

SAVING  
LIVES  
CHANGING  
LIVES



# Ethics Office 2017 Annual Report

## Summary









**“We are recognised around the world for our dedication to excellence in serving the most vulnerable. We are equally committed to serving others with honesty and integrity. At WFP, we do the right thing in the right way.”**

**David Beasley**  
WFP Executive Director

*“This Annual Report Summary reflects the activities of the Ethics Office in 2017 and includes some updates since. For example, it is noted that the volume of advice and guidance matters has substantially increased to date. Details will be coming in the 2018 Annual Report. In the meantime, the Ethics Office views the increase of volume over the last number of years and as detailed herein as a positive reflection of its efforts.*

*Through proactive education and training initiatives, the Ethics Office continued to promote ethical awareness and ethical decision-making to help employees understand what is expected of them—as an employee, manager, and otherwise.*

*Through advice and guidance, which tends to be reactionary in nature, the Ethics Office is able to advise employees on how to act in accordance with expectations and, also, to make informed decisions. In fact, advice is most valuable when the queries are made in advance of decision making; thus, the advice becomes essentially proactive and/or preventive in nature. The ethics and compliance knowledge and experiences of the Ethics Office inform the contribution to the development of standards, policies and processes with an ethical lens, as well.*

*In furtherance of accountability and transparency, the Ethics Office continued to administer the Annual Conflicts of Interest and Financial Disclosure Programme and to work collaboratively to address conflicts of interest as they arise. Addressing conflicts of interest is in the interests of WFP and each one of us.*

*As well, having the Whistleblower Protection Policy is in the interest of WFP and each one of us. The administration of the Whistleblower Protection Policy through an independent office helps to facilitate protection measures and a “speak-up” culture. Throughout 2018, the Ethics Office has been working collaboratively to help all employees become more comfortable with coming forward—whether it be to report misconduct, make a conflict of interest disclosure and/or request protection from retaliation.*

*All the activities of the Ethics Office are administered through its mandated areas for the purpose of empowering every employee to maintain high professional and personal standards of conduct. It is essential for every one of us to continue to help the people we serve and simply: ensures we not only do the right thing, but in the right way.*

*I invite you to read this 2017 Annual Report Summary and thank you for acting always with integrity.”*

**Bonnie E. Green**  
Director and Chief Ethics Officer, WFP Ethics Office

# Introduction

The Ethics Office assists the Executive Director in nurturing a culture of ethics and accountability to enable all employees to perform their functions in accordance with the highest standards of conduct and to come forward without fear of retaliation.

The Ethics Office conducts its activities based on the principles of **confidentiality**, **independence** and **integrity**.

The Ethics Office functions through the following mandated activities:

- **Advice and Guidance**
- **Standard Setting and Policy Advocacy**
- **Protection against Retaliation—Whistleblower Protection**
- **Education, Outreach and Training**
- **Annual Conflicts of Interest and Financial Disclosure Programme (Annual Disclosure Programme)**



In 2018, the Ethics Office was tasked with being the corporate focal point **Protection from Sexual Exploitation and Abuse (PSEA)**. This entails facilitating WFP’s multi-disciplinary approach to PSEA and working collaboratively with other UN agencies and entities to reinforce WFP’s joint approach to PSEA.

Through membership in the Ethics Panel of the United Nations (EPUN) and the Ethics Network for Multilateral Organizations (ENMO), and coordination with the other Rome-based Agencies, the Ethics Office fosters **UN Coherence** and shares best-practices.

As part of **Reporting and Administration**, the Ethics Office compiles an annual report (upon which this summary is based) and presents it to the Executive Director. Starting in 2018, the Ethics Office also presents its annual report to the Executive Board. The Ethics Office considers this a positive reflection of the value placed on the Ethics Office and bolsters the independence nature of the Ethics Office and its work.

## CONSOLIDATED SUMMARY OF RECORDED ACTIVITIES OF THE ETHICS OFFICE

**374** registered requests for advice and guidance

**3** cases of protection against retaliation

**43** education, outreach and training initiatives

**69** recorded reviews of policies

**666** Disclosure Programme submissions reviewed

**74** EPUN consultations and/or deliberations

**The Ethics Office recorded 1,229 separate activities.**

The numbers reflect of activities recorded by mandated area and not amount of time or the number of people impacted.

