UNHCR Ethics Office
2019 Annual Report

Summary

The present annual report covers the activities of the Office of the United Nations High Commissioner for Refugees (UNHCR) Ethics Office in 2019.

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, as amended), the Ethics Panel of the United Nations reviewed the report by e-review before it was submitted with its recommendations to the High Commissioner.

The High Commissioner may wish to take note of the present report and consider the recommendations made by the UNHCR Ethics Office in formulating the UNHCR global and operational strategies to further strengthen the organization-wide implementation of and adherence to ethical standards and practices by its workforce and partners. It is the twelfth annual report presented by the Ethics Office since its establishment in 2008 as a stand-alone office reporting to the High Commissioner.

Contents

Introduction

1. This twelfth annual report of the Office of the United Nations High Commissioner for Refugees (UNHCR) Ethics Office sets out the activities and achievements of the Office during 2019 in support of its dual mandate:[1] (a) to promote the highest standards of integrity of its workforce; and (b) to cultivate and nurture a culture of ethics, respect, integrity and accountability built on a work environment of dialogue, openness, trust, inclusion, transparency and fairness.

2. The report is submitted in accordance with UNHCR Inter-Office Memorandum No. 040/2008 and Field Office Memorandum No. 042/2008 of 6 June 2008 whereby, the Ethics Office shall submit an annual report to the High Commissioner.

3. Since 2008, the UNHCR Ethics Office has had the following responsibilities:

    (a)   protecting individuals against retaliation;

    (b)   giving advice and assisting the High Commissioner in developing, disseminating and promoting ethics-related policies;

    (c)   providing guidance to the staff and management on ethical behaviour and standards and ensuring that they are understood;

    (d)   reinforcing a culture of ethics through learning and awareness-raising;

    (e)   providing advice to individuals who seek advice in confidence on ethical behaviour; and

    (f)   ensuring the implementation of the United Nations Financial Disclosure Programme (UNFDP) in UNHCR.

4. In addition, the Office had until the end of 2019 focal point responsibility for implementing the policy of the Secretary-General of the United Nations on protection from sexual exploitation and abuse (PSEA), as set out in the all staff email of 17 April 2009 from the High Commissioner. In March 2018, the High Commissioner appointed a Senior Coordinator to lead and co-ordinate the work being done across the organization to tackle all forms of sexual misconduct, and the Ethics Office worked closely with the Senior Coordinator in this respect, with some of the responsibilities of the Ethics Office in relation to PSEA being carried out by the Senior Coordinator. As of 2020, the support to the PSEA focal points was also transferred from the Ethics Office to the Division for International Protection (DIP). The decision was based, inter alia, on the findings of an external evaluative review of PSEA, an internal review of the Ethics Office's work, and with consideration of the work done by the Senior Coordinator. The transfer reflects the strong links between PSEA and UNHCR's work on prevention, risk mitigation and response to gender-based violence (GBV) more broadly and is placed within the broader work of accountability to affected populations and communication with communities. It does not signal less involvement from the Ethics Office in the broader values and behaviour work underpinning a culture free from SEA and SH.

5. The UNHCR Ethics Office builds on the premise that having an independent, impartial and confidential ethics function fostering a culture of ethics and promoting a workforce with integrity

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[1] "Ethics Office — establishment and terms of reference", ST/SGB/2005/22, 30 December 2005, UN Secretariat and "Ethics Office - terms of reference", IOM/FOM No. 040/2008/042/2008, 6 June 2008, UNHCR

is essential to achieving the overall strategic goals of the organization as set out in UNHCR's Strategic Directions 2017–2021, the Global Compact on Refugees (A/73/12 (Part II)) and the comprehensive refugee response framework.

6. A culture of ethics and a strong organizational commitment to integrity and accountability are fundamental requirements for the effective performance and delivery of the UNHCR mandate. In addition, demonstrated and lived commitment to integrity and ethical behaviour by the UNHCR workforce and management in their daily work contributes to an inclusive and innovative work environment and earns the organization a reputation of trust with government partners, donors, persons of concern, civil-society stakeholders and the wider public.

7. To contribute to building a culture of ethics, the UNHCR Ethics Office has taken a dual approach:

   (a) raising awareness about the core values, ethical principles and expected behaviours of a UN workforce, as set out in the UN Staff Regulations and Rules, the Standards of Conduct for the International Civil Service and the UNHCR Code of Conduct (CoC). This has been achieved through the dissemination of information about the CoC, providing ethics advice and the implementation of the FDP in particular; and

   (b) developing an engaged relationship with the workforce on ethical decision-making. This work has focused on creating dialogue around the CoC, with a view to anchoring desired behaviour in personal and organizational values. The work has been taken forward under the heading of values in action and your actions matter, and with emphasis on building a "Stop. Pause. Reflect" practice around ethics and integrity.

8. With this approach, the Office worked to reach the total workforce of 17,422 (12,833 staff members and 4,589 affiliate workforce) in its 544 field, national, regional and headquarters locations (37 per cent of whom are in hardship and non-family duty stations) with ethical advice and guidance. It is also fully engaged in the transformation process initiated by the UNHCR headquarters review as well as the related behaviour- and culture-change initiatives required to achieve the UNHCR strategic objectives. The work of the Office in 2019 was organized in relation to three strategic activity areas:

   (a) **standards of behaviour.** Through outreach to field colleagues, guidance and advice to individuals on ethical issues, collaborative learning events, a new approach to CoC Dialogue (CoCD) sessions, and the promotion of trust, inclusion and collaboration, the Office raised awareness with the workforce on ethical behaviour and enabled the modelling of ethical behaviour and decision-making in accordance with UN standards, rules and values, including compliance with the UNFDP;

   (b) **a speak-up culture with whistle-blower protection.** As part of fostering a speak-up culture where misconduct is reported and grievances are addressed without retaliation, the Ethics Office worked closely with independent entities such as the Inspector General's Office (IGO) and the UNHCR Ombudsman's Office as well as senior management to provide accessible and efficient channels for confidential and high-quality advice, solutions and protection against retaliation, including an external SpeakUp Helpline; and

   (c) **values and ethics.** To foster values of trust, collaboration and integrity and embed them in organizational policy and action, the Office invested in the professional development of the workforce and within the Ethics Office. The learning focused on training of CoC facilitators,

peer advisors,[2] leadership training, upskilling on PaR, systems thinking and value-spotting, which enabled the Office to better advise on policies, promote value- and ethics-based people management, foster a culture of dialogue and problem-solving, and ensure access to confidential, professional and trusted services for advice and guidance on ethical issues. Going forward, the Office will build on this work to engage further with the organization on future ethical dilemmas both for staff and the organization.

9. The present report will highlight key achievements, describe related activities and share resulting observations. In line with Inter-Office Memorandum No. 040/2008, it will also put forward recommendations to the High Commissioner on how to address recurring and systemic ethics problems in UNHCR arising from the work of the Ethics Office in 2019.

I. Key achievements

10. In its mission to foster an ethical culture in UNHCR, the Ethics Office in 2019 strengthened its roles as a key contributor to and stakeholder in the efforts of UNHCR to drive behaviour and attitude change in the organization. It did so by promoting a speak-up culture, enlarging safe spaces for dialogue, work with its partners, and empowering colleagues in ethical and value-based decision-making. Key milestones in that regard included the following:

    a. repositioning of the Ethics Office as a key driver of organizational culture and value-driven management at UNHCR through (a) a rebranded yearly CoC session to an organization-wide dialogue on ethical decision-making (CoC Dialogue), (b) training of CoC facilitators, and (c) development of a new and engaging online-based CoC manual for the 2019/2020 CoCD theme of "Values in Action: Trust and Collaboration", connecting the UNHCR vision/purpose, values, CoC principles and action-oriented guidance to reflect those values and principles in everyday behaviour;

    b. effective action to prevent, detect and respond to SEA through the upgrading of PSEA learning and outreach materials and strengthening of the PSEA Focal-point Community of Practice. Areas of specific focus have included enhancing the UNHCR role and profile in inter-agency PSEA networks, and providing PSEA/SH training;

    c. management of 47 protection against retaliation-related queries (43 queries from UNHCR personnel and 4 queries from EPUN), including 10 cases involving retaliation complaints for a preliminary assessment. This was a 50 per cent increase over 2018, including 70 per cent of the cases related to protection against risk of retaliation. The Ethics Office was also involved in several activities to strengthen the UNHCR speak-up culture;

    d. provision of proactive and timely ethics advice for UNHCR personnel through supporting the UNHCR SpeakUp Helpline; upgrading a professional case-management system; strengthening collaboration with IGO, the Legal Affairs Service (LAS), the Psychosocial Wellbeing Section (PWS) and the Ombudsman's Office; and provision of ethics advice via online tools. Requests for ethics advice increased by almost 50 per cent in 2019; and

    e. management of the UNHCR compliance with UNFDP, with a 20 per cent increase in UNHCR filers and a 99.9 per cent compliance rate.

