

## UNHCR Ethics Office 2020 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 2020.

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 in April 2021 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 thirteenth annual report presented by the Ethics Office since its establishment in 2008 as a stand-alone office reporting to the High Commissioner.

# Contents

<b>I. Introduction</b>	<b>3</b>
<b>II. Key achievements and recommendations</b>	<b>4</b>
A. Contributing to a culture that values trust, collaboration and integrity	4
Key recommendations	5
B. Promoting the highest standards of ethical behaviour	6
Key recommendation	7
C. Fostering a speak-up culture and whistle-blower protection	7
Key recommendation	7
<b>III. Activities of the Ethics Office</b>	<b>7</b>
A. Ethics advice and guidance	7
B. Protection against retaliation	10
Summary of protection-against-retaliation cases	12
C. SpeakUp! Helpline	<b>13</b>
SpeakUp! Helpline overview (1 January 2020–31 December 2020)	14
D. Outreach, training and education	<b>15</b>
E. Code of Conduct dialogue sessions	<b>15</b>
Global network of facilitators: Backbone of the Code of Conduct dialogue	16
Putting values into action	16
Continued efforts to strengthen integrity, diversity, equity and inclusion in 2021	18
F. United Nations Financial Disclosure Programme	18
G. Standard-setting and policy support	20
H. Coordination with the Ethics Panel of the United Nations and professional networking with other ethics committees	20
<b>IV. Observations and 2020 recommendations</b>	<b>21</b>
A. Observations	21
<b>Implementation of pending 2017–2019 and 2020 Ethics Office recommendations</b>	<b>21</b>
B. 2020 recommendations	24
<b>V. Conclusion</b>	<b>25</b>
<b>Annex. Terms of reference of the Ethics Office</b>	<b>26</b>
<b>List of abbreviations and acronyms</b>	<b>26</b>

## I. Introduction

1. This thirteenth 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 2020 in support of its dual mandate:<sup>1</sup> (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 “will submit an annual report to the High Commissioner”.
3. UNHCR continues to be primarily a field-based organization, with 91 per cent of its 17,878 member workforce based in field locations (13,336 staff members and 4,542 affiliate workforce),<sup>2</sup> leading international action to protect people forced to flee owing to conflict and persecution. The Ethics Office, located at the UNHCR headquarters in Geneva, provides ethics advice and guidance to colleagues in 133 countries and 550 locations. The breakdown of international and national staff in 2020 was 22 and 53 per cent, respectively, with the remaining 25 per cent in the “affiliate workforce” category. The gender breakdown for staff members was 59 per cent male and 41 per cent female, while the affiliate workforce was comprised of 47 per cent male and 53 per cent female colleagues.
4. The UNHCR Ethics Office has, since 2008, undertaken activities relating to its mandated responsibilities set out in the terms of reference (see annex). 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) within UNHCR, 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 coordinate 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 that 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 of International Protection.
5. In line with the High Commissioner’s vision for how to eliminate sexual exploitation and abuse and sexual harassment (SEA/SH), the Ethics Office continued to play a role in 2020, such as through the Code of Conduct dialogue (CoCD). The yearly CoCD sessions support the creation of more spaces for open dialogue and an environment where transparency and inclusiveness can be embedded in the way in which we work together to tackle harmful behaviours that run counter to the fundamental values of the United Nations. This is also part of the broader change efforts where managers are encouraged to take concrete steps to enable exchanges and ensure dialogue to end all forms of misconduct including SEA/SH.
6. The UNHCR Ethics Office builds on the premise that having an independent, impartial and confidential ethics function that fosters and contributes to an organizational culture where ethical decision-making and values provide a strong framework for behaviour and guide leaders and teams in their daily work are fundamental requirements for the effective performance and delivery of the UNHCR mandate and essential to achieving the overall strategic goals of the organization as set out in the UNHCR Strategic Directions 2017–2021 and the Global Compact on Refugees (A/73/12, Part II). In addition, demonstrated and lived commitments to integrity and ethical behaviour by the UNHCR workforce and management contribute to an inclusive, innovative work environment and earn the organization a reputation of trust with Government partners, donors, persons of concern, civil-society stakeholders and the wider public.

---

<sup>1</sup> UNHCR, Ethics Office, Terms of reference (UNHCR/IOM/040/2008 – UNHCR/FOM/042/2008), 6 June 2008.

<sup>2</sup> Workforce statistics from the Division of Human Resources, shared on 16 March 2021.

7. In 2020, the activities of the Ethics Office were further shaped by the findings and recommendations from a mapping of the organizational integrity work (the integrity mapping) undertaken by the Ethics Office on behalf of the Deputy High Commissioner in 2019/2020.

