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Annual report of the Ethics Office for 2019

Executive summary

This annual report is hereby submitted to the Executive Board at its 2020 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 2019, by mandated areas of work presented in section III, by subsection, 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

In addition, 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 corporate/organizational focal point for PSEA (section V).

In this annual report there is a new section (section IV) on special projects of particular significance conducted in 2019 followed by, as in past years, a section on United Nations Coherence (section VI) 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 VII).

Focal point:

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Draft decision*

The Board takes note of the annual report of the Ethics Office for 2019 (WFP/EB.A/2020/4-B).

I. Introduction

1. This report covers the work of the Ethics Office for the period from 1 January to 31 December 2019 and provides analysis and assessments as compared to previous years and relevant activities anticipated into 2020.
2. The Ethics Office is a formal independent office with the head of the office 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 (employed through all employment contract types and volunteers) to perform their functions in accordance with the highest standards of conduct and to come forward without fear of retaliation.

II. Background

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, pursuant to section 5.4 of ST/SGB/2007/11, the Ethics Office is required to submit a draft report to the Ethics Panel of the United Nations (EPUN) for e-consultation. The Ethics Office confirms having submitted a draft of this report to members of EPUN. The draft was reviewed and comments provided, all of which were considered in preparing this report. It is important to note, such review does not constitute an endorsement of the contents of this report by EPUN nor any member of EPUN.
6. The overall objective of the Ethics Office is to assist the Executive Director in fostering an ethical environment whereby all employees observe and perform their functions with the highest standards of integrity as required by its values, standards and principles, which includes: the Charter of the United Nations, the Standards of Conduct for the International Civil Service, 2013,¹ the WFP Code of Conduct² and other relevant policies and practices – relevant to standards of conduct for employees and those working in support of WFP's operations and those WFP serves.
7. This report provides an overview of the activities (including statistical information) undertaken by the Ethics Office by its mandated areas of work as follows:
 - A. Advice and guidance
 - B. Annual conflicts of interest and financial disclosure programme

* 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.

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

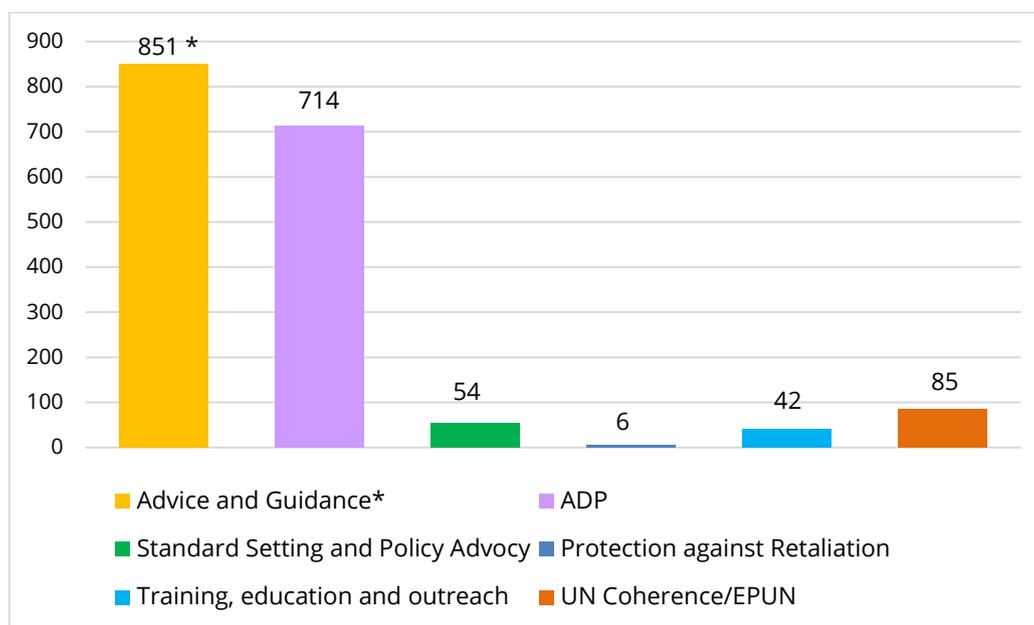
² Executive Director's Circular OED2014/016, *WFP Code of Conduct*.

- C. Protection against retaliation – Whistleblower Protection Policy
 - D. Standard setting and policy advocacy
 - E. Training, education and outreach
8. This report also includes information regarding activities undertaken by the Ethics Office on protection from sexual exploitation and abuse (PSEA) as the Ethics Office is WFP's corporate/organizational focal point for PSEA (section V), a new section on Special Projects (IV) followed by the section on United Nations Coherence, including the Rome-based agencies (section VI) and closing with observations not otherwise provided in the respective sections (section VII).

III. Activities of the Ethics Office

9. The Ethics Office recorded 1,752 activities (Figure 1) – including PSEA, as follows: *Advice and Guidance*: 851 separate matters were recorded; *Annual Conflicts of Interest and Financial Disclosure Programme (ADP)*: 714 submissions (from both the conflicts of interest questionnaires and financial disclosure statements) were initially flagged as possible conflicts of interest; *Protection against Retaliation*: six cases were considered; *Standard Setting and Policy Advocacy*: 54 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*: 42 separate activities were conducted; *United Nations Coherence*: eight conference calls/meetings were attended and 77 consultations and/or deliberations were recorded. In addition, 139 gifts were disclosed through and recorded into the electronic gifts register, some of which were provided to the Ethics Office directly. These activities are not reflected in the total number of activities in Figure 1 below.

Figure 1: Summary of activities recorded



*PSEA advisories (161) and ADP-related advisories (100) included.

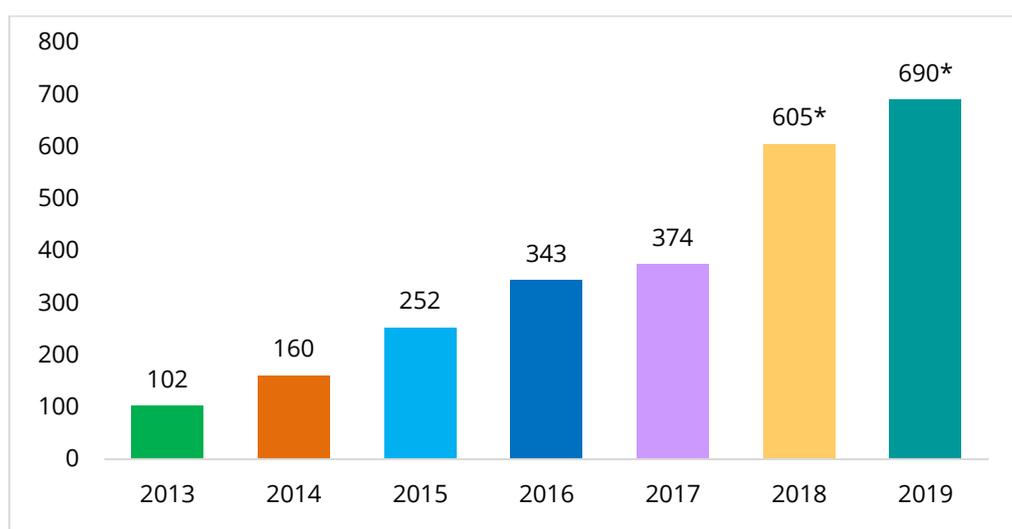
10. Figure 1 represents the number of activities recorded, not the amount of time spent by the Ethics Office, nor the number of people impacted. While it is difficult to record every consultation (as some are *ad hoc* in nature or arise during missions/other meetings), this number represents the overwhelming amount of work, although other activities remain unrecorded or covered separately herein.
11. In this regard, the Ethics Office dedicated a significant amount of time and resources to unanticipated initiatives, for example, as a member of the Inter-divisional Standing

Committee and of the Joint Executive Board/WFP Management Working Group on Harassment, Sexual Harassment, Abuse of Power and Discrimination (JWG); and as co-chair of the Sub-Working Group on safeguarding against sexual harassment and sexual exploitation and abuse (SWG-1) and as related to the External Review as the liaison to the external provider and the external advisors (known as the Support Group) and as an interlocutor between the external provider and management and staff on the Harmonious and Safe Workplace Survey (workplace survey). This work is not reflected in the overall statistics and the charts; it is covered separately in section IV. As in past years, the Ethics Office advanced projects to make its work more efficient and reliable – again, not reflected in the overall statistics.

