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Annual report of the Ethics Office for 2022

Executive summary

This annual report is hereby submitted to the Executive Board at its 2023 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".¹

The report provides an overview of the activities and achievements of the Ethics Office (including statistical information) during the period from 1 January to 31 December 2022. It is organized by the office's mandated areas of work, 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

The report also covers the activities of the Ethics Office on the prevention of and protection from sexual exploitation and abuse because, since mid-2018, the Ethics Office has been WFP's organizational focal point for protection from sexual exploitation and abuse. The report also contains a section on United Nations coherence and ends with observations related to the work of the Ethics Office and ethics within WFP.

Draft decision*

The Board takes note of the annual report of the Ethics Office for 2022 (WFP/EB.A/2023/4-B).

¹ <https://docs.wfp.org/api/documents/WFP-0000011007/download/>.

* 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.

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I. Introduction

1. This report covers the work of the Ethics Office for the period from 1 January to 31 December 2022 and provides analysis and assessments, including comparisons with previous years and relevant activities planned for 2023.
2. The Ethics Office is an independent office whose Director is accountable to and reports to WFP's Executive Director.² All activities of the Ethics Office are based on the principles of confidentiality and independence.
3. The Ethics Office nurtures a culture of ethics and accountability and is mandated to ensure that all employees³ perform their functions in accordance with the highest standards of conduct – as required by WFP's values of integrity, collaboration, commitment, humanity and inclusion; the standards and principles set out in the Charter of the United Nations; the Standards of Conduct for the International Civil Service;⁴ the WFP Code of Conduct;⁵ and other relevant policies and practices – and that all employees can come forward without fear of retaliation.

II. Background

4. The Ethics Office was established in January 2008 by Executive Director's circular 2008/002, "Establishment of Ethics Office in WFP", in alignment with the Secretary-General's bulletin ST/SGB/2007/11.⁶
5. Pursuant to Executive Director's circular 2008/002, the Ethics Office is required to provide an annual report on its work to the Executive Director for submission to the Executive Board. Further, the Ethics Office is required to submit for review a draft annual report to the Ethics Panel of the United Nations (EPUN).⁷
6. At the beginning of 2021, the Ethics Office strategy for 2021–2022⁸ was approved by the Executive Director. The strategy identifies and prioritizes strategic actions with the aim of achieving the vision of "a culture of ethics and accountability ... [that] means constantly and continuously nurturing a culture of ethics and accountability through proactive, ... preventative and supportive measures [...]." Through the strategy, the Ethics Office acts in accordance with the highest ethical expectations and standards while maintaining its independence and working to create an environment in which employees feel confident that they can freely consult and receive the support of the Ethics Office.
7. To achieve this vision, three interlinked objectives guide the implementation and monitoring of the strategy:
 - Strategic objective 1: Use an evidenced/data-driven approach to maximize the impact of advice, education and outreach initiatives and recommendations to and on standards, policies and procedures, matters of retaliation and ethics.
 - Strategic objective 2: Integrate values, ethics, standards of conduct and compliance in everyday practices in a practical and relevant manner.

² Executive Director's Circular ED2008/002, *Establishment of the Ethics Office*.

³ As of 31 December 2022, the Ethics Office was serving 23,266 employees.

⁴ International Civil Service Commission. 2013. *Standards of Conduct for the International Civil Service*.

⁵ Executive Director's Circular OED2022/014, *WFP Code of Conduct*.

⁶ Secretary-General's Bulletin. 2007. *United Nations system-wide application of ethics: separately administered organs and programmes* (ST/SGB/2007/11).

⁷ *Ibid.*

⁸ WFP Ethics Office. 2021. *Ethics Office Strategy 2021–2022*.

- Strategic objective 3: Capacitate employees to live up to the values, principles and standards by recognizing and addressing ethical issues in the ordinary course through strengthened knowledge and skills.
8. The Ethics Office will submit to the Executive Director an updated version of the strategy to extend it by one year, thus covering 2023 as well.
 9. A separate strategy on protection from sexual exploitation and abuse (PSEA) for 2021–2023 was issued to identify the strategic and technical actions to be taken by the Ethics Office as the PSEA organizational focal point. The vision of the strategy is that “WFP has effective prevention and protection measures that safeguard the people WFP serves enabling safe access to WFP programmes and operations without being subject to sexual exploitation or sexual abuse by WFP employees and partnership, and, if acts of exploitation and abuse are attempted or committed, WFP responds swiftly with a victim-centred approach”. Five interlinked strategic objectives guide the Ethics Office in this area of work.
 10. The Ethics Office budget in 2022 was sufficient to cover all key activities and staff. The budget allocation for 2023 is expected to cover an additional professional position.

III. Activities of the Ethics Office

11. During the reporting period the Ethics Office continued to assist WFP and its employees in preventing, mitigating and managing ethical and reputational risks. As a strong organizational culture of ethics and integrity is an essential foundation for the effective performance of WFP programmes and operations, the office continued to work as an advocate for the organization’s ethical values and principles and, through its activities, achieved notable results in all areas of its mandate.

