ETHICS IN WFP

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WFP CODE OF CONDUCT
At WFP, we are committed to the highest standards of conduct and integrity to effectively reach the people and communities we serve. Our actions are based on, and driven by core WFP and UN values, principles and standards. It is crucial to the work of WFP that employees uphold the United Nations Charter and adhere to the Standards of Conduct for the International Civil Service.

**WFP VALUES**

- **COLLABORATION**: Working together toward a shared vision
- **INTEGRITY**: Living up to the highest standards
- **HUMANITY**: Improving the lives of the people we serve and each other
- **COMMITMENT**: Delivering on our promises to each other
- **INCLUSION**: Respecting each other’s unique contributions

**CODE OF CONDUCT**

The WFP Code of Conduct (see the full version on page 18) reflects the values of fundamental human rights, social justice, the dignity and worth of the human person, respect for equal rights for men and women, as well as competence, integrity, impartiality and discretion. It also highlights WFP’s commitment to anti-fraud and anti-corruption, protection from sexual exploitation and abuse of the people we serve, and mutual respect.

**HUMANITARIAN PRINCIPLES**

Our humanitarian response is rooted in the core humanitarian principles of humanity, neutrality, impartiality and operational independence. Together, these principles are crucial for WFP to effectively reach the people and communities we serve and to maintain the trust of our stakeholders.
The Ethics Office was created in 2008 to assist the Executive Director in nurturing a culture of ethics and accountability. The overarching objective of the Ethics Office is to enable staff to observe and perform their functions with the highest standards of integrity, as required by the UN Charter, the Standards of Conduct for the International Civil Service (2013), the WFP Code of Conduct and other applicable administrative issuances and practices.

The Ethics Office is an independent and formal office and an integral part of the WFP internal justice system.

It is available to all employees worldwide—national and international staff, consultants, interns, service contract holders, special service agreement holders, staff on secondment, junior professional officers, United Nations volunteers (UNVs), WFP volunteers, interns and fellows —regardless of contract type or duration.

The Ethics Office guides employees to think through ethical dilemmas more clearly and encourages a “speak up” culture, without fear of retaliation. The Ethics Office is also WFP's focal point for Protection from Sexual Exploitation and Abuse (PSEA).

In addition, through membership in the Ethics Panel of the United Nations (EPUN) and the Ethics Network of Multilateral Organizations (ENMO), IASC Results Group 2 on Accountability and Inclusion and the UN SEA Working Group, as well as coordination with the ethics offices of the other Rome-based Agencies, the Ethics Office fosters UN harmonization and coherence and shares best practices and policies with partners.

The Director of the Ethics Office reports directly to the Executive Director and is also a member of the Oversight and Policy Committee (OPC) in an advisory capacity.
Providing consistent, timely and practical advice is one of the most critical components of the work of the Ethics Office. This includes a range of issues, including but not limited to conflicts of interest, political activities, pre- and post-employment issues. More on page 6.

**Annual Conflicts of Interest and Financial Disclosure Programme**

The Annual Disclosure Programme is a mechanism for the disclosure of actual, perceived and potential conflicts of interest (an incompatibility between the private interests and the official duties of employees). More on page 8.

**Standard Setting and Policy Advocacy**

The Ethics Office advocates for the incorporation of ethical standards into organizational policies, practices, and operations, which ultimately contributes to giving a voice and empowering employees. More on page 10.

**Communications, Education and Outreach**

Knowledge and active internalization of values, standards and principles are essential components for understanding and ensuring compliance. To increase knowledge and skills on the integrity expected of all employees, the Ethics Office engages in regular training and outreach activities, as well as internal communication campaigns. More on page 12.

