SAVING LIVES CHANGING LIVES



Ethics Office 2018 Annual Report

Summary





A MESSAGE FROM THE DIRECTOR OF THE ETHICS OFFICE

Dear Colleagues, I am pleased to provide this Annual Report Summary highlighting key achievements of the Ethics Office in 2018 while, at the same time, providing insights into initiatives and priorities for 2019.

The Ethics Office planned and implemented activities for the purpose of integrating ethical considerations and ethical decision making throughout WFP. In this regard, we continued to promote ethical awareness and ethical decision-making in education and outreach.

To mark the 10th Anniversary of the establishment of the Ethics Office in WFP, we conducted an ambitious awareness campaign throughout the year on the WFP Code of Conduct, focusing on and reinforcing its principles. Outreach initiatives such as this and other education and training endeavors have proven to be useful and valuable tools to help employees understand the values, standards and principles of WFP, how to live them, and what is expected from them.

Conducting trainings and education also serves to raise awareness on issues requiring consultation. The continued increase in the number of advisories are a positive reflection of the impact of the education and outreach by the Ethics Office.

Many of the individual consultations are related to conflicts of interest. In this regard, the number of participants in the Annual Conflict of Interests and Financial Disclosure Programme continued to increase. The purpose of the Programme is to surface personal conflicts of interest—actual, perceived and potential in order to mitigate or eliminate them in the best interests of WFP. Disclosures are in the interest of WFP and the individual.

Maintaining the Whistleblower Protection Policy is also in the interest of WFP/the individual. It enables employees to fulfill their duty to make good faith reports without fear of retaliation.

As noted, we planned our work with the aim to integrate ethical considerations throughout WFP and our input to standards and policies provides such an opportunity, as well. Looking into 2019, ethics-related policies and practices are largely dated and, thus, the Ethics Office has begun working on proposed revisions to the Executive Director Circulars on Whistleblower Protection and the Conflicts of Interest and the Annual Financial Disclosure Programme.

Of note, 2018 was the first year of activity of the Ethics Office as Corporate/Organizational Focal Point for Protection from Sexual Exploitation and Abuse (PSEA). I am particularly pleased by what we accomplished in 2018 and envision increasing the presence of the Ethics Office on PSEA in WFP, in the UN system, through inter-agency and bi-lateral collaboration, and as well as among the RBAs. Of paramount importance, we are in alignment with the UN principles and in integrating a victim centered approach into our work going forward into 2019.

Lastly, it is without a doubt that there has been an increase in work in all areas of the Ethics Office mandate, especially in the areas of education and outreach and PSEA.

I invite and encourage you to read this 2018 Annual Report Summary — and thank you for always acting with integrity, with respect towards each other and the people we serve.

INTRODUCTION

This report covers the work of the Ethics Office in each area of its mandate for the period from 1 January to 31 December 2018.

The Ethics Office assists the Executive Director in nurturing a culture of ethics and accountability to enable all employees (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.

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
- Protection against Retaliation Whistleblower Protection
- Standard Setting and Policy Advocacy
- Training, Education, and Outreach
- Annual Conflicts of Interest and Financial Disclosure Programme

This report also includes information regarding initiatives undertaken by the Ethics Office on **Protection from Sexual Exploitation and Abuse** (**PSEA**) as, in March 2018, the Ethics Office was appointed as the **Organizational Focal Point for 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 and this abbreviated version. This area includes also the time spent on the tender to procure an external company to administer a "**culture survey**" in 2019.



CONSOLIDATED SUMMARY OF RECORDED ACTIVITIES

The Ethics Office conducted more than activities by all areas of its mandate.













Note:

These numbers reflect the number of activities recorded, not the amount of time spent or the number of people impacted. Additionally, this overview does not reflect the work undertaken by the Ethics Office as:

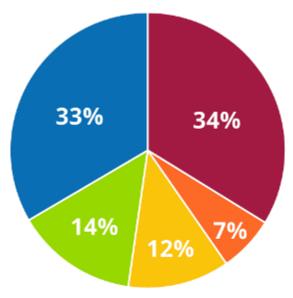
- Chair of ENMO
- Member of the Inter-divisional Standing Committee; and
- Sexual Harassment, Abuse of Power and Discrimination; and Co-chair of the Sub Working Group on Safeguarding against sexual harassment and sexual exploitation and abuse.