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[2] The UNHCR global volunteer network of some 400 peer advisors provides support in prevention and early-response capacity to respond to workplace grievances and in psychosocial well-being of UNHCR personnel by providing an easily accessible and confidential point of contact.

II. Activities of the Ethics Office
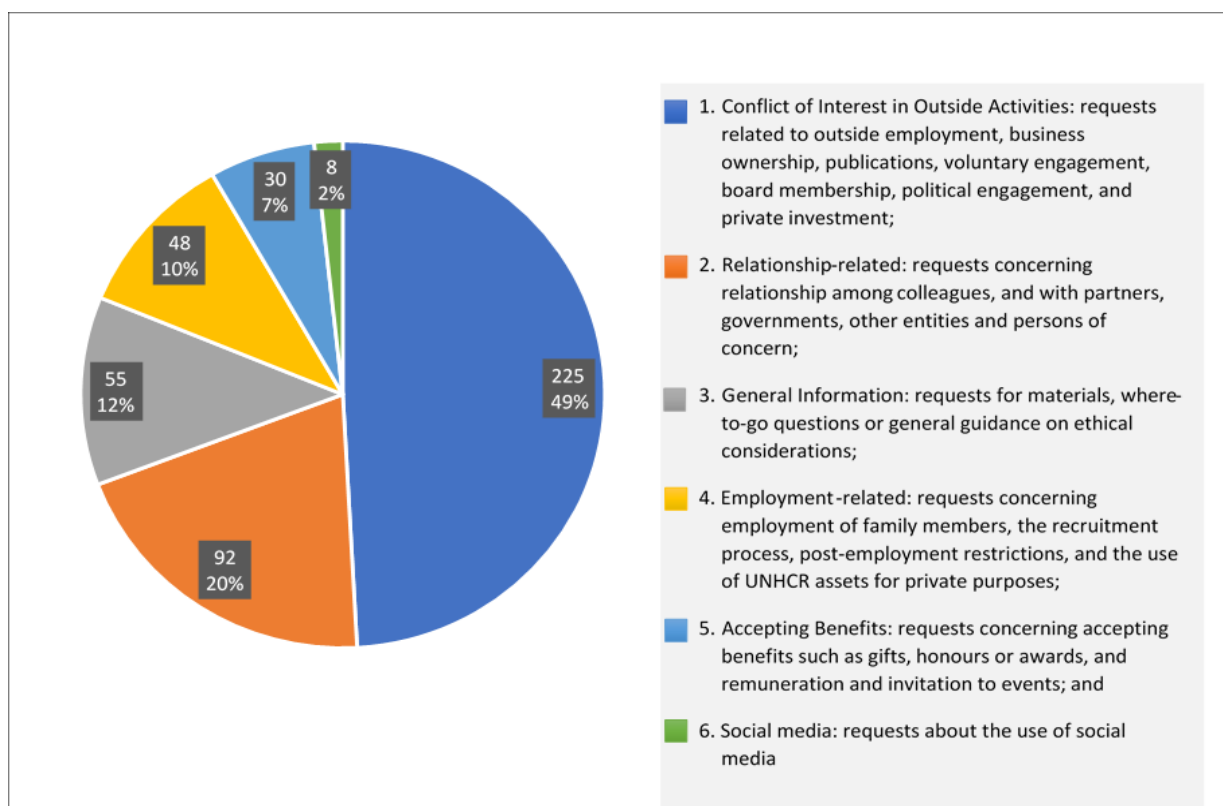
A. Ethics advice and guidance

11. The Ethics Office provides confidential advice and guidance concerning ethical dilemmas and conflict-of-interest questions that personnel may encounter in the workplace. Providing an independent, impartial and confidential procedure early in the decision-making process of ethical dilemmas is beneficial to ensuring that ethical standards are upheld and contributes to the ethical culture of the organization. The work of the UNHCR Ethics Office is also an integral part of the UNHCR risk management strategy.

12. In 2019, the Ethics Office provided ethics advice and guidance to 407 UNHCR personnel. With multiple requests from some of those colleagues, the Ethics Office addressed a total of 458 cases for ethics advice and guidance in 2019. That represents a 45 per cent increase in cases compared to 2018, when 316 cases were received, and a sevenfold increase in the number of cases in 2019 compared to 2013. This trend of growing numbers of requests is seen from the staff and from the affiliate workforce.

Figure 1. Requests for ethics advice, by category and year, 2013–2019
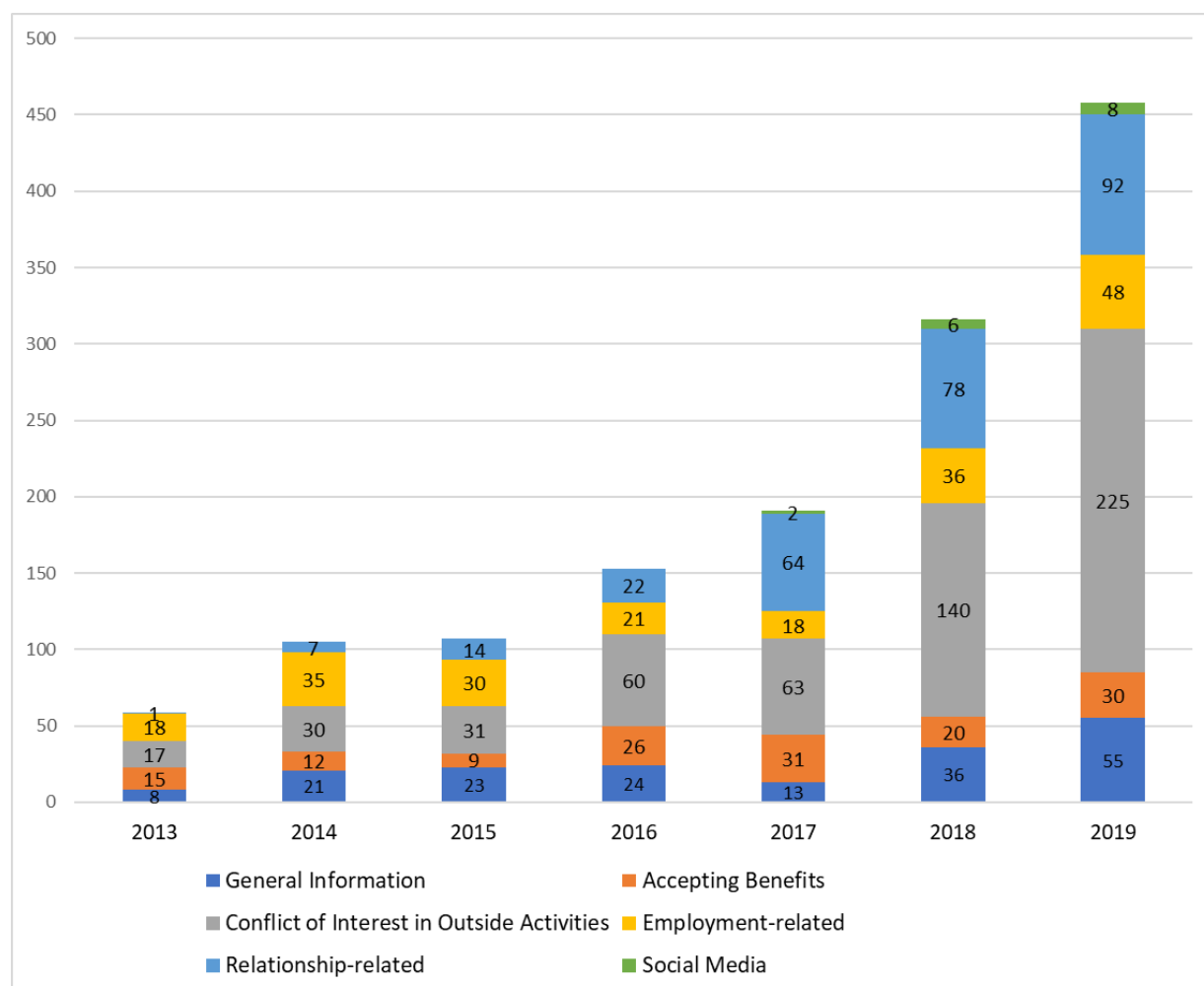
13. Based on feedback received, there are two key factors behind that substantial growth: greater trust in and awareness of the ethics function and its role. Efforts to build trust in the system have been twofold. The first is responding more efficiently and effectively to the cases by engaging in a systematic and empowering dialogue about the ethical dilemmas in all cases and using the ethical decision-making process and tools. The second is ensuring an initial response to all new cases within 48 hours and continued follow-up and dialogue to support decision-making. Steps to increase awareness about staff obligations and what action to take concerning ethical issues have also been taken, in particular by raising awareness of ethical dilemmas, such as conflict of interest, in the mandatory CoCD sessions (see Section E). More efforts have also been made to provide engaging and updated guidance and information on the Ethics Office intranet site.