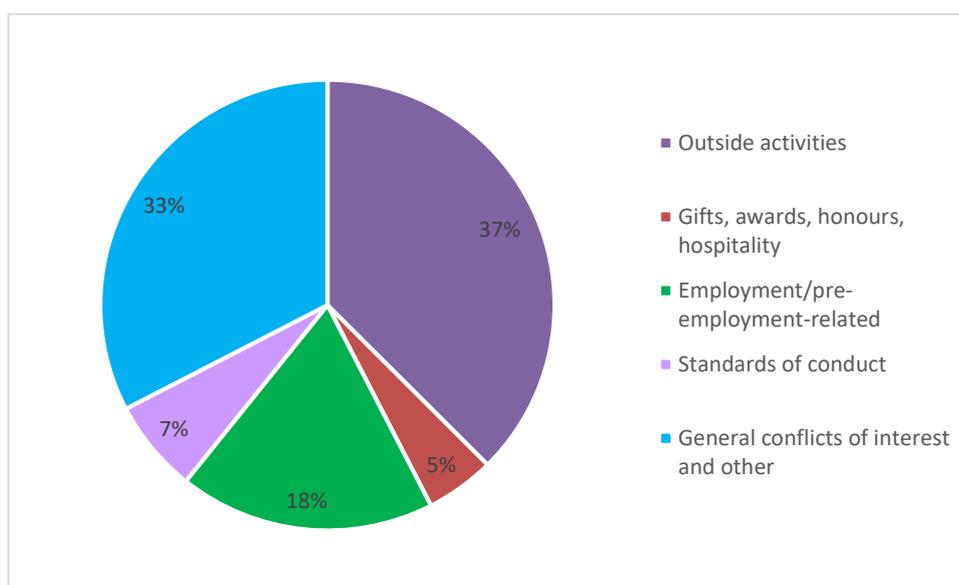
A. Advice and guidance

12. Providing advice and guidance is a cornerstone of the work of the Ethics Office and key to supporting a culture of ethics. Whatever the issue, employees rely on professional, practical, knowledgeable, and timely advice. Sustained growth in advisories is considered a success of the professionalization of the office – the team and the work product of the team.
13. There were 851 advisories recorded, including 161 related to PSEA. (See section V.) Advice recorded by year and by category are outlined in Figures 2 and 3, respectively.

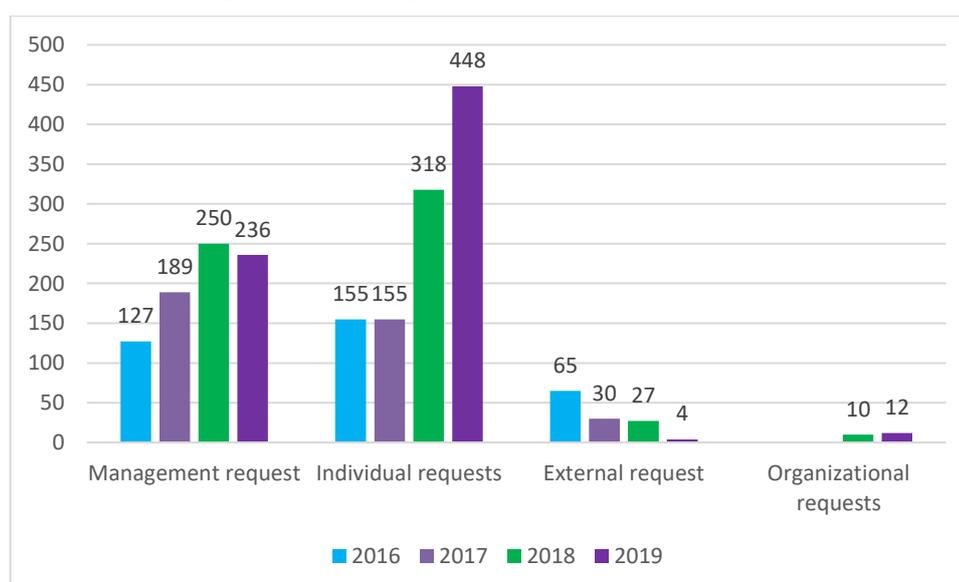
Figure 2: Advice – 2013–2019



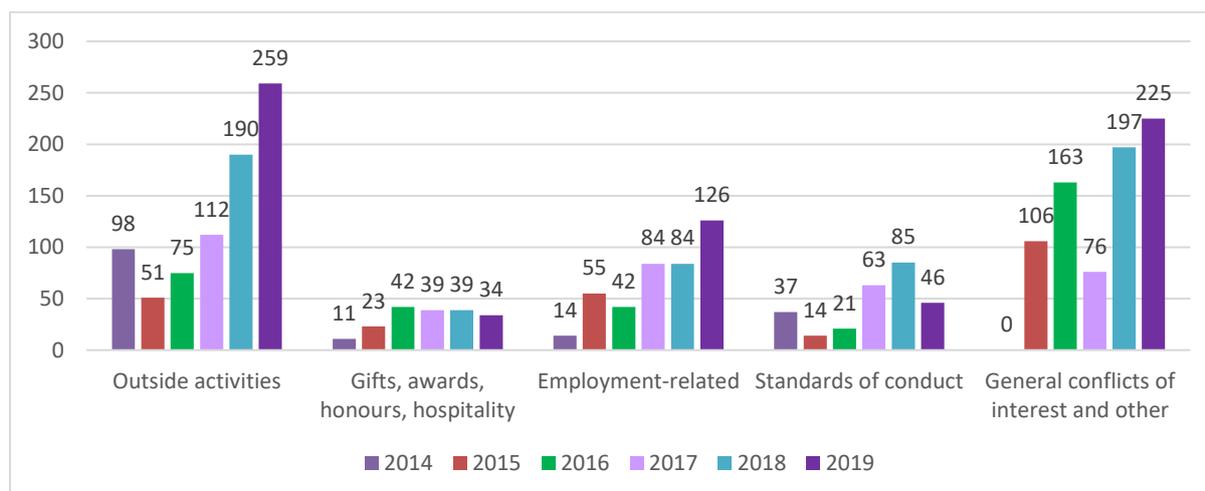
* PSEA-related advisories not included.

Figure 3: Advice by category

14. The types of advice and guidance were categorized by: “Management” (queries by a WFP employee in his/her official capacity), “Individual” (queries more personal in nature, as opposed to WFP official work, like outside activities), “External” (queries from outside WFP) and “Organizational” (queries from WFP itself through any Division/Unit and external stakeholders, like donors, Executive Board members). In 2019, 236 advisories were recorded as made by employees as “Management”, 448 as “Individual” (including queries that originated from the ADP), 12 as “Organizational”, and 4 were “External” (Figure 4). External queries have typically come in through the external website. It is unknown why these requests have reduced considerably to practically non-existent. Most “Organizational” matters recorded were related to PSEA. (See section V.)