HIGHLIGHTS



Advising and guiding WFP employees on ethical matters ADVICE REQUESTS BY CATEGORY is critical to helping all of us make good ethical decisions and take appropriate actions, ultimately for WFP to reflect integrity, in all locations and initiatives.

The Ethics Office provided advice and guidance to all employees, as individuals and as Management.



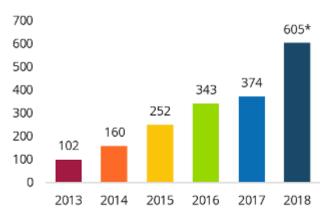
- Outside Activities
- Gifts, Awards, Honours, Hospitality
- Employment-related
- Standards of Conduct
- General Conflicts of Interest and Other

DATA COMPARISON: FIVE YEAR RETROSPECTIVE

Category	2014	2015	2016	2017	2018
Outside Activities	98	51	75	112	190
Gifts, Awards, Hospitality	11	23	42	39	39
Employment related	14	55	42	84	84
Standards of Conduct	37	14	21	63	85
General Conflicts of Interests and other	0	106	163	76	197



FACTS AND FIGURES



*This number does not include PSEA advisories.

REQUEST FOR ADVICE, 2013-2018

The increase from 2017 to 2018 was largely a result of:

- Education and outreach initiatives
- #MeToo movement
- Roll-out of the revised on Policy on Protection from Harassment, Sexual Harassment, Abuse of Authority and Discrimination Policy and related awareness initiatives.

The comparison of the 2017 and 2018 actual numbers also showed a substantial increase of:

- "Outside Activities" requests, probably due to:
 - education and outreach activities
 - increased transparency on investigations, including the failure to disclose such activities
 - increased disclosures under the Annual Disclosure Programme
- "General conflicts of interest and other" and "Standard of Conduct" matters, likely the result of high-profile standards of conduct discourse in WFP and the public.

Training, Education, and Outreach

To help employees understand their ethical responsibilities working for WFP and promote an organization-wide ethical culture, the Ethics Office continued to work on awareness, training, education and other outreach initiatives.

AWARENESS CAMPAIGNS

To mark the 10th anniversary of the Ethics Office, the Ethics Office organized a year long awareness campaign on the establishment of the WFP Code of Conduct, focusing on separate principles covered by the WFP Code of Conduct and in coordination with relevant Divisions and leaders. Toolkits and communication material for use by Regional Directors, Country Directors, Division Directors and Directors of Liaison Offices were prepared and distributed. Appreciative acknowledgements on the usefulness of the awareness campaigns and their tools were received.



- JANUARY: Standards of Conduct and United Nations Charter
- FEBRUARY: Protection and Accountability to Affected Populations
- MARCH: Protection from Sexual Exploitation and Abuse (PSEA)
- APRIL: Humanitarian Principles
- MAY: Harassment, Sexual Harassment, Abuse of Authority and Discrimination
- JUNE: Accountability at WFP
- JULY: Speaking-Up/Listening Culture
- NOVEMBER: Executive Director's Message on Ethics
- DECEMBER: Gifts and Anti-Fraud and Anti-Corruption

The end-of-the-year campaign focusing on policies and practices on gifts was linked with anti-fraud and anti-corruption messaging. Again, the Ethics Office provided sample messages to Country Directors, Division Directors and Directors of Liaison Offices for distribution to local partners. A joint Ethics Office/Supply Chain Division communication was sent to aviation vendor partners managed directly through the Supply Chain Division at HQ. A communication, translated into Italian, was also sent directly to more than 500 Italian suppliers. Additional messages were sent directly by Country Directors, for example by the Country Directors of Uganda, Mauritania, Republic of the Congo, the Islamic Republic of Iran and the United Republic of Tanzania.

