with the support of the Chief of Staff, the external webpage on ethical culture was revamped and an external PSEA webpage launched. The Ethics Office also updated the ethics-related pages and created new pages on PSEA on WFPgo.
60. Where possible, the Ethics Office approaches ethics and standards of conduct knowledge building and skill enhancement by mainstreaming ethics into existing and new initiatives conducted by others without attribution. Despite reaching out directly, integrating ethics into “tone-at-the-top” and “model in the middle” initiatives conducted by other divisions has not been realized. Nonetheless, the Ethics Office continues to advocate for ethics and standards of conduct in the “Speak Up” training, in the country directors/deputy country directors’ induction programme, “middle manager” learning programme, leadership framework, and other initiatives and communications as part of culture and other work. The Ethics Office remains available to work side by side with divisions like HRM on areas of common interest. In contrast, the Ethics Office has been notably successful in integrating PSEA through partnering with relevant internal stakeholders and workstreams.

IV. Protection from Sexual Exploitation and Abuse

61. The Ethics Office continued to address protection from and prevention of SEA holistically, focusing internally and externally on making an impact at the field level and ultimately to those WFP serves. This included extensive work with regional bureaux and country offices, and increased collaboration and coordination at the United Nations and inter-agency levels. The Ethics Office (as the organizational focal point for PSEA) quickly adapted to continue providing support and effectively responding to the unprecedented challenges caused by COVID-19.
62. Building on a network of more than 300 PSEA focal points (located in every country office and regional bureau), online training sessions for PSEA focal points were conducted by the Ethics Office in all six regional bureaux, in collaboration with the NGO Unit and the Office of Inspections and Investigations and with participation from approximately 60 country offices.

¹⁹ RWAs are employees who work in coordination with OBD, in focusing on preventing or reducing workplace conflicts at the field level. Since 2012, RWAs have been designated as “ethics ambassadors”. In this capacity, they are capacitated to raise awareness on ethics and standards of conduct.

63. Since June 2019, all PSEA focal points are to complete an online training course designed specifically to support them to fulfil their responsibilities. The course includes downloadable tools and ready to deploy training resources to facilitate conducting awareness and outreach initiatives at the local level. The course is available in English, French, and Spanish. In 2020, the Ethics Office continued to receive positive feedback on the course and started updating it to ensure it remains continually relevant, with an anticipated re-launch in 2021.
64. Over the year, the Ethics Office strengthened PSEA coordination and outreach through active and proactive engagement with PSEA focal points and all employees. This included providing prompt support on PSEA matters through awareness, onboarding sessions for new focal points, and regular interactions and response to queries from country offices and regional bureaux. The number of PSEA-related advisories continued to grow with 308 advisories in 2020 compared to 161 in 2019. This increase is considered a positive indicator and result of the Ethics Office's proactive outreach and prompt and relevant responsiveness/performance.
65. In furtherance to field level implementation of protection from and prevention of SEA, several initiatives were initiated. One example was the "PSEA at the Front line" project, which is aimed to equip employees, including often overlooked front-line workers such as drivers, non-WFP employees such as contractors (including financial service providers) and small NGO partners with PSEA knowledge and skills through the multilingual outreach package. It is anticipated that this project will be launched in 2021 and shared with the Inter-Agency Standing Committee (IASC), the United Nations and NGO partners for global inter-agency usage.
66. In addition to capacitating WFP employees, as employees of cooperating partners interact directly in beneficiary communities, cooperating partners should also have minimum standards and mechanisms in place to identify, respond and prevent SEA. As such, the Ethics Office focused on promoting PSEA knowledge and understanding of expectations of conduct, while also updating and strengthening PSEA clauses in field-level agreements. It is anticipated that the Ethics Office will propose expectations of conduct in field-level agreements in addition to the creation of the expectations of conduct guidance as referenced above.
67. To further equip partners (especially small partners) and field-level employees, the Ethics Office initiated another initiative – the "PSEA in a box" project, comprised of interactive outreach tools, accessible regardless of technical background. This means WFP employees who take a lead role in communicating about SEA would not have to develop their materials, and those outside of WFP (who may have resource and capacity challenges to develop material) could use WFP-developed material.
68. The Ethics Office continued to be actively involved in inter-agency collaborations such as taking a lead role in the adaptation of an existing PSEA training into an interactive and innovative inter-agency learning tool for United Nations partners: the "Say No to Sexual Misconduct" package. The purpose of this package is to raise knowledge of partners on SEA and the obligations as partners to WFP/United Nations and includes skill development to define, detect and respond to SEA. An excellent example of WFP stepping up in the inter-agency *fora*.
69. Another example of greater United Nations coherence and increased efficiency to strengthen accountability and avoid duplication of processes was the launch of the United Nations Implementing Partner PSEA Capacity Assessment. WFP had a lead role in developing this harmonized screening tool. The Ethics Office recommends that the assessment be conducted WFP-wide as a standard procedure with cooperating partners.