8. The work of the Ethics Office in 2020 aimed to contribute to an organizational culture where:

- (a) UNHCR personnel experience and contribute to an organizational culture that values trust, inclusion, collaboration, dialogue and integrity, and embeds that in organizational leadership, policy- and decision-making, people management and action;
- (b) UNHCR personnel experience, and contribute to, ethical decision-making where personal, professional and organizational decisions are based on UNHCR values, conscious of operational and other risks, and comply with United Nations standards, values, regulations and rules; and
- (c) UNHCR personnel feel confident, and trust, that their participation in informal and formal grievance mechanisms and organizational procedures dealing with integrity and ethics issues will be confidential, respectful, professional and free from retaliation.

9. The present report will highlight key achievements, describe related activities and share resulting observations. In line with Inter-Office Memorandum No. 040/2008 and based on the work of the Ethics Office in 2020, it will also put forward recommendations to the High Commissioner on how to address recurring or systemic ethics problems in UNHCR.

## **II. Key achievements and recommendations**

10. In 2020, the ongoing organizational change processes coincided with new challenges brought on by COVID-19, highlighting the importance of duty-of-care, ethics and value-based leadership. For the Ethics Office, that also provided new opportunities to work more closely and collaboratively with regional and local colleagues, facilitated by the increased virtual connectivity. The year also brought new perspectives on the ethics work with the findings and recommendations from the internal and Ethics Office-led integrity mapping.

11. The integrity mapping identified areas where the Ethics Office could play a more prominent role in strengthening the ethics and integrity culture, such as (a) improving integrity-related data; (b) providing a consolidated intranet site with information, guidance and access for the workforce to seek advice, support and guidance and report misconduct; and (c) strengthening the links and support to operations through more proactive and targeted CoCD interventions based on their risk assessments and needs. The integrity mapping also guided the formulation by the Ethics Office of a clearer vision for the integrity work in UNHCR as well as the Office strategy for change in 2021 and beyond.

12. The following summary outlines the key achievements in relation to three change areas, with high-level recommendations for the organization.

### **A. Contributing to a culture that values trust, collaboration and integrity**

13. During 2020, the Director of the Ethics Office continued to benefit from a commitment from senior managers, including the High Commissioner and the Deputy High Commissioner, to foster a culture of ethics and integrity. That was expressed at different moments in townhall meetings with the workforce, emphasizing the need to create a culture of dialogue and inclusion, free from abuse of authority and discrimination. The focus on moving towards a human-centric model of people management with value-based leadership as one of the pillars of organizational transformation provided another important avenue for the Ethics Office to contribute to the culture change.

14. Nevertheless, the year had important challenges when it came to fostering a culture of trust, collaboration and integrity. With the COVID-19 pandemic, the entire organization adopted teleworking as the principal mode of operation for the first time, and colleagues expressed concerns with uneven application of flexible working arrangements, duty-of-care measures and connectivity. For many colleagues, the situation led to increased workloads and placed work-life balance under pressure. Differentiated contract status for employees and weak management practices were raised as exacerbating the difficult situation. Outreach and conversations with colleagues confirmed the findings of the 2018/2019 Global Workforce Survey<sup>3</sup> that a general fear of speaking up remained a serious concern for fostering a dialogue culture and ensuring reporting.

15. To meet the challenges, the Ethics Office relied on the strong working relationships and good collaboration with the Deputy High Commissioner's Office (DHC), key headquarters divisions and entities to continue to contribute to the culture change.

16. Key achievements contributing to culture change in 2020 were as follows:

- (a) completion of an internal mapping of the integrity landscape in UNHCR, leading to recommendations shaping different aspects of the integrity work of the organization going forward, including the links between vision, values and behaviour;
- (b) increased proactive outreach to senior managers and Risk Advisers to strengthen the leadership, risk and ethics approach to tackling integrity challenges;
- (c) contributions to working groups on culture change, tackling SEA/SH and setting up a group to coordinate different workstreams concerning race, discrimination and inclusion;
- (d) development and dissemination of a series of videos on building trust and collaboration in times of COVID-19 together with the Senior Inclusion and Diversity Adviser and the national Staff Association in Copenhagen;
- (e) collaboration with the Leadership Development Section to embed ethics and integrity more fully in mainstream learning materials and in the Reflective Leadership Dialogue programme;
- (f) piloting of a value-spotting learning programme for CoCD facilitators; and
- (g) sharpening the "theory of change" for the Ethics Office and engaging externally on ethics and compliance to bring best-practice standards to the organization and continue to improve the internal messages.

## Key recommendations

17. With the ongoing organizational changes, the integrity and ethics work of the organization is at an important place, with an opportunity to increase the trust in the organizational commitment to integrity and improve its dialogue culture as an integral aspect of ensuring ethical decision-making. It will be essential that the momentum for culture change, including this aspect, be seized.

