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

Report of the joint Board/management working group on harassment, sexual harassment, abuse of power and discrimination

Draft decision*

The Board:

- i) appreciates the progress report of the joint Executive Board/WFP management working group on harassment, sexual harassment, abuse of power and discrimination and on sexual exploitation and abuse (WFP/EB.2/2019/9-A);
- ii) endorses the recommendations set forth in the report and requests WFP to develop a comprehensive action plan in respect of them for consideration by the Board at its 2020 first regular session;
- iii) decides to extend the mandate of the joint working group up to the Board's 2020 first regular session; and
- iv) decides to remain seized of the matters of harassment, sexual harassment, abuse of power, discrimination and sexual exploitation and abuse at WFP.

* 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 points:

Ms V. Guarnieri

Mr D. Marzano

Assistant Executive Director

Chief, Staff Relations Branch

Programme and Policy Development Department

Human Resources Division

tel.: 066513-2200

tel.: 066513-2441

Executive summary

This report provides an update on the work of the Joint Executive Board/WFP management working group on harassment, sexual harassment, abuse of power, and discrimination (the "JWG") and on sexual exploitation and abuse in accordance with the JWG's terms of reference. It also provides an overview of WFP's ongoing efforts to address harassment, sexual harassment, abuse of power, discrimination and retaliation and provides specific recommendations for reinforcing those efforts.

Every person at WFP has the right to be treated with dignity and respect and to work in a safe environment free from harassment, abuse and discrimination. Every WFP employee also has a duty to foster such an environment. That duty starts at the top of the organization and flows through leaders and managers at the headquarters, regional, country and sub-office levels.

The JWG acknowledges actions taken by WFP in recent years to ensure this. For instance, WFP's strengthened policy provisions on protection from harassment, sexual harassment, abuse of power and discrimination, introduced in 2018, reflect the organization's stance and help to address problems that were brought forward by employees. However, the results of the 2018 global staff survey ("GSS") and management's discussions with employees at every level of the organization have revealed that WFP has a long journey ahead and that more needs to be done. It has also become clear that while WFP is and should be focused on addressing sexual harassment, there are problems with abuse of power, discrimination and broader workplace harassment within the organization that must be addressed as well.

Building on the GSS results, WFP and the JWG secured the services of the advisory company Willis Towers Watson to conduct an external review of the workplace culture and ethical climate at WFP to better understand the magnitude and nature of harassment, sexual harassment, abuse of power, discrimination and retaliation at WFP and as an input for the JWG's work. In connection with this effort, the JWG further decided to establish a support group of independent individuals renowned for their expertise relevant to issues of abusive behavior in the workplace. Drawing upon its own analysis and these external sources, the JWG notes that:

- Abusive conduct is an issue that needs to be tackled across WFP, starting at headquarters, where, the external review suggested, it was perceived more often;
- It is important that WFP increase the engagement of its employees. To achieve this, it is fundamental that employees' trust in the organization be restored, which starts with management acknowledging the problem, recognizing any mistakes made in the past or the shortcomings of ongoing actions, putting in place effective measures to remedy those and convincingly supporting those affected;
- WFP should improve the way it communicates on these matters and ensure the protection of whomever reports or witnesses issues. Recent outreach efforts have been received positively, with 83 percent of external review respondents indicating that WFP is doing a good job at educating employees about culture and values. Those outreach efforts should continue.

The JWG therefore provides recommendations in six core areas to inform WFP's development of a comprehensive action plan, which should factor in ongoing actions, for 2020 and beyond, consisting of a holistic, multi-strategy approach:

- **Reaffirming values:** WFP should continue and expand its efforts to ensure a common understanding of values, standards of conduct and internal rules across the organization, including by continuing its global awareness-raising efforts while also identifying ways to reinforce them in daily practice;
- **Leadership:** Starting at the top, with the Executive Director and his Leadership Group, and permeating through to all levels of the organization, WFP's core behavioural standards need to be heard and seen, and leadership qualities need to be identified, cultivated and measured;
- **Employee engagement:** In order to prompt behaviour change across a large, devolved and dispersed organization, all WFP employees should feel encouraged and supported by leaders and frontline managers to participate in the change process;
- **Policy and system revisions:** WFP should revise personnel-related systems and processes to support prevention and remedial mechanisms, foster safe and respectful work environments and ensure a true meritocracy. Revisions should also address organizational inequalities and vulnerabilities, including across dimensions such as gender, staff versus non-staff and managers versus the team members they supervise;
- **Discipline:** WFP should work to gain greater confidence and trust from its employees in its internal justice system. Appropriate disciplinary action should continue to be taken against proven perpetrators, while those who report as well as witnesses should be protected from retaliation and provided with credible assurances that their careers will not be derailed as a result of reporting abusive conduct;
- **Communications:** WFP needs to clearly communicate its values and how they apply to specific roles and responsibilities at all levels of the organization. WFP should also ensure that policies and procedures on abusive conduct, including reporting mechanisms, are easy to understand, for example by developing a pocket guide, educational videos, articles and other easily accessible materials on how to act properly and respond to abuse.

To achieve sustainable and credible change, the change process needs to involve and engage all employees, but with a particular focus on leaders at all levels, acknowledging the issues and their urgency, setting the tone and modelling respectful behaviour. These efforts are seen as essential to ensuring a better workplace for all WFP employees, at headquarters and in the field, and to ensuring and further enhancing WFP's efficiency and effectiveness as the world's leading humanitarian organization.

Measuring results will be key. A regular monitoring and audit framework should be established in connection with the comprehensive action plan to measure progress using quantitative and qualitative data. The comprehensive action plan should further be conceived as a living document that can be enriched and strengthened through additional work and insight of the JWG, further expert advice over the coming months and the organization's own further experience and engagement with employees.

Introduction

1. WFP's governing body, echoed by management, considers that "[h]arassment in all its forms, notably racial, moral and sexual, abuse of power, exploitation and violence destroy the life and dignity of their victims, they undermine human relationships wherever they are found; they impair the ability of teams to work; and they threaten organizations' scope to carry out their missions [E]minently, WFP's credibility and role to support victims of displacement, conflict and all other forms of duress from sexual attack and exploitation, rests on its ability to handle all incidents of sexual harassment and abuse of power in its own ranks robustly and convincingly Only by penalizing and removing perpetrators of harassment can an organization prevent the same individuals and the corrosive work culture they represent from perpetrating or at least tolerating the abuse and exploitation of those whom WFP sets out to serve. If WFP fails in this fundamental undertaking, it fails in its responsibility to ensure beneficiaries are treated with dignity and respect. It also loses its authority and agency to speak and act against those in field contexts who commit acts of sexual and gender-based violence. On this basis, ... WFP [shall] be uncompromising in its efforts to root out sexual harassment and violence and to nurture a culture in which all employees regardless of gender, can unfold their full personal and professional potential. A sober systemic review should be undertaken to inform appropriate institutional changes."¹
2. Across the world there has been more attention to the issue of abusive conduct, including sexual harassment. WFP has been determined to better understand how these issues have manifested in the organization and may be addressed. Since taking office in April 2017, the Executive Director has been driving action to define strategies and measures to deliver and improve the effectiveness of its commitment to provide all employees with a safe and respectful environment free from any form of abusive conduct. This includes working towards creating an environment where people speak out freely and ensuring that complaints are fully investigated and followed up with appropriate disciplinary measures. In parallel, WFP continues to enforce its policy of zero tolerance of any form of sexual abuse or exploitation of the people it serves and playing a key role within United Nations system-wide fora aimed at improving the protection of beneficiaries.
3. At its 2018 first regular session, in connection with significant developments in the global context (e.g. the #metoo and #aidtoo movements) and the WFP context, including specific concerns of sexual harassment and the forthcoming issuance of the Executive Director's circular of 1 March 2018, "Protection from harassment, sexual harassment, abuse of authority, and discrimination" (OED2018/007), and of related measures taken by WFP, the Executive Board expressed interest in receiving regular updates on these especially sensitive matters and in the establishment of a dedicated joint working group on harassment, sexual harassment, abuse of power and discrimination. The JWG was established shortly after, with the mandate to review and report to the Board on measures and actions implemented in those areas, both for employees and for beneficiaries. The results of the 2018 GSS further amplified the Board's concerns and informed the JWG's work from its early stages.