AUCTION OF GIFTS

As in past years, in December, the Ethics Office organized an **internal auction of gifts**.

As in 2017, the Ethics Office added an "open house" event to the on-site auction at Headquarters to raise awareness of the Ethics Office mandate and its work. Proceeds of the on-site auction were allocated to the operations in Madagascar.

MANDATORY ONLINE TRAINING

The Ethics Office rolled out the **third and last module** of the **mandatory Ethics e-learning**, focusing on addressing misconduct, protection against retaliation, fundamental values, like respect, reinforcement of the Humanitarian Principles, and the prevention of and protection from sexual exploitation and abuse of those we serve.

The mandatory completion of the ethics e-learnings is integrated in the personal Performance and Competency Enhancement Assessments (PACE) of all employees and is part of new employee onboarding during probation.

HQ INDUCTION BRIEFINGS

The Ethics Office continued to conduct the **Headquarters Ethics Induction Briefing**. The Briefing is compulsory and aimed at employees new to WFP Headquarters (whether completely new or re-assigned to WFP Headquarters).

INDUCTION BRIEFINGS FOR COUNTRY OFFICES

The Ethics Office also created **two induction briefings for country offices**, covering fundamental expectations of conduct and tailored to specific country needs. Presentations were delivered in the Ankara area office and Pakistan country office.

TRAINING TO BOARD MEMBERS

The Ethics Office continued to conduct briefings for Executive Board Members, reaching approximately **130 Board Members** through two sessions.

PANEL TO THE GENEVA GROUP

The Director, Ethics Office participated on a panel to the Geneva Group on "Applying an ethical framework to tackle sexual harassment and sexual exploitation and abuse", together with the UN Under-Secretary-General for Management and Chair, CEB Task Force on Addressing Sexual Harassment within the organizations of the United Nations System and the UNFPA, Ethics Advisor. Feedback was positive, furthering the understanding of the role of UN ethics offices. The session was well received as informative and thought provoking.

TRAINING SESSIONS BY COUNTRY

The Ethics Office approached trainings holistically, conducting training sessions and presentations directly and indirectly through "Ethics Ambassadors" and others, by creating relevant materials to suit requests and needs.

from

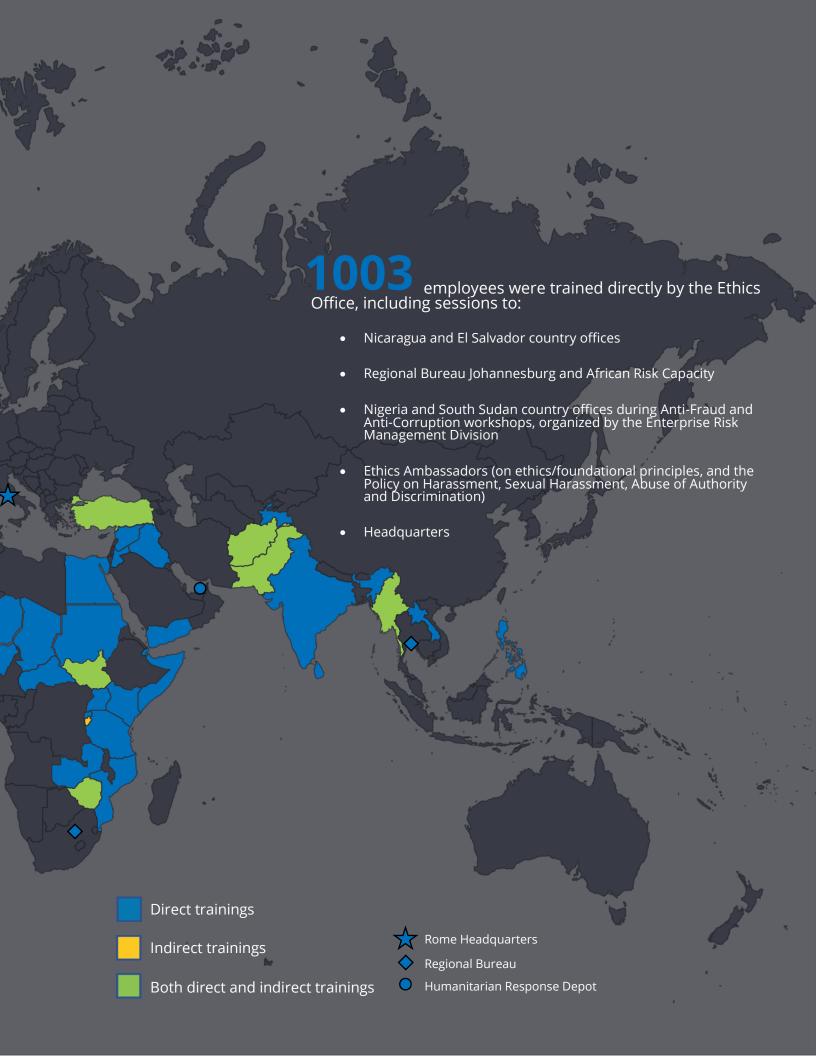
1534
employees representing Country Offices