14. Access to confidential advice and guidance was ensured by using various means and channels, such as email, telephone, Skype and face-to-face meetings (both at headquarters and during field missions). Having varied channels of access and communication has proven to be a good practice, which will be continued and expanded where possible. The Office has also cooperated with other entities working in the "integrity" family, such as the Peer Advisor Networks (PANS) and CoC facilitators, to raise awareness about ethics and the role of the Ethics Office. Since the Office will remain based at headquarters, access, outreach and face-to-face interaction (including virtual) are areas to strengthen going forward.

15. The Ethics Office uses the six categories reflecting areas of the UN Staff Regulations and Rules in the classification of its cases. In 2019, the cases were distributed as shown in figure 2.

Figure 2. Number and percentage of ethics advice cases per category in 2019

Legend:
1. **Conflict of Interest in Outside Activities:** requests related to outside employment, business ownership, publications, voluntary engagement, board membership, political engagement, and private investment;

2. **Relationship-related:** requests concerning relationship among colleagues, and with partners, governments, other entities and persons of concern;

3. **General Information:** requests for materials, where-to-go questions or general guidance on ethical considerations;

4. **Employment-related:** requests concerning employment of family members, the recruitment process, post-employment restrictions, and the use of UNHCR assets for private purposes;

5. **Accepting Benefits:** requests concerning accepting benefits such as gifts, honours or awards, and remuneration and invitation to events; and

6. **Social media:** requests about the use of social media

16. As was the case in previous years, the majority of cases (49 per cent) concerned conflict of interest in outside activities. Those cases, together with relationship- and employment-related concerns, accounted for close to 80 per cent of all requests for advice received. The relatively high level of

relationship- (20 per cent) and employment-related (10 per cent) cases is particularly concerning. These cases reflect concerns with managerial and human-resource practices, which are often difficult to address and, when unaddressed, may linger and undermine trust and collaboration.

17. Of particular note is the increase in requests about the use of social media. While the numbers are still low (8 cases in 2019), this is a more recent but growing area, where more guidance and outreach will be needed in the future.

18. Of the 225 requests for ethics advice regarding conflict of interest, 77 per cent related to outside employment, voluntary engagement and publications. While many of those requests were addressed directly to the Ethics Office, 57 per cent were referred by the Division of Human Resources (DHR) to the Ethics Office for advice on actual, potential or perceived conflict of interest. While authorization on outside activity can be granted only by DHR, the Ethics Office works in close collaboration with DHR to provide ethics advice. The increase in requests concerning outside activity can be explained partly by additional Ethics Office-led country-specific outreach activities on outside activity following a marked increase in detection of non-compliance with related Staff Regulations and Rules and disciplinary cases in those operations.

19. In 2019, 20 per cent of requests for ethics advice concerned relationship issues in the workplace. Those included working relationships among colleagues as well as relationships with personnel of UNHCR implementing partners. The issues that were raised in that category were often multifaceted and complex, regarding HR decisions, performance management and relational aspects. The Ethics Office addressed situations where staff members felt that their rights had been violated and the rules of the organization had not been respected. There were other situations where the behaviour was not clearly violating any UN Staff Regulations and Rules but had the potential to be perceived as unethical. In most cases, the issues that were raised related to workplace culture, the way in which things were communicated, and feelings of unfair or unjust treatment.

20. In response to cases concerning workplace culture and difficult workplace relations, the Ethics Office used a mix of three different follow-up actions:

    (a)   active engagement and dialogue, with the aim of assisting and empowering the concerned colleague to address the issues in a proactive manner. That included facilitated consideration, and "walking through" an ethical decision-making model, which begins with identifying "what happened" and comparing that with relevant rules and standards derived from the UN Charter, the Staff Regulations and Rules, and the CoC;

    (b)   proposing proactive outreach and CoCD sessions in the concerned office or team. That response seemed particularly relevant for issues at a systemic level that were affecting many people in the workplace; and

    (c)   cooperation and outreach with other entities of UNHCR, such as the Ombudsman's Office, the PWS and the DHR, for consulting on multifaceted concerns as well as referring colleagues to them when relevant.

21. Cases addressing employment-related questions represented 10 per cent of requests for ethics advice The majority of those cases concerned questions of fairness and transparency in the recruitment process at UNHCR including extension of contracts and conflict of interest during the hiring of spouses, partners and other family members at UNHCR or in UNHCR partner organizations.

22. Cases addressing ethical dilemmas and questions about accepting benefits represented 7% of requests for ethics advice. They concerned situations where colleagues were offered benefits in the form of an award, gifts, remuneration or recognition by governmental and non-governmental individuals or entities as well as some situations where colleagues had questions or concerns about giving gifts or hospitality to these entities or individuals.

23. In 2019, 16 per cent of the total cases for ethics advice were received from the senior managers of UNHCR. The cases concerned advice on conflict of interest in outside activities and accepting benefits as well as employment and relationship-related issues. While the majority of requests (60 per cent) came from personnel in Europe, including headquarters in Geneva, requests from managers in Africa and in the Middle East and North Africa (MENA) region comprised 30 per cent of the total requests from senior managers.

Figure 3. Requests for ethics advice, by region and category, 2019
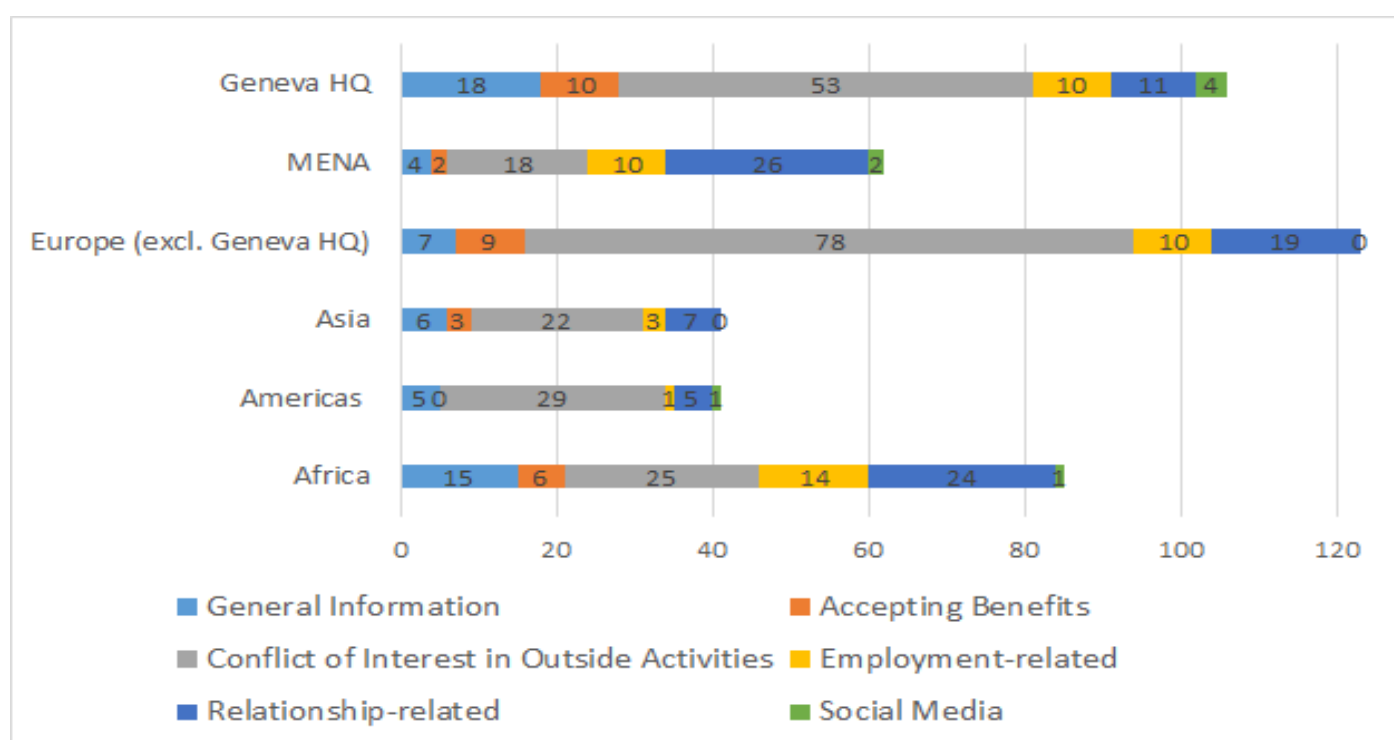
24. While the majority of requests for ethics advice and guidance in 2019 came from colleagues in Europe (including Budapest, Copenhagen and UNHCR headquarters at Geneva (Geneva had the highest number of requests at 47 per cent)) (fig. 3), the number of personnel working in Asia and the Americas who contacted the Ethics Office increased twofold from 2018 to 2019.

B. Protection against retaliation

25. The Ethics Office administers the Administrative Instruction on Protection against Retaliation (hereinafter the AI on PaR), which was revised in September 2018. The AI on PaR aims at protecting UNHCR personnel who report misconduct or engage in any other protected activity from any detrimental actions that would adversely impact their working and employment conditions. The AI on PaR also aims to enhance the speak-up culture within the organization.