¹ First regular session of the Executive Board 2018, Item 8 a) – "Update on WFP internal directive on harassment, sexual harassment and abuse of power", joint statement delivered by Switzerland on behalf of Lists A, B, C, D and E.

4. The JWG is a time-bound, *ad hoc* joint Executive Board and WFP management working group, serving as a forum for the exchange of information and discussion of methods, lessons learned and best practices in addressing the prevention and protection of employees from harassment, sexual harassment, abuse of power and discrimination; the prevention and protection of beneficiaries and others (e.g. minors), covered under applicable policies, from sexual exploitation and abuse; and whistle-blower protection. Moreover, the purpose of the JWG is to assist in defining strategies and identifying measures that ensure WFP has the most effective prevention and protection actions, reporting mechanisms and screening mechanisms in place to prevent the hiring of confirmed offenders and to hold confirmed offenders to account. The JWG is co-chaired by one Executive Board representative (previously the Permanent Representative of Guatemala and, since August 2019, the Permanent Representative of Yemen) and one WFP management representative (namely, the Assistant Executive Director, Programme and Policy Development).² Its composition is detailed in annex I to the present document.
5. The JWG held its first meeting on 28 May 2018. Since then it has met regularly and its co-chairs have reported to the Executive Board at each Board session. Before the end of 2018, the JWG formed two sub-working groups to facilitate more focused meetings, on safeguarding against sexual harassment and sexual exploitation and abuse and on protection from harassment, abuse of power and discrimination. The composition of the sub-working groups is detailed in annex II.

WFP actions and the external review

6. WFP is committed to ensuring a workplace environment where employees feel safe and leaders set the model for respectful behaviour. Since 2017, the Executive Director has been particularly vocal in communicating WFP's zero-tolerance of any form of abusive behaviour in both written and verbal communications to employees and has initiated concrete actions to address the causes and effects of abusive conduct, including among others:
 - Issuing a revised policy on "Protection from harassment, sexual harassment, abuse of authority, and discrimination", introducing new approaches to enhance the protection of affected employees and encourage reporting;
 - Reinforcing the capacity and responsiveness of the Office of the Inspector General;
 - Ensuring individual accountability through firm disciplinary and administrative actions, in line with WFP's zero tolerance of abusive conduct;
 - Promoting awareness-raising activities on behavioural standards to help employees identify abusive conduct and their role in ensuring a respectful workplace;
 - Driving gender parity across the organization by establishing ambitious targets, with implementation tracked closely by the Executive Director; and
 - Conducting the 2018 GSS.

Additional details on these actions are provided in annex III. As recent surveys suggest that employees are not sufficiently aware of them, communication on WFP actions taken and ongoing will be enhanced.

² The Assistant Executive Director's portfolio changed from Operations Services to Programme and Policy Development in July 2019 as part of a broad organizational restructuring.

7. The establishment of the JWG provided an opportunity for WFP to engage the Executive Board directly in helping to review ongoing actions and recommend further steps to ensure that WFP is a leader in combating abusive conduct.
8. Building on the GSS results, WFP, in close consultation with the Executive Board through the JWG, secured the services of the advisory company Willis Towers Watson to conduct an external review of WFP's workplace culture and ethical climate (the "external review") to better understand the magnitude and nature of harassment, sexual harassment, abuse of power and discrimination at WFP over time, including underlying causes.³ Under the oversight of WFP's independent Ethics Office, the initiative was also aimed at helping WFP gain increased awareness of its own evolving culture through a blend of one-on-one interviews, an online topical survey and focus group discussions that would contribute quantitative and qualitative analysis and a final report as input for the JWG's efforts. Further, the JWG would draw upon the collective analysis to recommend measures to better mitigate and address the issues underlying abusive conduct at WFP.
9. The external review comprised three components. The first was an anonymous survey completed by 8,137 employees (nearly half of WFP's workforce), which was designed to delve deeply into WFP's workplace culture and in particular issues of abusive behaviour. Second, three virtual focus groups were organized in which employees engaged in online, moderated dialogue about WFP's culture and their perceptions and experiences, in English, French and Spanish. Finally, employees were invited to get in touch directly with the advisory company for confidential one-on-one interviews to further discuss their experiences with abusive behaviour. The final submission from Willis Towers Watson, delivered to the JWG in September 2019, was shared with WFP staff and Member States on 8 October 2019 and is available as indicated in annex IV.
10. In addition to the services of Willis Towers Watson, the JWG decided to engage experts with experience relevant to addressing abusive behaviour in the workplace (hereinafter referred to as the "support group") to accompany the external review and to assist the JWG in interpreting its findings and identifying global best practices. A shortlist of prominent scholars in sociology and organizational psychology and practitioners experienced in policy enforcement, victim-assistance and management training was prepared by Human Resources and the Office of the Ombudsman and approved by the JWG. Prof. Paula McDonald of Queensland University of Technology in Brisbane, Australia, and Dr Bettina Palazzo of Business School Lausanne, in Lausanne, Switzerland, were appointed as support group members from that shortlist. Brief biographies of the members of the support group are provided in annex V.

³ The JWG decided that while protection against sexual exploitation and abuse is an extremely important issue it should be analysed as a separate matter. The focus of the external review would therefore remain on harassment, sexual harassment, abuse of power and discrimination to ensure a deep dive assessment of that issue within WFP.

JWG findings and recommendations

11. The information available to the JWG, including without limitation the results of the external review, confirms that abusive conduct is a serious issue at WFP.
12. The JWG acknowledges the actions already taken by WFP in recent years, including the strengthened policy provisions introduced in 2018 and its efforts to address problems reported by employees. Prevention and deterrence play an essential role in promoting a safe and harmonious work environment and protecting employees from all forms of abusive conduct. It is essential that employees who come forward to report abusive behaviour are protected from retaliation and that disciplinary measures are taken against proven perpetrators in a fair and expeditious manner. Various options for reporting, including informal processes alongside the formal one, should be kept available to encourage reporting and resolution.
13. Harassment, abuse of power and discrimination appear to be persistent and pervasive at WFP. The external review points to them being perceived more largely in headquarters and amongst consultants. Based on the external review, action should start at headquarters. Earlier, the GSS already showed that such behaviours need to be tackled throughout the organization.
14. It is important that WFP increase the engagement of its employees. To achieve this, it is fundamental that employee trust in the organization is restored, which starts with management acknowledging the problem, recognizing any mistakes made in the past and the shortcomings of ongoing actions, putting in place effective measures to remedy those and convincingly supporting those affected.
15. The main specific observations made by the JWG, based on inputs provided by the sub-working groups and the support group, in relation, respectively, to harassment, abuse of power and discrimination issues and sexual harassment at WFP are summarized in the following sections.

Harassment, abuse of power and discrimination

16. Employee survey results and discussions with employees at every level of the organization reveal that there are problems with abuse of authority (also referred to as “abuse of power”), discrimination and broader workplace harassment within WFP.
17. Improvements should be made in the way the organization communicates on these matters and on the protection of those who report abuse. Initial WFP outreach efforts have received a positive reception, with 83 percent of external review respondents indicating that WFP is doing a good job educating employees about culture and values and that efforts in that regard should continue and expand. According to the external review, however, employees who have experienced or witnessed abusive behaviour during their careers are less likely to report future incidents, highlighting the need for additional steps.
18. To bring about the necessary change, further action should be taken in many areas, such as articulating and driving a new management culture; reviewing the WFP Code of Conduct; deriving a set of related core competencies; seeking to purposefully address all organizational divides; ensuring effective whistle-blower protection; reforming key human resources policies and practices; making appropriate adjustments to the organization’s internal justice system; and working on effective internal communications. The urgent need for actions in these areas is reflected in the JWG recommendations.