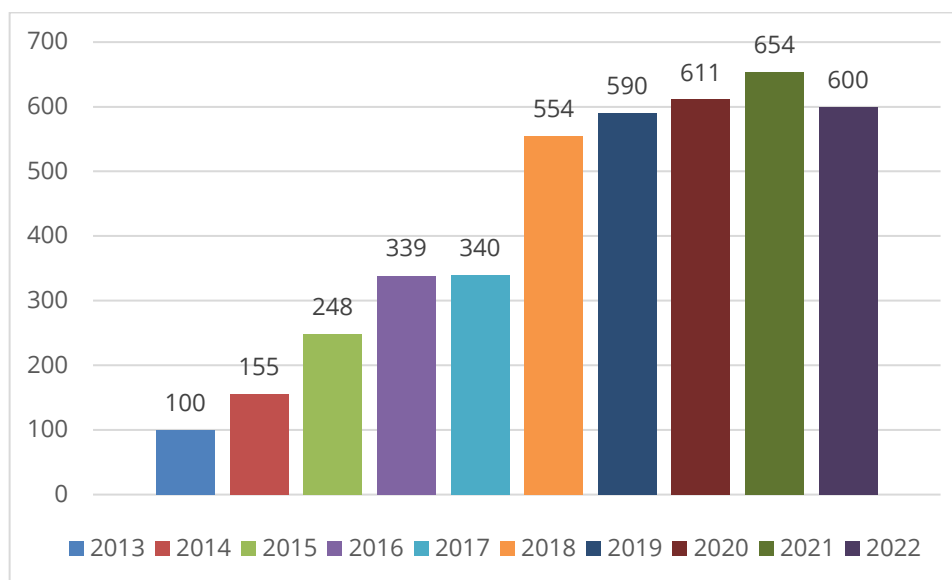
A. Advice and guidance

12. Ethics at WFP is about doing the right thing in one’s daily work. It is also about how employees regulate their conduct, how decisions are made and how WFP is trusted by government partners, donors, the public and the people it assists. It is therefore vital that WFP demonstrate a positive ethical culture and commitment to fairness, accountability and transparency and that it hold itself and its employees to the highest standards of ethical conduct.
13. Through the provision of confidential advice and guidance, the Ethics Office works to educate employees at all levels to make informed ethical decisions and to act ethically and in the best interest of WFP. In doing so, the Ethics Office contributes to the prevention of wrongdoing, the strengthening of accountability and the integrity of WFP.
14. This work includes managing potential conflicts of interest before they escalate into potential misconduct and wrongdoing. The Ethics Office thus plays a fundamental risk management role, promoting awareness of and adherence to applicable rules, policies and standards of conduct. In addition, by serving as a trusted consultative resource available for all employees, the Ethics Office provides a place where employees may confidentially raise concerns and seek guidance.
15. Given the importance of its advisory role, in 2022 the Ethics Office made significant efforts to raise awareness of its services throughout WFP. In addition to providing action-oriented, reliable and pragmatic guidance, the office has maintained its commitment to providing same-day acknowledgment of all requests for advice and issuing clear and practical advisories.
16. In 2022 the total number of advisories provided by the office remained quite steady, declining 8 percent from 2021 (figure 1). This is considered to be a positive indicator and probably reflects favourably enhanced awareness of employees about standards of conduct

and their ability to assess their own dilemmas, as well as the outreach efforts of the Ethics Office during the reporting year.

17. The Ethics Office met its strategic objectives 1 and 3 while also achieving the relevant key performance indicator included in its annual plan of work, specifically by responding to 90 percent of the total requests for advice received within a reasonable timeframe, no more than ten days after the requester provided all relevant information.

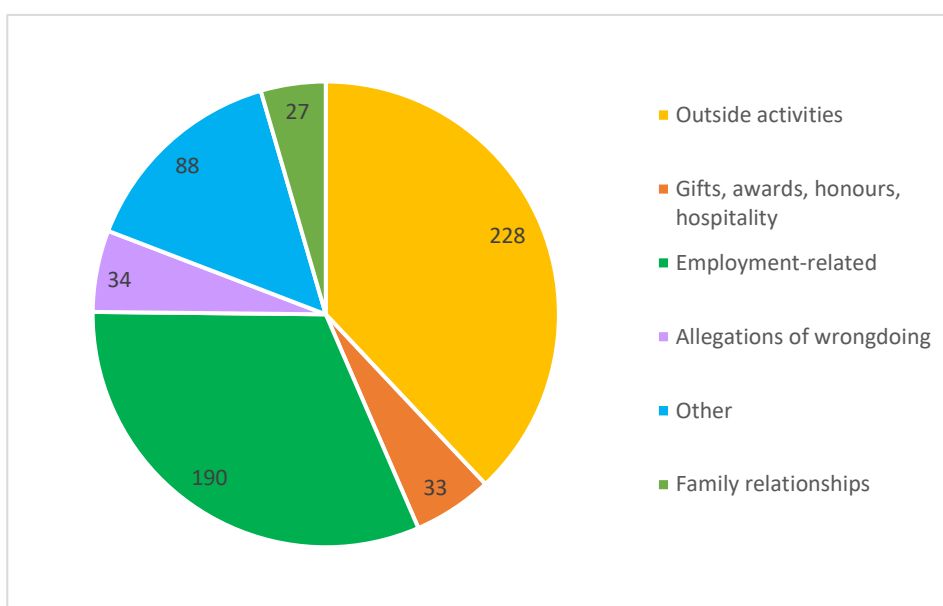
Figure 1: Advisories issued, 2013–2022*



* Excluding advisories related to the annual disclosure programme and PSEA.

18. Figure 2 summarizes the advisories by category; advisories by location are reported in the annex to this report.

Figure 2: Advisories issued by category, 2022*



* Excluding advisories related to the annual disclosure programme and PSEA.