regions were trained directly and indirectly

531 employees were trained indirectly, including:

- Sessions conducted by Ethics Ambassadors on ethics/foundational principles, and the Policy on Harassment, Sexual Harassment, Abuse of Authority and Discrimination
- Inductions briefings in Ankara area office and Pakistan country office.

^{*}This number includes also direct and indirect trainings conducted at HQs, Regional Bureaux and Humanitarian Response Depots.



Annual Conflicts of Interest and Financial Disclosure Programme

The Annual Conflicts of Interest and Financial Disclosure Programme (Disclosure Programme) reflects WFP's commitment to **transparency and public confidence-building** and acts as a **safeguard and risk management tool** for employees and WFP as a whole. It is not a tool to uncover fraud or unjust personal enrichment.

THE ROLE OF THE ETHICS OFFICE

The Ethics Office is mandated to administer the 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 ON THE DISCLOSURE PROGRAMME

- First implemented in 2009
- Tenth exercise, launched on 9 April 2018
- Comprised of three parts:
 - **♦ conflict of interest (COI) questionnaire**
 - eligibility questionnaire
 - **♦** financial disclosure (FD) statement
- **100%** compliance completion rate, achieved in February 2019
- 1830 employees were identified to participate
- **7.8%** population increase from 2017 to 2018
- 1793 COI Questionnaires reviewed and
 449 submissions flagged as possible conflicts of interest and reviewed
- 1435 FD statements reviewed and 437 flagged as possible conflicts of interests and reviewed
- 51 outside activities identified for complete reviews

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 also included proactive integrity reviews in practice.

THE ROLE OF THE ETHICS OFFICE

The Ethics Office administers the Whistleblower Protection Policy and determines whether there has been a *prima facie* case of retaliation. If the matter is substantiated, it is referred to the Office of Inspections and Investigations (OIGI) for investigation. However a conflict of interest exists in making a referral to OIGI, the matter is referred directly to the Executive Director for action.

The Ethics Office also provides advice and guidance on whistleblower protection matters.

FACTS AND FIGURES



Cases of protection against retaliation were considered

- Three new cases; and
- One case continuing from 2017

The 2017 case was not completed due to uncomplete information.

Out of the three new cases:

- In one case, no prima facie was established but protection measures were provided during the prima facie review.
- In one case, the complainant did not provide complete information and, therefore, the review was not completed.
- ♦ One case was still under review by the Ethics Office into 2019.

The Ethics Office continued to work on an updated Whistleblower Protection Policy, to reflect relevant practices at the UN level and recommendations from a 2018 Joint Inspection Unit Report.

The drafting of a revised policy and various consultations with interested internal stakeholders started at the end of 2018; the adoption of such policy is anticipated in 2019.