26. The AI on PaR assigns a dual role to the Ethics Office: (a) carry out the preliminary assessment in cases where there is a formal complaint of retaliation, and (b) play a central role in preventing and mitigating risks of retaliation. In accordance with the AI on PaR, the work on cases involving protection against retaliation can be separated into three categories:

   (a)   requests for information and advice;
   (b)   risk of retaliation and requests for preventative action; and
   (c)   retaliation complaints and requests for a preliminary assessment.

27. When receiving retaliation complaints and requests for a preliminary assessment, the Ethics Office will conduct a preliminary review to determine the following: first, whether the complainant has engaged in a protected activity; second, whether the action alleged to be retaliatory or a threat of retaliation (detrimental action) did take place; and third, whether there is a *prima facie* case that the complainant's engagement in the protected activity was a contributing factor in causing the action or threat alleged to be retaliatory.

28. If the Ethics Office determines a *prima facie* case of retaliation, the case will be referred to the IGO for a full investigation. Pending the completion of the investigation, the Ethics Office can recommend interim protective measures to safeguard the interests of the complainant. The Ethics Office reviews the investigation report and determines whether the investigation supports the allegations of retaliation; and informs the complainant of both the outcome of the investigation and whether retaliation was found. If the outcome is positive, the Ethics Office recommends corrective measures to relevant entities to rectify negative consequences as a result of retaliation.

29. In 2019, the Ethics Office received a total of 43 queries from UNHCR personnel regarding protection against retaliation (figs. 4 and 5):

   ● 14 cases involved a request for information and advice about retaliation;
   ● 19 cases involved risk of retaliation; and
   ● 10 cases involved retaliation complaints and requests for a preliminary assessment.

30. Since the Director of the Ethics Office is a member of the Ethics Panel of the United Nations (EPUN), the Ethics Office also received three requests from other EPUN members for a consultation opinion and one case for an independent review of the determination made by the United Nations Ethics Office of a no-*prima-facie* case of retaliation.

31. Out of the 14 cases involving a request for information and advice:

   • 6 cases fell outside the mandate of the Ethics Office because no protected activity or no detrimental action was involved. The Ethics Office advised the enquirers to seek help from other entities.
   • 2 cases involved protected activities, but the Ethics Office advised the enquirers to first follow up on the activities of the Ombudsman's Office since the detrimental actions were more in the nature of management issues.
   • In 3 cases, the Ethics Office provided advice and closely monitored the situation until there was no element to negatively influence the working and employment situation of the enquirers.
   • In 1 case, the Ethics Office consulted with other entities (with the consent of the enquirer) and provided answers to the questions of the enquirers.
   • In 2 cases, the Ethics Office provided guidance and advice, but the enquirers decided not to follow up on their requests for protection against retaliation.

32. Out of the 19 cases involving risk of retaliation:

- In 7 cases, the Ethics Office consulted and had exchanges with other entities including the senior managers of the reporters to monitor the situation until the risks of retaliation were mitigated.
- In 6 cases, the Ethics Office, combined with other entities, recommended putting the subject on Special Administrative Leave with Full Pay pending the completion of the investigation in order to avoid a confrontation between the subject and the reporters.
- In 2 cases, the Ethics Office, combined with other entities, recommended putting both the subject and the reporter on Special Administrative Leave to mitigate the risk of retaliation.
- In 2 cases, the Ethics Office consulted with DHR to monitor the contract extensions to mitigate the risk of retaliation.
- In 2 cases, the Ethics Office frequently checked the situation with the reporters, but the reporters decided not to follow up on their requests.

33. In the 10 retaliation complaints, the Ethics Office conducted the comprehensive preliminary review for all received complaints, which involved the analysis of relevant rules, regulations and administrative issuances that were related to the case and the review of information and supporting documents submitted by the complainant or third parties.

34. Out of the 10 retaliation complaints:

- In 2 cases, the Ethics Office determined a *prima facie* case of retaliation and referred the cases to the IGO for a full investigation.
- In 4 cases, the Ethics Office determined that a *prima facie* case of retaliation had not been established. In 1 of those cases, the Ethics Office collaborated with other entities to implement preventive measures, including putting the subject on Special Administrative Leave with Full Pay and the support of sick leave credits and Visa applications, before the complainant submitted a request for *prima facie* assessment.
- In 3 cases, the assessment is still ongoing.
- In 1 case, the complainant withdrew the complaint because the situation improved after the arrival of the new Representative.

35. For those complaints where a *prima facie* case of retaliation was not established, the reasons included: (a) the complainant did not engage in protected activity; (b) the actions alleged to be retaliatory or a threat of retaliation turned out to be legitimate applications of regulations, rules or administrative policies; (c) the actions alleged to be retaliatory or a threat of retaliation were based on ongoing interpersonal-relationship problems, harassment or other workplace concerns; and (d) the complainant did not provide evidence proving a causal link between the detrimental action and the protected activity.

36. In the first case where the Ethics Office determined that there was a *prima facie* case of retaliation, the complainant alleged to have suffered from the removal of functions and the exclusion from communication, discriminatory treatment regarding work arrangements, as well as arbitrary imposition of performance appraisal documents (ePAD) objectives and an insubstantial evaluation as a result of the complainant's participation in the activities of the Ombudsman's Office. After reviewing the facts and findings in the investigation report, the Ethics Office made the final determination that the retaliation complaint had been substantiated. The Ethics Office subsequently made recommendations of corrective measures to DHR to correct the negative consequences suffered by the complainant.

37. The second *prima facie* case of retaliation involved a complainant who alleged to have suffered from interference in the application for future appointments and side-lining in the workplace after the reporting of an abuse of power, harassment and discrimination to the IGO. This case has been referred to the IGO for a full investigation. Under the recommendation of the Ethics Office, the complainant has been put on Special Leave with Full Pay pending the completion of the investigation.

Summary of protection against retaliation cases
1 January 2019 – 31 December 2019

[Observation 1] Nearly **50 per cent** of cases fell into the category of **risk of retaliation,** and the Ethics Office collaborated with other entities to provide preventive measures and mitigate risks of retaliation at an early stage.

[Observation 2] Colleagues became more aware of the service of protection against retaliation after the implementation of the AI on PaR, since there was a **35 per cent increase** in cases in 2019.

[Observation 3] **Close collaboration** between different entities can be observed throughout the process, from the intake of the cases until the implementation of corrective measures.