19. As in past years, the highest number of requests concerned outside activities⁹ such as external employment, occupation and other activities that might interfere with an employee's ability to serve WFP. As a risk control measure, the Ethics Office provides advice to ensure that such activities are compatible with the best interests of WFP and do not conflict with a requestor's function or commitment to impartiality, independence and loyalty to WFP. In 2022, the Ethics Office began to identify options for the clarification of WFP's rules and procedures on outside activities and considered drafting a revised Executive Director's circular on the topic of outside activities.
20. The second most numerous requests were "employment-related". This category includes advisories regarding outside interests identified during employees' recruitment, in particular through guidance provided to human resources officers on the pre-appointment conflict of interest disclosure form completed by prospective WFP employees. This practice allows WFP to detect potential conflicts of interest at an early stage.
21. In 2022 the Ethics Office continued to advise employees on how to conduct themselves when offered gifts, favours, remuneration, honours, awards or hospitality from external sources in the course of their official duties or in relation to their WFP status, clarifying WFP's disclosure procedure and practice.
22. In this regard, advisories on gifts are separate from disclosures, which are required to be made through WFP's electronic gifts register.¹⁰ In 2022, 214 disclosures of gifts were made through the register. Each disclosure is reviewed by the Ethics Office and advice is provided depending on the circumstances and as appropriate. While the number continued to appear low in comparison to the size of the workforce, the Ethics Office registered an increase in disclosures and requests for advice on this topic during the month of December. This is considered to be a positive result of the annual end-of-year awareness campaign on gifts (described in paragraphs 60–61). In addition to advising on the appropriateness of receiving gifts and related conflicts of interest, the Ethics Office continued to administer and manage the disposal of the gifts received. Recognizing that this task is outside its mandate, the office has been exploring options for this task with the Management Services Division. This work is expected to continue in 2023.
23. The Ethics Office's case management system, I-Sight, continued to provide accurate and timely data (see the annex to this report) regarding the queries received by the office. As a result, and with the objective of using an evidence- and data-driven approach to maximize the impact of its advice, the Ethics Office continued to analyse such data with a view to planning measures to fill knowledge challenges and prioritizing prevention and proactive outreach initiatives (see paragraph 52 for more information).
24. While the Ethics Office continued to receive positive and satisfactory feedback regarding the timeliness, clarity and usefulness of its advisories, in 2022 it started to gather such feedback more systematically. In this regard, it is expected that from 2023 the office will distribute revised surveys to assess employee satisfaction regarding the provision of advice and guidance. The data collected will enable the Ethics Office to further tailor its responses and services to employees' needs.

⁹ The most common activities include writing-related activities, outside teaching and lecturing, speaking engagements, membership of external boards, part-time employment and ownership of and participation in personal or family businesses.

¹⁰ Executive Director's circular OED2017/002, *Disclosure of Gifts*.

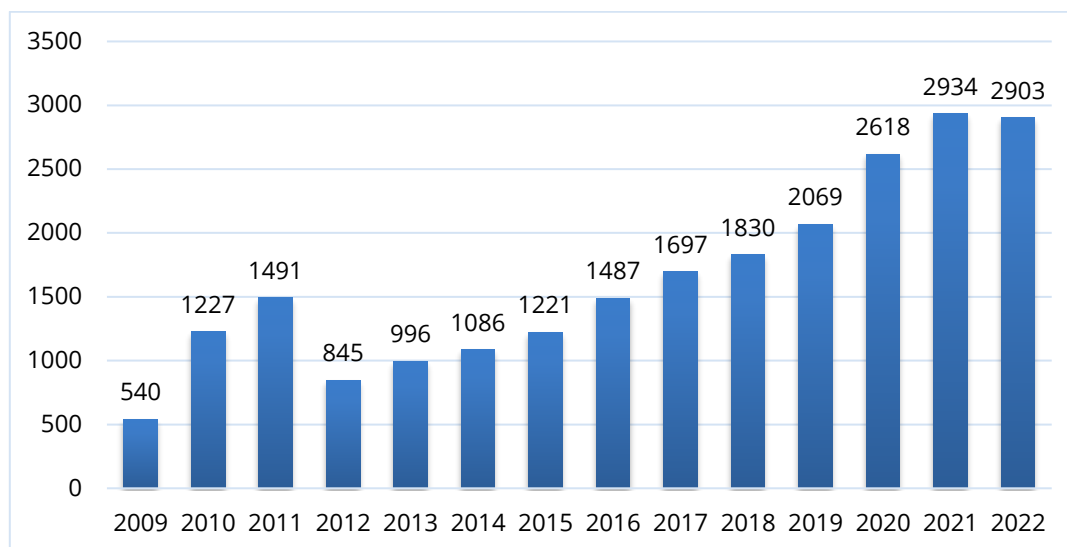
B. Annual conflicts of interest and financial disclosure programme (disclosure programme)

