

## UNHCR Ethics Office 2017 Annual Report

### *Summary*

This Annual Report covers the activities of the UNHCR Ethics Office in 2017. It was submitted to the High Commissioner at the end of 2018.

In accordance with the Secretary-General's bulletin on United Nations system-wide application of ethics: separately administered organs and programmes (ST/SGB/2007/11), the Ethics Panel of the United Nations reviewed the report.

### *Elements of decision*

The High Commissioner may wish to take note of the present report and consider the recommendations made by the UNHCR Ethics Office in formulating UNHCR's global and operational strategies to further strengthen the organization-wide implementation and adherence to ethical standards and practices by its staff and partners.

## **I. Introduction**

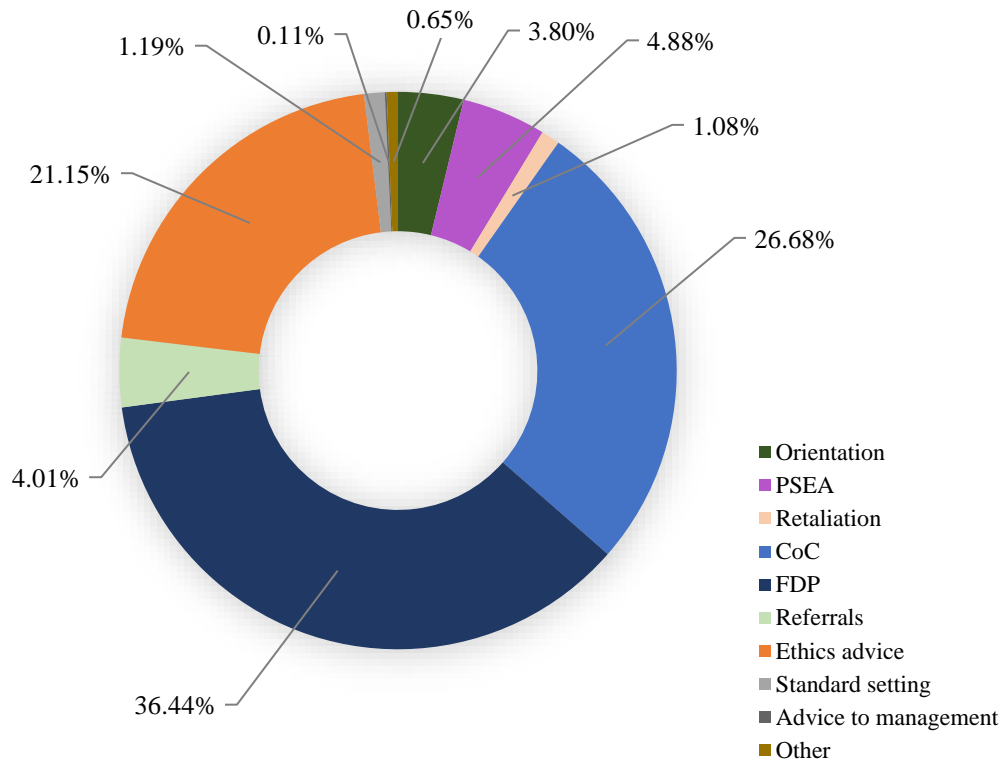
1. This is the 9<sup>th</sup> Annual Report of the UNHCR Ethics Office since its establishment on 6 June 2008 which is submitted in accordance with UNHCR Inter-Office Memorandum No. 040/2008 and Field Office Memorandum No. 042/2008 of 6 June 2008 and General Assembly resolution 60/254 which requested the annual reporting of the UN Ethics Office on the implementation of ethics policies.
2. The UNHCR Ethics Office is mandated to promote the highest standards of integrity and foster an organizational culture of respect, transparency and accountability to its staff members and affiliated workforce in accordance with Article 101, paragraph 3 of the Charter of the United Nations as well as to its partners and stakeholders to ensure a work environment that upholds these values.
3. UNHCR has a workforce of 15,273 individuals comprising 11,423 staff and 3,850 affiliated workforce (as of 31 December 2017).
4. In promoting a sustainable culture of ethics in UNHCR, the Ethics Office is guided by the Organization's 2017-2021 Strategic Directions.
5. This report will highlight key achievements, state the mandate of the Ethics Office, describe related activities and share resulting observations and recommendations.

## **II. Key Achievements**

In its mission to foster an ethical culture in UNHCR and in its partner organisations, in 2017 the Ethics Office has:

- (a) Provided advice and guidance to 922 UNHCR personnel (see fig.1). This includes advice on the performance of outside activities, receiving benefits, employment related matters, ethical behaviour, questions pertaining to the code of conduct as well as ethical dilemma situations. The requests also addressed standard setting issues, advice regarding the UN Financial Disclosure programme as well as Protection from Sexual Exploitation and Abuse (PSEA) and protection from retaliation.

