

Seventy-ninth meeting of the Standing Committee
16-17 September 2020

Agenda item 2(b)

Oral update on integrity in UNHCR, including efforts to prevent and respond to sexual exploitation and abuse, and sexual harassment

Providing protection and life-sustaining support to people of concern in complex operating environments is not without challenges. By the very nature of its mandate, many of UNHCR's operations take place in fragile political environments, with high risks of organized crime, terrorism, corruption, and the abuse and exploitation of vulnerable people. UNHCR's stakeholders – including the people it serves, UNHCR personnel, partner agencies, and host and donor governments – rightly have high expectations for strong systems to prevent, mitigate, respond to, and learn lessons from all forms of misconduct, fraud, corruption, sexual exploitation and abuse (SEA), and sexual harassment (SH).

This imperative has guided much of UNHCR's work in recent years. Initiatives to date have centred around: a) reviewing the way in which UNHCR's suite of oversight bodies operate and relate to each other; b) bringing about a significant shift in the organization's risk culture; c) refocusing and coordinating the organization's engagement on topical issues; and d) reinforcing individual functions and systems within bodies pertaining to UNHCR's integrity.

Changes to UNHCR's oversight bodies were effected following a review of related functions in 2016. At the close of this review, the High Commissioner took the decision to implement greater coherence and complementarity in this regard, including by entrusting the Inspector General with the responsibility of coordinating and ensuring coherence among oversight functions. The subsequent changes have been discussed at the Standing Committee and through briefings on oversight.

The Risk Management 2.0 initiative, launched in late 2017, was designed to improve risk-informed management of select operations by reinforcing the continuum between risk identification, root-cause analysis, the implementation of risk mitigation measures and the response to risks. This approach aimed to strengthen risk culture gradually across the organization and has significantly enhanced UNHCR's risk maturity since its launch, resulting in the organization reaching an "established" level of risk maturity in 2019.

In 2018, a Senior Coordinator was appointed to lead UNHCR's prevention of and response to sexual exploitation and abuse, and sexual harassment. This enabled the organization to engage with greater focus and coordination on tackling these harmful behaviours that run counter to its fundamental values. Together with the creation of a Director-level task force and a related working group, UNHCR is better equipped to effect change and take tangible steps towards creating an environment in which transparency, consideration of victims' and survivors' voices, inclusiveness and a healthy vigilance are embedded in its work.

At the same time, UNHCR bolstered its integrity and related functions, with additional investments made in the Inspector General's Office, the Legal Affairs Section, and the Ethics and Ombudsman's Offices, among others. These efforts were supported by a Senior Advisor on Inclusion, Gender and Diversity, established in 2016, who now advises the High Commissioner and the senior management team on matters such as race issues and discrimination. Systems were further enhanced through the launch of a SpeakUp helpline in late 2018, which provided colleagues with access to informational support from trained and impartial professionals, bound by confidentiality. These investments were underpinned, in 2018, by a UNHCR appeal to donors to invest in UNHCR's integrity by providing resources to support prevention, training, awareness-raising, effective investigation, survivor and whistle-blower protection, and robust action against perpetrators. With unearmarked support from generous donors, the organization has been able to strengthen these important mechanisms.

UNHCR's ongoing human resources transformation is an integral part of this process, with a renewed focus on people management through dialogue, learning and communication. Recognizing the importance of good people management in preventing, managing and responding to conflicts and grievances, UNHCR has taken a proactive approach to leadership

development. Over 700 colleagues have completed one of a range of management learning programmes and reflective leadership dialogues that encourage managers to build an inclusive, collaborative, safe, innovative and accountable work environment.

These initiatives, and the gradual reinforcement of select functions, have allowed for greater coherence and coordination among integrity-related entities. Efforts in this regard remain ongoing and were built into planning exercises for 2020 and 2021, including through work led by UNHCR's Ethics Office. This, together with advice from UNHCR's new Inspector General to further enhance the organizational framework against the three lines of defence model, will contribute to further improvements of individual functions, and their coordination, in the coming months.