Figure 4: Advice by source of queries – 2016–2019

15. Advice provided on organizational conflicts of interest were not recorded as part of advice and guidance. As well, consultations at the most senior levels of the organization were unevenly recorded. The full implementation of the database should enable more consistent and accurate recording.

Figure 5: Advice by categories, 2014–2019

16. The comparison of the actual numbers of 2018 to 2019 (Figure 5) showed a substantial increase of matters categorized as “employment-related”. The actual numbers were 84 and 126, in 2018 and 2019, respectively. This is likely due to changes in the contracts and Human Resources Division (HRM) processes, resulting in more consultations on conflicts of interest during the recruitment phase flagged and funnelled to the Ethics Office.
17. There was a sharp increase in reviews of matters categorized as “outside activities”: 259 reviews were conducted in 2019, 190 in 2018. Such a high number may be attributed to several other increased factors, for example, awareness of the duty to disclose because of outreach and disciplinary actions taken on non-disclosure of outside activities and other conflicts of interest under WFP’s regulatory framework; the actual number of employees – employee population; and, disclosures of outside activities through the ADP (77). (See section B.)
18. There was also an increase in requests categorized as “general conflicts of interest and others”. The actual numbers were 197 in 2018 and 225 in 2019. In particular, requests related to education and outreach and to complaints which were referred or otherwise addressed directly by other units/divisions increased.
19. The number of “gifts-related” queries slightly decreased, from 39 in 2018, to 34 in 2019. Consultations on gifts and other forms of recognition seemed, again, appreciably low in comparison to the entire employee population. It is anticipated that the Ethics Office will start working on revised policies in the form of circulars on gifts, hospitality, outside activities and, as a consequence, queries on gifts may increase.
20. Advice on gifts is separate from disclosures through the electronic gifts register. Since its implementation,³ disclosures through the electronic register continued to increase with 139 gifts disclosed in 2019, 131 in 2018, 98 in 2017, although the number of gifts disclosed seems rather low to the employee population.
21. Since the inception of the gifts register, the Ethics Office has raised concerns about the tool – as related to its usefulness for compliance, management of the gifts, and the absence of disclosures of offers. While there has been some progress over the last few years and more is anticipated, as there continue to be gaps – especially on tracking the actual gifts, the Ethics Office has fully disclosed these challenges to relevant divisions in 2019 and prior years, as indicated in last year’s annual report.

³ Executive Director’s Circular OED2017/002, *Disclosure of Gifts*.

22. Of note, while advice and guidance is generally reactive in nature, the implementation of a case management system should enable the Ethics Office to more easily track and analyse advice through various lenses – for example, by region, type of contract and level for the purpose of spotting trends, identifying risks and opportunities to fill knowledge gaps/weaknesses and planning and prioritizing preventative actions, and enable reporting more efficiently and accurately, addressing a significant challenge identified in past annual reports.
23. Lastly, as requested by one Executive Board Member in 2018, a feedback survey was created and implemented to assess satisfaction, 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 were relatively few, the ratings were satisfactory and very satisfactory – no dissatisfactory ratings were received. The relatively low number of surveys received may be attributable to survey fatigue especially as many of the queries official in nature come from the same colleagues – HRM, for example. The Director, Ethics Office has discussed with the Director, HRM, “mini retreats” to identify means for more effective collaboration with HRM to take place in 2020.

B. Annual conflicts of interest and financial disclosure programme

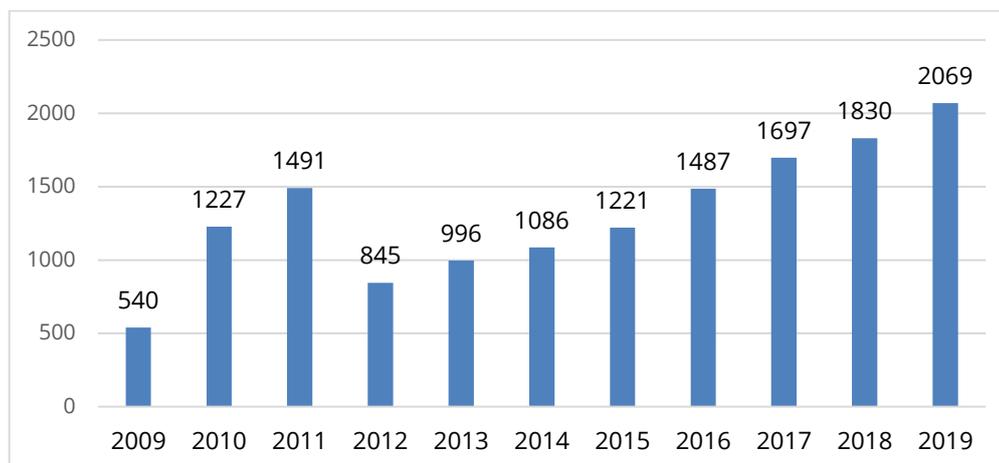
24. The Ethics Office is mandated to administer the ADP⁴ to assist WFP in identifying and addressing personal conflicts of interest for the purpose of mitigating or eliminating conflicts of interest in the best interest of WFP. The ADP reflects a commitment to transparency and public confidence-building, and it acts as a safeguard and risk management tool for employees and WFP. It is not a tool to uncover fraud or unjust personal enrichment.
25. As in past years, ADP data continued to be transmitted and maintained in a technologically secure and confidential manner, provided through the oversight of the Information Technology Division.
26. The 2019 tenth annual ADP exercise was launched on 15 April 2019. In 2017, the Ethics Office instituted a first deadline of six weeks (as opposed to four weeks) and this practice continued in 2019. At the deadline (24 May 2019), the completion rate was 76 percent. The first deadline was routinely extended to 28 June 2019 with a completion rate of 87 percent. In 2018 and 2017, respectively, the completion rates were 99 and 98 percent at the extended deadline. There is no apparent reason for this considerable change. This notwithstanding, at the end of the calendar year, the completion rate was 99 percent. Following support by the then, Executive Management Group (EMG), now the Oversight and Policy Committee (OPC) and an External Audit Report recommendation,⁵ the Ethics Office condensed the escalation process to HRM – to follow-up with those employees who were not compliant and closed the ADP at 99 percent. Specifically, 16 non-compliant employees were escalated to HRM in November for disciplinary action.
27. Out of a total employee population of 17,439,⁶ 2,069 employees were identified to participate in the 2019 exercise. This represented 11.86 percent of the total employee population. The increase over the 2018 ADP population was 13 percent. (Figure 6).

⁴ Secretary-General's bulletin ST/SGB/2007/11, *United Nations system-wide application of ethics: separately administered organs and programmes*. Executive Director Circular ED2008/004, *Disclosure of financial interests, outside activities and honours, decorations, favours, gifts or remuneration*.

⁵ Report of the External Auditor on fraud prevention, detection and response, WFP/EB.A/2019/6-F/1, 8 May 2019.

⁶ Total number of employees as of 31 March 2019.