**Fig 1. Advice provided in 2017 per category**



- (b) Conducted a comprehensive review of its Code of Conduct outreach activities covering the period 2011 to 2016, resulting in a rebranding of UNHCR’s Code of Conduct refresher learning programme and the development of a new approach to ethics in UNHCR (see also Paragraph 27 below).
- (c) Launched a bi-annual 2017/2018 Code of Conduct refresher session on *Diversity and Inclusion*, in close collaboration with the Senior Advisor on Inclusion, Diversity and Gender Equity, moving beyond the mandatory “one-off” annual Code of Conduct refresher sessions to a more continuous dialogue on ethical decision making and everyday reinforcement of the Organization’s underpinning values. As in 2016, PSEA was added as an integral part of the refresher sessions. In 2017, 65 operations organised refresher sessions and 6,190 UNHCR personnel participated in the 2017/18 refresher programme (see fig. 8).
- (d) Facilitated a three-day Training of Trainers workshop for 32 Code of Conduct facilitators in Budapest in November 2017 see also Paragraph 33 below).
- (e) Provided ethics training to UNHCR personnel in Chad, Denmark, Egypt, Greece, Hungary and the United States.
- (f) Led the coordination of UNHCR activities on PSEA. Within the context of the Secretary-General’s report issued in February 2017 on “Special Measures for Protection from Sexual Exploitation and Abuse: A new Approach”, the Ethics Office (1) spearheaded the development of a mandatory UNHCR PSEA e-

learning course which was launched in August 2017, (2) created and coordinated the distribution to all UNHCR personnel of UNHCR adapted “no excuse” pocket cards in English, French, Spanish and Arabic and (3) created a PSEA focal point community of practice on Yammer connecting some 200 PSEA focal points to promote the sharing of best practices, lessons learned and information. In this context, the Ethics Office fielded a mission to Chad providing training on PSEA to about 100 UNHCR personnel. Beyond that, the Ethics Office also continued to contribute to the Inter-Agency Standing Committee (IASC) on PSEA composed of partner organizations, NGOs, and other UN agencies.

(g) Participated in the monthly meetings of the Ethics Panel of the United Nations (EPUN), which was created in 2007 by the Secretary-General to promote the coherent application of ethical standards, thus enhancing harmonized ethics and integrity practices among member organizations.

(h) Participated in the annual meeting of ENMO (Ethics Network of Multilateral Organizations) in Rome and the annual meeting of ECI (Ethics and Compliance Initiative) and EBEF (European Business Ethics Forum) in London.

### **III. Terms of reference of the Ethics Office in accordance with UNHCR Inter-Office Memorandum No. 040/2008 and Field Office Memorandum No. 042/2008**

6. The UNHCR Ethics Office was established by the High Commissioner as an independent office in 2008 pursuant to ST/SGB/2007/11 on United Nations system-wide application of ethics: separately administered organs and programmes. The main responsibilities of the Ethics Office are as follows:
  - (a) Raise staff awareness of expected ethical standards and behaviour, including the policies and procedures related thereto, in close cooperation with DHRM, LAS, IGO and the Office of the Ombudsman, and reinforce a culture of ethics in UNHCR through appropriate orientation, learning and induction programmes, and communications and information dissemination activities;
  - (b) Advise individuals who seek advice in confidence regarding ethical behaviour, issues and standards;
  - (c) Provide guidance to UNHCR Management and staff to ensure practical implementation of UNHCR’s policies, procedures and practices relating to ethical standards called for under the UN Charter, Staff regulations and Rules and UNHCR’s Code of Conduct and ensure that ethical standards pertaining to employment and service with UNHCR are clearly understood;
  - (d) Advise and assist the High Commissioner in the development, dissemination and promotion of ethics related policies in accordance with the common standards of conduct prescribed for all United Nations staff members;

- (e) Undertake the responsibilities assigned to it under the Organization's policy on protection of individuals against retaliation, for individuals who report misconduct, provide information in good faith on alleged wrongdoing or cooperate with, or participate in, a duly authorized audit, investigation or inquiry or the activities of the Office of the Ombudsman;
- (f) Coordinate UNHCR activities on Protection from Sexual Exploitation and Abuse;
- (g) Assist the High Commissioner in ensuring compliance with UNHCR's policy on Financial Disclosure and providing guidance to concerned UNHCR staff in ensuring full understanding of the financial disclosure requirements and objectives and their timely implementation.

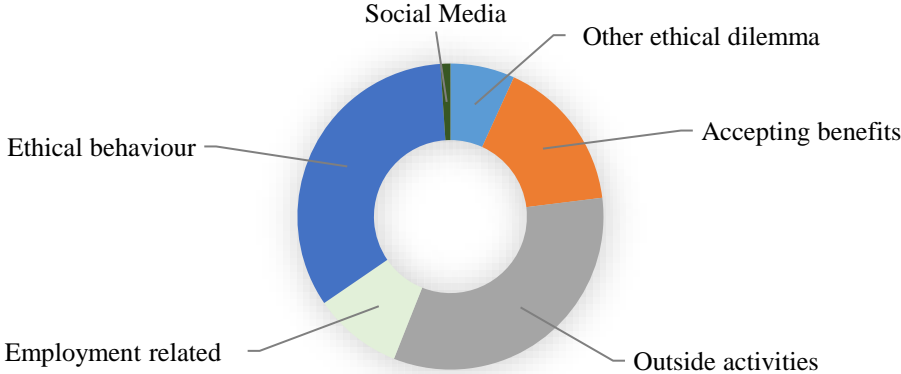
## **IV. Activities of the Ethics Office**

### **A. Ethics advice and guidance**

7. The Ethics Office provides confidential advice and guidance concerning ethical dilemmas and conflict of interest questions which personnel may encounter at the workplace. The confidential procedure ensures that colleagues have the opportunity to make informed decisions based on ethical values and principles without fear of speaking out or upsetting their work environment. Providing guidance to personnel early in their decision-making processes particularly with regard to resolution of ethical dilemmas enables them to focus on achieving operational objectives. This strengthens the effective delivery of protection and humanitarian assistance to populations of concern and increases the productivity of the team. Finally, giving advice and guidance to staff on their ethical obligations is key to promoting ethical standards and nurturing an ethical organisational culture as stipulated in the UN Charter.
8. By providing independent and impartial guidance, the Ethics Office seeks to mitigate operational and reputational risks through preventing, managing and resolving actual, perceived or potential conflict of interest issues faced by UNHCR personnel.
9. In 2017, the Ethics Office responded to 191 UNHCR staff's requests for ethics advice and guidance. Confidential advice was requested and given in different ways: through emails, phone calls, Skype or via face to face meetings, the latter including particularly colleagues at Headquarters (HQ), colleagues on mission at HQ as well as colleagues met by the Ethics Office team during field missions.