25. The Ethics Office is mandated to administer the disclosure programme¹¹ to assist WFP in identifying and addressing personal conflicts of interest in order to mitigate or eliminate them in the best interest of WFP. The disclosure programme reflects a commitment to transparency and public confidence-building and acts as a safeguard and risk management tool for WFP and eligible employees. It is not a tool for uncovering fraud or unjust personal enrichment.
26. The fourteenth disclosure programme exercise was launched on 11 April 2022 with an initial six-week deadline of 20 May 2022. By that deadline the completion rate was 63 percent; by an extended deadline of 17 June 2022 the completion rate was 70 percent. At the end of the calendar year the completion rate was 99 percent, compared with 100 percent in 2021 and 99 percent in 2019 and 2020.
27. To ensure full compliance, the Ethics Office continued to collaborate with the Human Resources Division (HRM) to follow up with those employees who had not submitted the required questionnaires by the extended deadline.
28. Accordingly, in September 2022, 119 cases of non-compliance were escalated to HRM for further action. With the objective of achieving full compliance and further supporting HRM, the Director of the Ethics Office has additionally sent individual reminders to 53 employees who were still non-compliant. The Ethics Office anticipates that full compliance will be reached in February 2023.
29. In addition, the Ethics Office has developed, together with HRM, standard operating procedures to clarify the process for reminding employees of their obligation to comply with the disclosure programme and to set out the agreed measures that both offices can take to streamline the completion process and close the disclosure programme by the end of the calendar year.
30. Of 21,917 WFP employees,¹² 2,903, or 13.2 percent, were required to participate in the 2022 exercise (figure 3). The reduction in the disclosure programme population in 2022 compared with 2021 is probably due to the identification of less participants meeting the eligibility criteria in 2022 by the managers in each office.

¹¹ Secretary-General's bulletin. 2007. *United Nations system-wide application of ethics: separately administered organs and programmes* (ST/SGB/2007/11). Executive Director's circular OED2020/007, *Conflicts of Interest and the Annual Conflicts of Interest and Financial Disclosure Programme*.

¹² Total number of employees as of 31 March 2022.

**Figure 3: Disclosure programme:
employees required to participate, 2009–2022**



31. Of the 2,903 participating employees, 62 were exempted for various reasons, including separation, retirement or extended leave. As a result, 2,845 employees completed the disclosure programme exercise. Of the questionnaires submitted, 161 were reviewed by the Ethics Office. Upon review, the Ethics Office provided proactive advice on 89 questionnaires (51 related to outside activities and 38 to conflicts of interest). The remaining questionnaires did not warrant the provision of proactive advice because they presented no material change from past disclosures or because no conflicts of interest were found after additional clarification by the employees concerned.
32. Also in 2022 the database used for the administration of the disclosure programme was fully implemented, hence providing the Ethics Office with direct access to its own data, which, in turn, allowed the office to produce reports and identify trends and risks.

C. Protection against retaliation: whistleblower protection policy

33. The primary objective of the whistleblower protection policy is to ensure that employees can report allegations of wrongdoing and misconduct without fear of retaliation. The whistleblower protection policy¹³ applies to all WFP employees (current and former) who allege that they have been subjected to or threatened with retaliation as a consequence of reporting alleged wrongdoing or misconduct or for cooperating with a duly authorized audit, inspection, investigation, proactive integrity review or evaluation. Thus, the policy encourages and supports the reporting of alleged wrongdoing or misconduct and cooperation with investigations and audits, thereby enhancing the ability of WFP to investigate and remedy conduct that, if left unreported and unaddressed, could cause significant risk or damage to the organization.
34. Under the policy, the Ethics Office is responsible for conducting a review of each complaint to determine whether there is a *prima facie* case of retaliation and, if so, referring it to the Office of Inspections and Investigations (OIGI) for investigation. Before and during the preliminary review the Ethics Office may recommend interim protective measures to protect the complainant or any other affected employee.
35. In 2022 the Ethics Office addressed 25 matters relating to protection against retaliation. Of those, 11 matters resulted in formal requests for protection against retaliation under the whistleblower protection policy. Two of those cases were closed because no *prima facie* case

¹³ Executive Director's Circular ED2020/022, [Protection against Retaliation Policy \(or Whistleblower Protection Policy\)](#).

- was established, one was closed at the request of the complainant owing to material changes in the office concerned, one was closed because the complainant stopped providing information to the Ethics Office, one remained open after being referred to OIGI for investigation, and six were still under review at the end of 2022.
36. The remaining 14 matters were requests for advice and guidance that did not warrant full *prima facie* review but nevertheless required thorough assessment. In some of those cases, the complainants were reminded about or, with their consent, referred to other available avenues for further support.
 37. In addition, four formal cases were carried over from 2020 and 2021. One of those was closed because no *prima facie* case was established and three were referred to OIGI for investigation after the Ethics Office found *prima facie* cases of retaliation. Of those three, one was closed because the complainant did not wish the investigation to proceed; in another case, retaliation was substantiated and the Ethics Office recommended protection measures; in the third case the investigation did not yield sufficient evidence to substantiate retaliation.
 38. Following the rollout of the revised whistleblower protection policy at the end of 2020, the Ethics Office created standard operating procedures for reviewing requests for protection against retaliation and revised the form used to facilitate the preliminary assessment. As these are living documents the Ethics Office has continued to revise and update them, working in close consultation and collaboration with OIGI, the Legal Office and HRM.
 39. To support the achievement of strategic objectives 2 and 3 of the Ethics Office strategy, the Ethics Office has taken action to promote enhanced clarity regarding what “protected activity” and “retaliation” mean under the whistleblower protection policy compared with other forms of abusive conduct set out in the Executive Director’s circular, “Prevention and Response to Abusive Conduct (Harassment, Sexual Harassment, Abuse of Authority and Discrimination)”.¹⁴ To that end, the Ethics Office has been working with an external vendor with adult-learning expertise on the development of an outreach toolkit and training to provide all staff with clear and straightforward information on the whistleblower protection policy, with a focus on ensuring that the perceived lack of understanding of the protection from retaliation process does not deter whistleblowers from coming forward.
 40. As part of these efforts, the Ethics Office continued to engage with the Staff Relations Branch of HRM (HRMSR) and the interdisciplinary committee to coordinate and raise awareness of cases that did not involve retaliation as defined in the whistleblower protection policy but did raise issues of abusive conduct or disagreement on work performance and to refer them to the appropriate channels, including HRMSR or OIGI for allegations of abusive conduct and to the appropriate recourse mechanisms for performance management disputes.