Figure 6: Annual conflicts of interest and financial disclosure programme: employees identified to participate, 2009–2019



28. Through an extensive 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 and management seemed to fulfil this responsibility in good faith and overwhelmingly timely.
29. The policy criteria captured employees at D-1 and D-2 levels; all country directors, deputy country directors and heads of offices/sub-offices; all oversight – audit/investigations, inspections – and investment – treasury, procurement and legal officers, with the exception of the Employment and Administrative Law Branch; those whose occupational duties included procurement authority to release purchase orders of any type (those who have authority to release only micro purchase orders are excluded); those who had regular access to confidential procurement information; and, members of vendor management committees.
30. As previous years, the ADP was comprised of the conflicts of interest (COI) questionnaire, eligibility questionnaire, and financial disclosure statement.
31. Of the 2,069 employees identified to participate, 54 were exempted mainly because of separation, including retirement and extended leave. As a result, 2,015 employees completed the COI questionnaire. The COI questionnaire required disclosures related to relationships of employees and their dependent family members with WFP partners and of outside activities, gifts or awards, family relations in the United Nations, landlord/tenant relations, etc.
32. The eligibility questionnaire combined with exemptions exceptionally granted further reduced the number of participants completing the financial disclosure statements to 1,525.
33. The financial disclosure statement required disclosure of assets, profits, income, supplements, liabilities and other financial interests of employees and their dependent family members plus whether such interests were with vendors/partners, etc.
34. During the ADP review, of the total COI questionnaires completed, 354 submissions (some of which had multiple disclosures) were flagged as possible conflicts of interest and reviewed. Of the total financial disclosure statement completed, 460 submissions (without bank account disclosures and some of which had multiple disclosures) were flagged as possible conflicts of interest and reviewed. In addition, some submissions warranted further review. This included 77 outside activities – a considerable increase over 2018 and 2017, for which 51 and 34 outside activities, respectively, were further reviewed. Advice was also provided for an additional 23 matters. This number is tracked under advice and guidance. This was the first year that the Ethics Office is reporting on advisories other than outside activities. Monitoring these additional advisories will continue into 2020 for purposes of

- identifying opportunities for mitigation measures including but not limited to proactive education and outreach.
35. The ADP continued to have a large administrative component including an extensive number of email messages (including reminders) and queries by phone. While the Ethics Office has adopted a continuous improvement approach, taking advantage of new technologies for implementing efficiencies, it has also consulted sister organizations and determined administering a disclosure programme of this sort and in a complex, decentralized organization with a certain (high) level of mobility, makes some of the more “manual” processes still inherent necessities of administering the annual exercises.
 36. Since 2014, the Ethics Office has tracked the number of submissions with no financial information reported. In the 2019 exercise, 257 submissions had no financial information reported, in comparison to 229 submissions in the 2018 exercise.⁷ The Ethics Office considers more reports of no financial information to be understandable because of the minimum thresholds in reporting (i.e., USD 10,000) and the continuous growth of the participant population. As in past years, employees with no disclosures received a follow up query directly. It is anticipated that this process can be automated with upgrades to the database.
 37. Through the External Audit on fraud prevention, detection and response,⁸ the Ethics Office clarified that the ADP is not a tool for detecting fraud and unjust enrichment; further, to use contrary to this stated purpose as provided in the Executive Director’s Circular 2008/004, would, *inter alia*, undermine trust in the Ethics Office and the confidentiality commitment to participants. It is likely that part of the confusion on the purpose and use of the ADP is due to the inclusion of a duplicate definition of conflicts of interest in the Anti-Fraud and Anti-Corruption Policy⁹ rather than a cross-reference to the Executive Director’s Circular 2008/004. The Ethics Office continued to carry forward its initial recommendation from 2015 on point as related to anticipated revisions to the Anti-Fraud and Anti-Corruption Policy.
 38. Although there have been improvements in the service, work and oversight of the ADP over the years, some weaknesses remain. The recommendations by the External Auditors on the ADP were related to same and welcomed by the Ethics Office.
 39. Lastly, based on experience and assessment on the suitability of the existing format to the purpose, the Ethics Office continued to be of the opinion that, with relatively few modifications, the COI questionnaire would be the most effective means to identify conflicts of interest – the intended purpose of the ADP and, further, using a consolidated COI questionnaire would reduce the privacy and security risks – particularly of information financial in nature. Moreover, eliminating details unnecessary to the objective, would create efficiencies, facilitating more expedient completion of the ADP, improving the quality of the information disclosed and the user experience. It was the intention of the Ethics Office to implement these changes in 2018; however, challenges with technology and the update of the Executive Director Circular 2008/004 hindered this timeline. It is anticipated that the changes will be implemented for the 2020 exercise. (See section D).

⁷ In the 2017 and 2016 ADP exercise, the percentage of participants with submissions with no financial information was 15.5 percent, while in the 2018 exercise, the rate was 12.5 percent.

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

⁹ Executive Director Circular OED2015/019, *WFP Anti-Fraud and Anti-Corruption Policy*.

C. Protection against retaliation – Whistleblower Protection Policy

40. The primary objective of the Whistleblower Protection Policy is to ensure that employees can report misconduct and cooperate with audits, investigations and, in practice, proactive integrity reviews without being subject to retaliation.¹⁰
41. Under the Whistleblower Protection Policy, the Ethics Office is responsible for conducting a review of a complaint for determining 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 (OIGI) for investigation, unless there is a conflict of interest in making a referral to OIGI. In the latter instance, the matter is referred directly to the Executive Director for action. It is also the responsibility of the Ethics Office to provide advice and guidance on whistleblower protection matters.
42. Six cases of protection against retaliation were considered: two cases continued from 2018 and four new cases arose. For the two 2018 cases and for three new cases, no *prima facie* was established. As for the remaining case, a *prima facie* case of retaliation was established and, as a result, such case was referred to OIGI.
43. The Ethics Office provided advice and guidance on whistleblower protection; however, only on a handful of queries, which seems substantially low relative to the concerns raised about whistleblower retaliation protection under the global staff survey (GSS) and under the workplace survey. In this regard, the Ethics Office intends to conduct a thorough analysis of the responses to the retaliation questions of the workplace survey for the purpose of taking or making recommendations on actions to management in 2020. Over several years, the Ethics Office has raised concerns with advice on whistleblower retaliation matters being provided by the Office of the Ombudsman in lieu of and/or concurrently with the Ethics Office—the Office of the Executive Director through the leadership of the current Chief of Staff has agreed to consider the concerns in order to resolve them.
44. As anticipated in past annual reports, the Ethics Office continued to work on an updated Whistleblower Protection Policy, which was originally promulgated in 2008, for the purpose of reflecting relevant practices and in consideration of the United Nations system-wide review by the Joint Inspection Unit (JIU)¹¹ conducted in 2018. While the drafting of a revised Whistleblower Protection Policy and various consultations with interested internal stakeholders started at the end of 2018 and continued throughout 2019, the adoption of the updated Executive Director Circular is anticipated in 2020. (See section D).
45. The protection against retaliation policy was intended to protect “whistleblowers” who report failures that are harmful to the public interests of WFP, thus playing a key role in preventing misconduct and/or wrongdoing and in safeguarding the best interests of WFP, itself.

D. Standard setting and policy advocacy

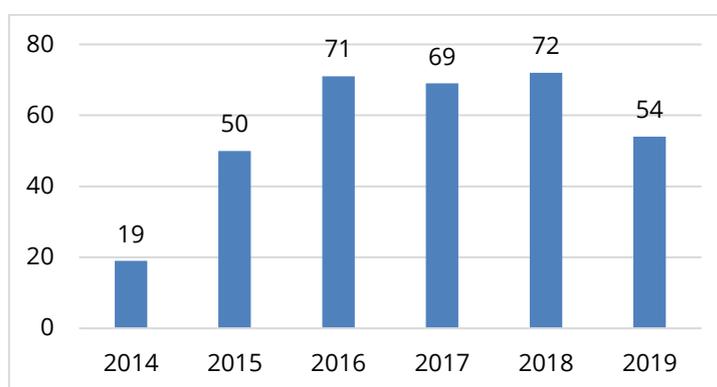
46. Fostering an organizational culture of ethics and accountability requires frequent and consistent advocacy. To integrate ethical considerations institutionally, the Ethics Office continued to provide input to reflect ethical considerations in policies, practices and processes.

¹⁰ Executive Director’s Circular ED2008/003, *Protection against retaliation for reporting misconduct and for cooperating with duly authorized audits and investigations (WFP “Whistleblower” Protection Policy)*.