Standard Setting

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

Proactive engagement with management, including through the proactive provision of recommendations for new and updated policies and standards is critical.

FACTS AND FIGURES

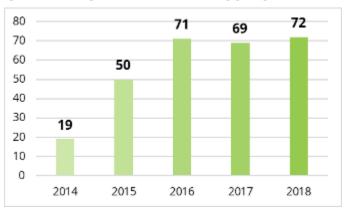
86 recorded requests for input:



72 of them were reviewed

- 22 requests were received as part of the Director's role on the Executive Management Group
- **64** as the Chief Ethics Officer and Director, Ethics Office

NUMBER RECORDED REVIEWS OF POLICIES AND STANDARDS—FIVE YEAR RETROSPECTIVE



JOINT WFP MANAGEMENT/EXECUTIVE BOARD WORKING GROUP ON HARASSMENT, SEXUAL HARASSMENT, ABUSE OF POWER AND DISCRIMINATION

In May 2018, WFP established a dedicated Joint WFP Management/Executive Board Working Group on Harassment, Sexual Harassment, Abuse of Power and Discrimination – the first such joint body in the United Nations system. The Working Group is an ad-hoc body, co-chaired by the Assistant Executive Director, Operations Services Department, and consists of ten representatives of the Executive Board and representatives from WFP Management and independent offices, including the Director, Ethics Office.

The Director, Ethics Office was appointed as cochair of one of its sub-working groups – on safeguarding against sexual harassment and sexual exploitation and abuse. This work is continuing into 2019.



ETHICS PANEL OF THE UNITED NATIONS (EPUN)

The Director, Ethics Office, continued to engage with EPUN, participating in all 10 conference calls/meetings, and recording consultations/deliberations on 72 issues of common interest.

The EPUN conducts reviews of non-prima facie findings of the member Ethics Offices. In 2018, there were 10 such reviews.

ETHICS NETWORK OF MULTILATERAL ORGANIZATIONS (ENMO)

ENMO is comprised of multilateral inter-governmental institutions. The most senior professionals responsible for the ethics functions of the member organizations of ENMO participate in the annual ENMO Conference. The Director, Ethics Office, was appointed **ENMO Chair** for 2017-2018 and advocated for an expanded three- and one-half-day agenda for the **2018 Annual Conference** to commemorate the **10-year anniversary of the ENMO Meeting**. The Annual Conference was a success. It was opened by Under-Secretary General and Chef de Cabinet who delivered a message on behalf of the Secretary General.

"The United Nations and other Intergovernmental Organizations have a double duty to demonstrate organizational integrity and professional ethics to our Members States and the public at large [...] Thank you for contributing to ongoing efforts to enhance a culture of ethics and integrity in your organizations."

Antonio Guterres UN Secretary General

Of note, the UN Under-Secretary-General for Management and Chair of CEB Task Force on Addressing Sexual Harassment in the UN System, the Victims' Rights Advocate, and the Joint Inspection Unit Inspector for the review of the whistleblower protection policies led some sessions, in addition to sessions led by ENMO members. The dialogue was productive and enriching.

ROME-BASED AGENCIES

The ethics officers of the three Rome-based agencies continued ad-hoc sharing of best practices and knowledge with increased interaction, especially with the Director, Ethics Office, IFAD on common issues.



The area categorized as "Reporting and Administration" includes activities related to administration and infrastructure, such as tracking mechanisms which enable the Ethics Office to measure its activities.



EVERY WFP EMPLOYEE HAS THE RIGHT TO BE TREATED WITH DIGNITY AND RESPECT AND TO WORK IN A SAFE ENVIRONMENT FREE FROM HARASSMENT, ABUSE AND DISCRIMINATION. I EXPECT EVERY ONE OF US, WITHOUT EXCEPTION, TO CREATE AND CONTRIBUTE TO SUCH AN ENVIRONMENT."