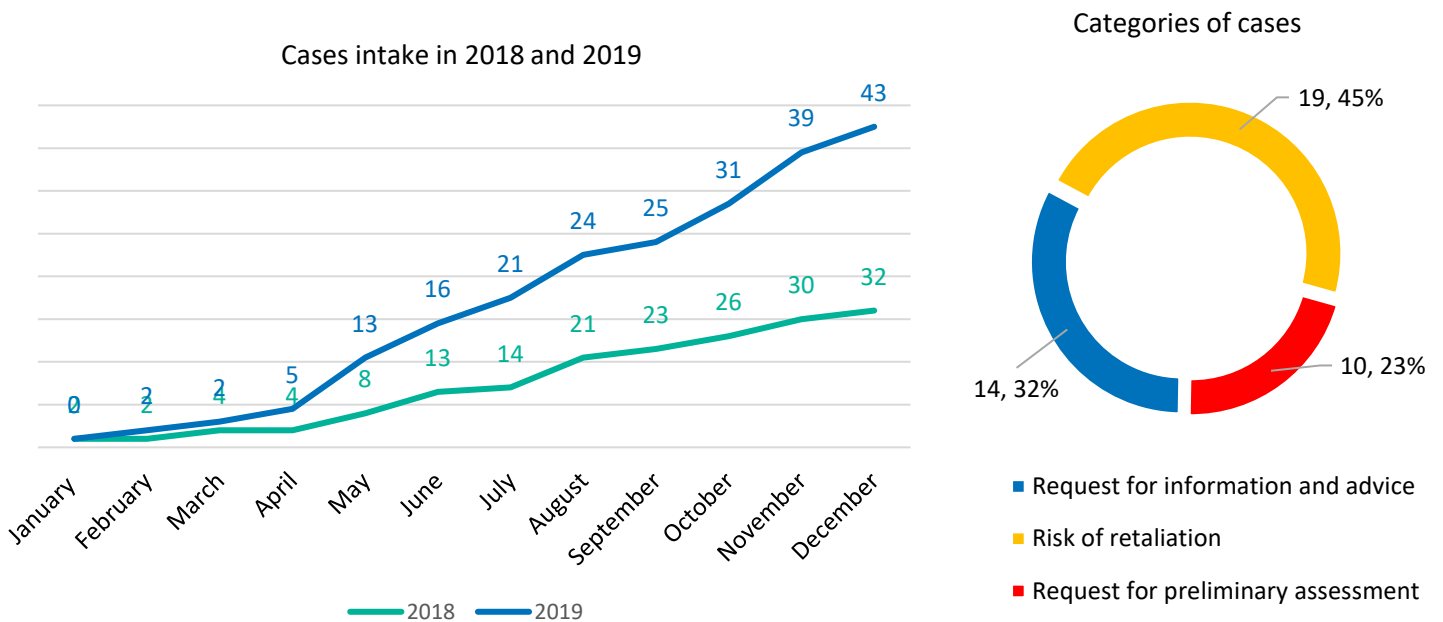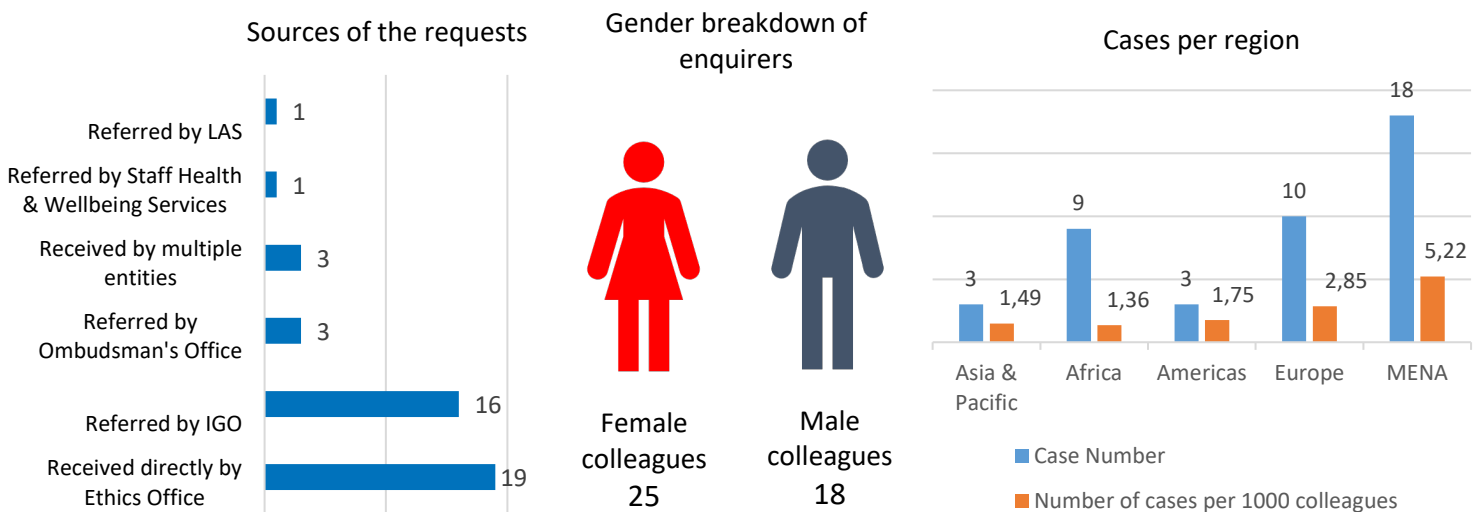## Figure 4. Cases concerning protection against retaliation in 2018 and 2019

Cases intake in 2018 and 2019

2018: January 0, February 2, March 2, April 4, May 8, June 13, July 14, August 21, September 23, October 26, November 30, December 32

2019: January, February 2, March 5, April 5, May 13, June 16, July 21, August 24, September 25, October 31, November 39, December 43

Legend: —— 2018 —— 2019

Categories of cases

- 19, 45%
- 14, 32%
- 10, 23%

■ Request for information and advice
■ Risk of retaliation
■ Request for preliminary assessment

Figure 5. Cases of protection against retaliation, by category, source, gender and region, 2018–2019

Sources of the requests

- Referred by LAS: 1
- Referred by Staff Health & Wellbeing Services: 1
- Received by multiple entities: 3
- Referred by Ombudsman's Office: 3
- Referred by IGO: 16
- Received directly by Ethics Office: 19

Gender breakdown of enquirers

Female colleagues
25

Male colleagues
18

Cases per region

Region	Case Number	Number of cases per 1000 colleagues
Asia & Pacific	3	1,49
Africa	9	1,36
Americas	3	1,75
Europe	10	2,85
MENA	18	5,22

■ Case Number
■ Number of cases per 1000 colleagues

C. SpeakUp Helpline

38. In September 2018, UNHCR launched the SpeakUp Helpline to provide UNHCR personnel with an independent external hotline for reporting misconduct, including sexual misconduct, and raising other concerns and grievances. This additional, and external, channel for reporting misconduct, is a collaborative initiative spearheaded by the UNHCR Ethics Office and involves teams from DHR, the Field Security Service, IGO, LAS, the Ombudsman's Office and PWS.

39. Through the external SpeakUp Helpline, colleagues have the option to report anonymously, and in this case, the identity of a service user is fully protected. The service is accessible worldwide and is available 24 hours a day, 7 days a week, every day of the year. It offers three channels for reporting: telephone, an online form or a mobile app. Real-time telephone interpretation enables colleagues to report in their own language. The online form and the mobile app are available in seven languages, with translation services integrated into the service.

40. Cases reported through the SpeakUp Helpline are confidentially assessed by the UNHCR Triage Team and then referred to the most appropriate entity within UNHCR to seek resolution. The Triage Team, which is comprised of members from LAS, PWS, the Ombudsman's Office and the Ethics Office, formalized an internal process for channelling, recording and handling reports received by the Helpline.

41. Following the launch of the SpeakUp Helpline, the Ethics Office led a phased roll-out of information to colleagues in the field through a poster campaign, pocket-card dissemination, and an informational webinar series combining topics on reporting and protection against retaliation.

42. From 17 September 2018 to 31 December 2019, the SpeakUp Helpline received 83 reports from different regions (fig. 6). The top-four reporting categories were: abuse of power, harassment, human resources and sexual harassment. Anonymous reporting remained high at 63 per cent (52 cases) (fig. 7), which demonstrated the Helpline added value of creating a safe space for reporting in confidence.

43. From 17 September 2018 to 31 December 2019, 44 cases were closed (fig. 8). Among those cases, 22 cases were closed with relevant resolutions, while 22 cases were closed because of non-engagement by the reporters. A total of 28 reporters engaged in mutual dialogue, and 78 per cent of the cases where the reporters engaged in the process were successfully resolved. It is highly recommended that the reporters, especially anonymous reporters, engage in the process to achieve a timely resolution.

44. Analysis revealed that 43 per cent of reporters expressed fear of retaliation and 28 per cent cited lack of confidence in existing reporting mechanisms as reasons for reporting anonymously via the SpeakUp Helpline. Also, 50 per cent of reporters had previously reported internally. No action or follow-up on previous reports, concerns related to fear of retaliation and lack of knowledge of exactly where to go for help were reasons leading to the use of the SpeakUp Helpline.

45. Data indicate that 70 per cent of reporters favoured the online reporting method (fig. 9). The "SpeakingUp App" and the telephone served as supplementary methods. Reports were received in various languages: 80 per cent of the 83 reports were made in English and 20 per cent of the 83 reports came in another language, such as French, Spanish, Portuguese or Arabic.

SpeakUp Helpline overview (17 Sept. 2018–31 Dec. 2019)
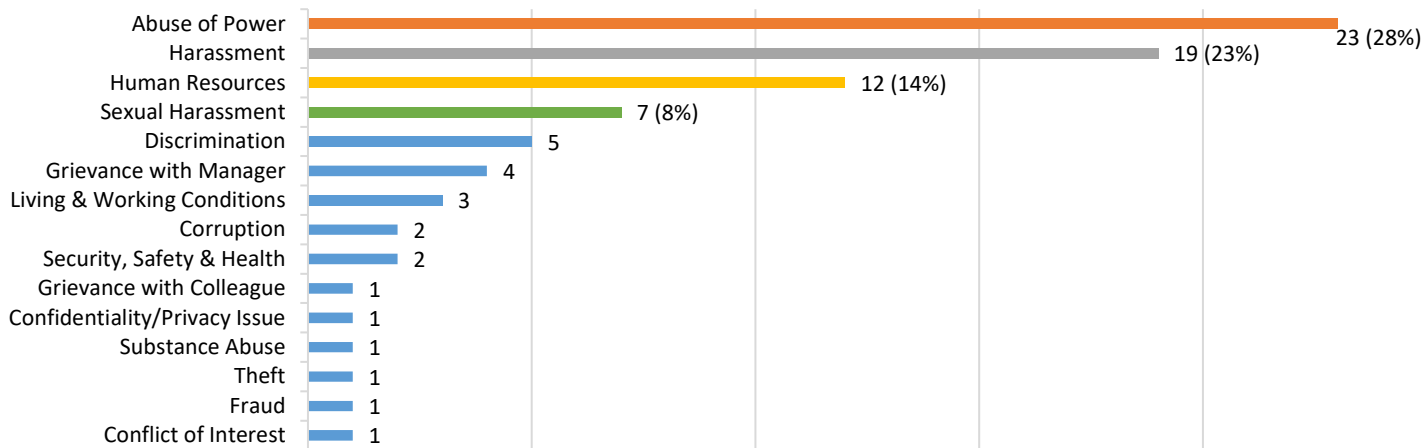
Figure 6: Incident Reports Types