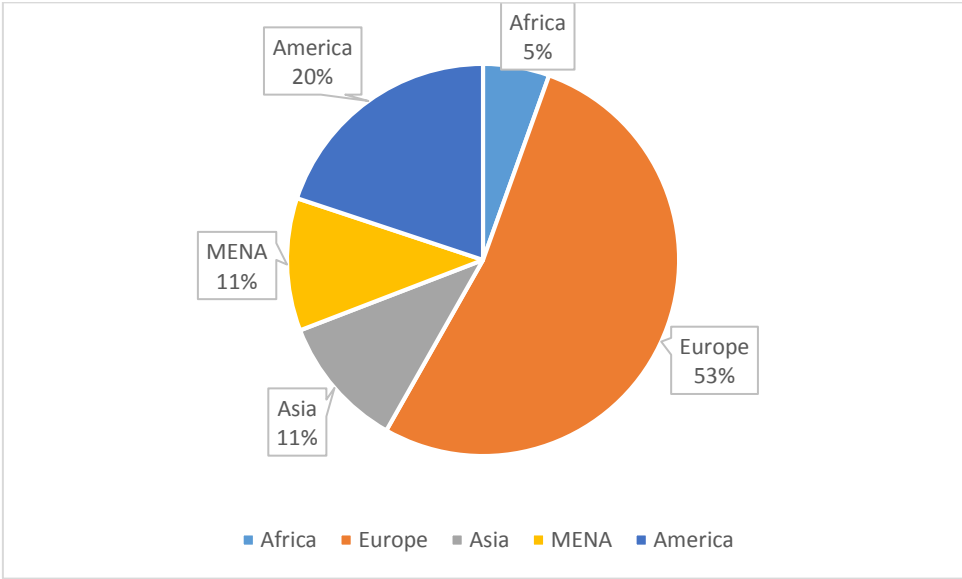
10. In 2017, 33.5 per cent of the requests for advice were related to questions of ethical behaviour. Another third of all requests related to outside activities, while 16.2 per cent related to gifts, awards and hospitality. Moreover, 9.5 per cent addressed employment related questions, such as the hiring of family members, post-employment restrictions, matters pertaining to recruitment processes as well as the use of UNHCR assets for private purposes. 1.1 per cent of the requests focused on the use of social media, whereas 6.8 percent of requests for advice were related to ethical dilemmas not falling in any of the listed categories (figure 2).

**Fig 2. Requests for ethics advice by category**



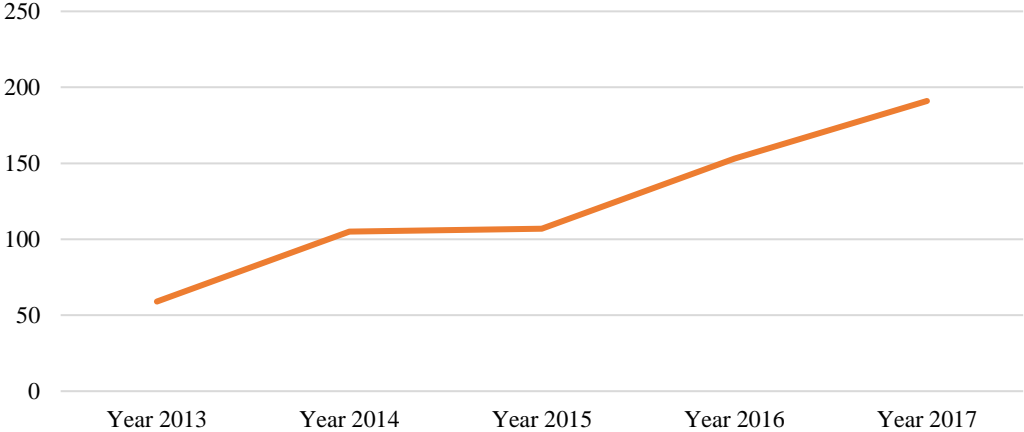
11. Most requests for ethics advice and guidance in 2017 came from colleagues in Europe (see fig. 3), namely at Headquarters. While it appears that factors such as visibility and proximity of the Ethics Office at Headquarters and the possibility to have face to face conversations facilitated easier access, the data is also a stark illustration of the need to decentralize Ethics Office services to reach UNHCR colleagues globally.