Annex I

Prevention of and response to sexual abuse and exploitation, and sexual harassment

Eradicating sexual exploitation and abuse (SEA) of the people UNHCR serves, as well as sexual harassment (SH) in the workplace, is a top priority for the organization. UNHCR is committed to providing “a trusted, respectful and inclusive environment, where the people we serve and those who work for the organization feel safe, heard, equipped and empowered to speak up for themselves and others, and to take robust and visible action as appropriate, to eradicate SEA and SH”.¹

Key areas of focus and initiatives

During the past two years, UNHCR has made significant progress towards realizing its commitment. Critical to the success of this approach was the High Commissioner’s decision in 2018 to establish a dedicated capacity and coordination structure focusing on both SEA and SH, while at the same time ensuring strong engagement across the organization² and in inter-agency efforts. These achievements are outlined in the [2018](#) and [2019](#) year-in-review publications and are complemented by ongoing projects related to the High Commissioner’s priorities and initiatives as Inter-Agency Standing Committee (IASC) Champion on Protection from SEA and SH.³ Recent key achievements under the High Commissioner’s Championship include:

- **The establishment of a community outreach and communications fund with regard to protection from sexual exploitation and abuse (PSEA):** As one of the High Commissioner’s initiatives in the role of IASC Champion, UNHCR and the International Council of Voluntary Agencies (ICVA) launched an [Interagency Community Outreach and Communications Fund](#) on protection from sexual exploitation and abuse in April 2020. The fund provides support to smaller non-governmental organizations (with over 1,600 applications received) with developing information, education and communications materials to raise community-awareness and ensure that victims know where, and how, to safely report incidents.
- **The development of an interagency training for partners on protection from sexual misconduct:** UNHCR, the International Organization for Migration (IOM), the World Food Programme, the Office for the Coordination of Humanitarian Affairs, and other partners, have jointly developed a learning package, “[Saying NO to Sexual Misconduct](#)”, based on an earlier package from IOM. This multilingual package, launched in May 2020, intended for all partners in the humanitarian sector, uses innovative learning methodologies and combines learnings on SEA and SH. While

¹ See: UNHCR [Addressing Sexual Exploitation and Abuse and Sexual Harassment. Strategy, Structure and Key Actions](#), 2018, and UNHCR [Tackling sexual misconduct: 2020-2022 Strategy and Action Plan](#), 2020.

² UNHCR continued to reinforce its safeguarding structure in 2019 by allocating additional resources to the Senior Coordinator on Prevention and Response to SEA and SH who is responsible for leading and coordinating organizational efforts to prevent and respond to sexual misconduct. The Senior Coordinator works in collaboration with a cross-functional working group which includes representation from the Divisions of External Relations, Human Resources, International Protection, and Strategic Planning and Results, as well as Enterprise Risk Management, the Ethics Office, Field Security Service, Innovation Service, Inspector General’s Office, Legal Affairs Service and Ombudsman’s Office, together with a Director-level task force led by the Deputy High Commissioner with most of the same entities.

³ In addition, UNHCR co-chairs the IASC’s Results Group 2 on Accountability and Inclusion and works closely with the office of the Secretary-General’s Special Coordinator on improving the United Nations response to sexual exploitation and abuse and the office of the Victims’ Rights Advocate. Since September 2019, UNHCR’s Deputy High Commissioner, Ms. Kelly T. Clements, chairs the Task Force on Addressing Sexual Harassment within the United Nations system.

the material was designed for face-to-face learning, it can be readily adapted for online delivery.