Type	Value
Abuse of Power	23 (28%)
Harassment	19 (23%)
Human Resources	12 (14%)
Sexual Harassment	7 (8%)
Discrimination	5
Grievance with Manager	4
Living & Working Conditions	3
Corruption	2
Security, Safety & Health	2
Grievance with Colleague	1
Confidentiality/Privacy Issue	1
Substance Abuse	1
Theft	1
Fraud	1
Conflict of Interest	1

Figure 7. Anonymous report rate
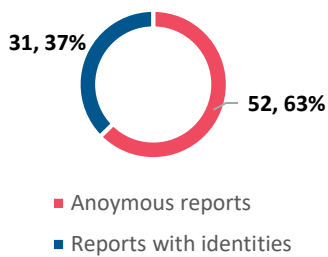
- 31, 37%
- 52, 63%

■ Anonymous reports
■ Reports with identities

Figure 8. Engagement by reporter

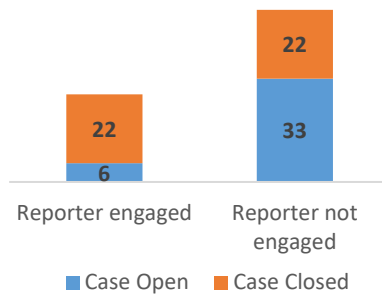|	Reporter engaged	Reporter not engaged
Case Closed	22	22
Case Open	6	33

■ Case Open ■ Case Closed

Figure 9. Reporting methods

- Web report, 58, 70%
- Telephone, 12, 14%
- Speaking Up App, 10, 12%
- Email, 3, 4%
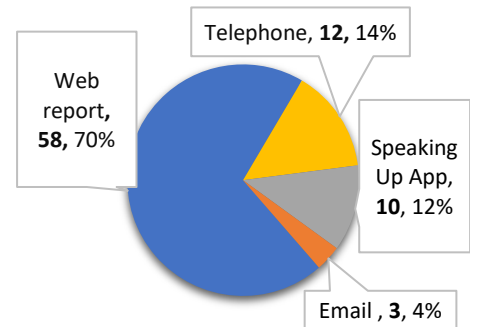
Reports per month (Sep. 2018 - Dec. 2019)

Number of reports

Month	Number
Sep.2018	1
Oct.2018	5
Nov.2018	3
Dec.2018	6
Jan.2019	12
Feb.2019	6
Mar.2019	3
Apr.2019	8
May.2019	4
Jun.2019	8
Jul.2019	4
Aug.2019	1
Sep.2019	1
Oct.2019	5
Nov.2019	7
Dec.2019	9

Assignment of reports

LAS	Triage	Reg. Bur.	Ethics	Ombuds	DHR	PWS	IGO
0	5	3	13	38	10	9	5

Reports per region

Africa	Americas	Asia	Europe	MENA
23	12	6	18	24

15
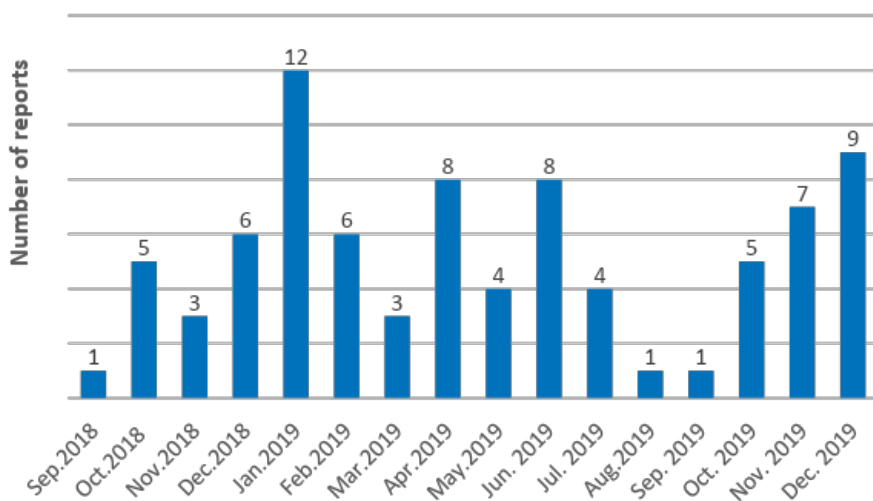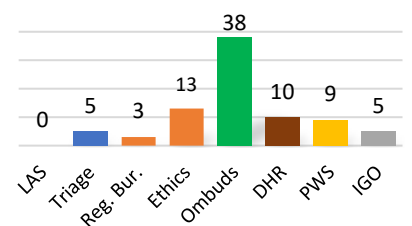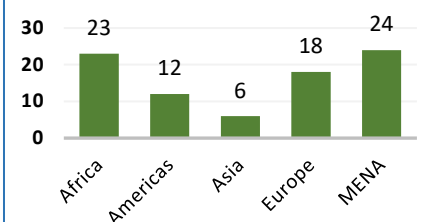
D. Outreach, training and education

46. Outreach, training and education activities continued to be key initiatives through which the UNHCR Ethics Office could raise awareness and identify high-risk areas and ethical dilemmas to better address ethical decision-making and to prevent misconduct.

47. The Ethics Office also continued to upgrade its intranet site to support greater visibility of the Office and to enable easier access to education and training materials.

48. In addition, the Ethics Office initiated and supported several global email messages to the UNHCR workforce on topics such as the CoCD, the UNFDP, the SpeakUp Helpline, protection against retaliation and PSEA.

E. Code of Conduct Dialogue sessions

49. One of the well-established outreach activities spearheaded by the Ethics Office is the dialogue session on the CoC, which is mandatory and thus carried out worldwide by all country operations. The main purpose of the mandatory dialogue session is to provide the UNHCR global workforce with a space for open dialogue and collaborative learning in applying CoC principles and to foster an organizational culture that upholds ethical and value-based behaviour.

50. In 2017, the Ethics Office introduced the UNHCR new approach to ethics, seeking to reinforce a strong value-based "ethics culture" within the organization by engaging colleagues in shaping this culture and behaviour change. This entails engaging, empowering and trusting everyone at all levels to become involved in contributing individually and as part of a team to an overall environment that supports ethical behaviour and ethical decision-making. Simply put, the approach is about building a shared understanding among colleagues that "Your actions matter", an ability to reflect on the impact of one's behaviour, a capacity to strengthen ethical decision-making, and an obligation and commitment to do what is right.

51. The Ethics Office spent the first half of 2019 developing the Code of Conduct Facilitation Guide in line with the new modular approach to the CoC. It incorporates new visual communication materials created in collaboration with the Innovation Service. Officially launched by Broadcast Message on 17 October 2019, the Guide offers an innovative training package to support offices in tailoring sessions to their specific needs while offering activities to experience challenges and opportunities in relation to UNHCR values, trust, collaboration and ethical decision-making.

52. The theme of the 2019–2020 CoCD is "Values in Action: Trust and Collaboration". The theme was chosen to accompany the ongoing transformation and regionalization of UNHCR into a forward-looking, flexible and field-driven organization. The journey of organizational change requires a high level of trust and the ability to collaborate among colleagues as well as with partners. Colleagues need to be equipped to navigate difficult situations and challenges to make the "right" decisions, based on the UNHCR vision and values, ethical principles, and rules and regulations. The learning objectives and materials were developed in close coordination with a learning design specialist and in co-creation with a group of instructional designers, facilitators and users within UNHCR. The main learning objectives include:

    (a) explore and determine the values underlying ethical decision-making and how these values are put into action;
    (b) identify what "trust" and "collaboration" mean in daily work at UNHCR;

(c) reflect on the impact of trust and communicating and their influence on building trust in UNHCR as an organization; and

(d) enhance the understanding of how to build and increase trust and communicating with colleagues, partners and persons of concern.

53. Sessions have a minimum duration of half a day, with many offices going beyond that and allowing for a full day. The modular structure of the Facilitation Guide allows for customization and focus according to the needs of each office. In addition to the mandatory sessions, the new approach encourages ongoing dialogue among colleagues on ethical decision-making, and the Ethics Office supports this process with periodic global ethics dialogue on its Ethics in Action platform. This new approach aims at emphasizing open dialogue and providing colleagues with an opportunity to "reflect and contribute" and will help UNHCR to transition to more value-based management and decision-making when it comes to managing ethical dilemmas and a value-based organizational culture.

54. As in the previous two years, the annual CoCD cycle was extended to a two-year period: 2019–2020. As a result, the mandatory CoCD sessions on "Values in Action: Trust and Collaboration" for that two-year cycle will be concluded on 31 December 2020.