D. Standard setting and policy advocacy

41. At WFP, the values and principles that guide employees as they carry out their work are just as important as how WFP supports the people it assists. With WFP’s workforce and global presence growing, the fostering of an organizational culture of ethics and accountability requires frequent and consistent advocacy. To integrate ethical considerations institutionally, the Ethics Office continues to advocate, and provide guidance to the Executive Director and senior management regarding, the incorporation of ethical standards into WFP policies, practices and operations to ensure that WFP functions in an open, transparent and fair manner.

¹⁴ Executive Director’s Circular OED2022/004, *Prevention and Response to Abusive Conduct (Harassment, Sexual Harassment, Abuse of Authority and Discrimination)*.

42. Of note is the rollout of the revised WFP Code of Conduct¹⁵ in June 2022. The revised code introduced important updates, such as the expectation that employees will honour WFP's corporate values and place respect, tolerance and professional behaviour at the heart of everything they do. Furthermore, it elaborated and clarified expectations relating to independence and impartiality while including new expectations regarding confidentiality, data protection, privacy, gender equality, diversity and the safeguarding of the environment.
43. The issuance of the revised Code of Conduct was supported by an internal WFP-wide outreach campaign to raise awareness of the document. The campaign included the dissemination of posters and messages to all employees and senior leaders, as well as a request that the latter make it known to their teams that they personally endorse the code. Reflecting a strong interest in and commitment to the Code of Conduct, some country offices required the support of the Ethics Office in organizing all-staff briefings on the code. In this regard, the Ethics Office has also begun work on a scenario-based, highly interactive training programme on the Code of Conduct to be piloted in selected country offices and with selected audience groups in 2023.
44. With the objective of achieving strategic objective 2 of the Ethics Office strategy, and consistent with the key performance indicator included in its annual workplan,¹⁶ the Ethics Office continued to support policy development through active membership of the Oversight and Policy Committee and by responding to various policy and process reviews requested by management and several units and offices. Examples of the policies, guidelines and other institutional documents reviewed in order to achieve the incorporation of ethics considerations into everyday practices and to support an organizational culture of ethics included the Executive Director's circular covering the revision of the national staff recruitment and promotion framework and the promotion of staff to the D-2 level, WFP's updated corporate evaluation strategy and the new Executive Director's circular on governance structure for the protection of personal data.
45. In addition, the Ethics Office was consulted on Joint Inspection Unit (JIU) questionnaires concerning the *review of accountability frameworks in the United Nations system organizations* and a *review of measures and mechanisms for preventing and addressing racism and racial discrimination in the institutions of the United Nations system*. The office also continued to support management in responding to the recommendations included in the JIU *review of the ethics function in the United Nations* and the *review of the management of implementing partners in United Nations system organizations*.
46. The fostering of an ethical culture requires the involvement and collaboration of relevant actors working within the internal justice system (such as HRMSR, the Legal Office, OIGI and the Office of the Ombudsman and Mediation Services) and, more generally, within the Workplace Culture Department. Multiple efforts were pursued to strengthen collaboration and coordination with relevant offices by continuously cultivating fruitful collaboration and by streamlining and clarifying processes, thus promoting consistency and clarity for employees.
47. The Ethics Office further strengthened its collaboration with the Risk Management Division and, among other actions, updated the questions related to ethics and PSEA in the questionnaire used in the 2022 Executive Director's assurance exercise, which is completed by all senior WFP officials in WFP to provide assurance on the effectiveness of internal controls in their offices.

¹⁵ Executive Director's Circular OED2022/014. [WFP Code of Conduct](#).

¹⁶ The Ethics Office achieved its internal key performance indicator related to this area of its mandate by reviewing 100 percent of the total number of requests for input to organizational policies, standards, practices, processes, etc.

48. In response to a JIU recommendation¹⁷ the Ethics Office continued in 2022 to work to understand and map the most common organizational conflicts of interest, registering the related risks within WFP and, where necessary and practical, developing tools to address or mitigate such risks. Working with the Risk Management Division, the project began with initial consultations with regional bureaux and the launch of a detailed and extensive online survey that targeted more than 250 staff across WFP. More than 150 responses were received. In parallel the Ethics Office conducted briefing sessions with the Office of Internal Audit and the Legal Office and analysed the results of the online survey with support from the Innovation and Knowledge Management Division. The analysis, together with feedback collected through additional in-depth interviews with selected country offices, was used to formulate recommendations on how to mitigate organizational conflicts of interest. The recommendations were presented to the Oversight and Policy Committee at the end of the year, and the Ethics Office will work to implement them in 2023.

E. Training, education and outreach

49. Training, outreach and awareness raising are critical components of the Ethics Office's mandate. In training employees on standards of conduct and reinforcing WFP's ethical values, the office empowers employees to make ethical decisions and conduct themselves in the best interests of WFP.

50. The Ethics Office began the year by redefining its brand and adopting a simple message to describe its outreach. This message started by emphasizing the importance of trust: WFP's purpose is to save and change lives, and to do so WFP needs the people it assists, donors, Member States and the public at large to trust it and all of its employees. The people who work for and with WFP must earn that trust by always doing the right thing.