19. In addition, the organization should establish specific measures to tackle the divide between staff and non-staff (consultants and other short-term personnel). While WFP needs contractual flexibility to meet short-term demands in emergency situations, the use of short-term contracting modalities outside of these situations may contribute to employment insecurity that generates a climate of fear, stress and anxiety that can drive abusive behaviour or increase perceptions of vulnerability. It is therefore important that short-term contracting modalities be applied properly and restrictions on their use for ongoing staff functions be introduced. To that end, WFP should ensure that non-staff assignments are truly temporary and time-bound in nature and that non-staff are not working side-by-side with staff in the long-term doing the same jobs as staff without the corresponding employment stability, compensation and benefits. Moreover, WFP should provide regular data on the sizeable, locally managed non-staff workforce, including numbers, locations, profiles and functions. Finally, the organization should ensure that non-staff effectively benefit from the same protections against misconduct and retaliation as staff.⁴
20. Drawing upon global best practices, experts in the support group also shared reflections on harassment, abuse of authority and discrimination on the basis of the external review and their conversations with individual JWG members, including suggesting that WFP:
- Shift to conscious, responsible leadership that empowers employees to speak up, including identifying key attributes that it wants to see in its leaders, investing in and reinforcing them through training and enforcing them through performance evaluations that specifically address efforts to prevent and redress abusive behaviour;
 - Address, through better communications, the gap between low employee perceptions of accountability (i.e. "abusive conduct is tolerated and never punished") and the fact that perpetrators actually do face discipline at WFP. This could also include reviewing the current process for reporting misconduct to determine what works well and what does not, taking steps to accelerate disciplinary procedures without sacrificing due process, and ensuring that investigators have the necessary skills to engage affected employees and witnesses;
 - Offer employee training in bystander intervention (how to be an ally to an affected employee), which would equip them to intervene in various ways to either prevent or arrest abusive interactions while they are happening or to support colleagues affected by abusive behaviour;
 - Review its Code of Conduct and emphasize that compliance with the standards of conduct is mandatory;
 - Monitor those who have reported abusive behaviour, provide proactive, ongoing support and keep track of their employment history to ensure that they do not suffer retaliation as a result of speaking up.

⁴ The provisions of Executive Director's Circular OED2018/007 and of Executive Director's Circular OED 2008/003, "Protection against retaliation for reporting misconduct and for cooperating with duly authorized audits and investigations (WFP Whistleblower Protection Policy)", apply equally to all employees, no matter their contract type. WFP should ensure that employees are, and believe that they are, in a position to avail themselves of the safeguards that these policies provide regardless of their contract type.

Sexual harassment

21. Sexual harassment is any unwelcome sexual advance, verbal or physical conduct of a sexual nature, be it an act of sexual violence or any other behaviour of a sexual nature, that might reasonably cause offense or humiliation to another person. It usually expresses and reinforces gender inequalities of power, even among peers. The powerful can use sexual harassment as part of an exchange where their power allows them to confer a good (e.g. a job, promotion or invitation to attend a meeting) in return for sexual engagement. Sexual harassment can also create hostile or intimidating environments without relying on specific exchanges. While often involving a pattern of behaviour, it can also take the form of a single incident. Women are by far the primary targets of sexual harassment, but men can also be targeted.
22. The external review reports that “sexual harassment was reported as occurring the least of the five types of abusive behaviour explored, with 8 percent of respondents (641 people) indicating they have experienced or witnessed sexual harassment at WFP. Women indicate they have experienced or witnessed sexual harassment significantly more than men (13 percent of women vs. 5 percent of men). The most common form of sexual harassment mentioned was suggestive sexual comments or jokes, which speaks to the type of inappropriate interactions that are indicated as occurring within WFP”.⁵
23. Acknowledging WFP actions under way to increase the reporting of sexual harassment, investigate all cases reported and ensure appropriate disciplinary action, the JWG also sought to better understand factors leading to sexual harassment in order to identify ways to prevent its occurrence. While it is commonly accepted that there is no single cause of sexual harassment, some of the factors that may explain its occurrence include power dynamics between potential perpetrators and victims and a heightened vulnerability of certain categories of employees. Furthermore, studies have revealed that some individuals are more inclined to commit certain forms of wrongdoing due to pre-existing beliefs (including gender-based ones) stemming from their education or culture or the development of their own personality.
24. As concerns models of perpetrator behaviour, the JWG found that:
 - Abusive behaviour is strongly correlated across its various categories, e.g. a higher prevalence of sexual harassment will tend to be accompanied by higher rates of abuse overall;
 - Although abusive behaviour is enacted at an individual level, the systems, structures and local conditions of any workplace can provide the setting in which individuals may act. For example, a workplace where disciplined and ethical behaviour is insisted upon narrows the scope for abuse of power in all its forms. The professional atmosphere can be compromised by hardship conditions, a corrosive environment and severe work pressures. Markers of gender inequality also allow sexual harassment to flourish. These include sexist or misogynistic language, conservative norms of gender or sexuality that limit the roles women play, limited or no access to flexible work arrangements or career penalties for using them, and strong norms of male bonding that intensify sexism and encourage group loyalties to override personal integrity;
 - The ethos of a working climate is to a strong degree determined by codified behavioural expectations, which are in turn set and enforced by management;

⁵ See annex IV, p. 23.

- Sexual harassment usually takes place in the context of power differentials; and
- Sexual harassment and sexual exploitation and abuse are linked in that perpetrators may act similarly towards employees and beneficiaries if the relevant enabling conditions exist.

In addition, areas that could be clearly influenced at the institutional level were identified:

- Workplace barriers such as policies and rules, accepted behavioural patterns and the instruments in place to regulate and sanction inappropriate behaviour;
- Strengthening the means by which victims can be encouraged to report abuse and harassment and potential victims to resist abuse and harassment (victim resistance); and
- Ensuring that swift and decisive disciplinary action is taken with regard those who perpetrate abuse.

25. The JWG notes the positive impact that overall changes in workplace culture, as well as stronger reporting and disciplinary measures, will have in reducing sexual harassment. There are, however, areas specific to both the occurrence of sexual harassment in the contexts where WFP works and its reporting and follow-up that were not adequately addressed in the external review and therefore require further analysis or action, including:

- Underreporting and fear of reporting, specific to incidents of sexual harassment, and related stigma and consequences;
- Cultural differences among internationally diverse staff members at duty stations, which may affect interpretation of behaviour and civility in the workplace;
- Limited awareness of the standards and rules in place at WFP, including basic definitions of undesirable behaviours and processes of reporting – informally and formally;
- Limited or unappealing communication on reporting outcomes and measures taken against proven perpetrators;
- Difficult living and working conditions for employees working in hardship duty stations (some root causes of bad conduct in extreme and harsh duty stations may be alcohol abuse, distance from family); and
- Movement of perpetrators from one organization to another, especially as non-governmental organizations are not currently part of the ClearCheck and sexual exploitation and abuse offenders' databases.⁶

26. Experts in the support group have highlighted that a key difference between sexual harassment and other forms of abusive behaviour is that sexual harassment has a gender dimension, which calls for specifically tailored, gender-specific responses to deter and redress the problem. For instance, women – even if working in the same contract category – are likely to hold less institutional and authoritative power than a man due to patriarchy in broader society. This is especially the case for a woman who is pregnant or has primary caregiving responsibilities. This may be further exacerbated for female employees

⁶ ClearCheck is a confidential screening database to avoid the hiring of personnel who have been dismissed from other United Nations entities for having engaged in sexual harassment or who have left organizations pending investigation of allegations of sexual harassment against them. Through the same platform, WFP can screen individuals against a similar United Nations system-wide database of perpetrators of sexual exploitation and abuse. More information is provided in annex III, para. 7.

holding non-staff contracts who experience the added dimension of job insecurity. Identifying credible and effective solutions to these contractual vulnerabilities is a necessary step in sustainably addressing sexual harassment.

27. Moreover, sexual harassment is not simply a consequence of gender ratio (i.e. the representation of women at different levels of position or seniority), but also of the organizational environment. The support group consequently advised that WFP review its gender parity action plan to ensure that it considers all drivers of gender inequality and assess its human resource structures and processes (from recruitment to remuneration and promotion) to better understand the factors needed to turn the organization into a truly inclusive workplace where women and men participate on an equal playing field.

Recommendations for a durable change in workplace culture at WFP

28. The JWG urges WFP to implement decisive actions in the recommended areas of focus identified by the advisory company upon completion of the external review, in accordance with the matrix of management responses set in out in annex VI.
29. Furthermore, drawing on discussions within the JWG and its sub-working groups, the external review and GSS results, other documentation examined and the advice of the experts in the support group, the JWG provides the following recommendations for achieving a durable change in workplace culture at WFP. These recommendations are meant to inform a detailed comprehensive action plan to be developed by management, which should factor in ongoing actions, for 2020 and beyond.