Looking ahead

Despite this progress, UNHCR must stay the course on its steps taken to tackle sexual misconduct. Issues of SEA and SH are deeply rooted in discrimination, power imbalances and gender inequalities, which require fundamental change at the individual, organizational and sectoral levels. In recognition of this, and building on the work of the past two years, in August 2020, UNHCR issued a new strategy and action plan for 2020 to 2022, “[Tackling sexual exploitation and abuse and sexual harassment](#)”, guided by four overarching objectives and twelve areas of action. The strategy and action plan aims to:

- ensure that UNHCR’s efforts are guided by an end-to-end victim/survivor-centred approach, which prioritizes the rights, well-being, security and the expressed needs and choices of victims, and avoids re-traumatization;
- equip UNHCR and partner personnel to prevent, identify and respond to sexual misconduct;
- uphold UNHCR’s accountability to tackle sexual misconduct; and
- maintain UNHCR’s active engagement as a key stakeholder in inter-agency efforts.

UNHCR recognizes that building upon inter-agency and wider partnership efforts is crucial. As IASC Champion on Protection from Sexual Exploitation and Abuse and Sexual Harassment, the High Commissioner is working with a broad range of partners in implementing initiatives to further his Championship goals of bolstering prevention; expanding safe spaces; and promoting respectful use of authority. A number of these initiatives have proven to be particularly timely in the context of the COVID-19 pandemic.

This collective journey to eradicate sexual misconduct forms part of the organization’s broader efforts of safeguarding and integrity. UNHCR will continue its work to ensure that all persons of concern and humanitarian workers feel safe, protected and empowered to speak up.

Annex II

The Ethics Office

The High Commissioner established the Ethics Office in UNHCR in June 2008 with the overarching mandate of cultivating, nurturing and fostering a culture of ethics, respect, integrity, transparency and accountability. It aims to ensure an environment of openness and fairness within UNHCR, as well as enhancing the trust in, and the credibility of, the United Nations, both internally and externally.

The Ethics Office is operationally independent, while complementing the work of other UNHCR offices pertaining to professional conduct. Its mandate includes:

- developing and communicating standards on ethics issues;
- providing training and education opportunities to personnel with the objective of promoting the highest ethical standards in the workplace;
- offering confidential advice to personnel and management to prevent conflicts of interest;
- administering the financial disclosure programme; and
- protecting personnel against retaliation for reporting misconduct.

Key areas of focus and initiatives

- **Improved ethics induction for new personnel:** A newly-created induction kit will assist in orienting new personnel on ethics, thereby investing in mitigating future risks through proactive and early intervention.
- **Increased workforce engagement in ethics dialogue** through a virtual approach to Code of Conduct sessions: The annual Code of Conduct sessions are being reoriented to an annual Code of Conduct Dialogue session framed as “Values in action”. The Ethics Office moved towards a virtual approach mid-year in response to COVID-19-related restrictions. Code of Conduct training for facilitators, comprising the standard curriculum, was provided virtually in two languages, reaching some 100 facilitators. The Code of Conduct Dialogue sessions and facilitator training will continue to be rolled out virtually in 2020 to 2021.
- **Expanded space for dialogue on values and ethics:** Currently in a pilot phase, the online “Ethics in action” space is setting an example of dialogue culture. It provides a safe platform for personnel to raise ethical issues; share resources; and discuss ideas, knowledge, and experiences on related concerns.
- **Providing confidential guidance to personnel** on ethical dilemmas and conflict-of-interest questions: Colleagues are empowered to consider guidance on potential issues of concern through a dialogue-driven, collaborative decision-making approach that fosters an ethical culture and prepares them to act proactively in future situations.
- **Proactive engagement with UNHCR’s workforce on protection against retaliation:** Recommendations, as well as preventative and corrective measures, were placed to safeguard the interests of affected UNHCR personnel, including thorough responsive support on requests for information, requests for preventative action, and preliminary assessments.

Looking ahead

The Ethics Office envisions an organization where ethical decision-making and values provide a strong framework for organizational culture and behaviour and guide leaders and teams in their daily work to fulfil the mandate. This vision is underpinned by core building blocks intended to **empower, build trust** and **promote dialogue**.