The overview does not reflect the work by the Ethics Office on hosting the ENMO Annual Conference in Rome and associated with the Director, Ethics Office, as ENMO Chair, 2017–2018.

The numbers do not reflect the roll-out of the updated Annual Disclosure Programme application and the administrative and substantive requests related to its roll out, plus the time and resources dedicated to the creation of the Ethics Office Strategy to align with WFP’s Strategic Plan and other initiatives aimed at enhancing the functioning of the Ethics Office and the proliferation of ethics initiatives and standards of conduct in WFP.

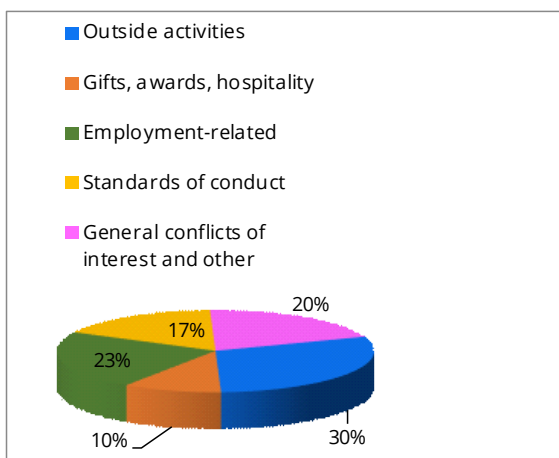
# Highlights

## Advice and Guidance

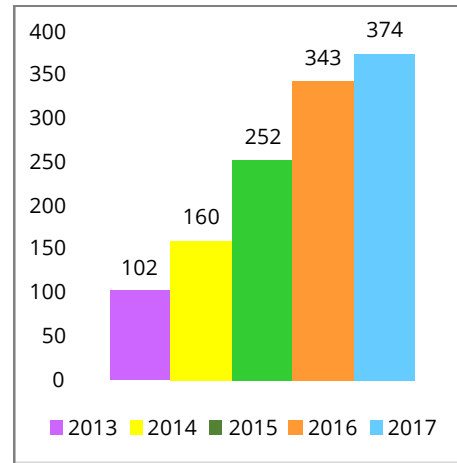
Advising and guiding WFP employees with respect to ethical matters, as employees and as managers (no matter the contract type or level) is critical to helping WFP employees make ethical decisions and take appropriate actions.

In 2017, **the Ethics Office registered 374 requests for advice and guidance.**

### REQUESTS FOR ADVICE BY CATEGORY



### REQUESTS FOR ADVICE, 2013-2017



Requests for advice and guidance continued to increase, likely due to:

- Professionalizing the Ethics Office;
- Continued participation on the Executive Management Group and in WFP; and
- Enhanced personal outreach by the Director, Ethics Office in WFP.

Organizational advice, which has proliferated in 2018 because of external/internal developments, are not included in the 2017 advice and guidance numbers. Organizational advice enables the Ethics Office to provide input from an institutional standpoint—helpful to addressing possible incompatibilities and reputational risk.

### A focus on 2014-2017 Data Comparison

	2014	2015	2016	2017
<b>Outside activities</b>	98	51	75	112
<b>Gifts, awards, hospitality</b>	11	23	42	39
<b>Employment-related</b>	14	55	42	84
<b>Standards of conduct</b>	37	14	21	63
<b>General conflicts of interest and other</b>	0	106	163	76

The Ethics Office continued to work on its analytics and, as a result, there was:

- A decrease of matters classified as “General conflicts of interest and other”, with more requests classified under the “Standards of Conduct” and “Employment-related” categories;
- An increase of “Employment-related” matters, due to the reclassification, plus an increase of queries through the Human Resources Division; and
- A substantial increase in advice and guidance on (personal) outside activities, which reflected three distinct occurrences:
  - ◊ The continued increase of disclosures (34) originating from the ADP exercise;
  - ◊ Country office-specific initiatives; and
  - ◊ The roll-out of the second module of the ethics e-learning, which included conflicts of interest and reporting on outside activities, gifts, etc.

# Annual Conflicts of Interest and Financial Disclosure Programme

The Annual Conflicts of Interest and Financial Disclosure Programme (Annual Disclosure Programme) reflects WFP's commitment to transparency and public confidence-building; it acts as a safeguard and risk management tool for employees and WFP as a whole.