70. As mentioned in last year's annual report, the Ethics Office has continued to take forward the innovation project selected by the Innovation Accelerator. The "PSEA Digitalization" project is being developed to leverage the use of technology to enhance a victim-centred approach through safe reporting, access to assistance services, and to improve information analysis to facilitate evidence-based prevention and mitigation of SEA.
71. Of note, WFP, through the Director, Ethics Office, participated in the OECD/DAC Reference Group on Preventing Sexual Exploitation and Abuse meeting and has inquired about the adherence to the recommendations on *Ending Sexual Exploitation, Abuse, and Harassment in Development Co-operation and Humanitarian Assistance*.
72. Lastly, WFP, through the Executive Director, continued to be a member of the High-level Steering Group on Sexual Exploitation and Abuse, enabling the Executive Director, the Deputy Executive Director and other leaders to be directly involved in the strengthening and alignment of the system-wide response to SEA, while also being represented within the IASC Champions on PSEA and other technical groups.

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

73. The EPUN was instituted in 2007 and composed of the heads of the ethics offices of separately administered United Nations organs and programmes.
74. While the work of the EPUN is reflected in the Report of the Secretary-General to the General Assembly, it is worth noting that the Director, Ethics Office, continued to be actively engaged with EPUN, participating in nine monthly standard conference calls/meetings and providing her expertise in consultations/deliberations on issues of common interest. This included reviews of EPUN members' annual ethics reports.
75. In addition to sharing her expertise with EPUN on multiple ethics matters, the Director, Ethics Office, following the EPUN Alternate Chairmanship *ad interim* role from May to August 2019, assumed the role as Alternate Chair again from December 2019 to 10 March 2020. In this role, one case as EPUN Alternate Chair was reviewed. Several reviews were conducted otherwise as required, and input provided by the Director, Ethics Office, as an EPUN member.
76. In support of the Secretary-General's promotion of system-wide collaboration on ethics-related issues within the United Nations system, the Ethics Network for Multilateral Organizations (ENMO) was established in 2010. ENMO is comprised of multilateral inter-governmental institutions and provides a forum to exchange information, good practices for professional development and benchmarking. The Director, Ethics Office, continued to be an active member of the ENMO planning committee and participated in the Annual ENMO Conference, which was organized and hosted online.
77. The Director, Ethics Office, continued collaboration with the ethics officers of the Rome-based agencies (RBAs) through enhanced and more regular sharing of best practices and knowledge. A good example, initiated through the heads of the RBAs Ethics Offices, was a joint Statement against Racism issued by the Food and Agriculture Organization of the United Nations (FAO), the International Fund for Agricultural Development (IFAD) and WFP Principals at the Fourth Informal Joint Meeting of the FAO Council, IFAD Executive Board and WFP Executive Board.
78. Furthermore, during the 16 Days of Activism Against Gender-Based Violence Campaign, the Ethics Offices of the RBAs collaborated on organizing and participating in a joint online panel entitled: *Working together to enhance prevention and response to Sexual Exploitation and Abuse (SEA): The Role of Ethics*. The panel was attended by approximately 150 United Nations colleagues, NGO partners and others. Panellists outlined their respective agencies'

frameworks for preventing and responding to sexual exploitation and abuse and provided some concrete examples of PSEA initiatives, through representatives of the respective organizations from the field.