¹¹ Joint Inspection Unit, *Review of the whistle-blower policies and practices in the United Nations system organizations*, 2018.

47. The Ethics Office maintained a proactive engagement with management, including through recommendations for establishing new and revised policies and standards. Consultations in the ordinary course continued and were considered a reflection of the confidence of the value of the Ethics Office. Feedback was positive and welcome.
48. The Ethics Office provided input to 54 separate policies (23 received as part of the role on the former EMG and 31 as the Ethics Office), in various forms – circulars, policies, guidance and other administrative issuances and documentation – and on a range of topics. For example, the Ethics Office was involved in consultations regarding the evaluations of the Gender Policy and the People Strategy, both of which the Ethics Office considers impactful to culture transformation.
49. The Ethics Office recorded consultation on more policies in the past three years, which is simply the result of fewer requests received in 2019. (Figure 7).

Figure 7: Recorded reviews of policies and standards, 2014–2019



50. As anticipated in the 2018 annual report, the Ethics Office created for HRM a pre-appointment disclosure process and corresponding guidance for pre-employment vetting conflicts of interest, in general and related to temporary recruitment of government employees who are unable or unwilling to resign from a government position because of pensions. The guidance satisfies a JIU recommendation¹² and aims at identifying, avoiding and/or mitigating any actual, perceived or potential conflicts of interest or any incompatibility otherwise that candidates may have in an efficient and timely way, prior to their appointment, enabling informed decisions to be made by management, as well as the candidate.
51. The Ethics Office continued working on the revision of the Executive Director's Circular 2008/004 covering conflicts of interest and the ADP to make the circular relevant to current activities and practice, and address conflicts of interest more comprehensively. There were extensive consultations with relevant stakeholders. The Ethics Office consolidated the heterogeneous input received and otherwise revised the proposed circular. It is anticipated that the revised circular will be promulgated in the first quarter of 2020.
52. As part of the update of the current Executive Director Circular 2008/004 and in line with the audit recommendation from the Office of Internal Audit, the Ethics Office proposed a definition for organizational conflicts of interests based on research of organizational conflicts of interest in the United Nations and otherwise, consultations, and relevant experiences. At the same time, the Ethics Office made recommendations to integrate organizational conflicts of interest considerations into well-established procedures¹³

¹² Joint Inspection Unit, *Review of mechanisms and policies addressing conflict of interest in the United Nations system*, 2017.

¹³ Executive Director's Circular, *Guidelines for Private Sector Partnerships* OED2013/025, 2013.

including an *ad hoc* consultative process as part of the Due Diligence conducted by the Legal Office and with respect to the Due Diligence Committee. Work on organizational conflicts of interest will continue into 2020.

53. The Ethics Office continued to work on a revised Whistleblower Protection Policy¹⁴ to reflect relevant practices in consideration of the policies of the United Nations Secretariat and other United Nations organizations and pertinent recommendations from the JIU.¹⁵ Again, the Ethics Office had extensive consultations with relevant stakeholders and received and considered extensive written comments/input. It is anticipated that the revised circular will be promulgated in 2020. Based on concerns raised by other division directors and first-hand experiences, the Ethics Office has continued to raise the issue of governance with successive chiefs of staff.

E. Training, education and outreach

54. In any organization, employees must be knowledgeable about expectations in order to abide by them. With the additional layers of complexity – high-risk contexts, diverse multicultural work force in a decentralized structure, focusing on knowledge and skill building is essential for employees to understand and uphold the values, standards and principles of an organization. Outreach, awareness, and education initiatives in various forms and *fora* are critical to enhancing knowledge and, thus, compliance.
55. In this regard, the Ethics Office conducted various outreach activities, again, in 2019. To mark the WFP Code of Conduct fifth anniversary, the Ethics Office conducted an awareness campaign including toolkits with an updated Code of Conduct poster and talking points for use by regional directors, country directors, division directors and heads of liaison offices. The purpose and structure of this campaign was to support leadership to set and maintain the “tone from the top” in their respective offices and divisions.
56. The Ethics Office, again, conducted what has become an annual end-of-the-year awareness campaign – focusing on policies and practices on gifts and linked with anti-fraud and anti-corruption messaging, which included sample communications for country directors, division directors and liaison offices for their teams and local partners. A joint Ethics Office/Supply Chain Division email was again sent in 2019, to 774 business partners worldwide managed directly through the Supply Chain Division at headquarters and included suppliers local to headquarters with communications in Italian. The purpose of this annual organization-wide, internally and externally focused campaign, is to ensure employees understand their responsibilities and vendors understand WFP’s expectations of them as related to gifts. This was the fifth year of this initiative and it will continue in 2020.
57. As mentioned in the 2018 annual report, the Ethics Office does not have empirical data on the extent to which awareness campaigns and materials have been cascaded as part of the organization-wide campaigns. Nevertheless, the Ethics Office routinely receives favourable feedback from country directors and there tend to be requests for additional advice and guidance referencing awareness campaigns, thus reflecting some level of effectiveness and success.
58. While the Ethics Office had originally planned to roll out an additional awareness campaign from the Executive Director, due to the messaging more generally on workplace culture and, in the interest of harmony, this initiative was eliminated.
59. Besides these high-profile initiatives, throughout the year, the Ethics Office continued with more traditional training sessions. The mandatory ethics e-learning courses were developed

¹⁴ Executive Director’s Circular ED2008/003, *Protection against retaliation for reporting misconduct and for cooperating with duly authorized audits and investigations (WFP “Whistleblower” Protection Policy)*.

¹⁵ Joint Inspection Unit, *Review of the whistle-blower policies and practices in the United Nations system organizations*, 2018.

in response to a recommendation received from an internal justice system review in 2014 and was released in three modules in December 2016, 2017 and 2018, respectively. The translated versions of the third module, which focused on addressing misconduct, protection against retaliation, fundamental values, such as respect, reinforcement of the humanitarian principles, and prevention of and protection from sexual exploitation and abuse of those we serve, were launched in the first quarter of 2019.

60. For the purpose of compliance, as recommended by the Ethics Office, the ethics e-learning courses are integrated in the personal Performance and Competency Enhancement Assessments (PACE) of all employees and the probation process of relevant employees. As of 31 December 2019, 15,346 employees completed the third module of the e-learning, comprising 88 percent of the total employee population of 18,589.¹⁶ A total of 16,218 and 15,869 employees completed the first and second modules, respectively, representing 93 and 91 percent of the total employee population. Feedback on training courses 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.
61. The Ethics Office promoted ethical awareness through training sessions and presentations conducted directly, reaching more than 830 employees plus through the provision of presentations upon request from country offices and tailored to in-country contexts. Moreover, the Ethics Office employed various media, for example, pens, pins, pamphlets and plans to continue to expand the collateral to accommodate different learning styles into 2020 and beyond. In country dialogue with in country leadership on tone at the top issues was also implemented into field missions.
62. One example of targeting integrated outreach was the robust training session created to support a Food Procurement training initiative conducted in all regional bureaux, in part, to remedy issues identified in a proactive integrity review. The training session, *inter alia*, focused on conflicts of interest issues – which may arise in the procurement/supply chain context – and on other relevant ethics and compliance issues, like possible red flags in fraud and corruption in the procurement/supply chain context. Feedback was clearly positive. This new training, as well as the revamped training for ethics ambassadors, reflected the continued evolution of the materials – relevant, interesting, interactive.
63. Another example of targeted education was an induction training for finance officers. This collaboration was again welcome. To date, however, the Ethics Office has not presented to HRM and recommends this is rectified in 2020.
64. Where possible, the Ethics Office approaches ethics and standards of conduct knowledge building and skill enhancements by mainstreaming into existing and new initiatives. In this regard, while the Ethics Office appreciates the inclusion of some of its materials on ethics-related matter (like disclosures of conflicts of interest) into the HRM field initiative – reaching more than 5,000 employees worldwide, there would be additional benefit from having the Ethics Office provide its recommended input into this initiative. In addition, as a key stakeholder on “tone at the top,” the Ethics Office has requested to be included in the new country directors/deputy country directors induction programme and the new supervisor training programme – dialoguing on “tone at the top” as country directors are the top in their respective country offices and “model in the middle”, as supervisor’s conduct impact employee understanding of appropriate behaviours. The Offices of the Executive Director, Chief of Staff, Deputy Executive Director have all expressed support for substantive inclusion of the Ethics Office in these initiatives.