Reaffirming values

30. WFP should review its Code of Conduct and continue global awareness-raising efforts on values.
31. WFP should redouble awareness and prevention efforts through a holistic approach to ensure a common understanding of existing values, standards of conduct and available protection and reporting mechanisms. This includes tailoring awareness-raising initiatives to the field context and/or local or regional differences and incorporating topics of diversity and inclusion, as well as “peer speak-up” tools to empower vulnerable targets who traditionally do not voice their concerns (e.g. women, witnesses, consultants, service contract holders).
32. WFP should also expand “tone from the top” accountability through all layers of management, making clear that abusive conduct is unacceptable, clarifying options for reporting and providing reassurance that disciplinary action will be taken. This includes providing tools to empower management in communicating and taking appropriate actions when unacceptable behaviour comes to its attention.

Role of leadership

33. Change starts at the top. Focus groups held during the external review identified leadership as the number one element that participants would like to see improved⁷ and revealed that “although a large proportion of employees feel leaders have an intention to address improper conduct and set the right example, there are still challenges associated with leadership and the actions of leaders at WFP”.⁸ WFP’s ethical culture should be first and foremost improved by reminding leaders that they should promote and role-model the reaffirmed values and standards of conduct, starting with senior leaders across the

⁷ See annex IV, p. 23.

⁸ Ibid.

organization, trickling down to all layers of management (especially mid-level managers who handle day-to-day operations). This includes, in addition to the tools noted in paragraph 32 above, providing guidance and support to management. Special attention should be given to headquarters, where the problems seem to be more significant.

34. WFP should articulate and drive a new management culture, develop new managerial competencies for people management, establish managerial accountability and make visible changes. Moreover, the organization should offer comprehensive training on leadership skills, including support and training for managers at all levels commensurate with their responsibilities, as well as ensure that all new managers receive such training before they take on new responsibilities. In this framework, all managers should be trained specifically to encourage the reporting of abusive behaviour in all forms and on how to respond properly to reports reaching them; to identify possible employee vulnerabilities and take measures to avert or mitigate them (risk management); and to make known the mechanisms in place to protect employees from retaliation.
35. Ultimately, though, management must also lead by example. Ethical leadership and leadership ability must be given greater importance in recruitment and training. The JWG was pleased to note that, immediately following the release of the external review results, the Executive Director engaged with WFP management at headquarters and in the field to update them on the findings and discuss management's essential role in modelling and driving ethical behaviour. The Executive Director also announced to all staff the launch of a "leadership forum", starting at headquarters, to discuss with leaders across the organization the steps that they can and should take to improve the workplace culture in their offices and units. These efforts should accelerate and continue.

Employee engagement

36. Every person at WFP has the right to be treated with dignity and respect and to work in a safe environment free from harassment, abuse, discrimination and retaliation. Every WFP employee also has a corresponding responsibility to actively promote such an environment. The change needed at WFP cannot occur without engagement from all. For this reason, employee insights on the subject were surveyed twice by the organization in the last two years as part of the GSS and the external review exercises. For the same reason, this report should be brought to the attention of all WFP employees, as was done with the external review outcomes in October 2019. Employees should be fully informed of developments in the areas covered in this report.
37. As said, change starts from the top. It should cascade from there. Given its large size, decentralized structure and geographic spread, enabling frontline managers to represent the values of WFP will be key to behaviour change across the organization. Immediate supervisors are important individuals in employees' working lives. Supervisors set the tone for behaviour, have the power to implement rewards and correction on an everyday basis and can make or break a person's career. What they say and do will often be echoed by the team members they supervise. Managers should be able to be confident that WFP supports them in doing the right thing and, further, that there are significant benefits for them in adopting management strategies that align with WFP's values and standards of conduct. For example, they should realize that a harmonious workplace is also a more efficient one.
38. Change should nevertheless involve everybody. To this end, employee meetings should be organized by managers and by employees to discuss planned actions and to chart progress made and change experienced on the ground. These meetings should be organized at headquarters and in regional bureaux, country offices and other WFP offices. Inter-divisional and cross-functional meetings of employees, including peer-led group reflections taking

place in the absence of supervisors, should also be considered to support staff and non-staff involvement and advise management on change.

39. Bystander, or “ally”, training may also be one useful response intervention. However, it is important to ensure that bystander training approaches do not have the unintended consequence of placing responsibility for correcting abusive behaviour on those witnessing it (and facing the associated risks of doing so) while absolving senior management from responsibility for dealing authoritatively with systemic misconduct and abuse.

Policy and system revisions

40. WFP should invest in its overall capacity to prevent and address abusive behaviour, to enable the continuous development of other prevention and remedial mechanisms, foster safe and respectful work environments throughout the organization and address related issues more effectively. Furthermore, the organization should assess, transparently communicate and set expectations concerning its internal justice system, including by reviewing reporting structures and, if necessary, modifying them to ensure that all employees have equal access to internal justice mechanisms, regardless of language, gender, grade or contract type, taking into account the possible impact of power imbalances.
41. Initiatives for protecting potential victims should be promoted, specifically engaging Staff Wellness, Security and other relevant WFP offices to proactively identify care solutions and support for affected employees. Moreover, mechanisms enabling Human Resources to advise managers proactively with respect to performance management and conduct matters should be in place.
42. As change should include everyone, in reviewing its Code of Conduct WFP should derive a revised set of core competencies and seek to address all organizational divides purposefully, including but not limited to gender, diversity, the divide between staff and non-staff and the divide between managers and staff. This needs to include a particular effort to address WFP’s use of non-staff contract modalities and to ensure that all employees effectively benefit from the same protections against misconduct and retaliation.
43. Key workforce management policies and practices should be reformed. Besides those relevant to recruitment, promotion and career development, the reform of annual performance evaluation processes, including by instituting regular anonymous multi-rater feedback and strengthening the checks and balances against discrimination, favouritism and abuse of power, is needed. To support a true meritocracy, the JWG recommends that WFP avail itself of an external expert to make concrete recommendations on improving the current system (i.e. the length of the process, the scope of what is measured and how) and enabling managers to have honest, respectful conversations with employees and Human Resources to elaborate on reasonable career expectations for employees working under all contract types.
44. While ensuring swift action to protect and support those who report or witness abusive conduct, WFP should also monitor the career paths of those who file complaints to ensure that no retaliation or marginalization occurs over time.

Disciplinary processes

45. It is commonly believed that attitudes must first shift if behaviour in organizations is to change. This is not necessarily the case. While a focus on employee education and culture change alone may eventually change the underlying attitudes of employees, in the shorter term swift, decisive, consistent and visible responses to abusive behaviours will have an immediate impact on behaviour, from which changes in attitudes are likely to follow. The explanation for behaviour change preceding changed attitudes is that when people are

compelled to act in a particular way, they try to reduce cognitive dissonance by changing their attitudes to align with their behaviours.^{9,10} Thus when employees see specific actions that reflect new organizational norms, such as abusive behaviours being called out or harassers being disciplined, they adjust their behaviour accordingly and, to avoid dissonance, also their attitudes.¹¹ Such decisive and courageous responses should be implemented irrespective of the seniority, location or employment contract of the staff members implicated or their apparent importance to the organization.

46. WFP should work to earn greater confidence and trust from its employees in respect of its internal justice system, including by making appropriate adjustments to it. Disciplinary action should be taken against proven perpetrators while ensuring that complainants and witnesses are protected from retaliation and their careers are not derailed.

Communications, accountability and transparency

47. A comprehensive, expert and prolonged communication strategy should be developed, that sets clear expectations that the values of the organization will be adhered to and attempts to address backlash, which is a problematic but inevitable component of any major structural and behavioural change strategy. While the notion of “culture” may be ambiguous, the language of structures, processes, policies, everyday practices and norms should be preferred in that these are easier to define and communicate and hence change. The organization should re-conceptualize its internal communications approach and develop a cohesive internal communications strategy, training and manager support to improve two-way communication within teams, for example by using 360° or 180° assessment tools.
48. In connection with these efforts, particularly the effort to ensure that policies and procedures are visible and easy to understand for all employees, WFP should improve the frequency of its communication on formal reports of abusive conduct (including information on reports received and investigated, confirmed cases of abusive conduct and measures taken), while maintaining confidentiality on all individuals involved in investigations, to provide reassurance that actions are regularly taken when cases of misconduct are substantiated. A scorecard with statistics from each of the reporting and support mechanisms (Office of the Inspector General, Office of the Ombudsman, Ethics Office, Human Resources, Staff Wellness, etc.) could be considered, along with a pocket guide describing options from different perspectives for victims and witnesses. Weekly or bi-weekly series of educational videos, articles or other short and interesting input made available to all and introduced and commented on by the Executive Director and other senior leaders could be planned as well. These materials should have a personal touch and provide real-world examples at the workplace level that communicate WFP’s commitment to the change initiative.