VI. Observations

79. Although the pandemic had a significant impact on WFP and its operations, the Ethics Office remained fully responsive to employees' requests and proactive in the development and delivery of quality activities. It has become increasingly evident to the Ethics Office that its greatest impact to the culture of WFP and to those WFP serves is its work in and focus on in-country/in-region operations/programmes. Consequently, regular participation in country and regional meetings on topical matters would be welcome going forward.
80. Noting that advice and guidance constitute a critical component of the work of the Ethics Office, the willingness of employees to approach the office is dependent in large measure on receiving prompt, pragmatic and action-oriented guidance. The Ethics Office considers every advisory an opportunity to thwart wrongdoing and advance doing the right thing. Thus, the approach to every advisory is to make the advice well understood and understandable while not compromising relevant principles. As such, the constant upward trajectory of advisories is a positive reflection of the value the Ethics Office brings as an experienced and knowledgeable centralized function.
81. With the objective of using an evidence/data-driven approach to maximize the impact of advice, the Ethics Office has started assessing queries received from country offices and initiated conversations with regional/country directors to inform them on trends in respective regions/countries. This has resulted in planning measures to address gaps in countries without any advisories provided and to have "tone-at-the-top" conversations with country directors. Positive feedback and support have been received by all the regional directors. Likewise, the Ethics Office has started analysing the most frequent queries from different offices/divisions to proactively address areas of confusion and support fair and consistent guidance. For example, the Ethics Office consulted with the Communications, Advocacy and Marketing Division (CAM) to ensure advice related to social media and other public communications is in alignment with CAM policies and practices, and to regularize certain areas as referrals. In 2021, it is anticipated that the Ethics Office will consult with the Procurement Division similarly.
82. Tremendous progress has been made in the Disclosure Programme: the consolidated structure into one questionnaire, the revised guidance, forms and processes have all contributed to a more efficient and user-friendly administration, while at the same time increasing the number of participants and decreasing external costs. The current external vendor is ceasing to exist as of 2021 and, thus, the Ethics Office anticipates exploring a joint tender with one or more of the RBAs while continuing to recommend the Disclosure Programme be taken in-house.
83. Providing input to standards/policies/practices/processes is essential in operationalizing ethics and compliance seamlessly. This is another area where the Ethics Office advanced considerably. The Whistleblower Protection Policy and Circular OED2020/007 were promulgated. In addition, substantive contributions were made through the issuance of guidance documents and other activities; for example, the pre-appointment vetting of conflicts of interest guidance, recommendations on organizational conflicts of interest including as related to private sector partners, and the organizational conflicts of interest mapping exercise. Several recommendations have also been proactively made to HRM, including amendments to the HRM Manual to ensure consistency with provisions of Circular OED2020/007 and concerning the more onerous restrictions placed on consultants