**Fig 3. Requests for ethics advice per region**



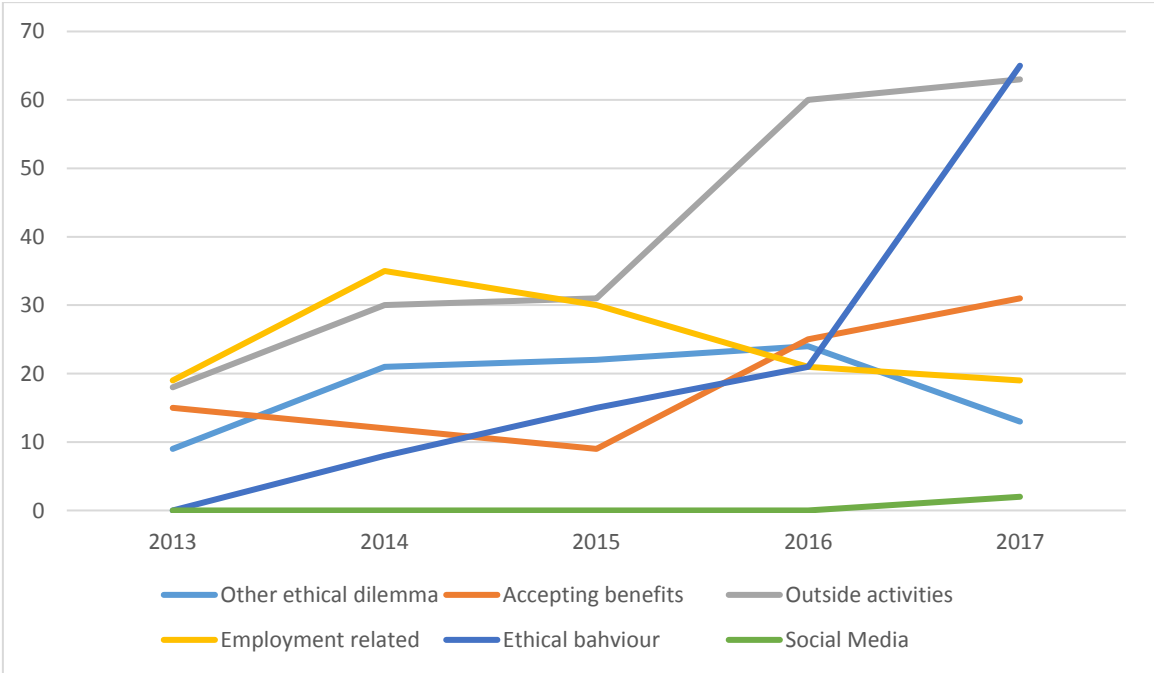
12. Overall, there was a 25 per cent increase in requests for ethics advice from 153 in 2016 to 191 requests in 2017 (see fig. 4).

**Fig 4. No. of requests for ethics advice 2013–2017**



13. The disaggregated data in figure 5 below illustrates changes in numbers of requests for advice per category. According to feedback received from colleagues, the substantive increase in ethical behaviour related requests is partly based on the Ethics Office’s efforts to provide timely feedback and to engage with colleagues in person. That happens preferably face to face or via phone and Skype and aims at (1) engaging colleagues in dialogue and (2) including colleagues in understanding the rationale for the advice provided. It is hoped that this approach will help colleagues in supporting value based decision making and in understanding the benefits of ethical decision making.

**Fig 5. No. of requests by category**



## **B. Protection against retaliation**

14. Pursuant to Secretary-General's bulletin ST/SGB/2007/11, *United Nations System-Wide Application of Ethics: Separately Administered Organs and Programmes*, the Ethics Office administers UNHCR's *Policy for Protection Against Retaliation*. The policy is both a whistle-blower protection programme and a risk management mechanism that encourages UNHCR personnel to report misconduct and/ or cooperate with authorized audits and investigations, without fear of reprisal. In promoting and providing protection for such reporting, the policy serves to reinforce public confidence in UNHCR and enhances the Organization's ability to deliver its mandate with integrity.
15. The Ethics Office receives the complaints of retaliation for reporting misconduct and conducts preliminary assessments to determine whether a complainant has engaged in a protected activity and, if so, whether the protected activity was a contributing factor in causing the alleged retaliation. If the Office determines that a *prima facie* case of retaliation has been established, the matter is referred to IGO for investigation. The Ethics Office makes a retaliation determination subsequent to its receipt and independent review of the IGO investigation report. Pending the completion of the IGO investigation, the Ethics Office may recommend that the High Commissioner takes appropriate interim action to safeguard the interests of the complainant.
16. During 2017, the Ethics Office received 10 inquiries regarding protection against retaliation, of which 6 involved requests for policy information and advice. The remaining four requests were formal complaints of retaliation, where the complainants alleged they had been subjected to harmful retaliatory action as a consequence of engaging in a protected activity. In comparison, the Ethics Office had received 5 formal complaints in 2015 and 6 complaints in 2016.
17. Colleagues who raised issues not covered by the policy were advised of other avenues to pursue their concerns, including the respective management, DHRM, the Ombudsman Office, the Staff Council, and the Office of Staff Legal Assistance.
18. Of the four retaliation complaints received in 2017, the Ethics Office determined in all of those cases that a *prima facie* case of retaliation had not been established. All complainants were advised of alternate internal mechanisms to address their concerns.
19. In 2017, the Joint Inspection Unit (JIU) initiated a UN system wide whistle-blower policy review. The Ethics Office coordinated UNHCR's contribution to that review. Following the Secretary-General's whistle-blower policy review in 2017, UNHCR decided to await the JIU recommendation for a review of whistle-blower policy in the course of 2018.



### **C. Outreach, Training and Education (OTE)**

20. Outreach, training and education activities continued to be key initiatives for UNHCR's Ethics Office to raise awareness, and identify high risk areas and ethical dilemmas to better address ethical decision making and to prevent misconduct. Global and regional training sessions on ethics were co-facilitated by the Ethics Office for field staff in Greece, Egypt and Chad and at Headquarter locations in Denmark, Switzerland and Hungary.
21. Against the backdrop UNHCR's Strategic Directions 2017-2021, the Ethics Office developed a new communication strategy in 2017 building on the five core commitments underlying UNHCR's Strategic Directions: Protect, Respond, Include, Empower and Resolve.
22. The Ethics Office reviewed and updated its Intranet site to support greater visibility of the Office and to allow easier access to education and training materials.
23. Several all-staff global broadcasts were sent by email during the reporting period, including on topics such as the Code of Conduct, the Financial Disclosure Programme and PSEA.