⁹ Poortinga and others. 2013. “The introduction of single-use carrier bag charge in Wales: Attitude change and behavioural spillover effects.” *Journal of Environmental Psychology*, 36, 240–247.

¹⁰ Schuitema and others. 2010. “Explaining differences in acceptability before and after implementation of a congestion charge in Stockholm”. *Transportation Research Part A*, 44, 99-109.

¹¹ Smith & Louis. 2009. “Group norms and the attitude-behaviour relationship”. *Social and Personality Psychology Compass*, 3/1, 19–35.

Next steps

49. Planned comprehensive audits against defined, targeted improvements and a commitment to invest significant resources over time are crucial for continued improvement. Therefore, WFP is requested to develop a comprehensive action plan (CAP) taking in to consideration ongoing actions and the findings and recommendations in this report. Alongside the CAP, the organization should establish a systematic outcome monitoring framework that includes quantitative and qualitative data collection (e.g. workforce data trends, 'pulse' surveys, reporting statistics, focus groups in 'hot spots'). The CAP should be a living document that can be further enriched as WFP's insights and experience grow, taking into account additional inputs from the JWG and external experts.
50. Proposals on mechanisms to help support change have been tabled and require further JWG discussion. One suggested option is the establishment of a small, informal and accessible advisory panel including Board members, staff members and external experts to follow the implementation process. Another proposed approach is the Executive Director's appointment of a dedicated team to follow the implementation process, drawing on internal and/or external expertise and keeping the Board regularly informed of progress in driving workplace culture change and with the CAP through the Bureau and regular informal consultations.
51. Moreover, in order to contribute fully to the body of knowledge underlying the CAP, the JWG will require additional time to complete its work in the area of sexual exploitation and abuse. Also, more time is needed to conduct additional data analysis in order to provide further actionable recommendations specific to the prevention of, and protection from, both sexual exploitation and abuse and sexual harassment. This is expected to be completed through a series of workshops in the coming weeks.
52. Therefore, the JWG proposes that the duration of its mandate be extended until the first regular session in 2020 to allow it to present concrete findings and recommendations in these areas to inform the CAP as a living document to be rolled out in 2020. The Executive Board should be kept regularly apprised of progress in driving workplace culture change and with the CAP, through existing mechanisms.

ANNEX I

Composition of the joint working group

Executive Board members:

List	Name and title	Country
A	Her Excellency Lineo Irene Molise-Mabusela, Ambassador and Permanent Representative <i>Alternate Co-Chair from 6 September 2019 to present</i>	Lesotho
	His Excellency Mohamed Elghazali Eltigani Sirrag, Chargé d'affaires a.i., Deputy Head of Mission and Deputy Permanent Representative (until February 2019) Mr Sid Ahmed M. Alamain Hamid Alamain, First Secretary and Alternate Permanent Representative (from March 2019)	Sudan
B	Mr Yousef Juhail, Counsellor and Permanent Representative	Kuwait
	Her Excellency Asmahan Abdulhameed Altoqi, Ambassador Extraordinary and Plenipotentiary and Permanent Representative <i>Co-Chair from 6 September 2019 to present</i>	Yemen
C	Ms Sylvia Wohlers de Meie, Minister Counsellor and Deputy Permanent Representative (from May to July 2018) Her Excellency Karla Samayoa Recari, Ambassador Extraordinary and Plenipotentiary and Permanent Representative <i>Co-Chair from July 2018 until 3 September 2019</i> Ms Karen María Ordoñez Taracena, Minister Counsellor (from 9 September 2019)	Guatemala
	Ms Angélica Jácome, Permanent Representative (until 6 September 2019) Mr Roberto Bermúdez, Alternate Permanent Representative (from 9 September 2019)	Panama
D	His Excellency Dr. Hans Hoogeveen, Ambassador and Permanent Representative	Netherlands
	Mr Bruce Campbell, Counsellor and Alternate Permanent Representative	Switzerland
	<i>Backup: Ms Karen Garner, Counsellor and Deputy Permanent Representative (until August 2019)</i>	Canada
E	Ms Zora Weberová, Counsellor and Permanent Representative	Slovakia
	His Excellency Artur Pollok, Ambassador and Permanent Representative <i>Backup: Ms Magdalena Walczak, Advisor (until June 2019) and Ms Agnieszka Galazka (from July 2019)</i>	Poland

WFP Management members:

Name and Title
Ms Valerie Guarnieri, Assistant Executive Director, Programme and Policy Development* Co-Chair
Mr John Aylieff (until July 2019) and Ms. Joyce Luma (from August 2019), Directors, Human Resources Division
Ms Patricia Ann Kiko Harvey, Inspector General and Director, Oversight Office
Mr Bartolomeo Migone, General Counsel and Director, Legal Office
Ms Bonnie Green, Chief Ethics Officer and Director, Ethics Office
Ms Gabrielle Kluck, Ombudsman and Director, Office of the WFP Ombudsman and Mediation Services

* Co-Chair – The Assistant Executive Director’s portfolio changed from Operations Services to Programme and Policy Development in July 2019 as part of a broad organizational restructuring.

- Ms Harriet Spanos, Secretary to the Executive Board, ensured the necessary services to facilitate joint body meetings.
- Other representatives of the Executive Board, WFP management, as well as external experts were invited to JWG meetings as advisors or observers, as deemed appropriate.

ANNEX II

Title and composition of the sub working groups

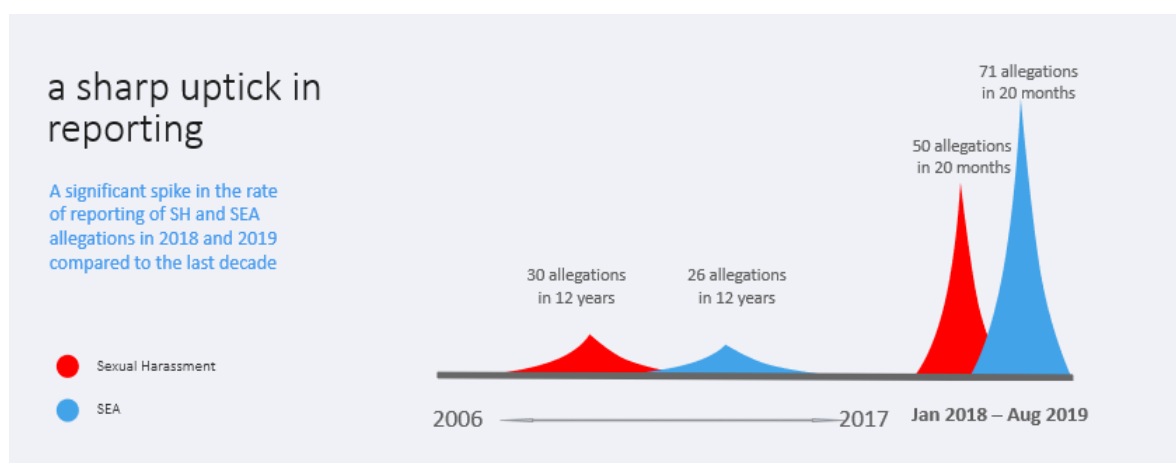
Sub Working Group on: Safeguarding against sexual harassment and sexual exploitation and abuse	Sub Working Group on: Protection from harassment, abuse of authority and discrimination
Sudan (List A)	Lesotho (List A)
Yemen (List B)	Kuwait (List B)
Guatemala (List C)	Panama (List C), Co-Chair until 6 September 2019
Switzerland, Co-Chair (List D)	Netherlands (List D), Co-Chair from September 2019
Slovakia (List E)	Poland (List E)
WFP Chief Ethics Officer, Co-Chair	WFP Director, HRM, Co-Chair
WFP Inspector General	WFP Ombudsman
WFP General Counsel and Director, LEG	WFP General Counsel and Director, LEG

ANNEX III

WFP actions to protect employees from harassment, sexual harassment, abuse of power, and discrimination