- as related to outside activities and errant language regarding the approval authority of outside activities.
84. It is worth noting that due to the widely divergent and unanticipated volume of the comments and consultations on the Whistleblower Protection Policy and the Code of Conduct, the Ethics Office was unable to conclude the re-drafting of circulars on gifts, honours/awards, hospitality, and outside activities. This work is slated for 2021.
 85. Requests for protection against retaliation remained constant. It continues to seem an oddity that there were not more queries for advice regarding retaliation in comparison to the results from the 2018 GSS and the 2019 workplace survey. Related to the latter, the Ethics Office has analysed data from the retaliation questions and will submit recommendations to management in 2021.
 86. Understanding expectations and how to make sound decisions had even greater importance in the COVID-19 circumstances where employees spent significant time working remotely and making decisions outside of their usual office workspace. The Ethics Office adapted innovatively to the challenges of the pandemic and concentrated its efforts on updating internal information, materials, and tools and in strengthening the online ethics and PSEA presence and to more accurately reflect the related work by WFP and the Ethics Office. Similarly, the Ethics Office updated the training materials for RWAs/EAs and recalibrated the collaboration with OBD on the training and communication with RWAs/EAs.
 87. The Ethics Office continued to advocate tools for managers to manage employees on behaviours contrary to the values of WFP as an alternate avenue in between and in addition to the informal/formal mechanisms, and for ways to support managers who are the subject of spurious claims. In addition, the Ethics Office continued to raise how WFP seems to concentrate on the relatively few difficult situations and bad behaviours without celebrating the many who do the right thing.
 88. The Ethics Office continued to conduct outreach activities in various forms, although the organization-wide awareness initiatives continued to fall short of expectations and the pinnacle reached in 2018. A robust communications and outreach workplan has also been created for 2021.
 89. The volume of work on PSEA has continued to increase considerably, and, at the same time, the work of the Ethics Office has appropriately developed. While the Ethics Office prioritizes the needs and demands of WFP and its various stakeholders, it simultaneously actively participates and leads, as appropriate, on ethical matters and in the prevention of SEA through United Nations system-wide, inter-agency, RBAs, bilateral and multilateral collaboration with humanitarian and development partners in the interest of WFP, those WFP serves and the greater international community.
 90. By proactively working to embed ethics in the daily practices, and through advisories and awareness-raising initiatives, the Ethics Office has continued to provide employees with knowledge and skills to perform their function, at all times, in accordance with the values, standards and expectations of WFP. Through a robust ethics programme and trusted relations with employees, the Ethics Offices has remained fully engaged with and accessible to all employees within WFP.
 91. To continue to take forward its work in the most relevant and productive way and positively impact the ethical culture of WFP, as well as following a recommendation in the Audit of Tone-at-the-Top and WFP's Leadership Arrangements,²⁰ in December 2020, the Ethics Office

²⁰ The Internal Audit recommends that the Ethics Office "i) [r]evisit the multiyear goals and strategy of the Ethics Office and present this to the Executive Director for review and approval together with a resource plan for the Ethics Office itself –

presented to the Executive Director for review and approval a new strategy for 2021–2022 *"Ethics is how we do, what we do"*. The vision of the strategy is: *"a culture of ethics and accountability. This means constantly and continuously nurturing a culture of ethics and accountability through proactive, preventative and supportive measures to the Executive Director, leadership and management divisions/colleagues/peers working on workplace culture, and all employees and other vested stakeholders, including through messaging/communications"*. To achieve the vision, three strategic objectives have been developed, which are in brief: i) use an evidenced/data-driven approach; ii) integrate values, ethics, standards of conduct and compliance in everyday practices in a practical and relevant manner; and iii) capacitate employees to live up to the values, principles and standards.