### **D. Code of Conduct refresher programme**

24. One of the well-established outreach activities spearheaded by the Ethics Office is the annual refresher session on the Code of Conduct, which is mandatory and thus carried out worldwide by all country operations. The main purpose of the annual refresher session is to provide UNHCR's global workforce a space for open dialogue and collaborative learning in applying Code of Conduct principles and to foster an organizational culture that upholds ethical and value based behaviour.
25. The Ethics Office initiated a comprehensive review of UNHCR's annual and mandatory Code of Conduct refresher sessions which were first launched in 2008 as the Ethics Office's central awareness raising tool. The Ethics Office conducted a comprehensive qualitative and quantitative analysis of the refresher sessions 2012-2016 to outline best practices, lessons learned and recommendations on how future refresher sessions should be structured to most effectively address systemic ethical challenges, single out potential reputational risks for UNHCR and help colleagues navigate the ethical dilemmas at work.
26. The review built on annual participant surveys and reports on annual Code of Conduct refresher sessions. The findings can be summarized as follows:
  - a. While the Code of Conduct refresher session has become a UNHCR 'brand' and an integral part of UNHCR's culture, average participation over the past five years only reached some 60 per cent, despite the mandatory nature of the sessions;
  - b. Overall, some 70 per cent of the respondents consider the Code of Conduct refresher sessions as effective;
  - c. Central areas of suggested improvements include the need for qualified Code of Conduct facilitators, more frequent Code of Conduct dilemma dialogues throughout the year and senior management involvement in the facilitation of Code of Conduct refresher sessions;

- d. In 2015 and 2016, the majority of facilitators were women;
  - e. The main recurring ethical challenges reported in the context of Code of Conduct sessions include lack of (1) speak-up culture, (2) transparency and (3) internal communication.
27. The results of the report informed *UNHCR's New Approach to Ethics*, including the design of the 2017-2018 Code of Conduct refresher session. In its new approach to ethics, UNHCR is seeking to reinforce a strong “ethical culture” within the Organization engaging everyone at all levels to get involved in establishing an overall environment that supports *ethical behaviour* and *ethical decision-making*. Simply put, this is about instilling in each individual an understanding that “*Your Actions Matter*” and an obligation and commitment to do what is right.
28. The 2017/ 2018 Code of Conduct refresher theme is Inclusion and Diversity, the choice of the theme was a result of various surveys conducted in UNHCR in 2016, illustrating the need to enhance diversity and inclusion in the Organization. All Code of Conduct sessions include a dedicated section on Sexual Exploitation and Abuse and Sexual Harassment. The workshop design and materials for the 2017/ 2018 theme were developed and rolled out in close collaboration with the Senior Advisor on Inclusion, Diversity and Gender Equity. The main learning objectives can be summarized as follows:
- a. Increase the understanding of the importance of inclusion and diversity in UNHCR’s workforce;
  - b. Explore the influence of unconscious bias on decision-making and its unintended consequences;
  - c. Identify and commit to actions strengthening inclusive behaviours and enhancing the quality of decision-making in each team;
  - d. Discuss PSEA and reaffirm the policy of zero tolerance of SEA in UNHCR by raising awareness on actions that can be undertaken to prevent and respond to cases of SEA.
29. Sessions have a minimum duration of half a day with many offices going beyond that and allowing for a full day. In addition to the mandatory annual refresher sessions, the new approach encourages ongoing dialogue among colleagues on ethical decision making and the Ethics Office will support this process with periodic global ethics dialogue topics. It is hoped that this new approach, emphasizing open dialogue and providing colleagues with an opportunity to ‘reflect and contribute,’ will help UNHCR transition to more values based decision-making when it comes to managing ethical dilemmas.
30. The annual Code of Conduct cycle has exceptionally been extended to a two year period. As a result, the mandatory Code of Conduct refresher session on Inclusion and Diversity must be conducted before 31 December 2018.
31. In 2017 at least 6,190 people - including staff, affiliate work force and implementing partners - participated in the Code of Conduct refresher sessions (see fig. 6) and a total of 65 operations reported having rolled out Code of Conduct refresher sessions (see fig. 7). The overall participation rate within the operations having conducted the 2017-2018 Code of Conduct refresher session was recorded at 71.59 per cent.

**Fig 6. CoC refresher session participants per region<sup>1</sup>**

Region	Total no. of staff*	Total no. of participants**	% of attendance
Africa	2460	1400	56.91
Americas	580	488	84.14
Asia	1744	1195	68.52
Europe	1042	877	84.17
MENA	2532	1956	77.25
HQ	288	274	95.14
<b>Total</b>	<b>8,646</b>	<b>6,190</b>	<b>71.59</b>

\*The data is based on the operations which reported the no. of participants in the CoC session.

\*\*Include UNHCR staff, affiliate work force (AWF) and partner staff.

**Fig 7. No. of operations that conducted CoC refresher sessions per region**

Region	Total no. of operations	No. of operations that participated*
Africa	34	15
Americas	11	9
Asia	21	17
Europe	12	9
MENA	16	10
HQ	24	5
<b>Total</b>	<b>118</b>	<b>65</b>

\*The data is based on the operations which reported on the CoC session.

32. In 2017, the Ethics Office received a total of 246 Code of Conduct refresher session related requests.
33. In building on a key recommendation of the Code of Conduct refresher session review, the Ethics Office organised in close collaboration with the Senior Advisor on Inclusion, Diversity and Gender Equity, UNHCR's Global Learning Centre, the Ombudsman Office and the Staff Welfare Section a three day train the trainers workshop in Budapest for 32 Code of Conduct facilitators. This is part of an effort to build a global network of trained Code of Conduct facilitators, building also the networks of Respectful Workplace Advisors (RWAs), focusing on conflict management support, and Peer Support Personnel (PSPs), focussing on psycho-social support.