## [The role of the Ethics Office](#)

The Ethics Office administers the Annual Disclosure Programme to assist WFP in identifying and addressing personal conflicts of interest for the purpose of mitigating or eliminating conflicts of interests in the best interests of WFP.

## FACTS AND FIGURES

- The Annual Disclosure Programme was first initiated in 2009; 2017 was the ninth exercise.
- 100% compliance rate for the third consecutive year.
- 2017 was the first year of a new application. Feedback was positive.
- The participants were required to complete the Conflicts of Interest (COI) Questionnaire; the Eligibility Questionnaire; and the Financial Disclosure (FD) Statement.
- **1697 employees were identified to participate.**
- 1371 COI Questionnaires were reviewed.
- **397 COI Questionnaire submissions were flagged as possible conflicts of interest and reviewed.**
- 1319 FD Statements were reviewed.
- **203 FD submissions were flagged as possible conflicts of interest and reviewed.**
- **34 outside activities were identified** for complete reviews through the Ethics Office standard practices.

# Protection Against Retaliation—Whistleblower Protection Policy

The primary objective of the Whistleblower Protection Policy is to ensure that employees can report misconduct and cooperate with audits and investigations without being subject to retaliation.

As of 2017, this includes Proactive Integrity Reviews in practice.

## [The role of the Ethics Office](#)

The Ethics Office administers the Whistleblower Protection Policy and determines whether there is a *prima facie* case of retaliation.

If 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 such an instance, the matter is referred directly to the Executive Director for action.

## FACTS AND FIGURES

- The Ethics Office worked on **3 cases of protection against retaliation.**
- Two continued from 2016; one was a new case.
- One *prima facie* case of retaliation was established and protection measures were implemented.
- In one case, no *prima facie* was established and no protection measures were implemented.
- One case was still under review by the Ethics Office into 2018.

# Training, Education and Outreach

To help employees to understand their responsibilities working for WFP and promote a WFP-wide ethical and “speak up/listen” culture, the Ethics Office concentrated on awareness, training, education and other outreach initiatives.

## MANDATORY ONLINE TRAINING

The Ethics Office rolled out the **second module of the Ethics e-learning**, focused on practical responsibilities of employees, including conflicts of interest, confidentiality, respectful treatment of colleagues, responsible use and stewardship of WFP assets and IT resources.

## TRAINING SESSIONS

**More than 290 employees** were trained on ethics and standards of conduct directly by the Ethics Office, with briefings to the Wellness Division, Finance Officers, Panama Regional Director/Country Directors, Haiti Country Office and in the New York Office.

## ANNUAL AUCTION OF GIFTS

The Ethics Office continued to organize the internal auction of gifts and, for the third consecutive year, conducted an online version to all employees worldwide. The auctions have proven to be an effective “fun” awareness tool.

New in 2017, the Ethics Office added an “open house” event to the on-site auction at HQ to raise awareness of its mandate and, especially, understanding of WFP policies and practices on gifts and other ethics issues.

*“Thank you to the Ethics Office for organizing the auction. This is a really effective and engaging way of raising awareness on WFP’s policies and practices on gifts.”*

**Filippo Pompili**  
Regional Evaluation Officer, Senegal

Proceeds were allocated to WFP’s response to the Rohingya refugee crisis in Bangladesh.

## AWARENESS CAMPAIGNS

- An **Anti-Fraud and Anti-Corruption Campaign** was organized for the third consecutive year by the Ethics Office to mark International Anti-Corruption Day.

*“December 9 was International Anti-Corruption Day — an internationally-recognized day dedicated to raising awareness about the consequences of fraud and corruption. Each one of us is required to report good faith suspicions or knowledge of fraud and corruption so that WFP has the opportunity to properly address. **Coming forward is the right thing to do.**”*

**Domenico Scalpelli**  
Country Director, Myanmar

The campaign was spearheaded by the Assistant Executive Director and Chief Financial Officer and by the Director of the Ethics Office through an all Staff e-mail and a toolkit distributed to Regional Directors, Country Directors and Division Directors.

The campaign was also launched in connection to an **end-of-the-year campaign on gifts**. In addition to translations in Arabic, French, and Spanish, a sample communication in Italian was provided for use with local business partners at HQ.

The Ethics Office also conducted a **“train the trainer” session** on anti-fraud and anti-corruption for **Risk and Compliance Advisers** representing three regional bureaux.