Updating existing policy to encourage employees to speak up

1. In March 2018, WFP issued its revised policy on harassment, sexual harassment, abuse of power, and discrimination (HSHAAD) as an Executive Director Circular. Several new approaches were introduced with the HSHAAD policy, making it easier for employees to speak up about abusive conduct, including by removing any time limit to report abuse; enabling anonymous reporting and allowing witnesses to also report abuse. A new hotline to be rolled out in the last quarter of 2019 will further ensure greater anonymity by allowing contact by investigators with those who report abuse, through a numbering scheme that will mask all contact information.
2. The HSHAAD policy also placed a heightened focus on providing protection and remedies for employees who report, or are affected by, abuse, such as suspending suspected perpetrators, temporarily relocating affected employees, other interim measures (alternative duties or reporting lines, special leave arrangements), and expanding protection from retaliation. It established an inter-divisional standing committee consisting of the directors of the Human Resources Division (HRM), the Legal, Ombudsman, and Ethics Offices, and the Inspector General to oversee its implementation and enable effective measures for protecting affected employees. The HSHAAD policy also placed special responsibility on managers and supervisors to ensure a safe and harmonious work environment and to act on allegations of abusive conduct.
3. Over the past couple of years, WFP has made significant progress and today has an environment where many employees have grown more confident to speak up regarding incidents of abusive conduct. The table below, for instance, shows the increase in the number of formal reports of sexual harassment and sexual exploitation and abuse (SEA) received by WFP investigators as of 1 January 2018, compared to the preceding 12 years.



Reinforcing capacity and responsiveness of the Office of the Inspector General

4. WFP bolstered the investigative capacity of the Office of the Inspector General (OIG) by USD 1.3 million per year since 2018, doubling the number of investigators from 11 to 22 in order to address the significant increase in reporting of abusive conduct since the HSHAAD policy was issued. In addition, OIG engaged an external firm to review its approach to

investigations, and conducted a peer review of all investigative procedures in 2018. Both exercises concluded that OIG has the capacity, procedures, and qualifications to perform the investigative work properly, with investigators who have the appropriate training and experience to do so. Other initiatives to ensure expediency and transparency include the implementation of a “proxy investigation” process to move less complex and less serious complaints to the field for evidence gathering and the appointment of a liaison officer to keep complainants and subjects informed of the progress of the investigations.

5. The Executive Director has asked the Inspector General to prioritize and complete within 90 days the investigation of any cases related to sexual harassment and abuse, as also requested by the United Nations Secretary-General to all United Nations principals.

Ensuring accountability within WFP and United Nations system wide

6. In line with WFP’s zero-tolerance of abusive conduct, the organization prioritises the review of, and takes firm disciplinary action in, when allegations of abusive conduct are substantiated, including through separation of employees and bans from future employment for separated employees. All employees are provided with a copy of an annual report on disciplinary actions taken, published by the Director, HRM. Additional personnel in OIG, as well as in HRM and the Legal Office, will allow WFP to further expedite the processing of disciplinary cases.
7. In November 2017, the United Nations System Chief Executives Board for Coordination (CEB) established a task force on addressing sexual harassment within the organizations of the United Nations system to drive joint action to tackling sexual harassment, strengthening victim-centred prevention and response efforts, and fostering a safe and inclusive working environment across the United Nations system in key priority areas. As part of the CEB task force, WFP co-chaired a technical sub-working group on “improved reporting”, which established the guidelines for a confidential screening database (“ClearCheck”) to avoid the hiring of personnel dismissed from other United Nations entities for having engaged in sexual harassment or who left organizations pending investigation of allegations of sexual harassment against them. As of 1 August 2019, WFP is carrying out systematic ClearCheck verifications prior to the confirmation of any new appointment. Through the same platform, WFP can screen individuals against an analogous United Nations system-wide database of perpetrators of sexual exploitation and abuse. In addition, WFP has revised its hiring procedures to require disclosure of any investigations or disciplinary processes against applicants, as well as vetting of applicants against WFP’s own disciplinary records.
8. In the same technical sub-working group, WFP led in developing a mechanism to collect and analyse data across the United Nations system on sexual harassment to ensure timely and accurate reporting and to enable entities to revise their policies and approaches based on it.

Awareness-raising activities

9. In 2018, HRM started conducting face-to-face awareness-raising sessions on behavioural standards to help prevent abusive behaviour and, where it occurs, enable employees to identify and report it.¹ By the end of 2019, nearly 5,000 employees across 25 WFP country offices and headquarters will have participated in these sessions, with plans to reach a total of 10,000 people in an additional 25 countries by the end of 2020.
10. In the same period, WFP developed and rolled out a “Respect Each Other” campaign in more than 40 countries, which emphasizes the benefits of - and provides guidance on how to build a - respectful workplace culture. This is now being rolled out to the remaining countries and in headquarters divisions.²

Driving gender parity across the organization and other initiatives

11. The Executive Director has set ambitious targets for all managers to drive gender parity across the organization, which is seen as a fundamental step in ensuring a safe and respectful workplace environment, and particularly in mitigating the risk of sexual harassment and sexual abuse. This drive towards gender parity is being delivered through an Action Plan which was launched in 2018 by WFP and adopts the United Nations System-wide Strategy on Gender Parity, launched by the Secretary-General in 2017. The Action Plan provides a road map for helping WFP progress towards gender parity at all levels and offices in the organization, and seeks to leverage on best practices that have contributed towards bringing more women in to the organization. The Executive Director is personally monitoring implementation of these targets to ensure that gender parity is achieved.
12. Building on existing systems to assess leadership capabilities, manage employee performance and support career development, WFP is developing several initiatives to measure the effectiveness of leaders and strengthen management skills. For example, in 2020, WFP, through HRM, intends to roll out 180 assessments (supervisee, manager, manager’s supervisor) for all managers; an induction programme for current and prospective Country Directors; and a streamlined promotion process that incorporates sound people management strengths as a factor in determining suitability for the higher grade. In addition, measures are being reviewed to improve the wellbeing of more vulnerable employees, including non-staff categories.

Conducting the 2018 Global Staff Survey

13. WFP conducted its third GSS in 2018, following earlier surveys in 2012 and 2015. For the first time, the GSS included questions on sexual harassment alongside questions on harassment. With a response rate of 85 percent, the 2018 GSS represented WFP’s highest participation rate ever, indeed the highest participation on record for any United Nations system entity.

¹ Aimed at raising employees’ awareness on “Behavioural Standards and Protection from Abusive Conduct”, this initiative involves staff relations’ experts, preferably of different genders, conducting face-to-face awareness-raising sessions for groups of up to 50 employees (from all contract modalities) at a time. The sessions focus on WFP’s revised approach to protection from harassment, sexual harassment, abuse of authority and discrimination, as well as on issues emerging from GSS responses on standards of conduct and disciplinary practice.

² This global campaign aims to engage staff in fun, team-building activities that lead to meaningful conversations among staff at all levels. There are four pillars to the campaign: Awareness, Inclusion, Fairness and Humanity. Each pillar is designed to take participants on an awareness-raising journey that leads them to devise a personal and a team charter for upholding respect and dignity in the workplace.

14. While 88 percent of staff who participated in the 2018 GSS said they were proud to work for WFP, their responses regarding abusive conduct were cause for concern. Eighteen percent of participants said they had experienced harassment in the past year, but only 48 percent said that they would trust WFP to protect them if they spoke out about possible wrongdoing.
15. In response to the GSS results, the Executive Director held a meeting with all employees in July 2018 where he shared these findings and emphasized that managers had a special responsibility to set the tone, including by listening more attentively to employees. Country directors and headquarters division heads were also instructed to engage their respective teams on the GSS results through group discussions and to invite proposals for improving their working environments. These measures were aimed at fostering a culture within WFP where abusive conduct would be discouraged.

ANNEX IV**External review of workplace culture and ethical climate at World Food Programme (Willis Towers Watson)**

The Willis Towers Watson report on the external review of workplace culture and ethical climate at World Food Programme is available at the following link: <https://docs.wfp.org/api/documents/WFP-0000108824/download/>.

ANNEX V**Short biographies of members of the support group****Prof. Paula McDonald, Queensland University of Technology, Brisbane, Australia**

Paula McDonald is Professor of Work and Organisation and Associate Dean, Research in the QUT Business School and visiting Professor at Queen Mary University London. Her research addresses topics which span: the dimensions of digital platform work; education to work transitions for young people; social media in employment; customized and flexible work; and socio-legal aspects of workplace discrimination. She has published over 100 academic journal articles, books, chapters and industry reports in these fields.