51. WFP works in high-risk environments and has a diverse and multicultural workforce located in more than 120 countries and territories. Its good reputation and its effectiveness depend on all employees understanding and adhering to WFP's unified set of ethical principles and expectations, which is incorporated into all WFP contracts issued across all duty stations. The emphasis is therefore on outreach, awareness raising and education initiatives – in various forms and forums – aimed at helping employees to identify potential ethical dilemmas and make decisions that are in WFP's best interest.

52. In 2022, the Ethics Office successfully shifted its approach to training and outreach from being reactive and demand-driven to being more proactive, needs-specific and targeted. The work required to achieve this shift included a thorough revision of existing training materials and the development of tailored and customized training and outreach materials for country offices. In addition, with the support of the Innovation and Knowledge Management Division, the Ethics Office conducted an ethics risk mapping exercise aimed at identifying the country offices and regional bureaux with the highest likelihood of ethical challenges and developing and using an ethics risk map to prioritize and target prevention and outreach initiatives.

53. The outcome of the analysis described in the previous paragraph enabled the Ethics Office to provide targeted and field-oriented support, including focused training sessions in several country offices such as those for Cameroon, the Gambia, Guatemala, Indonesia, Madagascar, the Philippines, Sierra Leone and Zimbabwe and discussions of training with other country offices such as those for Burkina Faso, the Central African Republic, Chad, Colombia, the Democratic Republic of the Congo, Mali, Somalia, Uganda and Türkiye.

¹⁷ *Ibid.*

54. In addition, the Ethics Office piloted proactive outreach to country offices in countries with imminent elections for the purpose of reminding all staff that as WFP employees they should demonstrate qualities such as impartiality, incorruptibility and loyalty to WFP. Another tool piloted in 2022 was an ethical decision making model for senior leaders and employees in every position and at every level. When operating in volatile environments, and especially where events may challenge employees' integrity, accountability, impartiality and neutrality, ethical decision making and addressing ethical dilemmas are of paramount importance.
55. As part of outreach efforts, the Ethics Office in 2022 revised its dedicated webpage on the intranet and rolled out, in Arabic, English, French and Spanish, a two-page welcome document introducing ethics to new WFP employees, and another outreach document focusing on essential ethics for leaders. The welcome document was also made available to colleagues joining WFP 's Ukraine operation.
56. Ethical leadership training encourages management to think about and promote positive and harmonious workplace behaviour and business practices. In this regard, the Ethics Office was again invited to participate in the induction programme for country directors and deputy country directors organized by HRM. The office led a session entitled "Leading Ethically: Enhancing ethical decision making skills", which, through real-life case studies, focused on how to handle complex ethical dilemmas and outlined the role of the Ethics Office in providing country directors and deputy country directors with guidance on making the right choices.
57. Mandatory e-learning courses on ethics, in Arabic, English, French and Spanish, continued to be available to all employees and are integrated into employees' personal performance and competency enhancement assessments, as well as probationary processes. As of 31 December 2022, 97 percent of the active workforce¹⁸ had completed the first module of the course and 96 percent the second and third modules. This represented a solid improvement over 2021, probably as a result of personalized emails asking regional directors to share the completion rates of their staff and, where required, to ask for their support in urging their employees to complete the modules. The Ethics Office hired an external vendor and started work to update its mandatory e-learning ethics courses and to develop refresher modules on selected ethics issues and dilemmas.
58. Using a virtual format, the Ethics Office continued to provide the headquarters ethics induction briefing, which is considered compulsory for employees new to headquarters (whether completely new or reassigned). The Director of the Ethics Office also continued her quarterly reporting to the Executive Board and the Independent Oversight Advisory Committee (IOAC). The Ethics Office continued to review the disclosure of interest and affirmation of independence forms of IOAC members and provided advice as necessary.
59. Internal communication campaigns are a key component of the Ethics Office's work and continued to be central to nurturing an organization-wide ethical culture.
60. In addition to an awareness-raising initiative linked to the rollout of the updated Code of Conduct (described in paragraph 43), the Ethics Office repeated its annual end-of-year awareness campaign on policies and practices related to gifts. The dual purpose of the initiative was to provide proactive guidance to prevent the occurrence of conflicts of interest related to employees being offered or accepting gifts. Specifically, the campaign had the objective of reminding all staff that, as WFP employees, they are required to promptly decline any gift and reminding partners about that obligation while encouraging them not to offer gifts to WFP or its employees. As in past years, the campaign included sample communications for country and division directors to share with local partners, an all-staff

¹⁸ The total number of active WFP employees as of 31 December 2021 was 21,259.

email sent by the Director of the Ethics Office, and thousands of emails sent jointly by the Ethics Office and the Supply Chain Operations Division to business partners worldwide and to partners local to headquarters.

61. New in 2022 was the creation of a very practical and engaging “bite-size” e-learning module on WFP’s policies and procedures related to gifts. The feedback received was extremely positive, resulting in a high participation rate among employees completing the e-learning, a high and increased number of disclosures of gifts through the gift register in December, and the receipt of an unexpected number of queries from WFP employees. Such queries continue to be an opportunity to promote ethics and “doing the right thing”, i.e., making decisions based on WFP’s values and standards and not on personal interests or needs.