- The **“16 Days of Activism Against Gender-Based Violence” campaign** was supported by the Ethics Office through the creation and dissemination of a **Guidance Note about the Prohibition on Engaging Prostitution Services**, which is considered a form of sexual exploitation and abuse.

## HQs INDUCTION BRIEFINGS

The HQ Ethics Induction Briefing, created in 2016, was rolled-out in January 2017. It is compulsory and aimed at employees new to WFP HQ (whether new to WFP or re-assigned to the HQ). The Ethics Office conducted **25 Ethics Induction Briefings, resulting in approximately 260 employees trained.**

## INDUCTION BRIEFINGS FOR REGIONAL BUREAUX AND COUNTRY OFFICES

The Ethics Office created induction briefings for regional bureaux and country offices. As a result, **almost an additional 200 employees received induction briefings in country offices/sub-offices.**



# Respectful Workplace Advisors (RWAs) as “Ethics Ambassadors”

## RWAS TRAININGS

In collaboration with the Office of the Ombudsman and Mediation Services, **one basic training session was organized** in Rome at the HQ for **16 RWAs, representing 15 country offices**.

The Ethics Office trained RWAs on their role and expectations as “Ethics Ambassadors”, and the RWAs learned how to present on their role and on the WFP Code of Conduct.

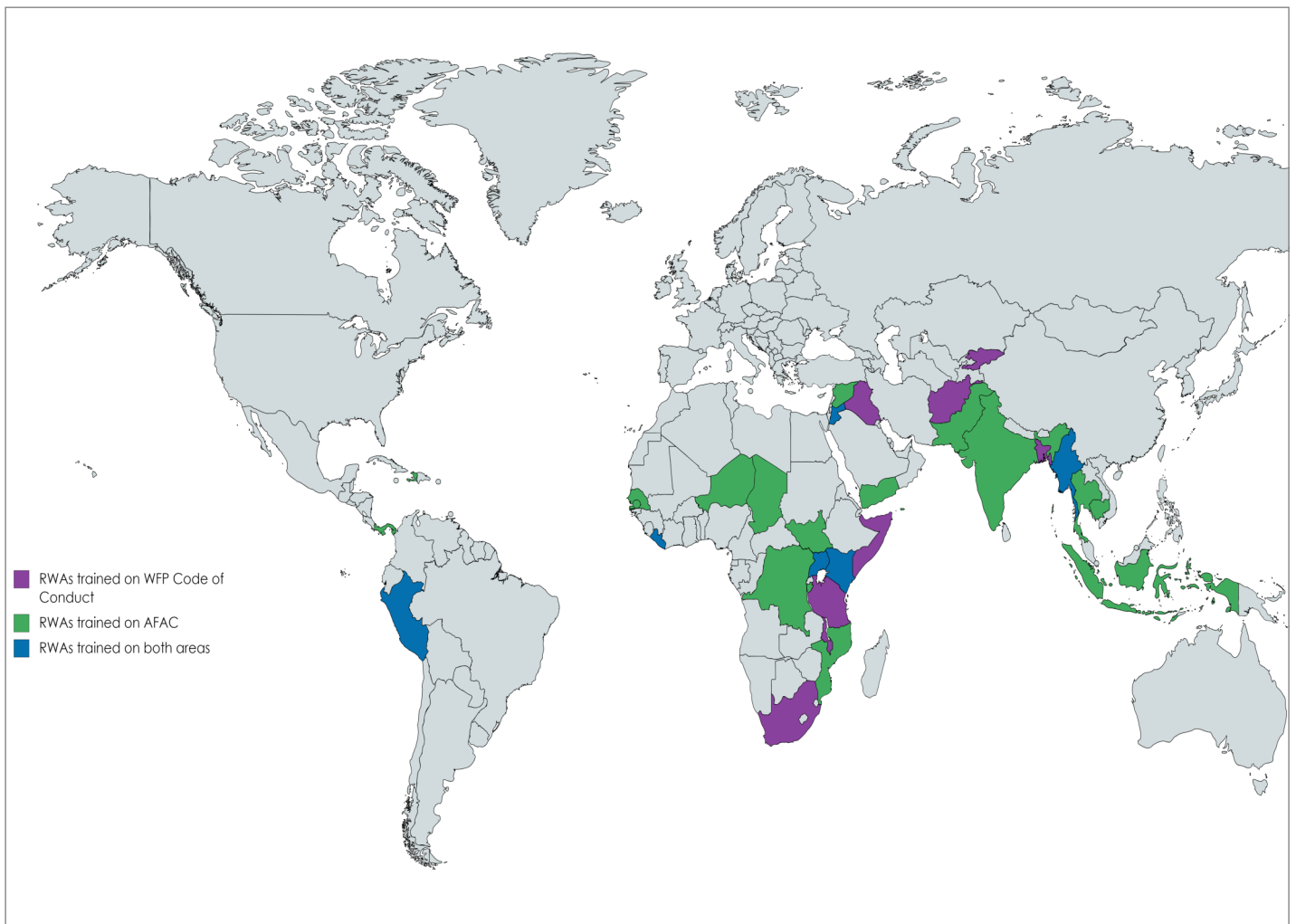
The Ethics Office also **trained 31 of the total 104 RWAs** through “train the trainer” sessions on **anti-fraud and anti-corruption (AFAC)**.