## **E. United Nations Financial Disclosure Programme (UNFDP)**

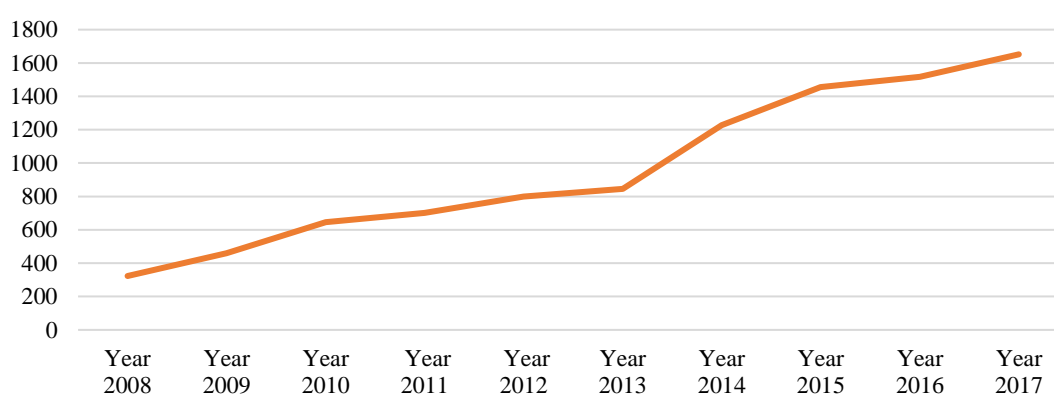
34. The primary purpose of the UN Financial Disclosure Programme (FDP) is to protect the integrity and reputation of the Organization by identifying, managing and mitigating the risk of personal conflicts of interest. It is a tool to assess actual, apparent or potential conflicts of interest so that appropriate advice may be provided. The Financial Disclosure Programme helps to ensure that all staff members observe and perform their functions

<sup>1</sup> The 2017/18 Code of Conduct refresher programme was conducted as a bi-annual programme requiring one mandatory refresher session during the 2017/2018 cycle. The number of 8,646 participants in 2017 reflects 57% of the total workforce. The final participation rate of the 2017/18 cycle will be reflected in the Ethics Office 2018 Annual Report.

consistent with the highest standards of integrity required by the UN Charter, staff regulations and rules, and relevant guidelines and policies. This, in turn, reinforces trust and confidence in UNHCR, thereby facilitating advocacy for increased support.

35. The UNHCR Ethics Office works closely with the UN Ethics Office (UNEO) to administer the FDP for the eligible UNHCR staff members: i.e. those whose grade is D1 and above, procurement officers, those involved in investment of UN assets, all members of contracts committee, and staff of the Ethics Office. During the 2017 annual filing cycle, reporting on the previous year (1 January–31 December 2016 period), 1,652 staff members participated in the programme. UNHCR achieved 100 per cent compliance for the filing cycle. As illustrated in figure 8, the number of FDP participants has been steadily increasing since the establishment of the Ethics Office in 2008.

**Fig 8. FDP participants 2008-2017**



36. The Ethics Office prepared the master list of UNHCR participants for the UN Ethics Office after verifying each submission, and particularly reasons for inclusion. The Ethics Office assisted participants on an ongoing basis, responding to queries and providing counselling by email and telephone, liaising with the UN Ethics Office and with filers’ managers, and performing searches in HR databases as needed. The Office received 318 requests from participants, regarding eligibility, change of duty station, staff members not being aware of their participation and asking for clarifications, password not received or not working, access to the website, confirmation of submission, and compliance follow up to ensure timely submission.

## **F. Standard-setting and policy support**

37. The Ethics Office is responsible for disseminating and promoting ethics-related policies and guidelines. In 2017, the Ethics Office continued to lead a process that aims at formulating an “umbrella” ethics policy and guidelines for UNHCR to be issued in 2018. Moreover, the Office provided inputs for the drafting of Social Media guidelines by the Division of External Relations.
38. The Ethics Office participated in monthly meetings of the Informal Conflict Management Support Group (composed of IGO, LAS, SWS, the Ethics Office and the Ombudsman

Office) and assisted in this context to finalize a guide on “Where to go for Help: Addressing Grievances in UNHCR”, the guide on “Prevention and Response to Discrimination, Harassment, Sexual Harassment and Abuse of Authority” as well as the “Conflict Management & Mediation Handbook”.

## **G. Protection from Sexual Exploitation and Abuse**

39. In 2017, the Ethics Office supported the Organization, pursuant to its mandate, in the implementation of the Secretary-General’s Bulletin on “Special Measures on Protection from Sexual Exploitation and Abuse”. The Ethics Office therefore participated in the initiatives spearheaded by the UN Special Coordinator on SEA, which have been outlined by the Secretary-General’s report titled “Special Measures for Protection from Sexual Exploitation and Abuse: A new Approach” and issued in February 2017.
40. At the inter-agency level, the Ethics Office’s involvement translated into the participation and representation of UNHCR in the High Level Meetings and High Level Steering Group Meetings on PSEA of the wider UN System. The Ethics Office staff participated in the monthly meetings of the Office of the Special Coordinator and its Working Group’s weekly nucleus meetings and contributed to various work streams and initiatives, such as the Task Force on Allegations Involving Implementing Partners or the Victim Assistance Protocol. Additionally, the Ethics Office coordinated the participation of UNHCR staff members in the 2017 Survey of UN Personnel on SEA conducted by the Office of the Special Coordinator to improve the UN response to SEA.
41. The Ethics Office participates in the Inter-Agency Standing Committee (IASC) Task Force on Accountability to Affected Populations (AAP) and PSEA. The agencies of the Task Force support field offices in implementing joint CBCMs (Community-Based Complaints mechanisms), including survivor assistance and related activities. The Ethics Office participated in the monthly IASC Task Team meetings to combine and coordinate the efforts of both UN and NGO organizations to meet agreed IASC minimum operating standards on PSEA and to implement the requirements for UNHCR’s policy of zero tolerance towards SEA.
42. Within UNHCR, the Ethics Office coordinated the “Working Group” meetings at Directors’ level to further consolidate organization-wide PSEA institutionalisation. At the technical level, the Ethics Office monitored progress regarding the mainstreaming of PSEA across UNHCR.
43. As part of its mandate to lead the implementation of PSEA in UNHCR, the Ethics Office has also coordinated and contributed to various activities and deliverables focusing on the prevention and risk management of SEA, including:
  - a. Integration of PSEA in the Administrative Instructions on Detailed Planning and Budgeting for 2018;
  - b. Development of a HR Certification Programme;
  - c. Creation of a Programming for Protection learning programme (P4P) Module on PSEA;
  - d. Integration of PSEA in the job descriptions for SGBV officers;