IV. Protection from sexual exploitation and abuse

62. As the organizational focal point for PSEA, the Ethics Office has continued to support safe programming at WFP by addressing the prevention of and protection from sexual exploitation and abuse (SEA) holistically through a survivor/victim-centred approach and by taking steps to ensure a sustainable long-term approach to PSEA. Throughout 2022, this has included implementing and applying to WFP’s systems and operations an approach that meaningfully addresses the factors contributing to SEA, cultivating safer environments for the people that WFP assists, and focusing on activity-based interventions that mitigate SEA risks proactively.
63. Policy and strategy form the overarching framework for work on PSEA at WFP. The Ethics Office continued to update the Executive Director’s circular entitled “Special Measures for Protection from Sexual Exploitation and Sexual Abuse”. Having shared a draft of the circular with Oversight and Policy Committee members, the Ethics Office has been incorporating comments and conducting additional consultations. It is expected that the updated circular will be promulgated in 2023.
64. The Ethics Office started to support regional bureaux and country offices in the integration of PSEA into the design and drafting of country strategic plans and the mainstreaming of PSEA into annual country reports submitted to headquarters that they highlight the PSEA risks, challenges and achievements faced by country offices.
65. In addition, with the objective of strengthening PSEA knowledge and skills in country offices, the Ethics Office continued to support selected country office initiatives, including in the Eswatini, Mali, State of Palestine, the Syrian Arab Republic, and Zimbabwe country offices, through, for example, the development of beneficiary sensitization materials, visibility items and training for staff and partners. Support for operation in Ukraine was provided from the onset of the conflict there: The Ethics Office supported the emergency response team in managing beneficiary PSEA risks in and outside Ukraine, advising on various issues, including interagency PSEA referral pathways. As part of that work, PSEA focal points were appointed in Ukraine and neighbouring countries and received onboarding training and materials in local languages to be shared with staff and partners, displayed at distribution sites and used as a basis for staff information and sensitization sessions.
66. The number of PSEA-related advisories remained stable in 2021, with over 300 requests received. These included requests for capacity building support, training tools and resources; guidance on SEA incidents and victim assistance; and support for the drafting and review of policy-related documents such as standard operating procedures and country office PSEA workplans.

67. Capacity and knowledge building for WFP employees, including PSEA focal points, and cooperating partners continued to be one of the objectives of the Ethics Office through ongoing and project-based initiatives, all-staff meetings and “train-the-trainer” sessions in country offices in all regions.
68. For example, the Ethics Office launched the “PSEA at the Front Line” project, a joint initiative by WFP and the International Organization for Migration, in partnership with Translators without Borders, aimed at providing front-line workers such as drivers, security guards, enumerators, translators, aid distributors, financial service providers and other contractors with critical knowledge on PSEA in an accessible and easy-to-understand format. Under the tagline “Together We Say No”, the campaign materials, available in 22 languages, include illustrated printed material, audio messages and multimedia resources developed based on feedback from more than 3,000 front-line humanitarian workers in more than 80 countries. The project was launched through a global online event hosted by the Inter-Agency Standing Committee (IASC) and was followed by official launch events in Colombia, and in Senegal for West Africa. In addition, the Ethics Office also hosted a series of webinars in Arabic, English, French and Spanish to guide PSEA focal points on how to disseminate the campaign materials and use them as key tools to support front-line staff working to ensure safe programming. A second phase of the project, targeting beneficiaries and communities, will be developed in 2023.
69. As a follow-up to the “Speak Up” awareness-raising initiative, the Ethics Office and HRMSR developed the training programme, “Speak Up! Be the Difference. Addressing Sexual Misconduct at WFP”, aimed at raising awareness on addressing SEA and sexual harassment at WFP. The training was rolled out globally in 2022, starting with offices deemed to be high priority.
70. The Ethics Office continued to strengthen PSEA coordination and outreach through active and proactive engagement with a network of around 400 PSEA focal points (located in every country office and regional bureau), and provided prompt support through awareness raising, onboarding sessions for new focal points and regular interaction and responses to queries.
71. Furthermore, since June 2019 all PSEA focal points are to complete an online training course designed specifically to support them in meeting their responsibilities. In 2022, the Ethics Office updated the online course to include more case studies and real-life scenarios while maintaining tools and resources that PSEA focal points can download, easily adapt and retain for reference. The update will be launched in 2023.
72. In consultation with an adult-learning company, the Ethics Office developed new interactive and scenario-based training specifically for country office senior management. The training aimed to equip senior management with a better understanding of the main challenges that arise from SEA allegations, along with practical guidance on their role in addressing those often complex issues. The training was launched with senior management from the Yemen country office after being piloted in the Colombia country office. A global rollout of the training is planned for 2023.
73. As part of efforts to identify, mitigate and manage SEA risks among cooperating partners and strengthen their capacity to ensure safe programming, the Ethics Office continued to support the implementation of the United Nations implementing partner PSEA capacity assessment. This harmonized screening tool for partners was developed by WFP, the United Nations Population Fund, the United Nations Children’s Fund and the Office of the United Nations High Commissioner for Refugees in coordination with IASC and members of the United Nations SEA working group. It is a key component of SEA risk management efforts because it ensures that partner organizations in the field have sufficient mechanisms in

place to prevent and respond to SEA. It also allows for a single assessment of common partners, resulting in increased transparency and reduced processes.