### Who are RWAs?

RWAs are WFP employees, nominated by their colleagues and trained to perform some of the functions of the Office of the Ombudsman and Mediation Services at the field level.

Since 2012, RWAs have been designated as “**Ethics Ambassadors**”. In this capacity, RWAs assisted the Ethics Office and WFP in raising awareness on ethics and standards of conduct.

## RWAS TRAINED BY COUNTRY







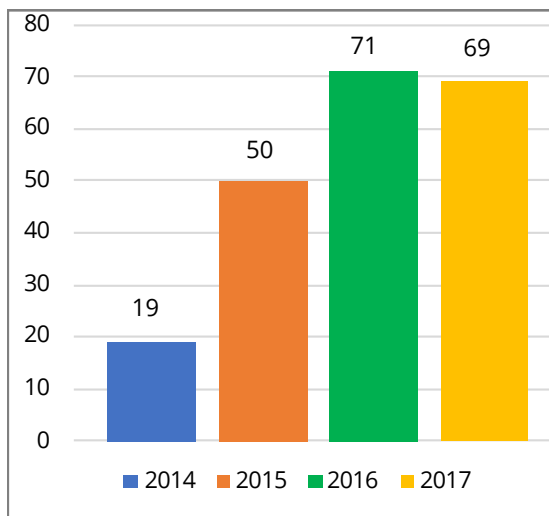
# Standard Setting and Policy Advocacy

To operationalize ethics and compliance, the Ethics Office continued to provide guidance to Management on the incorporation of ethical standards into various policies, practices and processes.

The Ethics Office **recorded requests for input to 87 separate policies** (23 received as part of the Director's role on the Executive Management Group and 64 as WFP's Chief Ethics Officer and Director, Ethics Office), in various forms – circulars, policies, guidance and other administrative issuances and documentation – and on a range of topics, such as harassment, sexual harassment and abuse of authority, anti-fraud and anti-corruption, conflicts of interest, data protection and ethical use of data, and more.

Of the 87 recorded requests, **the Ethics Office provided 69 reviews, some with multiple documents or multiple rounds of reviews.**

## RECORDED REVIEWS OF POLICIES AND STANDARDS (2014-2017)



# Reporting and Administration

Advancing administration and infrastructure enabled the Ethics Office to operate more efficiently and with consistency.

The establishment of tracking mechanisms for metrics and enhanced reporting enabled the Ethics Office to measure its activities and verify the continuous increase in workload. Ongoing work in this area continued into 2018.

# UN Coherence

## ETHICS PANEL OF THE UNITED NATIONS (EPUN)

The Ethics Office continued to be actively engaged with the EPUN, participating in all **11 standard conference calls/meetings**, and **recording consultations/deliberations on 63 issues** of common interest and real-time interactions on other ethical considerations.

The EPUN conducts reviews of non-*prima facie* findings of the ethics offices of the other funds and programmes and the UN Secretariat.

In 2017, the Director, Ethics Office participated in three such reviews and more in 2018.

## ETHICS NETWORK OF MULTILATERAL ORGANIZATIONS (ENMO)

ENMO is comprised of multilateral inter-governmental institutions. The most senior professionals responsible for the ethics functions of ENMO member organizations participate in the annual ENMO conferences.