DOM SCALPELLI
COUNTRY DIRECTOR
MYANMAR COUNTRY OFFICE

IN OUR ALL STAFF MEETING, WE DISCUSSED THE LETTER ON WFP'S EXPECTATIONS OF CONDUCT TOWARDS WFP BUSINESS PARTNERS. IT SEEMED COMMON PRACTICE TO BE PROVIDED WITH A STACK OF 'FREE' CALENDARS AT THE END OF THE YEAR. OUR STAFF THOUGHT IT WAS NORMAL PRACTICE, BUT THAT WAS CLARIFIED. WE ALSO TALKED ABOUT THE IMPLICATIONS INCLUDING THE DIFFERENT TYPES OF CONFLICTS OF INTEREST."

JEAN-MARTIN BAUER
COUNTRY DIRECTOR
REPUBLIC OF CONGO COUNTRY OFFICE



Protection from Sexual Exploitation and Abuse (PSEA)

In March 2018, the Ethics Office was appointed the **Organizational Focal Point for PSEA** and became responsible for overall coordination of PSEA efforts globally. Since then, the Ethics Office has been facilitating a multi-disciplinary approach to PSEA, including identifying good practices, supporting interagency coordination and UN coherence, and providing advice and guidance to employees on SEA prevention and response.

Through more than **40 consultations with key stakeholders** conducted in 2018, the Ethics Office was able to identify successes, challenges and priorities in the implementation of PSEA measures and initiatives.

KEY HIGHLIGHTS

- 66 PSEA-related advice and guidance provided
- Administration of the PSEA Focal Points network, consisting of 278 focal points/alternates in country offices and regional bureaux
- Online survey for PSEA Focal Points, completed by 130 PSEA Focal Points, providing valuable insights into key challenges that PSEA Focal Points face to support PSEA efforts in operations
- Development of a WFP PSEA Strategy (2020 -2022) to significantly enhance prevention and response to sexual exploitation and abuse, across WFP
- Creation and roll-out of the first ever online course for PSEA Focal Points
- Initiation of review and update of PSEA Focal Points Terms of Reference
- UN-wide engagement, facilitated through the Ethics Office and allowing WFP to become more active in the IASC Senior Focal Point Meetings, in the IASC Results Group technical-level and in the UN SEA Working Group
- Participation in a donor-led event on PSEA, where representatives from NGOs, UN entities (including WFP), private sectors and SEA survivors convened to commit to better prevent, listen and respond to SEA
- PSEA half-day session at the Annual Partnerships Consultation, with panel discussions, moderated by AED, Valerie Guarnieri, and featuring speakers from key NGOs, NGO consortiums, and the IASC. The focus was on raising awareness in communities and creating opportunities to report SEA, and ensuring accountability to people affected by SEA

PSEA Advisory Group

- The Ethics Office convened a PSEA Advisory Group for the purpose of providing a learning and knowledge sharing opportunity and promoting peer-learning to enhance the PSEA Focal Points capabilities to fulfil their roles.
- Advisory Group members consist of PSEA Focal Points and key PSEA stakeholders from country offices with strong experience and expertise in integrating PSEA into operations. In addition, a number of Deputy Regional Directors and Regional Humanitarian Advisors have been included, as well as key PSEA stakeholders in HQ.

PSEA Advisory Group First Consultation

- The first PSEA Advisory Group consultation, held at HQ, brought together participants from each of the regional bureaux, key country offices and relevant HQ stakeholders, and provided a critical platform for understanding PSEA challenges, gaps and strengths.
- The Advisory Group consultations and outputs have been useful and will be integrated into the PSEA Strategy.

Looking Ahead

Over the last number of years, the Ethics Office has implemented infrastructure to support its mandate and initiated the development of standard operating procedures to work more efficiently. In 2018, the tracking mechanisms continued to show an increase in the workload, viewed as a positive outcome of the activities and relationships cultivated by the Office. However, such tracking mechanisms has clearly become inadequate for the higher volume of work and demands, and the Ethics Office has been working on a case management system for implementation in 2019.

The Ethics Office has been proactive on outreach to management and, in turn, management has been proactively seeking advice. This type of advice is valuable as it enables managers to make good decisions and avoid mishaps.