Prof McDonald's research on workplace sexual harassment which spans a 10 year period, addresses the causes and solutions to this costly workplace problem. She has worked with the Australian Human Rights Commission on successive national reviews and prevalence studies and related codes of practice for employers. She has also provided expert advice and testimony to the Canadian House of Commons, the United States Equal Employment Opportunity Commission, and Legal Aid Queensland (Qld). In 2018, Prof. McDonald contributed to the development of new sexual harassment policies governing the United Nation's global workforce and locally, delivered workplace training to Qld Corrective Services managers. Recently, she was the academic member of an expert panel for the Victorian Equal Opportunity and Human Rights Commission's review into sexual harassment and predatory behaviour in the Victoria Police (2016–19) and an invited member of the University of California Berkeley global Comparative Equality and Anti-Discrimination Group. Prof. McDonald is also exploring the impacts of the global #MeToo movement and her research on workplace sexual harassment has been published in journals including *Work, Employment & Society*, *International Journal of Management Reviews* and *International Journal of Human Resource Management*.

Dr. Bettina Palazzo, Business School Lausanne, Lausanne, Switzerland

Bettina Palazzo is as an award-winning researcher, consultant, and lecturer in business ethics and corporate social responsibility (CSR). She has been deep down the supply chain of the food industry and knows that you cannot reduce ethics and human dignity into checklists. Thanks to her over 25 years in consulting, she is highly structured and hands-on. Her past experience has helped her to become very creative in the development and application of interactive, fun and impactful learning methods.

She has pioneered and started the development of the business ethics practice at KPMG Germany in 1997. In her consulting work she is focusing on the grey areas of ethical dilemma situations and the psychological dynamics that lead to unethical behaviour. In addition to her consulting work she is teaching at various Swiss universities where she aims at bridging academic theory and practical application. She also works as a trainer and coach in transformational leadership. Her research on the intercultural differences between United States of America and German Business Ethics won the Max-Weber-Award for Business Ethics.

ANNEX VI

External review recommendations – Management responses

External review, recommended areas of focus	Comments by WFP	Timeframe
Leadership		
<p>1. Leadership team effectiveness program for senior leadership team (Executive Director and his direct reports) to raise awareness of their role in creating the culture change required.</p>	<p>Agreed. Since 2017, the Executive Director has been particularly vocal in communicating WFP's zero-tolerance for any form of abusive behaviour in both written and verbal communications to employees. Concrete actions to address the causes and effects of abusive conduct should continue, including by reminding senior leaders across the organization that change starts at the top and they should promote and role-model reaffirmed values and standards of conduct.</p>	Ongoing
<p>2. Design, develop and implement leadership competencies and behavioural KPIs for leaders including an associated 360 assessment tool that can be used to assess performance on these KPIs</p>	<p>Agreed. A set of core leadership competencies and behavioural KPIs is in place and ad-hoc 360/180-degree assessments are carried out. These tools should be further developed and made part of the annual performance review processes for all managers.</p>	2020
<p>3. Introduce rigorous selection process to identify management and leadership talent, inclusive of the assessment of key leadership capabilities and behaviours that WFP expects their leaders to display.</p>	<p>Agreed. The selection process currently places considerable focus on ensuring that candidates for leadership positions demonstrate identified leadership capabilities and behaviours. A more specific and direct assessment of the managerial style of supervisors could be introduced, alongside increased focus on strengthening their people management skills.</p>	2020

External review, recommended areas of focus	Comments by WFP	Timeframe
<p>4. Roll out of extensive leadership development program with 2 streams – one for Senior Managers and one for Managers/Supervisors [...], designed specifically for WFP [...]. [...] attendance at this training must be mandatory with built-in assessments (online and practical) to ensure leaders develop the necessary skills to meet the learning outcomes. Assessments must be completed by external leadership development experts. To support leaders in developing their leadership style and adapting their behaviour, we recommend providing an external coach for each country head to support them in effectively role modelling professional behaviour and guide their response to abusive behaviour when it is brought to their attention.</p>	<p>Agreed. WFP should continue building on a comprehensive suite of leadership development programmes in place for both its senior leadership team and its middle-management, including without limitation by developing and rolling out a bespoke induction programme for country directors/deputy country directors which will include extensive focus on effectively leading a team and promoting a respectful workplace culture. At the managers/supervisors level, WFP needs to become more systematic and plans to revamp its approach to ensure that managers are equipped with the key people management skills across the organization. External coaching should remain a component of several management support and development programs, and country heads should be provided coaching opportunities at different points of their careers. Given the organization's size and geographical reach the provision of coaching service cannot be continuous, but at different career points</p>	2020
<p>5. Introduce a mandatory handover period between country leads (1-3mths) to ensure effective briefing of new leaders. This needs to include a briefing specifically on people and performance of team members.</p>	<p>Partially agreed. WFP has more than 80 country offices, and a presence in several other countries. Country lead positions are typically filled through rotation of staff between countries and it is not possible to guarantee that a handover period will happen in all cases, while ensuring that no leading positions are left unattended at the same time. Nevertheless, current processes include provision for double-incumbency for an up to 4-week period to facilitate handover. This is also reflected in the WFP "Country Director Handover" guidebook, launched in 2015 and outlining a 5-week structured process for handover to incoming Country Directors to ensure programme continuity and preserve institutional knowledge and relationships. The rolling out of an induction programme during the reassignment of senior staff could also be considered.</p>	Ongoing

External review, recommended areas of focus	Comments by WFP	Timeframe
Talent management		
<p>6. Detailed review of talent management processes and practices to inform complete redesign of approach. New approach to be built on the foundations of fairness, meritocracy, equity and transparency. This review should include full talent management lifecycle including selection, performance evaluation, promotion, reassignment and contract renewal as a minimum.</p>	<p>Partially agreed. Values relating to fairness, meritocracy, equity and transparency are integrated into current talent acquisition and management processes. Nevertheless, key human resource policies and processes should be carefully assessed and reviewed as appropriate moving forward.</p>	2020
<p>7. Review of consultant role/contracts to identify improvements that can be made to reduce the vulnerability of this group including updating of contract conditions to provide better job security and more equity in terms of benefits.</p>	<p>Agreed. It is recognized that consultancies and other non-staff contracting modalities should be applied properly and that restrictions on their use for ongoing staff functions should be introduced.</p>	2020
<p>8. Build out the values to include behavioural expectations for all employees that explicitly describe how the values can be brought to life every day. These should align with the behavioural expectations set for leaders. This will then ensure all leaders and employees are aware of what is expected of them and enable any behaviours outside of those expected to be called out and addressed. In addition, when people display positive behaviour in line with the values this should be celebrated and rewarded.</p>	<p>Agreed. The organization should continue reviewing and revising its applicable behavioural values, principles and standards as appropriate. Positive behaviour should be the normal practice and not extraordinary. It should not be specifically rewarded, outside of truly exceptional cases.</p>	2020

External review, recommended areas of focus	Comments by WFP	Timeframe
<p>9. Upskilling of HR professionals to be business leaders that monitor and enforce the behavioural expectations, support leaders to consistently apply policies and procedures and be the go-to function for managing employee conflicts. HR must be positioned and resourced as a function whose purpose is to represent and enforce the organization's values and behavioural standards. They need to be separate and equal in authority to business leaders to ensure they are empowered to hold business leaders accountable for inconsistent application of HR policies and non-compliance with HR procedures. In addition, HR needs to broaden in perspective to own and drive WFP's approach to providing a positive employee experience for all staff as well as work collaboratively with other key bodies such as the Ombudsman and Ethics Office to provide a consistent and effective response to abusive behaviour.</p>	<p>Agreed.</p>	<p>2020</p>
<p>10. Review existing compliance and online training to determine effectiveness. Ensure WFP values and behavioural standards are clearly communicated in all trainings with a specific focus on continual education about abusive behaviour – what it is, what to do if you're experiencing it and the ramifications are for those perpetrating it.</p>	<p>Agreed. A suite of mandatory online trainings focused on ethics and standards of conduct is in place, which should continue to be updated. Face-to-face awareness raising initiatives about behavioural standards and abusive behaviour are also being carried out globally. These outreach efforts should continue and be further expanded.</p>	<p>Ongoing</p>
<p>11. Review existing career pathways and identify additional career tracks that would provide alternatives to people leadership. This will ensure those employees not interested in or deemed unsuitable for leadership positions have an avenue to continue to progress in their career at WFP</p>	<p>Agreed. Careful consideration should be given to implementing changes in this area (e.g. in the context of workforce planning and the development of the role of WFP staffing coordinators), subject to WFP's operational needs.</p>	<p>2020</p>
<p>12. Introduce matrix reporting so individuals have multiple managers that they have relationships with and more people will be in a position to contribute to the performance evaluation of employees. This will reduce the opportunity for managers to abuse the authority they have as other managers will be involved.</p>	<p>Partially agreed. Introducing matrix reporting would require major adjustments to the WFP management and accountability framework, however other means to achieve the same objective could be considered (e.g. emphasizing the role played by second line supervisors and functional reviewers in the performance evaluation of international staff).</p>	<p>2020</p>