74. The Ethics Office recruited a dedicated PSEA and partnership consultant to support the rollout of the PSEA capacity assessment tool. The tool has been piloted in selected country offices through support missions and the provision of training and capacity building sessions for both the PSEA focal points and the cooperating partner management employees who lead on the implementation of the tool as well as directly for the cooperating partners.
75. In October 2022 the Ethics Office organized a PSEA lessons learned retreat, which brought together PSEA focal points and cooperating partner management staff responsible for the implementation of the PSEA capacity assessment in selected countries. Colleagues from the Burkina Faso, the Democratic Republic of the Congo, Ethiopia, Myanmar, Nigeria, Pakistan, Rwanda, South Sudan and Bolivarian Republic of Venezuela country offices were present. The purpose of the retreat was to exchange expertise and good practices on how to implement and operationalize the United Nations implementing partner protocol and the PSEA capacity assessment tool and to contribute to the review and development of guidance and documents for global use across programmes. The outcome of the retreat will inform the WFP 2023 strategy for the rollout of the PSEA capacity assessment.
76. The Ethics Office has also been supporting the digitalized integration of the capacity assessment tool into the United Nations Partner Portal. When completed, the portal module on PSEA will allow United Nations agencies to share partners' risk assessments across the United Nations system by using the United Nations common assessment methodology, thus further enhancing safeguards and appropriate action on SEA.
77. Lastly, through its Executive Director, WFP continued to be a member of the High-level Steering Group on SEA, enabling the Executive Director, the Deputy Executive Director and other leaders to be directly involved in the strengthening and alignment of the system-wide response to SEA. WFP also participated in the IASC technical advisory group on PSEA and other United Nations and interagency technical groups.

V. United Nations coherence: Ethics Panel of the United Nations and the Ethics Network of Multilateral Organizations

78. The Director of the Ethics Office continued to engage with EPUN, actively participating in the panel's monthly meetings and providing expertise for consultations on issues of common interest. Comprising the heads of the ethics offices of the United Nations Secretariat and separately administered organs and programmes and chaired by the Director of the Secretariat Ethics Office, EPUN is mandated to establish a unified set of ethics standards and policies and to consult on complex ethics matters that have system-wide implications.
79. In addition to continuing its existing activities, in 2022 EPUN took steps to further strengthen collaboration on training, awareness raising and outreach by establishing a standing agenda item for its monthly meetings, working on common messages on topics of common interest and sharing information on planned missions to allow the attendance of employees from other organizations, where appropriate. In December 2022, as suggested by WFP, EPUN agreed to pilot in 2023 a sub-group on communications with the aim of establishing cross-agency knowledge sharing and thus promoting increased collaboration and harmonization among EPUN members and more efficient use of resources.
80. The Ethics Office also remained an active member of the Ethics Network of Multilateral Organizations, which comprises ethics officers from United Nations system entities, affiliated international organizations and international financial institutions and was created to support the Secretary-General's promotion of system-wide collaboration on

ethics-related issues within the United Nations system. ENMO serves as a forum for exchanging information, good practices for professional development and benchmarking. Ethics Office representatives attended the ENMO annual conference and engaged extensively with other ethics offices on topics of common interest, including conflicts of interest and outside activities, the use of behavioural science to increase ethical behaviour and the use of data analytics.

VI. Observations and conclusions

81. Throughout 2022 the Ethics Office continued to assist WFP in nurturing a culture of ethics and integrity at WFP and to work to prevent, mitigate and manage ethical and reputational risks. In 2022 it also focused on repositioning itself within WFP through strengthened collaboration with relevant internal actors and renewed engagement and dialogue with a focus on the field.
82. In 2022 the Ethics Office achieved all the objectives in its strategy for 2021–2022. Progress continued to be made in all areas of its mandate, with a focus on shifting towards a more field-based, preventive and proactive approach to addressing and resolving emerging ethical issues. Emphasis and efforts have also been made to achieve the office's strategic objective 1 and apply a structured and data-driven approach to be able to target areas and offices of highest risk or concern for outreach activities.
83. By detecting conflicts of interest and preventing them from materializing, by alerting WFP to major risks and preventing SEA and allegations of retaliation, the Ethics Office plays a critical role in helping employees to “do the right thing” and navigate ethical challenges in their daily work in a complex world and when values, principles and standards are in tension or threatened. Ethics is about doing the right thing at the right time and for the right reasons, especially when no one is watching. Ethical decisions and ethical operations ensure that WFP is trustworthy, credible and reputable and help it to fulfil its mandate to save lives and change lives.

ANNEX

Additional information on advice and guidance trends and analysis

TABLE 1: ADVICE BY LOCATION AND CATEGORY*							
	Headquarters/ liaison offices	Regional Bureau for Asia and the Pacific	Regional Bureau for the Middle East, Northern Africa and Eastern Europe	Regional Bureau for Western Africa	Regional Bureau for Southern Africa	Regional Bureau for Eastern Africa	Regional Bureau for Latin America and the Caribbean
Total	245	69	96	44	56	46	44
Employment-related	62	26	41	11	13	17	20
Gifts, awards, honours, hospitality	18	6	2	4	2	1	0
Outside activities	93	26	25	21	33	16	14
Family relationships	4	5	7	1	2	4	4
Other	59	4	11	3	5	4	2
Allegations of wrongdoing	9	2	10	4	1	4	4

* Excluding advisories related to PSEA and to the disclosure programme.

Acronyms

EPUN	Ethics Panel of the United Nations
HRM	Human Resources Division
HRMSR	Staff Relations Branch of the Human Resources Division
IASC	Inter-Agency Standing Committee
IOAC	Independent Oversight Advisory Committee
JIU	Joint Inspection Unit
OIGI	Office of Inspections and Investigations
PSEA	protection from sexual exploitation and abuse
SEA	sexual exploitation and abuse