The Ethics Office's policies are dated and require revisions. Toward this end, the Ethics Office started working on the update of the WFP Whistleblower Protection Policy and the Circular on Conflicts of Interest and the Annual Conflicts of Interest and Financial Disclosure Programme for the purpose of separating the latter into different Circulars, including one covering conflicts of interest and the Annual Disclosure Programme. The completion and implementation of both are expected in 2019.

Related, the Ethics Office introduced a firmer Disclosure Programme deadline and a more immediate escalation process to address the lack of timeliness of completion and follow-up in the Disclosure Programme.

Nevertheless, some submissions remained outstanding until 2019. In addition, the Ethics Office analysed the administration of the Disclosure Programme and has proposed to eliminate the separate financial disclosure statement in favour of a consolidated conflicts of interest questionnaire, only.

Furthermore, with the addition of an Ethics Officer designated to standard setting and policy advocacy – in particular, to updating the Whistleblower Protection Policy, the Conflicts of Interest Policy, and others – the Ethics Office has anticipated increased input otherwise. This is particularly important in frontier areas entertained by WFP, like digitization that implicates the ethical use of data, drones, use of artificial intelligence, digitizing countries – all of which implicate ethical considerations.

The Ethics Office 10th Anniversary awareness campaign was a success and the Ethics Office received positive feedback and acknowledgements from various locations and levels of employees. Moreover, as already started in 2018, the Ethics Office plans to continue (and expand) the follow-up to trainings, through separate communications, highlighting key information and

clarifying questions that emerged during the live trainings. Despite considerable time and effort on Education and Outreach, the Ethics Office was however unable to fully meet the demand of requests in this area, especially at field level. Upscaling field missions is taken into consideration in the planning of the 2019 education and outreach initiatives.

Of note, the Ethics Office has been working collaboratively with the Supply Chain division and created a training for a workshop to food procurement employees at the field level, covering conflicts of interests, red flags for fraud and corruption, etc. The training has been implemented in 2019.

As part of fostering UN coherence, the Ethics Office was successful in chairing the ENMO meeting, while strengthening the Rome-based Agencies collaboration through more regular interactions. In addition, required input as a member of the EPUN has increased, while informal interactions remain substantial.

Over the last three Annual Reports, the Ethics Office has advocated for a separate "culture survey" and dedicated resources to create a multi-year action plan to enhance WFP's culture. Management made the decision to conduct such a survey, and the Ethics Office volunteered to lead the tender to procure an external company to administer this survey (separate from the 2018 GSS) for the purpose of having a deeper understanding of WFP's workplace culture and taking action, as necessary. This project has continued in 2019 and Management has asked the Ethics Office to lead, as an independent office.

As noted in the past two annual reports, the Ethics Office observed some apparent erosion of consideration of ethical conduct by and in WFP. For example, ethics and standards of conduct were not incorporated in the measures of the performance tool, known as PACE, and in vacancy announcements. The vacancy announcements were updated in 2018 and the Ethics Office started working with the Human Resources Division to incorporate ethics and standards of conduct into existing and new training initiatives. The spirit of collaboration by Human Resources and the tone set by colleagues of the Inter-Divisional Standing Committee have enabled efficient collaboration, while supporting enhanced ethical awareness.

Lastly, after being appointed WFP Organizational Focal Point on PSEA, the Ethics Office has been facilitating a multi-disciplinary approach to PSEA, including working collaboratively with other UN agencies and entities to reinforce WFP's approach to PSEA. The Ethics Office continues to value this work and, based on feedback from leadership and employees, it is valued by WFP. PSEA work and initiatives have been continuing in 2019.



World Food Programme, Ethics Office wfp.ethics@wfp.org

Photo credits: Cover: WFP/Ahmed Basha; Page 2: WFP/Gemma Snowdon; Page 4: WFP/Rein Skullerud; Page 12 and 13: WFP/Annabel Symington; Back: WFP/Giulio d'Adamo