¹⁶ Total number of WFP employees of 31 December 2019.

65. As anticipated in the 2017 annual report, the Ethics Office expanded direct training sessions at the field level, conducting briefings to employees in several country offices and to the leadership, such as in the Regional Bureau Bangkok. As an organization's ethical culture is significantly enhanced through the visible adherence of its leadership to ethical conduct, these briefings engaged leadership on serving as workplace examples and exhibiting role-model behaviour. To date, however, the Director, Ethics Office has not been to a regional director/country director meeting and recommends that this is rectified. The Office of the Executive Director through the leadership of the Chief of Staff supports a briefing from the Ethics Office covering WFP and United Nations standards of conduct and governance/procedures applicable to the executive management of WFP to ensure compliance with same.
66. It has to be noted that the field presence of the Ethics Office was impacted by the additional work requested by management. (See section IV). Field presence by the Ethics Office is critical to proliferating an ethical culture and field missions to regional bureaux/country offices should be taken on as much as possible.
67. The Ethics Office continued to deliver the Headquarters Ethics Induction Briefing, which was considered compulsory (yet 100 percent compliance is not achieved) for employees new to Headquarters (whether completely new or re-assigned to headquarters). Likewise, the Director, Ethics Office continued to conduct induction sessions for new Executive Board members, reaching approximately 100 Board members through two sessions. The Director, Ethics Office also conducted one-on-one briefings to the most senior appointments and would welcome expanding this process to incoming division directors and country directors through an induction programme for country directors.
68. Respectful workplace advisors (RWAs) are employees, nominated by their colleagues to perform some of the functions of the Office of the Ombudsman and Mediation Services (OBD), with a focus on preventing or reducing workplace conflicts at the field level. Since 2012, RWAs have been designated as "ethics ambassadors". In this capacity, ethics ambassadors assisted the Ethics Office and WFP in raising awareness on ethics and standards of conduct, including supporting the Respect Campaign, as recommended by the Ethics Office. As well, the Ethics Office recommended that RWAs, as they perform as ethics ambassadors, are vetted from an ethics standpoint.
69. OBD organized one basic and one advanced training session at Headquarters for a total of 32 ethics ambassadors. In addition to providing the training necessary and appropriate for RWAs to function as ethics ambassadors, the Ethics Office is responsible for facilitating informative sessions on the internal justice system and train the trainer sessions to enable ethics ambassadors to fulfil this role. For the first time, a session focusing on PSEA was also included.
70. The outreach in country by the ethics ambassadors resulting from "train the trainer" sessions seems to have peaked in 2018. In 2019, this may be because the ethics ambassadors were assisting with the Respect Campaigns or it may be because the coordination in this regard had become stale. In 2020, the Ethics Office anticipates re-assessing the administration of this role, while respecting the primary purpose of the role and its informality.

IV. Special projects

71. As a result of the 2018 GSS and recommendations of the Ethics Office through its last three annual reports concerning prior GSS results on protection from retaliation, WFP, through the Ethics Office, launched tenders for an independent consulting firm to conduct a "deeper dive" survey of workplace culture and ethical climate. Despite two tenders, the

- short-listed vendors, while experienced in conducting employee satisfaction survey, were not experienced in ethics surveys, per se.
72. This notwithstanding, at the request of the JWG, the scope of the work was expanded to include one-on-one interviews and focus groups, in addition to the survey plus a report to the JWG (collectively called the “External Review”). The Ethics Office was asked by management to oversee this expanded work plus additional experts (referred to as “Support Group”).
 73. The workplace survey was delivered online in English, Spanish, French and Arabic and made available to all employees, regardless of contract type. The Ethics Office worked closely with HRM to make sure that employees with no email address had access to the workplace survey.
 74. A total of 8,137 employees completed the workplace survey, representing a 46 percent response rate, which, according to external provider, was considered a good result for a topical survey focused on sensitive areas and above the statistics necessary to conduct meaningful, relevant analysis. In addition, 218 employees participated in the virtual focus groups, and 78 employees were interviewed, representing every regional bureau. The workplace survey was reinforced by a condensed and intense communication campaign, organized and executed by the Ethics Office with the support of the Communication, Advocacy and Marketing Division. The Ethics Office provided support within WFP including by responding to more than 220 requests for support with the workplace survey, addressing them in real time and within a 24-hour timeframe. The Ethics Office regularly informed regional directors/country directors on survey response rates and to further encourage participation. Regional and country directors were extremely supportive.
 75. Feedback on the Ethics Office role—in particular, its high level of responsiveness and problem solving—in administering the workplace survey from regional directors, country directors and all levels of employees was overwhelmingly positive. The Ethics Office accumulated feedback and its own experiences into a “lessons learned document” and provided insights to relevant stakeholders, including the Audit Committee.
 76. The results of the External Review fed into the JWG’s work and informed its recommendations to management¹⁷ and the creation of a comprehensive action plan (CAP). As co-chair of the SWG-1, the Ethics Office coordinated the work and discussions within SWG-1, through the organization of seven meetings held in 2019. It is anticipated that, under the continued lead of the Ethics Office, two workshops focusing on sexual harassment and sexual exploitation and abuse are to be organized in 2020 to produce recommendations on sexual harassment and sexual exploitation and abuse.
 77. Overall, approximately 1600 hours were spent by the Ethics Office in supporting the work associated with the JWG and SWG-1, including the workplace survey – which equates to more than one year of full-time work for one person and this does not include work by the Director, administrative and intern staff of the Ethics Office. Nevertheless, through an “all hands on” approach, the interactions on the administration of the workplace survey helped to raise the profile of the Ethics Office and its high level of responsiveness.

¹⁷ Report of the joint Board/management working group on harassment, sexual harassment, abuse of power and discrimination, WFP/EB.2/2019/9-A.