**Protection Against Retaliation**

The Whistleblower Protection Policy aims, on one hand, to enable employees to report misconduct and wrongdoings and cooperate with authorized audits, inspections, investigations, proactive integrity reviews and evaluations without fear of retaliation and, on the other, to safeguard WFP against forms of misconduct or wrongdoings that are harmful to its public interests. More on page 14.
Advice and Guidance
The Ethics Office assists employees in navigating complex situations. Ethical decision-making is key. We guide staff on issues of concern, identify applicable rules and regulations and relevant policies, ways to examine their options, and understand the potential consequences. The aim is to empower employees to make their own ethical decisions, which do not harm themselves, the people we serve, or WFP.

**OUTSIDE ACTIVITIES**

Remunerated or not, some external employment and activities, may interfere with the ability of employees to serve WFP, or may be incompatible with their status as international civil servants. They may also conflict with the best interests of the organization.

For these reasons, **employees can engage in outside activities only after approval has been granted through the reporting line.** The role of the Ethics Office is advisory in nature. Management has the authority to approve outside activities. The individual pursuit of studies, advancing education or training are considered compatible outside activities, and also encouraged. However, these too could present some conflicts of interest risks, and thus may need prior approval.

However, if declining or returning a gift would cause embarrassment, be offensive or otherwise unsuitable to WFP, gifts may be accepted on behalf of the organization. In such exceptional circumstances, employees should:

- Promptly disclose the gift through the electronic gifts register, located on the WFP Self-Service Portal. This will send automated notifications to the recipient, the employee's supervisor, the RD/CD and the Ethics Office.
- Turn over the gift to WFP through the Ethics Office or their RD/CD.

**HOSPITALITY**

Employees should not accept hospitality from external parties, except for courtesies which constitute part of normal social relations, infrequent working lunches, dinners, government, diplomatic or other functions, which staff are occasionally invited to attend as part of their functions.

In all cases, the scale of hospitality accepted should not be significantly greater than the hospitality WFP and its employees would be likely to provide in return.

**AWARDS AND HONORS**

Employees should not seek individual recognition (awards, honors, etc.) for WFP duties. They should also avoid being placed in a position where they might be/appear to be influenced in making, delaying or omitting any official act, including business decisions, as a consequence of accepting a recognition. If an award or honor is anticipated, employees should seek prior approval. The Ethics Office can assist you in this process.
Annual Conflicts of Interest and Financial Disclosure Programme
There are times when employees may be faced with an incompatibility between their private interests and their official tasks. However, it is the duty of employees to avoid or mitigate these conflicts of interest, in order to preserve both their and the organization’s integrity, independence and impartiality.

The Ethics Office administers a mandatory disclosure programme annually to identify, mitigate and address actual, perceived and potential conflicts of interest. It does this through the disclosure of relationships and financial holdings. Eligible employees include:

- Senior management
- Oversight, Investment (Treasury), Procurement and Legal
- Others with material procurement authority
- Employees on vendor management committees or with regular access to confidential procurement information/documents, and more.

Eligible employees are required to complete and submit a questionnaire disclosing relevant information (pertaining to the applicable reporting period) about themselves, their spouse/recognized domestic partner, and relatives, as necessary.

The Annual Disclosure Programme is not a tool to uncover fraud or unjust personal enrichment, but a commitment to transparency and public confidence-building.

**Conflict of Interest**

An actual, perceived or potential incompatibility between an individual’s private interests and either his/her official duties or the interests of WFP. It includes, but is not limited to, circumstances in which an employee, directly or indirectly, would appear to benefit improperly, or allow a third party to benefit improperly, from his/her association in the management or the holding of a financial interest in an enterprise that engages in any business or transaction with WFP.
Standard Setting and Policy Advocacy
Fostering a culture of ethics, accountability and transparency, requires frequent and consistent advocacy.

The Ethics Office provides guidance to management and advocates for the incorporation of ethical standards into the organizational policies, practices, and operations of the organization.

Guidance is provided for circulars, policies, standards and other administrative issuances and documentation and on a range of topics, such as protection from abusive conduct, prevention of sexual exploitation and abuse, anti-fraud and anti-corruption, privacy data protection and confidentiality.