The **2021 strategic priorities** for the Ethics Office aim to:

- consolidate and expand a value-based approach to foster a culture of ethical behaviour;
- continue to integrate and mainstream ethics into all areas of UNHCR learning;
- increase engagement with first-line colleagues to strengthen senior-level ownership for, and support to, integrity work in operations through outreach, risk mitigation, dialogue spaces and community of practices;
- strengthen a professional and centralized Ethics Office structure with field-based volunteer networks, including Code of Conduct Dialogue facilitators and Peer Advisors;
- finalize a communications strategy on promoting a dialogue culture on ethics, empowering ethical decision-making and enhancing the confidence to speak up;
- develop, finalize and implement the induction kit, drawing upon an upcoming data-mapping project, to systematically measure the ethical climate and identify risks proactively;
- develop/update and promote guidance on ethical dilemmas faced by colleagues, taking account of new realities, such as social media and socio-political issues; and
- expand and mainstream ethical decision-making from individual-level conduct to organizational-level policies and partnerships.

Annex III

The Ombudsman

The Ombudsman’s office is UNHCR’s informal conflict resolution mechanism, originally created as Mediator in 1993 and established by the General Assembly in 2008 as the informal component of the United Nations system of administration of justice. The UNHCR Ombudsman is one of three pillars of the Office of the United Nations Ombudsman and Mediation Services. Its mandate is to make available confidential services of impartial and independent persons to address work-related issues of personnel, and it is the designated informal conflict-resolution mechanism under UNHCR’s 2014 “Policy on discrimination, harassment, sexual harassment and abuse of authority”.

Key areas of focus and initiatives

- **Timely and professional Ombudsman and mediation support to personnel seeking informal resolution of grievances and conflicts:** The Office of the Ombudsman is responding to substantial increases in demand of its services. It is meeting these demands through methodologies including mediation, relaying messages between conflicting parties, guidance and conflict coaching, team surveys and feedback mechanisms, along with capacity-building initiatives.

A number of factors are contributing to the increased demand for Ombudsman services, including UNHCR’s promotion of a “speak-up” culture, increased promotion of informal conflict resolution by the High Commissioner and senior management, and proactive outreach of the Ombudsman’s Office itself to both staff and managers in the field. Ultimately, the Office’s actions help to resolve matters informally, thereby reducing litigation and the negative by-products of protracted conflict, including the loss of motivation and productivity, as well as stress-related sick leave, and their associated costs.

- **Systemic analysis leading to proactive improvements:** Based upon cases coming to the attention of the Ombudsman, enhanced data management is enabling the Office to identify, analyse and report on systemic issues and make recommendations to improve policies, procedures, systems and structures. This also supports the Office’s focus on empowering supervisors and managers to prevent, mitigate and respond to conflicts.
- **Field-level network of Peer Advisors:** The Ombudsman’s Office, Psychosocial Wellbeing Section and Ethics Office coordinate a global network of 400 Peer Advisors. This network, with a presence across UNHCR operations and offices, serves as a first point of contact for colleagues facing issues with other members of their teams or with the administration. Peer Advisors are equipped to offer colleagues immediate support, providing them with information on the systems available to address grievances and on where they can seek help. While bound by confidentiality, Peer Advisors serve to alert local management on trends and systemic issues discernable through individual queries.
- **Inter-unit collaboration:** Close collaboration with integrity-related entities is maintained, including through the Informal Conflict Management Support Group, which is co-convened by the Ombudsman and the Ethics Director. This group enables all entities working towards resolving conflict and integrity-related issues within UNHCR’s workforce to coordinate action on individual matters and emerging situations and issues, assigning a clear lead within the entities and determining the most appropriate course of action.

- **Inter-agency networks and promoting reforms:** The Ombudsman’s Office cooperates closely with the United Nations Ombudsman and Mediation Services, the United Nations and Related International Organizations Network, the United Nations System Chief Executives Board for Coordination, the International Ombudsman Association, and other interlocutors, including in the sharing of good practices and promoting policy development across the United Nations.

Looking ahead

With the increased demand for the Ombudsman’s services and ongoing work to enhance the articulation of bodies in UNHCR’s integrity functions, the organization is reviewing the scope and modalities of the Ombudsman’s independence and remit. At the same time, UNHCR is considering opportunities to further strengthen the function and ensure it has the necessary reach to cater to the decentralized workforce.