- e. Issuance of the Annual Management Letter to the Executive Board, signed by the High Commissioner;
  - f. Inclusion of a standard text on UNHCR's zero tolerance policy on SEA in all outgoing recruitment related correspondences such as pre-offers and letters of offer;
  - g. Developing reference to PSEA and a web link to related materials on the UNHCR Careers webpage, its other outreach mediums as well as job and talent pool advertisements;
  - h. Review of the Personal History (P11) Form to include a clause permitting UNHCR to access previous employment records; and
  - i. Inclusion of PSEA into the Accountability to Affected Population (AAP) framework.
44. To further increase prevention of SEA by UNHCR personnel, the Ethics Office was involved in supporting the development of an Electronic Screening Database which will allow, prior to recruitment, the identification of individuals who have been dismissed from the UN System for causes related to SEA previously. In addition, the Ethics Office initiated the development of a Programme Manual containing a section on PSEA and launched discussions on the inclusion of SEA in the Corporate Risk Register and related guidance in the ERM Policy and Administrative Instructions.
45. In the realm of providing support to PSEA focal points in the field, the Ethics Office created a "Community of Practice" on Yammer. Moderated and facilitated by the Ethics Office, this platform provides over 200 focal points with an opportunity to share their best practices, lessons learned and materials developed. Moreover, the platform has helped the Ethics Office to initiate dialogue on PSEA amongst bureaux and offices and to increase field ownership on organization wide implementation of PSEA activities.
46. As part of its awareness raising and outreach activities, the Ethics Office has created UNHCR adapted "no excuse" pocket cards in English, French, Spanish and Arabic. The cards were distributed to all UNHCR personnel in the field and at Headquarters by the Ethics Office during the 16 Days of Activism against SGBV campaign in November and December 2017. Beyond that, the Ethics Office PSEA intranet page was updated and posters and flyers revised and translated.
47. The Ethics Office PSEA training activities included the development of a UNHCR PSEA e-learning course, which was launched in August 2017 and is mandatory for all personnel. As of 31 December 2017, 9,870 UNHCR personnel completed the e-learning, available in English, French, Spanish and Arabic.
48. The Ethics Office also worked towards ensuring that awareness raising on PSEA is included in the Senior Emergency Leadership Programme (SELP) and in the induction briefings of security officers. The Ethics Office provided a training on PSEA to the Chad operation.
49. PSEA continues to be an integral part of Code of Conduct refresher sessions. As a result of the increased focus on PSEA in the Code of Conduct refresher sessions, the Ethics Office registered an increase in PSEA related inquiries from colleagues, including demands for information and training material, from 16 requests in 2016 to 45 in 2017.

50. The Ethics Office provided input on PSEA activities in the context of various donor briefings and surveys and UNHCR global broadcasts on SEA.

## **H. Coordination and professional networking with the Ethics Panel of the United Nations (EPUN) and other Ethics Committees**

51. The Ethics Panel of the United Nations (EPUN) was established in December 2007 as the United Nations Ethics Committee and renamed as EPUN in April 2013. It is mandated to create a unified set of ethical standards and policies for the Secretariat and separately administered organs and programmes. It consults on important and complex ethics matters having system-wide implications. The Panel is chaired by the Director of the Ethics Office, UN Secretariat.
52. The Ethics Panel is composed of the heads of the ethics offices of the funds and programmes and the Secretariat. In the course of the reporting period, the Ethics Panel met in eleven formal sessions.
53. Within the United Nations system, the Ethics Panel continues to serve an essential function as the sole mandated mechanism to promote the coherent application of ethical standards. In enhancing harmonized ethics and integrity policies and practices among member organizations, the Ethics Panel plays a vital role in fostering a “UN identity” based on integrity and accountability. Through promoting an organizational culture of ethics and integrity within the international civil service, the Ethics Panel supports stronger and healthier institutions.
54. The Ethics Office continued to be a member of ECI (Ethics and Compliance Initiative formerly ECOA) and continued UNHCR’s representation in this forum as well as in ENMO (Ethics Network of Multilateral Organizations) and the EBEF (European Business Ethics Forum).

## **V. Observations and recommendations**

55. UNHCR’s Ethics Office had limited visibility in the past, which had an impact on its perceived relevance, role and resourcing. Additional staffing requirements were primarily filled with the help of colleagues between assignments and interns. This resulted in high turn-over within in the Office and prevented the development of a professional service platform and a sustainable and institutionalize “Ethics memory” that would have allowed the Office to demonstrate its added value for the Organization. The situation also led to a Headquarter centric Ethics function with limited impact on UNHCR field operations.
56. Accordingly, the **first recommendation** for the Ethics Office is to foster greater engagement with the field to strengthen ethics learning globally. To that end, it is suggested to formalize support at field level and add ethics staffing capacity to regional hubs with existing LAS/SWS/IGO presence in locations such as Nairobi and Bangkok.