V. Protection from Sexual Exploitation and Abuse

78. The Ethics Office continued to address protection from and prevention of sexual exploitation and abuse holistically as the corporate/organizational focal point, increasing its active role working together (and, as appropriate, leading) with other United Nations and multilateral organizations and engaging at the United Nations and inter-agency level, and focusing on making an impact in the field to those we serve and in the communities we serve.
79. It is recognized that PSEA efforts resulting in prevention and protection of those we serve must be mainstreamed within and across WFP and with relevant stakeholders to be most effective and impactful. To this purpose, the Ethics Office partnered with key internal stakeholders, such as the Security Division, non-governmental organizations (NGO), Emergencies and Transitions, and Cash Based Transfers units, and others to ensure maximum impact. By integrating into existing and new initiatives in a seamless way, PSEA knowledge and skills building were more effective and efficient actions.
80. One PSEA project that advanced collaboratively in 2019 was chosen to be among nine projects of more than 500 submissions to participate in the 2020 WFP Innovation Bootcamp. The project proposes the development of an app to facilitate reporting of sexual exploitation and abuse, referral to assistance services, thus reinforcing victim-centred approach, simultaneously – with the development of analytics to facilitate relevant mitigation measures – reactively and proactively. It is anticipated that the project will continue in 2020.
81. Throughout the year, the Ethics Office strengthened dialogue with donors which were (and are) vested stakeholders as related to PSEA. Donors sought assurance that WFP had and continued to maintain appropriate measures to protect and prevent sexual exploitation and abuse. Related, SWG-1 discussed PSEA as part of its work, recognizing that WFP must do all it can to ensure beneficiaries and community members are safe from sexual exploitation and abuse as a moral imperative.
82. To support field level implementation of protection from and prevention of sexual exploitation and abuse measures, several projects were initiated. For example, recognizing that PSEA risks are often higher among cooperating partners who operate directly with beneficiaries, as well as recognizing that United Nations entities often work with the same partners, WFP partnered with other United Nations and international non-governmental organizations for the purpose of adapting an existing PSEA training created by IOM into an Inter-Agency Standing Committee (IASC) branded learning package. The package is an innovative tool, specifically designed for cooperating partners. It will be launched in 2020 across several organizations working together in the field.
83. In order to foster and support greater United Nations coherence and increased efficiency in the field, WFP – together with the United Nations Population Fund, the Office of the United Nations High Commissioner for Refugees (UNHCR), the United Nations Children's Fund – has been developing a harmonized screening tool to strengthen accountability and capacity of cooperating partners, which will be integrated into existing partner assessment mechanisms to streamline existing and duplicative processes. This work will continue to an anticipated conclusion in 2020.
84. Recognizing the importance of dedicated PSEA capacity and inter-agency coordination in key locations, it is worth noting that WFP was one of the first United Nations agencies to commit to designating employees to the newly formed PSEA Coordinator role and worked on recruiting them in Afghanistan, the Sudan, Nigeria, Colombia and Mozambique.
85. Building on a network of approximately 300 PSEA focal points (located in every country office and regional bureau), support to PSEA focal points continued and was expanded. In this

- regard, the Ethics Office developed and launched an online training – the first training ever tailored to PSEA focal points. The training, which was overwhelmingly requested by the PSEA focal points themselves, is available in English, French and Spanish and includes downloadable tools and other materials that PSEA focal points can easily adapt to use at country office/regional bureau level.
86. Moreover, to further strengthen PSEA focal points' knowledge and skills and, at the same time, increase coordination and interaction with sister organizations, a pilot joint WFP and UNHCR regional workshop for PSEA focal points from 11 country offices was launched through the coordination of the Ethics Office. The regional directors of WFP and UNHCR established the "tone at the top" and leadership from the United Nations Secretariat participated. The workshop was successful on many levels; of note, it facilitated cross-agency collaboration and sharing of substantive knowledge and best practices, collectively, for the benefit of those we serve.
 87. Over the year, the Ethics Office continued to strengthen its PSEA coordination and outreach role through active engagement with PSEA focal points. This included providing prompt support to PSEA focal points, through awareness one-one-one sessions, onboarding sessions for new focal points, and regular interactions and engagement with regional focal points. This also reflected well in the increase in the number of PSEA requests for advice and guidance (from 66 in 2018 to 161 in 2019). Out of the total PSEA advice and guidance requests, 66 requests were by managers as "management" and 89 were categorized as "organizational".
 88. The increase in advice and guidance is considered a positive indicator and result of its performance supporting PSEA, together with the increase in knowledge and skills of PSEA focal points, enabling them to perform their roles.
 89. Furthermore, WFP, through the Executive Director, continued to be a member of the High-level Steering Group (HLSG) on Sexual Exploitation and Abuse (SEA), enabling leadership 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.
 90. For the third consecutive year, WFP rolled out the United Nations survey on sexual exploitation and abuse created by the United Nations Secretariat from specific field locations, identified by the United Nations Secretariat. Collaborative support by country directors increased the participation level with markedly higher completion rates year over year. For the first time, the Ethics Office was capacitated to analyse the results of the survey, which are being used to inform the PSEA strategy under development and is anticipated to be incorporated into the risk based approach to the work by WFP as related to sexual exploitation and abuse.
 91. In this regard, as anticipated in the 2018 annual report, the Ethics Office started drafting a PSEA organization-wide strategy and accompanying implementation plan. The target delivery date has been postponed into 2020 and will include additional strategic consultations and be informed by the additional work by SWG-1 referenced above in section IV. The strategy will remain focused on those we serve, including those who are victimized, and for relevance to the field while supporting all stakeholders.

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

92. The EPUN, instituted in 2007¹⁸ and comprised of the heads of the ethics offices of separately administered organs and programmes of the United Nations, is mandated to create a unified set of ethical standards/policies and consult on complex ethics matters having system-wide implications.
93. The Director, Ethics Office, continued to be actively engaged with EPUN, participating in eight out of eleven monthly standard conference calls/meetings. The absences were a result of conflicts with mission travels, experienced by all members of EPUN at various times. More than 75 consultations/deliberations on issues of common interest – including the scope of permissible political activities, the promotion of speak-up cultures, whistleblower protection and the independence of the Ethics Offices were recorded plus real-time interactions on other ethical considerations were conducted.
94. 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 EPUN conducts reviews of appeals of non-*prima facie* determination issued by member Ethics Offices. This requires, at times, review of extensive documentation. There were seven reviews of protection against retaliation determinations submitted to the EPUN Chair or Alternate Chair. Starting from 1 May 2019 until 31 August 2019, due to illness of then EPUN Alternate Chair, the Director, Ethics Office took over the functions of the EPUN Alternate Chair *ad interim*. On 1 December 2019, the Ethics Office reassumed the role of EPUN Alternate Chair, resulting in two appellate reviews of *no prima facie* determinations in 2019. The time associated with this work is relatively substantial and not reflected in the overall statistics presented in this report.
95. In support of the Secretary-General's promotion of system-wide collaboration on ethics-related issues within an extended network, an 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, relevant practices, and enable collaboration on issues of common interest and applicability to the ethics functions of the ENMO membership.
96. The Director, Ethics Office participated in the 2019 Annual ENMO Conference, which was organized and hosted by the European Patent Office and focused on five topics: i) due diligence recruitment of new employees; ii) communication strategy to enhance ethics culture in organizations; iii) whistleblower protection and retaliation; iv) analysing conflicts of interest and organizational risks; and v) championing civility in the workplace: preventing sexual exploitation and abuse, harassment. Along with another ethics colleague and member of ENMO, the Director, Ethics Office delivered a presentation on Risk and Ethics, sharing publicly permissible information on WFP's risk journey and organizational conflicts of interest.
97. The ethics officers of the three Rome-based Agencies (RBAs) continued *ad-hoc* sharing of best practices and knowledge with increased interaction, especially with the Director, Ethics Office, IFAD on common issues – PSEA, for example – with the Director, IFAD participating in a meeting of the SWG-1 as related to sexual harassment, sexual exploitation and abuse and commonalities.

¹⁸ The Ethics Panel was originally known as the United Nations Ethics Committee and renamed in April 2013.