Annex IV

Risk management in UNHCR

UNHCR has been taking calculated risks since it commenced its work, and a risk management policy was formally introduced in 2014. In late 2017, to further strengthen the overall integrity and accountability of the organization, the High Commissioner launched the Risk Management 2.0 initiative, providing expanded professional resources at Headquarters, regional bureaux and the field; and a directive for all staff to manage risks more systematically, prevent fraud and corruption, and to improve programme delivery.

Key areas of focus and initiatives

- **Support to regions and countries:** In 2020, an expanded network of 33 dedicated Senior Risk Advisors – up from 3 in 2017 – has provided increased support across all regions and to 12 high-risk operations. The primary areas of focus have included conducting risk assessments and trainings; activities to prevent shortcomings in programme and partnership management; building best practices around partner monitoring; strengthening fraud risk management (e.g. conducting fraud vulnerability assessments, developing anti-fraud strategies and improving fraud detection); and improving stakeholder feedback mechanisms for, among other things, protection against retaliation and prevention of sexual exploitation and abuse, and sexual harassment.
- **Risk response to COVID-19:** UNHCR has implemented a robust system to identify and manage risks created by the COVID-19 pandemic. The organization has developed and regularly updates a global COVID-19 risk register, monitoring the potential impact of the pandemic on UNHCR’s objectives and operations. In parallel, some 130 COVID-19-related risks have been identified in field operations, reflecting a high level of perceived risk, while treatments are being put in place to address the risks. To enable operations to “stay and deliver”, Risk Advisors have supported the updating and operationalization of business continuity plans.
- **Risk review process:** For the second year in a row, UNHCR has achieved full compliance with the risk review process. This was achieved with the support of the 320 trained risk focal points. Operations have benefited from tailored feedback and quality assurance from the Enterprise Risk Management (ERM) unit and Senior Risk Advisors in the regional bureaux.
- **Strengthening risk culture:** To strengthen risk culture across operations, UNHCR focused on facilitating trainings, workshops and risk assessments. In this regard, close to 3,000 personnel have completed the ERM e-learning programme. A dedicated training on reputational risk management and crisis communications, targeting senior leadership in regional bureaux and country operations, has been developed and piloted. A risk management newsletter highlighting best practices is shared regularly with the workforce through the UNHCR intranet, and a campaign to strengthen risk culture is underway. To support colleagues in addressing high-risk areas, such as cash-based interventions and the prevention of sexual exploitation and abuse, toolkits (comprising common causes, consequences and treatments of risks) are being developed.
- **Embedding risk management:** Risk management is being embedded in UNHCR’s new results-based management approach, resulting in stronger links between identified risks and results. The revised programming manual also reflects a stronger risk process. Efforts are ongoing to embed risk management into the organization’s learning programmes.
- **Inter-agency cooperation:** UNHCR remains actively engaged in the High-Level Committee on Management’s Task Force on Risk Management. The organization is currently co-chairing the workstream to produce guidance on managing risks in

the field or in decentralized settings. The Task Force is also developing guidance on conducting fraud risk assessments.

Looking ahead

UNHCR has reached an “established”¹ level of risk maturity, with defined processes, good organizational coverage, evidence of embedding, regular reporting and escalation, and information used in operational decision-making. The organization is now working towards reaching an “advanced” level of risk maturity by reinforcing its risk management framework through a revised policy and a “risk appetite” statement², and by deepening the integration of risk management in UNHCR’s activities, policies and processes.

Recognizing that strengthening the risk culture of UNHCR is a long-term undertaking, the High Commissioner has resolved that UNHCR will pursue its efforts to enhance its risk maturity beyond the initial Risk Management 2.0 initiative (2018 to 2020); to that end, a strategy is under development.

¹ In 2019, an independent consultant assessed how well-established risk management was in UNHCR, providing important insight into the analysis of progress made.

² “Risk appetite” defines the level and nature of risk that UNHCR is willing to accept in pursuit of its objectives.