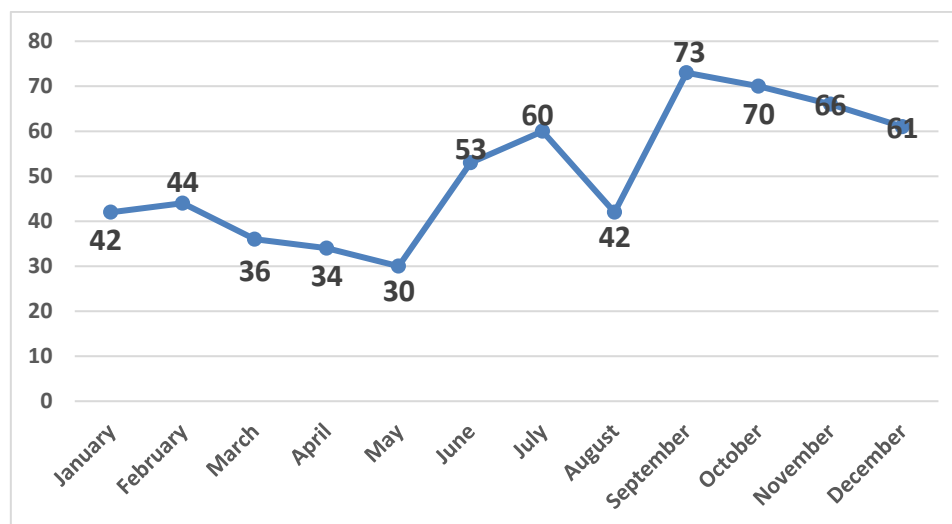
92. As per the above recommendation, the Ethics Office also presented a resource plan through which it proposes enhancing the structure and professional capacitation of the Office to be commensurate with the peer formal independent offices of WFP and appropriate for purposes of efficient operations and business continuity. A strategy and resource plan for PSEA is anticipated to be presented to the Executive Director in 2021.
93. Reporting formally and informally to the Executive Board and the Audit Committee helped to bolster the independence of the Ethics Office. The administrative move of the Ethics Office under the Workplace Culture Department, in contrast, has created some levels of confusion about the independence of the Ethics Office – based on feedback in this regard from within WFP and outside WFP. As a result and as the recommendation to change the administrative reporting line was based on the assumption that the Ethics Office works closely with the divisions under the Workplace Culture Department, which is not the case, the Ethics Office recommends the re-consideration of the administrative reporting line.
94. Making recommendations throughout the year to enhance the ethical culture of WFP and the efficacy of the Ethics Office's work in support of high standards of conduct, PSEA, and ethics in WFP is highly valued, and the Director, Ethics Office, looks forward to continuing the collaboration into 2021.

that takes into account the behavioural change initiatives to address workplace culture and tone issues being implemented; and ii) [w]ork closely with the Internal Communications team to ensure that ethics and integrity issues continue to be woven into WFP internal messaging." *Internal Audit of Tone-at-the-Top and WFP's Leadership Arrangements*, Office of the Inspector General, Internal Audit Report AR/20/01.

ANNEX

Additional information on advice and guidance trends and analysis

Figure A.1: 2020 advisories by month*



* PSEA-related and Disclosure Programme-related advisories not included.

Table 1: Advice by location and categories*

| | Headquarters/ Liaison offices | Regional Bureau for Asia and the Pacific | Regional Bureau for the Middle East and Northern Africa | Regional Bureau for Western Africa | Regional Bureau for Southern Africa | Regional Bureau for Eastern Africa | Regional Bureau for Latin America and the Caribbean |
|--|----------------------------------|---|--|---|--|---|--|
| Total** | 232 | 68 | 74 | 57 | 42 | 40 | 49 |
| Employment-related | 47 | 28 | 15 | 8 | 10 | 8 | 16 |
| Gifts, awards, honours, hospitality | 17 | / | 4 | 6 | 1 | 2 | 6 |
| Outside activities | 107 | 20 | 21 | 19 | 17 | 11 | 21 |
| Standards of conduct | 8 | 6 | 19 | 6 | 2 | 7 | 3 |
| General conflicts of interest and others | 53 | 14 | 15 | 18 | 12 | 12 | 3 |

* PSEA-related and Disclosure Programme-related advisories not included.

** Out of the total 611 advisories registered in 2020, the total number of advisories included in Table 1 is 562. This difference is due to the impossibility to track the location of some requests, especially when from external sources/non-WFP employees.

Acronyms

| | |
|------|--|
| EA | ethics ambassador |
| ENMO | Ethics Network of Multilateral Organizations |
| EPUN | Ethics Panel of the United Nations |
| GSS | global staff survey |
| HRM | Human Resources Division |
| JIU | Joint Inspection Unit |
| OBD | Office of the Ombudsman and Mediation Services |
| NGO | non-governmental organization |
| PSEA | protection from sexual exploitation and abuse |
| RBA | Rome-based agency |
| RWA | respectful workplace advisor |
| SEA | sexual exploitation and abuse |