The Ethics Office is also responsible for the administration of Executive Director’s Circulars on ethics and standards of conduct, such as: WFP Code of Conduct; Conflicts of Interest and the Annual Conflicts of Interest and Financial Disclosure Programme; Outside activities, honours, decorations, favours, gifts or remuneration; WFP Whistleblower Protection Policy; and Protection from Sexual Exploitation and Sexual Abuse.

The Ethics Office makes proactive recommendations to enhance standards and policies, many of which originate from advisories, concerns or suggestions formulated by employees themselves. We can help make employees’ voices heard. Please do contact us with any ideas or proposals you may have regarding existing or possible policies, practices or standards.
Communications, Education and Outreach
Why
The first step in building and maintaining an organizational culture of ethics is **awareness**. Knowledge and active internalization of values, standards and principles are essential components for understanding, and thus, ensuring compliance.

WFP employs a diverse, multicultural workforce, located in over 80 countries worldwide, many in high-risk contexts. As such, the Ethics Office employs **creative and dynamic ways** to reach a decentralized, geographically dispersed, multicultural and diverse number of employees.

How
To support employees in understanding their responsibilities, as well as enhance an organization-wide ethical and a “speak-up/listen” culture, the Ethics Office engages in regular, active **training and outreach activities**, as well as internal **communication campaigns** throughout the year.

Where possible, ETO approaches communication and outreach not as stand-alone projects, but rather as mainstreamed across mandated areas, as well as into new and existing employee-centered initiatives by other divisions.

What
Our activities range from **annual internal awareness-raising campaigns** to **training sessions** for HQ, regional, country and liaison offices; to **on-site and on-demand refreshers sessions** and face-to-face and webinar trainings, including “train-the-trainer” modules for Respectful Workplace Advisors (RWAs) in their role as “Ethics Ambassadors” and knowledge and skill–building for Risk Compliance Advisors.

In prior years, the Ethics Office developed a **three-module mandatory e-learning on ethics** and standards of conduct obligations, the completion of which is integrated into the personal Performance and Competency Enhancement Assessments (PACE) for the purpose of compliance. We are here to assist and guide employees, so do **contact us for any ethics-related capacity-building needs**.
Protection against Retaliation
The Protection against Retaliation Policy (or Whistleblower Protection Policy) has been established with a twofold aim to:

- provide protection against retaliation to employees who, in good faith, engage in a protected activity; and
- safeguard WFP against forms of misconduct or wrongdoing.

The Policy applies to any person currently or formerly employed by WFP, regardless of contract type or duration.

**To Request Protection against Retaliation**

If you believe you have been the subject of retaliation or a threat of retaliation for engaging in a protected activity, you can submit a request for protection against retaliation to the Ethics Office. Fill in the Protection from Retaliation Form (available on WFPgo) and submit it to the Ethics Office through the confidential mailbox global.etopar@wfp.org, along with the relevant documentation and information available to you to support your request.

Requests for protection against retaliation should be:

- made as soon as possible and no later than one year after the alleged acts of retaliation have taken place; and
- in good faith (an honest belief, on reasonable grounds, that the report is true).

If you have any doubts, please don’t hesitate to reach out to the Ethics Office.

**Definitions**

**Misconduct** is a failure by a WFP employee to comply with his/her duties and obligations under WFP General Regulations and Rules, applicable Staff Regulations and Rules, Executive Director’s circulars, WFP Financial Regulations and Rules, or any other relevant norms and administrative issuances and organizational policies, or to observe the standards of conduct expected of a WFP employee, including, but not limited to, the Standards of Conduct for the International Civil Service and the WFP Code of Conduct.

**Protected Activity** The following are considered protected activities under the Whistleblower Policy: reporting alleged wrongdoing or misconduct, cooperating with duly authorized audits, inspections, investigations, proactive integrity reviews or evaluations.

**Retaliation** is a direct or indirect detrimental action which has been recommended, threatened or taken toward an employee because that employee engaged in a protected activity.