In July, the Ethics Office successfully hosted the Ninth Annual ENMO Conference at WFP's HQ: a three-day conference, gathering 36 attendees from ENMO member organizations, preceded by a one-day meeting for EPUN members only.

*"ENMO's role in nurturing a culture of ethics, integrity, and accountability is critical to the achievement of Agenda 2030 and the SDGs.*

*I look forward to all that you set in motion to enhance our capacity to adhere to the highest ethical standards each day and in all that we do."*

**Amir Abdulla**

WFP Deputy Executive Director

The Director, Ethics Office was the ENMO Chair for 2017-2018, leading the 2018 Tenth Annual Conference hosted in the United Nations Headquarters.

## ROME-BASED AGENCIES

The ethics officers of the three Rome-based agencies coordinated sporadically in 2017, in part, because of differences in roles and the absence of a permanent Ethics Office Director at IFAD.



# Looking Ahead

Since 2014, the Ethics Office has focused on building and infrastructure, developing standard operating procedures and tracking mechanisms to enhance reporting and operate with consistency and more efficiently. While the tracking mechanisms have verified an increase in workload over the last years, they have also proven to be insufficient for the workload. As a result, the Ethics Office is exploring a case management system in 2018.

As a result of the increased workload, an Ethics Officer was recruited with commensurate ethics and compliance skills and knowledge, who started in February 2018 to support all areas of the mandate with a focus on advice and guidance.

During its initial years, the Ethics Office focused largely on advice and guidance as related to individual integrity risks, with limited involvement on institutional integrity risks. This has evolved over the years and, in 2017, the Ethics Office provided advice including on functional and institutional/organizational conflicts of interest in addition to ethical considerations and decision-making of Management and employees during the course of official duties.

Related, the Ethics Office has initiated a project to assess and enhance policies and practices regarding institutional/organizational conflicts of interest as related to private partnerships and other third parties. This is continuing into 2018.

Some submissions of the 2017 exercise of the Annual Disclosure Programme remained outstanding until 2018. As a result, the Ethics Office planned to address the lack of timeliness of completion of the Annual Disclosure Programme.

In addition, while the new Annual Disclosure Programme application was implemented for the 2017 exercise, the Ethics Office is continuing to work on a revised policy, including definitions of conflicts of interest – personal, functional and institutional/organizational. As well, the Ethics Office has proposed eliminating the separate financial disclosure statement in favour of a conflicts of interest questionnaire only.

The Ethics Office provided input on a substantial number of policies and standards, practical guidance and practices, and advocated for the development of certain other policies/practices. However, some policies and standards were not reviewed or not reviewed timely; as well, many recommendations were not well advanced.

Moreover, the Ethics Office policies are dated and require revisions. These are expected to be initiated in 2018. In September 2018, another Ethics Officer with relevant experience and knowledge was recruited to support all areas of the mandate with a focus on standards and policies.

Despite a sizeable concentration of time and effort on Education and Outreach, the Ethics Office was still unable to fully meet the demand of requests in this mandated area and the Director, Ethics Office did not increase field presence, which has been supported and expected by Management for the last several years.

As part of fostering United Nations coherence, the Ethics Office anticipated a strengthened Rome-based Agencies collaboration, more similar to the interaction among members of the Ethics Panel of the United Nations (ENMO).

As committed in the 2015 annual report, the Ethics Office procured a highly respected ethics and compliance consultant to assist the Ethics Office for an Ethics Office Strategy (2017-2021), which was created in 2017 after consultations with Management and presented in an abbreviated form to the EMG and the Audit Committee in 2018.

The Ethics Office continued to advocate for a separate culture survey and dedicated resources to create a multi-year action plan to address results. This is continuing into 2018.

As well, the Ethics Office advocated for having a functional leader with dedicated resources to work on matters related to PSEA. As a result, in March 2018, the Director, Ethics Office was asked to support WFP's work on PSEA, including working collaboratively with other UN agencies and entities. As part of these efforts, a dedicated PSEA consultant was hired in May 2018.

Lastly, the Ethics Office continued to recommend WFP re-emphasize fundamental values, principles and standards. This was addressed in 2018, working collaboratively with the Human Resources Division, which willingly included the Ethics Office as an active participant in various Human Resources Division initiatives, for example, as related to on boarding and orientation.

The Ethics Office is continuing this enhanced collaboration with the Human Resources Division and other functional and operational areas in 2018.



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