55. In the first three months since the roll-out of the Guide (October–December 2019), 56 UNHCR operations reported the participation of around 7,000 UNHCR colleagues in the mandatory CoCD sessions, representing 40.5 per cent of the total UNHCR workforce of 17,283. The participation rate (the percentage of each office that participated in the session) for sessions held to date is 84 per cent, compared to a participation rate of 60 per cent by UNHCR colleagues in 2016 and 80 per cent in 2018. The target of an 80 per cent participation rate in CoCD sessions by 2019 set by the Ethics Office and included in a recommendation in its 2017 annual report was thus reached.

56. The Ethics Office trained 30 facilitators from 18 operations in a training-of-trainers learning event held in Budapest in May 2019. In the 5-day training courses, which was co-hosted by the Ethics Office and the Global Learning and Development Centre (GLDC), facilitators were familiarized with the new training content and practised facilitation of the exercises.

57. Members of the Ethics Office facilitated in-person CoCD sessions in six operations, including large field operations such as those in Iraq and the United Republic of Tanzania, and headquarters locations such as Copenhagen and Geneva.

58. As part of engaging in more proactive follow-up and assistance to operations, the Ethics Office began collecting the name of a focal point in each operation to lead the planning and facilitation of the CoCD session in that operation. By the end of 2019, 103 focal points had been identified in 52 countries. That process is to be completed by the second quarter of 2020. By actively following up with the operations and supporting operations in their sessions, the aim is that 100 per cent of country operations will have held their CoCD session by the end of 2020.

59. As of November 2019, the Ethics Office had collected evaluation and feedback on the CoCD using a survey to be completed by participants after the sessions. It had collected feedback from 523 colleagues in 13 operations, and 87 per cent of those respondents stated that they were able to apply the steps involved in ethical decision-making. A total of 76 per cent of respondents stated that they "strongly agree" or "agree" with the statement that "I have been inspired to speak up (more) by today's session". Furthermore, 88 per cent of participants stated that they would use

what they had learned in the session in their professional life, and 93 per cent said that they were fully aware of the importance of trust and collaboration in their daily work.[3]

F. United Nations Financial Disclosure Programme

60. The primary purpose of the United Nations Financial Disclosure Programme (UNFDP) 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 with which to assess actual, apparent or potential conflicts of interest of UNHCR staff required to file an annual disclosure statement so that appropriate advice may be provided. The UNFDP helps to ensure that UNHCR colleagues observe and perform their functions consistent with the highest standards of integrity required by the Charter of the United Nations, Staff Regulations and Rules, and relevant guidelines and policies. This, in turn, reinforces trust and confidence in UNHCR, thereby facilitating advocacy for increased support.

61. The UNHCR Ethics Office works closely with the United Nations Ethics Office to administer the UNFDP for eligible UNHCR colleagues, that is, those whose grade is D1 and above, procurement officers, those involved in the investment of United Nations assets, all members of contract committees, and all Ethics Office personnel. During the 2019 annual filing cycle, reporting on the previous year (1 January–31 December 2018), 2,104 UNHCR colleagues participated in the UNFDP. The total number of staff required to participate in the programme has steadily increased over the past ten years at a rate that is slightly above the 50 per cent increase in the UNHCR global workforce since 2013 (fig. 10).

Figure 10. UNFDP participants, 2008–2019

62. A total of 1,102 filers (52.37 per cent) submitted their disclosures within the deadline; 1,000 filers (47.53 per cent) submitted them after the expiration of the deadline, often following receipt of a multitude of reminder messages; and 2 filers (0.10 per cent) did not submit their disclosures. One of the non-compliant staff retired from UNHCR, and one had been unable to process the submission for technical reasons.

63. The UNHCR Ethics Office prepared the master list of UNHCR participants for the United Nations Ethics Office after verifying each submission, particularly the 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 United Nations Ethics Office and with filers' managers, and performing searches in human-resource databases as needed. The Office received 353 requests from participants regarding eligibility, change of duty station, UNHCR personnel not being aware of their participation and requesting clarifications, lack of receipt of a password or

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[3] The results are drawn from a voluntary, anonymous survey shared after the sessions. Percentages are calculated based on the answers "agree" and "strongly agree" on a scale of 1 (strongly disagree) to 5 (strongly agree).

password not working, access to the website, confirmation of submission, and compliance follow-up to ensure timely submission.

64. Following the submissions, the external reviewers contracted by the United Nations Ethics Office conducted a conflict-of-interest assessment of the filers' statements. They identified 71 actual or possible conflicts of interest involving financial activity (11), family relationships (12) and outside activities (48).

65. Regarding the implementation of measures to mitigate conflict of interest, the external reviewers made 79 mitigation recommendations, of which 43 were completed before the end of the filing cycle while 17 were not implemented. Those 17 disclosure statements remained incomplete at the end of the filing cycle, and those filers will be subject to priority review if they should be required to participate in the 2020 filing cycle

66. The external reviewers' recommendations included the following action points as measures that UNHCR can take to strengthen timely compliance and knowledge of the applicable Staff Regulations and Rules: (a) undertake proactive, early and regular follow-up with non-compliant filers, explaining the mandatory nature of the exercise; (b) continue to positively engage with and educate filers regarding their obligations under UN policy, and particularly under the Staff Regulations and Rules with regard to independence and impartiality; and (c) explore new ways to track when disclosures have been submitted and how to promptly refer technical issues to the United Nations Ethics Office for further attention.

67. The external reviewers and the United Nations Ethics Office also addressed the specific situation of requirements under UN Staff Regulations and Rules regarding the obligation to seek approval for rental and business activities on a commercial scale. The UNHCR Ethics Office agreed to address that topic with the United Nations Ethics Office to clarify the threshold at which such activities would appear to be an "outside occupation or employment" under Staff Regulation 1.2 (o) and to inform filers accordingly.

G. Standard-setting and policy support

68. The Ethics Office is responsible for disseminating and promoting ethics-related policies and guidelines. In 2019, the Office provided input to the Evaluative Review of UNHCR's Policies and Procedures on the Prevention and Response to Sexual Exploitation and Abuse; contributed to the draft Administration Instruction on Sexual Misconduct; supported the design of learning initiatives, namely, the PSEA/SH learning package; and co-facilitated an information session on PSEA and SH at the global Sexual and Gender-based Violence Workshop that took place in June 2019.

69. The Ethics Office also chaired the UNHCR Informal Conflict Management Support Group comprising IGO, LAS, PWS, the Ethics Office and the Ombudsman's Office and involving regular informal consultation and monthly coordination meetings. The Group provides a confidential platform for discussion and consultation to (a) strengthen synergies between the different services and be an interlocutor for UNHCR leadership in early prevention and identification of dysfunctionalities requiring management action, (b) harmonize corporate messages to support conflict management and ethical behaviour, and (c) support related policy reviews in UNHCR.

H. Protection from sexual exploitation and abuse

70. In 2019, the Ethics Office continued to support the organization in the implementation of the Secretary-General's bulletin ST/SGB/2003/13 entitled "Special measures for protection from sexual exploitation and sexual abuse". The Ethics Office played an active role in the Inter-Divisional Working Group on SEA and SH established by the Senior Coordinator on SEA and SH and contributed to various activities led by the Senior Coordinator.

71. In 2019, the main focus of the Ethics Office remained on prevention of SEA and SH activities through training and awareness-raising, the management of the Community of Practice of PSEA Focal Points and facilitation of regional PSEA workshops. A number of activities were led by the Ethics Office to strengthen the web-based Community of Practice for PSEA Focal Points, which is a space for PSEA focal points to share best practices and lessons learned, and access information and resources including training materials. In 2019, the number of PSEA focal points appointed by each country and field office increased from 384 in 2018 to 433 by the end of 2019. A survey designed to identify the strengths and gaps of the Community of Practice indicated the need for a more efficient communication and engagement strategy, multiple channels to meet the capacity-building needs of focal points, and the need for a dedicated resource person to manage and moderate the platform. The Ethics Office also continued to provide operational support and advice on PSEA outside of the Community of Practice to personnel at large through its regular Ethics Office mailbox. In 2019, the total number of requests related to PSEA were 137 and related to requests for general information on PSEA, training and requests for confidential advice.

72. The Ethics Office organized and facilitated six regional workshops for PSEA focal points in the Americas (1), Africa (2), Asia (1) and Europe (2), training 129 PSEA focal points and 18 partner staff in 64 operations. The workshops aimed to strengthen staff skills and competencies in PSEA interventions in the field and provided a peer-training space to share good practices in PSEA interventions in the region. In 2019, the Ethics Office collaborated with the GLDC, the IGO, Innovation Services and the DIP, which provided further expertise in their respective areas related to PSEA, developed materials and facilitated the session on the related topic at the workshops. The Ethics Office prepared presentations on PSEA to the Gender Workshop for Associate Field Safety Advisors that took place in Tunis in October 2019, and provided 11 regional and global thematic webinars on themes such as inter-agency coordination and community-based complaint mechanism, inter-agency risk assessments, PSEA focal-point roles and responsibilities, SEA reporting and investigation, protection against retaliation and the SpeakUp Helpline.