**Wrongdoing** is any action or inaction performed by an individual, whether WFP employee or not, that, if established, would be materially harmful to WFP’s interests or operations.
Protection from Sexual Exploitation and Sexual Abuse (PSEA)

1. SEA constitute acts of gross misconduct and are grounds for termination of employment.

2. Sexual activity with children (<18 year of age) is prohibited.

3. Exchange of money, employment, goods for services for sex is prohibited, including hiring prostitutes.

4. Any sexual relationship with beneficiaries that involves improper use of position is prohibited.

5. Humanitarian workers (including WFP suppliers) are obligated to report any concerns regarding SEA by fellow workers.

6. Humanitarian workers (including suppliers) are obligated to create and maintain an environment which prevents SEA.

Adapted from the IASC 6 Core Principles relating to SEA, September 2019
Sexual Exploitation and Abuse (SEA) refers to acts committed by WFP employees (and those associated to the work of WFP) against beneficiaries and communities served by WFP.

**WFP Policy**

WFP has a zero tolerance policy for sexual exploitation and abuse, committed both at and away from the workplace, and during or outside working hours. This applies to:

- All WFP employees, regardless of contract type or duration;
- All WFP partners, suppliers, contract workers and external service providers.

If you observe or suspect SEA is committed by a WFP employee and those associated with the work of WFP, you are obligated to report it.

**How to Report**

Contact one of the following:

- **The Office of Inspections and Investigations**
  Direct: +39 06 6513 3663
  FoodSat: 1301 3663
  Hotline@wfp.org
  Online portal: https://wfphotline.ethicspoint.com

- **The designated PSEA Focal Point**
  at the country or field office levels, or his/her alternate. They will refer the matter to the Office of Inspections and Investigations (OIGI).

The Ethics Office is the organizational focal point for PSEA and administers a network of over 300 PSEA Focal Points and alternates. Your PSEA Focal Point can be found on WFP.Go.

**Definitions**

**Sexual Abuse** The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

**Sexual Exploitation** Any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting financially, socially or politically from the sexual exploitation of another. Engaging prostitution services is also considered a form of sexual exploitation. Please consult the “Ethics Guide about the Prohibition on Engaging Prostitution Services” on WFPGo for more information.
WE CONTRIBUTE to the WFP mission of promoting food security and fighting hunger worldwide, serving the ideals of peace, respecting fundamental human rights, economic and social progress, and international cooperation, adhering to highest standards of conduct and all the principles and values enshrined in the United Nations Charter – fundamental human rights, social justice, the dignity and worth of the human person and respect for the equal rights of men and women.

I COMMIT to carry out my duties and conduct myself, both in public and private life, with competence, integrity, impartiality, independence and discretion.

I UNDERTAKE

- to abide by WFP regulations and rules, as well as my contract, and to report any breach of them, understanding I have a right to be protected from retaliation;
- to contribute to building a harmonious workplace, based on mutual respect and understanding, free from discrimination, harassment, sexual harassment and abuse of authority, with respect for diversity;
- to respect the rights, dignity and safety of the people WFP assists and to act impartially and fairly. WFP upholds a zero-tolerance policy to sexual exploitation and abuse;
- to base my actions on honesty, truthfulness, impartiality and incorruptibility, reporting any practice or attempted practice of fraudulent, corrupt and collusive behaviors;
- to perform my official duties and conduct my private affairs in a manner that avoids actual, apparent and potential conflicts of interest or reflects unfavorably on WFP. If a conflict of interest should arise, I undertake to disclose it;
- not to accept any personal honor, favor, gift, remuneration or economic benefit from any source external to WFP without authorization;
- to protect confidential information, not using it for unauthorized purposes or disclosing it to unauthorized persons;
- to use and safeguard the assets, property, information and other WFP resources with care, efficiency, effectiveness and integrity and for authorized purposes only.

I RECOGNIZE privileges and immunities enjoyed by WFP employees are conferred solely in the interests of WFP. I am not exempted from observing local laws or respecting private legal or financial obligations.

I AM accountable and answerable for all my actions, decisions and commitments in the performance of my functions.