VII. Observations

98. The workload was quite heavy in 2019, most particularly because of the additional roles the Ethics Office was asked to play to support the JWG – in particular, the administration of the workplace survey, SWG-1, and the Support Group – in addition to the increased volume that continued in other areas of the core mandate. Consequently, some areas of the Ethics Office mandate were approached differently in 2019. For example, the fewest organization-wide awareness campaigns were planned and implemented than in the past few years and, certainly, in 2018 when the Ethics Office planned and implemented an annual campaign to celebrate the tenth anniversary of the Ethics Office. This notwithstanding, the Ethics Office was able to capitalize on its work supporting the JWG and the workplace survey. By taking an “all hands on” approach and deferring some work, the Ethics Office was able to address the large volume of queries and concerns in real time. The sentiments of gratitude and support by staff and management evidenced the success of the work by the Ethics Office on the workplace survey. In other words, the work, itself, became a sort of outreach campaign – helping employees to appreciate not only the high responsiveness level of the Ethics Office, but also the mandate of the Ethics Office – in helping to nurture a culture of ethics and accountability.
99. Over the years, and 2019 was no exception, the number of advisories continued to grow. As the role of the Ethics Office is largely preventative in nature, providing advice and guidance is a critical component of the core mandate and, since 2018, PSEA. Relevant, competent advice and guidance is arguably the most valuable result from professionalizing the office – enabling managers and staff to make good decisions and avoid misconduct and mishaps. The increase, year over year, reflects positively on the Ethics Office – its level of practicality, useful and timely advice. As well, it reflects a high level of trust.
100. Developing systems over the years has helped the Ethics Office to measure the workload. Having staff support for actively monitoring the various in-boxes, conduct triage, record and follow up on matters were some of the advancements in 2019, and proved critical to making difficult decisions on incoming work to the staffing at the end of 2019. Moving into a database in 2020 will help the Ethics Office to manage increases in advice and guidance, while conducting analytics to plan the work accordingly, and to report more efficiently and easily.
101. Another area of the core mandate that could benefit from more efficient reporting, as well as analytics, is the Annual Conflicts of Interest and Financial Disclosure Programme. Tremendous progress has been made over the years: a revised database with the inclusion of an annual certification of participants to the Code of Conduct; and, coming in 2020, a re-vamping of the applicable Executive Director Circular, a corresponding consolidated structure into one questionnaire, revised guidance, forms, and processes – all with the goal to be more efficient and user friendly, while at the same time appropriately increasing the population of participants because of the nature of WFP’s structure and the increase in employee population. The re-structuring of the COI questionnaire is also expected to lower the per participant review costs. However, the data for the purpose of properly documenting the mitigation of conflicts of interest work, including guidance and consultations with management, has not been easily maintainable because the database for the ADP has been limited to the user experience. In 2020, it is anticipated that the “back of the house” of the ADP will be developed enabling easy access for analysis for accountability purposes, work planning, and reporting and to implement remediation measures to address the deficiencies noted by the External Auditors in their audit report on fraud.¹⁹

¹⁹ Report of the External Auditor on fraud prevention, detection and response, WFP/EB.A/2019/6-F/1, 8 May 2019.

102. Over the years, the Ethics Office initiated annual retreats. In 2019, the retreat was facilitated by an external advisor, well versed and well respected in WFP. One outcome of the retreat was a recognition that the Ethics Office structure was flat without a deputy position. As a consequence, the Ethics Office considers enhancing the structure and professional capacitation of the Ethics Office to be commensurate with the peer formal independent offices of WFP necessary and appropriate for purposes of efficient operations and business continuity. The Offices of the Executive Director, Chief of Staff, and the Office of the Deputy Executive Director have expressed their support to further professionalize/capacitate the Ethics Office commensurate with the peer formal independent offices of WFP.
103. To address the lack of timeliness of completion and follow-up in the ADP, the Ethics Office continued to apply a firmer deadline and a more immediate escalation process to HRM, as supported by the then EMG, accepting a 99 percent completion rate. While the completion rates at the second extended deadline – which is the deadline measured year over year – was considerably lower than past years, the completion rate by year end was substantially the same. This enabled the Ethics Office to close more promptly the exercise and eliminate time wasted on administration.
104. The Ethics Office undertook an assessment of the ADP, in particular, as related to the relevance of some of the financial information being solicited. It was determined that an equally useful disclosure programme with fewer components yet more robust questions to be possible – while reducing the risk to WFP of collecting financial information of a personal nature not being used and the angst expressed by the participants (and associated time) in making disclosures considered irrelevant and intrusive. It is anticipated that the revised conflicts of interest questionnaire will be rolled out in 2020.
105. Requests for protection against retaliation remained constant. It continues to seem an oddity that there were not more queries for advice as related to retaliation as compared to results from the GSS and the workplace survey. Related to the latter, the Ethics Office anticipates understanding more about the fear of retaliation in WFP through an analysis of the data from the retaliation questions, as intended, for the purpose of helping to alleviate the fear. This analysis will be conducted in 2020.
106. Providing input to standards and policies/practices/processes is essential in operationalizing ethics and compliance seamlessly. While the number of reviews decreased because there was a reduction in new and revised policies and standards put forth for review in 2019 – our participation otherwise in related projects increased.
107. Despite a sizeable concentration of time and effort on education and outreach, the Ethics Office was unable to fully meet the demand of requests – in large part because of the other additional, unanticipated projects as noted above and lack of capacity as a result. Having the ability to meet the demands from the field and, simultaneously, prepare and deliver outreach on anticipated areas of knowledge and skills building to help ensure staff and management act in accordance with applicable standards of conduct and high integrity was (and is) considered another key area of the Ethics Office. For several years, the Ethics Office has made considerable efforts, including dedicated resources, to have the external website revised to more accurately reflect the work by the Ethics Office and all of WFP on acting with integrity. The offices of the Executive Director, Chief of Staff and Deputy Chief of Staff have expressed support for updating the external website with the Chief of Staff prioritizing this work in the Communications and Advocacy division to reflect to the public the depth of WFP's work and commitment to a strong ethical culture.
108. The volume of work on PSEA in the Ethics Office has increased considerably since the Ethics Office was appointed PSEA corporate/organizational focal point; at the same time, the work of the Ethics Office has appropriately developed. The Ethics Office endeavoured to balance

the needs and demands of the various stakeholders while helping WFP to actively participate and lead, as appropriate, to proactively prevent sexual exploitation and abuse through United Nations system-wide, inter-agency, RBAs, bilateral and multilateral collaboration with humanitarian and development partners in the interest of WFP and those WFP serves.

109. Lastly, while the changes to the Financial Regulations have resulted in more reporting to the Audit Committee²⁰ and the RBAs continue to interact informally to further enhance the working methods to support the ethics functions in the RBAs, the Ethics Office recommended to management that an ethics advisory committee be established in support of the three Ethics Offices of the RBAs, proposing that such a committee be composed of the three RBAs ethics directors and a maximum of three ethics professionals (an academic, an ethics professional from a private sector company with respected credentials in ethics and compliance, and someone from a professional ethics and compliance organization). This was one of several recommendations made throughout the year to enhance the work on the core mandate of the Ethics Office, PSEA, and in support of high standards of conduct and ethics in WFP. The Director, Ethics Office, appreciates the opportunities it has had in 2019 to make recommendations to management throughout 2019 and looks forward to continuing the collaboration into 2020.

²⁰ Revised terms of reference of the Audit Committee, WFP/EB.2/2018/10/1, 19 October 2018.

Acronyms

ADP	Annual Conflicts of Interest and Financial Disclosure Programme
COI	conflict of interest
EMG	Executive Management Group
ENMO	Ethics Network of Multilateral Organizations
EPUN	Ethics Panel of the United Nations
GSS	global staff survey
HRM	Human Resources Division
JIU	Joint Inspection Unit
JWG	Joint Executive Board/WFP Management Working Group on Harassment, Sexual Harassment, Abuse of Power and Discrimination
OIGI	Office of Inspections and Investigations
PSEA	protection from sexual exploitation and abuse
RWA	respectful workplace advisor
SEA	sexual exploitation and abuse
SWG-1	Sub-Working Group on safeguarding against sexual harassment and sexual exploitation and abuse
UNHCR	Office of the United Nations High Commissioner for Refugees