73. In regard to inter-agency coordination on PSEA, in October–November 2019, the first regional joint UNHCR-World Food Programme workshop took place in Nairobi with participation from both entities. The purpose of the workshop was to build the capacity of the focal points of the two entities, who are instrumental in ensuring quality inter-agency coordination to support programmes for PSEA. The four-day workshop laid the foundation for building stronger networking, coordination and collaboration between the focal points of the two entities.

74. At the end of 2019, the Ethics Office started the handover of the management of the Community of Practice and the training portfolio to DIP and drafted the terms of reference for the temporary position of Protection Officer (PSEA) located in DIP. This is in line with the recommendations from the Evaluative Review of UNHCR's Policies and Procedures on the Prevention and Response to Sexual Exploitation and Abuse.

I. Coordination and professional networking with the Ethics Panel of the United Nations and other ethics committees

75. The United Nations Ethics Committee was established in December 2007 and renamed the Ethics Panel of the United Nations (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 of the United Nations Secretariat.

76. EPUN comprises the heads of the ethics offices of the funds and programmes and the Secretariat. In the course of the reporting period, it met in 11 formal sessions.

77. Within the United Nations system, EPUN 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, EPUN plays a vital role in fostering a "United Nations identity" based on integrity and accountability. Through promoting an organizational culture of ethics and integrity within the international civil service, it supports stronger and healthier institutions. UNHCR participates in monthly EPUN meetings and supports the work of EPUN related to its community of practice and sharing of advice and information.

78. The Ethics Office participated in the Ethics Network of Multilateral Organizations (ENMO) annual meeting in Munich, periodic meetings of Geneva-based ENMO members and the annual European Business Ethics Forum meeting in Paris.

III. Observations and 2019 recommendations

A. Observations

79. The UNHCR Ethics Office gained significant leadership support, visibility and impact in becoming an active partner in supporting UNHCR culture and behaviour change. It received substantial additional short-term financial and staffing resources to support the Office capacity in processing protection against retaliation cases, in capacitating the field to deliver CoCD sessions and in strengthening learning spaces for value-based management and ethical decision-making. As a result, most of the recommendations in the Ethics Office 2017 and 2018 annual reports are partly implemented, with one closed, as shown in the following table.

Implementation of pending 2017 and new 2018 Ethics Office recommendations

No.	2017 Recommendation	Status	Comments
1	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.	**Closed**	The Ethics Office received additional substantial temporary staffing and financial resources in 2018 and 2019 supporting the delivery of CoCD learning globally. A strategic review of the delivery of ethics support at the field level has led to increased field support via the PAN and CoC

No.		Status	Comments
			facilitators versus the creation of ethics posts in the field.
2	UNHCR to consider the introduction of a **mandatory annual conflict of interest self-declaration for all personnel**.	**Partly implemented**	Following a pilot programme initiated in Kenya, DHR, LAS and the Ethics Office are leading on follow-up action, which is now planned for 2020-2021.

No.	2018 Recommendation	Status	Comments
1	Achieving **100 per cent compliance regarding mandatory CoCD sessions** for the UNHCR global workforce**.	**Partly implemented**	The 2019-2020 Code of Conduct Dialogue is a two-year cycle, with the compliance rate to be determined at the end of 2020. The 2019 target of an 80 per cent participation rate was achieved with an 86 per cent participation rate, building momentum to achieve 100 per cent compliance in the future.
2	**Strengthen the independence of the Ethics Office function,** namely with regard to (a) term limits for the Director of the Ethics Office; (b) submission of annual reports to the UNHCR's Executive Committee (EXCOM); and (c) reporting to UNHCR's Internal Audit and Oversight Committee (IAOC).	**Partly implemented**	The Ethics Office considered questions regarding its independence as part of a review of the UNHCR integrity functions (integrity mapping). The outcome of this mapping have been submitted to senior management and are feeding ongoing conversations regarding the role, and safeguards placed on the independence, of the Ethics Office.
3	Further **upgrade the professional expertise of the Ethics Office** and the in-person **provision of ethics services at the country operation levels.**	**Partly implemented**	As part of a wider integrity vision and roadmap initiated in 2019, UNHCR has recognized the need to further professionalize the Ethics Office. Plans to create ethics positions in the field have been put on hold in favour of engaging with first-line managers and staff and developing a system for robust second-line support including through volunteer and focal-point networks such as PAN, CoC facilitators, and focal points for protection from sexual exploitation and abuse (PSEA) and risk).

4	Increase efforts to make ethical-behaviour competencies integral parts of recruitment, job descriptions and performance management.	Partly implemented	DHR is leading the UNHCR efforts in reviewing the integration of ethical-behaviour principles and requirements into recruitment procedures, job descriptions and performance management, including the systematic integration of 360-degree feedback tools.
5	Develop UNHCR capacity to address organizational ethics challenges.	Partly implemented	The Ethics Office has engaged with UNHCR stakeholders, namely, the Innovation Service, to develop guidance on selected topics such as the use of artificial intelligence and ethics. The Office is also exploring the scope for the articulation of an organizational commitment to ethics and integrity, with formulation of both a vision and organizational values underpinning this commitment and linked to organizational leadership and to risk management.

B. 2019 Recommendations

80. As the 2019 Annual Ethics Report shows, creating a workplace culture of trust and collaboration remains an important challenge. A total of 20 per cent of cases seeking ethics advice concerned difficult work relations, and the number of requests for advice and support for protection against retaliation saw a 50 per cent increase. The complexity of addressing this issue should be recognized, while steps can be taken to (a) acknowledge the role that ethics and the CoCD have as an integral part of leadership and risk management, and (b) strengthen the case-management system available to the workforce when seeking advice and support or reporting issues.

81. In this regard, the Ethics Office recommends that the organization follow up on the work to provide a transparent, well-functioning and easy-to-access system for the workforce to seek advice and support and to raise and report issues of misconduct and problematic behaviour, and that it further strengthen the organizational approach to ethics by investing in ethics linked to individual behaviour, such as ethical people management and the CoC, and in organizational ethics and the links to risk management.

82. In its efforts to support the strengthening of a culture of ethics and integrity, the Ethics Office has benefitted from much stronger engagement with UNHCR's Executive Office, including with the Office of the Deputy High Commissioner and offices reporting to the Deputy High Commissioner. In this regard, the Ethics Office recommends the formalization of a functional link with the Deputy High Commissioner's Office. This will further enhance the coordination and development of synergies with stakeholders among the UNHCR integrity family reporting to the Deputy High

Commissioner, without prejudice to the Ethics Office's independence and its direct reporting line to the High Commissioner.

83. For the Ethics Office to play a more proactive role in fostering a global, field-driven ethics culture in the organization and respond effectively and in a timely manner to individual cases seeking advice and support, the Office continues to require more strengthening, including sustainable staffing. Full implementation of 2017 and 2018 recommendations will assist in achieving that objective.

IV. Conclusion

84. The Ethics Office in 2019 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. This is part of a much wider movement throughout UNHCR and the United Nations system 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 partnership and collaboration with UNHCR colleagues and the many stakeholders in UNHCR and in the UN system and governance structures, in 2020 and beyond.

Annex. Terms of reference of the Ethics Office

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 set out in the UNHCR Inter-Office Memorandum No. 040/2008 and Field Office Memorandum No. 042/2008, as follows:

(a) Undertaking 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, inspection, investigation or inquiry or the activities of the Office of the Mediator.

(b) Advising and assisting 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. This includes advocacy and promotion of ethical behaviour within UNHCR and co-operation with relevant internal units, such as LAS, DHRM, IGO, OIOS, the Office of the Mediator etc. as appropriate, as well as the Ethics Office within the United Nations Secretariat. This also includes participation in relevant inter-agency fora and facilitating, where practical, a harmonized approach with other UN entities.

(c) Providing 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) Raising staff awareness of expected ethical standards and behavior, including the policies and procedures related thereto, in close cooperation with DHRM, LAS, IGO, and the Office of the Mediator, and reinforcing a culture of ethics in UNHCR through appropriate orientation, learning and induction programmes, and communications and information dissemination activities.

(e) Advising individuals who seek advice in confidence regarding ethical behavior, issues and standards.

(f) Assisting 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.

(g) Addressing such other functions as the High Commissioner considers appropriate for the Office.

List of abbreviations and acronyms

AI on PaR	Administrative Instruction on Protection against Retaliation
CoC	Code of Conduct
CoCD	Code of Conduct Dialogue
DHR	Division of Human Resources
DIP	Division of International Protection
ENMO	Ethics Network of Multilateral Organizations
EPUN	Ethics Panel of the United Nations
GLDC	Global Learning and Development Centre
IGO	Inspector General's Office
LAS	Legal Affairs Service
MENA	Middle East and North Africa
PAN	Peer Advisor Network
PSEA	Protection from sexual exploitation and abuse
PWS	Psychosocial Wellbeing Section
SEA	Sexual exploitation and abuse
SGB	Secretary-General's bulletin
SH	Sexual harassment
UNFDP	United Nations Financial Disclosure Programme
UNHCR	Office of the United Nations High Commissioner for Refugees