57. It is further recognized that the functions of the Ethics Office since its creation in 2008 were primarily focused on transactional activities (such as giving advice on cases of conflicts of interest) and less on providing a platform for learning and dialogue to shape a UNHCR culture reflecting UNHCR's mission and vision as well as its values and Code of Conduct principles. The new approach to Ethics in UNHCR, spearheaded by the Ethics Office in 2017 in collaboration with various stakeholders in UNHCR with a re-branded action and dialogue based Code of Conduct refresher programme is starting to provide a stronger platform to support ethical decision making and behaviour change in UNHCR.
58. Building on the Code of Conduct refresher session analysis and the new approach to Ethics in UNHCR launched in 2017, the **second recommendation** is to bring the compliance rate in 2019 to at least 80 percent, through (i) the development of a new and engaging Code of Conduct learning approach, connecting UNHCR values, Code of Conduct principles and action oriented guidance, (ii) expanding the network of qualified Code of Conduct facilitators from currently 30 to 100, (iii) periodic global ethics dialogues, (iv) the integration of the ethics dimension in UNHCR's training programmes, including UNHCR's upcoming new induction learning programme and (v) the creation of an Ethics page on UNHCR's public website.
59. In 2017, the attention by the UN and UNHCR to the prevention of sexual exploitation and abuse and sexual harassment and abuse has grown in an unprecedented way. The years ahead will be marked by UN system wide actions to stop sexual misconduct by its workforce, including addressing its root causes through value based management. Hereby, prevention in all its aspects, including training and awareness raising, has been recognized as a critical component in combatting sexual harassment. Hence, the **third recommendation** for the Ethics Office is, in collaboration with Bureaux and stakeholders such as DIP, DSS, IGO, SWS and LAS, to strengthen its PSEA/SHA related coordination role namely through engaging outreach and learning activities, stronger anchoring of PSEA focal point networks and engagement with emergency operations.<sup>2</sup>
60. There are many linkages between sexual exploitation and abuse and sexual harassment in the workplace, and these two dimensions of sexual misconduct are closely connected, although they are different in nature and addressed through separate policies and procedures. The Ethics Office is actively involved both in various inter-agency efforts and UNHCR working groups in addressing SEA/SHA. Sexual harassment allegations that have ethical misbehaviour dimensions and can be appropriately addressed, as a first step, at the managerial level, are increasingly directed to the Ethics Office for follow up. To adequately address the expected increase in SEA/SHA related cases foreseen by the Ethics Office, the **fourth recommendation** highlights the need for additional financial and staffing resources for the Ethics Office to support SEA/SHA working groups in producing tools, policies and procedures.<sup>3</sup>

---

<sup>2</sup> The Ethics Office received additional resources for 2018 and 2019 to address PSEA related matters. Recommendation three has thus been successfully addressed and can be considered closed.

<sup>3</sup> The Ethics Office received additional resources for 2018 and 2019 to address PSEA related matters. Recommendation four has thus been successfully addressed and can be considered closed.



61. Recent IGO investigations found a lack of awareness amongst staff on conflict of interest reporting obligations and related under-reporting. While the UN is assessing options to introduce annual self-declarations on conflict of interest for all staff, UNHCR is piloting online conflict of interest declaration mechanisms for staff in selected countries (Kenya) and has started to review options for implementation of an online conflict of interest self-declaration globally for all UNHCR personnel. Following the suggestion of UNHCR's Independent Audit and Oversight Committee and the Joint Inspection Unit (JIU), the **fifth recommendation** is for UNHCR to consider the introduction of a mandatory annual conflict of interest self-declaration for all personnel.

## **VI. Conclusion**

62. The Ethics Office in 2017 engaged in hands-on and practical strategies to support personnel and management with the knowledge and skills to engage in ethical behaviour and take value driven decisions. It is hoped that this effort inspires a wider movement throughout UNHCR and the United Nations to strengthen the culture of ethics and integrity, value based management and delivery of quality services for persons of concern. The Ethics Office looks forward to continuing these efforts in 2018.

---

## **List of Acronyms**

AAP – Accountability to Affected Populations

CBCM- Community-Based Complaints Mechanism

CoC - Code of Conduct

DESS – Division of Emergency, Security and Supply

DHRM - Division of Human Resources Management

DIP – Division of International Protection

DIST- Division for Information Systems and Telecommunications

EBEF – European Business Ethics Forum

ECI – Ethics & Compliance Initiative

ENMO- Ethics Network of Multilateral Organizations

EPUN - Ethics Panel of the United Nations

ERM – Enterprise Risk Management

GLC - Global Learning Center

IAOC - Independent Audit and Oversight Committee (UNHCR)

IASC - Interagency Standing Committee (TF/Task Force)

IGO - Inspector General’s Office

JIU - Joint Inspection Unit

LAS -Legal Affairs Service

LONY - Liaison Office New York (LONY UNHCR)

NGO - Non-Government Organizations

ODMS – Organisational Development and Management Service

OIOS -United Nations Office of Internal Oversight

PSEA - Protection from Sexual Exploitation and Abuse

RWA - Respectful Workplace Advisors

SEA – Sexual Exploitation and Abuse

SGBV – Sexual and Gender Based Violence

SHA – Sexual Harassment

SMC - Senior Management Committee

SWS – Staff Welfare Section

UNEO - United Nations Ethics Office

UNFPD – United Nations Financial Disclosure Programme