External review, recommended areas of focus	Comments by WFP	Timeframe
<p>13. Gender analysis to explore the distribution of women in leadership roles across the organization.</p>	<p>Agreed. Gender distribution in leadership roles is being monitored. At the highest levels of leadership (grades P5 and above), women presently constitute 41 percent of WFP's workforce. In 2018, WFP launched a "Gender Parity Action Plan" which focused on ensuring equal representation of men and women at all levels within the organization.</p>	<p>Ongoing</p>
<p>14. Explore avenues for HR and the other departments involved in managing abusive behaviour to work more collaboratively in order to proactively address abusive behaviour.</p>	<p>Agreed. It should be noted that, under the HSHAAD policy, an inter-divisional standing committee consisting of the directors of HRM, the Legal, Ombudsman, and Ethics Offices, and the Inspector General was established in 2018 to address issues of abusive conduct through a coordinated, multidimensional approach. Additional forms of collaboration to proactively address abusive behaviour should be explored.</p>	<p>Ongoing</p> <p>2020</p>
<p>Accountability</p>		
<p>15. Instil an 'it's on us' mind-set such that all employees feel accountable for reducing abusive behaviour and creating a more harmonious and respectful workplace. This includes calling out abusive behaviour when it is witnessed by directly addressing it, through encouraging the victim to report it or reporting it themselves. Further, employees can promote the culture shift by raising the topic for discussion amongst themselves and in meetings, by embracing the topic rather than it being considered taboo. To empower employees to be accountable in this way, senior leadership needs to role model this by actively communicating about the topic including asking employees about their experiences and including the topic in meetings.</p>	<p>Agreed.</p>	<p>2020 and beyond</p>

External review, recommended areas of focus	Comments by WFP	Timeframe
<p>16. Introduce a requirement of transparency related to decision making. This will mean that leaders can only make decisions that are defensible and explainable. Employees will have more clarity regarding decisions that affect them including the reasons behind them which will prevent any opportunity for employees to misunderstand decisions or incorrectly attribute them to abusive behaviour.</p>	<p>Agreed. WFP already communicates clearly to its employees the reasons underlying a given administrative decision but is committed to do so even more clearly to avoid the appearance that a given decision is the result of abusive behaviour. The rationale and features of certain key HR processes (e.g. reassignment and promotion) could be the subject of specific communication and outreach efforts to improve levels of understanding on how they work and the safeguards in place to ensure fairness.</p>	Ongoing
<p>17. Introduce additional checks and balances for supervisors/managers as well as senior leaders on people related issues.</p>	<p>Agreed. Systematic 180-degree assessments for managers are planned to start from March 2020. Other actions to increase supervisors/managers accountability should be considered.</p>	2020
Reporting		
<p>18. Review entire formal and informal reporting approach including utilisation and effectiveness of avenues. Remove those avenues that are not adding value and invest time and resources into creating well-functioning and responsive reporting avenues. The number of reporting avenues should be kept to a minimum to reduce complexity and maximize effectiveness. Most importantly, all reporting avenues must ensure confidentiality is maintained throughout reporting and the investigation process.</p>	<p>Partially agreed. Formal and informal reporting avenues were carefully considered at the time of revising applicable provisions, leading to the introduction of the HSHAAD policy in March 2018. The HSHAAD policy and related processes should continue to be developed over time. WFP believes in allowing affected persons a wide choice in how they report their concerns.</p>	Ongoing
<p>19. Introduce avenue for anonymous reporting to allow people who would like to report but are fearful of retaliation are protected. This may be removed over time as reporting rates improve and fear of retaliation reduced. If this is already in place, greater communication is required to ensure employees are aware of this reporting avenue.</p>	<p>Agreed. Anonymous reporting is allowed under the HSHAAD policy. It is a specific area of focus in ongoing internal communications and awareness-raising initiatives. A new hotline to be rolled out in the last quarter of 2019 will further ensure greater anonymity by allowing contact by investigators with those who report abuse, through a numbering scheme that will mask all contact information.</p>	Completed.

External review, recommended areas of focus	Comments by WFP	Timeframe
<p>20. Redesign of investigation process to improve confidentiality, consistency in application of organization and HR policies and procedures. Build and train a consistent investigations team that have clear policies and procedures to follow and targets regarding the timeliness of investigations.</p>	<p>Partially agreed. Willis Tower Watson did not have the information needed to evaluate the investigation process and therefore did not obtain the understanding necessary to provide the recommendation that investigation processes should be redesigned. The second part of the recommendation is agreed and reflects actions taken and ongoing.</p>	<p>N/A</p> <p>Ongoing</p>
<p>21. Introduce a new reporting line targeting less serious complaints that may not be enough to warrant investigation on their own but if a number of complaints accumulate over time (3-5) then an investigation should be instigated. If this is already in place, greater communication is required to ensure employees are aware of this reporting avenue.</p>	<p>Agreed. The inter-divisional standing committee may identify patterns and prioritise actions when more than one complaint is received. Moreover, earlier this year the Office of the Inspector General, Investigations (OIGI) implemented a “proxy investigation” process to move less complex and less serious complaints to the field for evidence gathering, while retaining reporting and supervisory responsibilities over these investigations. Additional training and communication of this process is planned for launch in conjunction with the new hotline system.</p>	<p>Completed.</p> <p>Ongoing</p>
<p>22. Appoint an external ethics professional to visit each office for 2-3 weeks at a time to observe ways of working and interacting. This will enable them to call out abusive behaviour and support in the follow up action required to improve the workplace. This will help to build awareness of what abusive behaviour is and ensure perpetrators are clearly told that what they are doing is abusive and they are supported in how to change their behaviours to better align with WFP values.</p>	<p>Not Agreed. This is not reasonable given WFP’s size (hundreds of offices) and resources. Moreover, a presumption of innocence applies whereby an individual may be found to have engaged in abusive behaviour only following a full investigation and disciplinary process.</p>	<p>N/A</p>

External review, recommended areas of focus	Comments by WFP	Timeframe
<p>23. Conduct an audit of the investigations process to review cases and determine if correct processes were followed, if process taken is defensible and outcome could be replicated by a different team. If this type of audit has already taken place, the results should be communicated more proactively and clearly to employees to build confidence in the investigation process.</p>	<p>Agreed. A review of the OIGI capacity to investigate sexual harassment and SEA cases was commissioned by the Inspector General in early 2018. A peer review of all investigative procedures was performed in 2018 as well. Both exercises concluded that OIGI has the capacity, procedures, and qualifications to perform the investigative work properly. Moreover, the United Nation's Joint Inspection Unit report on investigations across the United Nations system should be issued shortly on work performed in 2019. The Inspector General will consider finding a way of communicating results and to provide more information on the qualifications of OIGI staff.</p>	<p>Completed.</p>
<p>24. Conduct an audit of the disciplinary process to determine how effectively WFP has been in disciplining those involved in substantiated cases of abusive behaviour.</p>	<p>Agreed. WFP should gain greater confidence and trust from its employees in its internal justice system, including by reviewing applicable procedures and their effectiveness, and making appropriate adjustments to it.</p>	<p>2020</p>

Acronyms used in the document

CAP	comprehensive action plan
GSS	Global Staff Survey
HSHAAD	Harassment, Sexual Harassment, Abuse of Authority, and Discrimination
HSHAAD policy	Executive Director's Circular No. OED 2018/007, "Protection from Harassment, Sexual Harassment, Abuse of Authority; and Discrimination"
JWG	Joint Executive Board/WFP management working group on harassment, sexual harassment; abuse of authority and discrimination