18. The Ethics Office recommends that:

- (a) the High Commissioner and senior managers at the headquarters, regional and national levels continue to confirm the commitment to integrity by modelling good people management, engaging proactively in integrity risk mitigation and in a CoCD culture, and explicitly practising value-based ethical decision-making; and

---

<sup>3</sup> While an important improvement (23 per cent) from the 2014 Global Workforce Survey results, only 58 per cent of respondents in 2018/19 indicated that they felt safe to speak up about misconduct and inappropriate behaviour. Colleagues who answered "disagree" or "strongly disagree" to the statement "I feel safe to speak up in UNHCR about misconduct and inappropriate behaviour" cited consequences for their position or future career as the main reasons for their responses. The overall rate of response to the survey was 22 per cent of the total workforce.

- (b) an organizational review be undertaken to understand the impact that different contract status and types has on inclusion, trust and collaboration in teams and the consequences for a speak-up culture.

## **B. Promoting the highest standards of ethical behaviour**

19. The year 2020 was a challenging one for the UNHCR workforce, bringing to the fore the importance of prioritizing good people management, collaborative problem-solving, and leadership anchored in organizational values and ethical decision-making. The Ethics Office benefitted from the robust business continuity and connectivity plans and action of the organization, which enabled a relatively easy transition from a face-to-face model of ethics and Code of Conduct (CoC) outreach to the virtual space.

20. For the Ethics Office CoCD team, 2020 was a dynamic year. The COVID-19 reality challenged established ways of doing face-to-face outreach and training relating to ethical standards and CoC and provided opportunities to rethink some of the approaches. That influenced the format and content of CoCD sessions. The increased connectivity and acceptance that we were all in a collective learning mode led to easier outreach and ability to speak with colleagues and co-create learning material more easily, including with colleagues in deep-field locations.

21. Through outreach to field colleagues, guidance and advice to individuals on ethical issues, collaborative learning events and a value-based approach to CoCD sessions, the Office raised the awareness of the workforce regarding ethical behaviour and enabled the modelling of ethical behaviour and decision-making in accordance with United Nations standards, rules and values, including compliance with the United Nations Financial Disclosure Programme (UNFDP).

22. Important achievements during 2020 in that regard were the following:

- (a) A total of 430 colleagues were provided with timely ethical decision-making guidance, which included follow-up conversations.
- (b) A 99.87 per cent compliance rate was achieved in the UNFDP. A total of 1,498 UNFDP filers (67.39 per cent, which is 15 per cent higher than in 2019) submitted their disclosures within an extended deadline.
- (c) In addition, 74 per cent of colleagues (13,282) in 120 operations participated in locally led CoCD sessions with the overall theme of building trust and collaboration and with particular focus on value-based ethical decision-making.
- (d) A total of 199 CoCD facilitators were trained in online facilitation of the CoCD session in seven webinars.
- (e) The Ethics Office CoCD team provided direct support to 50 operations with the CoCD sessions. The support ranged from co-creation of the agenda and exercises (37) to presentation or co-facilitation of parts of the sessions (13). That was done jointly with the Senior Inclusion and Diversity Adviser in offices focusing on unconscious bias and improving inclusion and diversity.
- (f) New ethics-advice materials were produced to adapt to a more virtual environment and in response to the call for guidance in relation to the Black Lives Matter demonstrations. They included a voice-over PowerPoint presentation on “Outside activities and conflict of interest” and two quick guides for employees on “Rallies and demonstrations” and “Supporting the causes you care about”.
- (g) Outreach was strengthened through a community of practice with 391 CoCD facilitators and the launch of a communication platform for information-sharing and dialogue on ethics in action.

## Key recommendation

23. Adapting to the reality of COVID-19 restrictions has created an opportunity to rethink how the Ethics Office may reach colleagues in all locations with ethics advice, guidance on ethical decision-making, and awareness of standards and where to seek redress or support in a virtual space. The lessons learned should also guide a more sustainable and efficient outreach programme in a post-COVID-19 reality. Success in that regard will depend on the overall connectivity of colleagues and on the incremental improvement in online facilitation and virtual-meeting skills of colleagues.

24. The Ethics Office recommends that:

- (a) connectivity technology be further strengthened for the entire workforce, and resources and efforts be placed on building future-focused skills across the organization to manage and facilitate virtual dialogue, meetings and learning events in support of an organization-wide dialogue culture.

### C. Fostering a speak-up culture and whistle-blower protection

25. As part of fostering a speak-up culture where misconduct is reported and grievances are addressed without retaliation, the Ethics Office administered the UNHCR Administrative Instruction on Protection against Retaliation (AI on PaR) and 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. That included an externally managed SpeakUp! Helpline that provided colleagues with access to informational support from trained and impartial professionals, bound by confidentiality.

26. With 55 inquiries, 2020 saw a continued upward trend in the number of colleagues seeking advice and guidance regarding protection against retaliation.

## Key recommendation

27. Compliance with the requirement to report misconduct must be connected to additional support mechanisms to be effective. Confidence in the commitment and ability of the organization to follow up in response to colleagues speaking up and recognition of colleagues who have spoken up for having done the right thing are strong trust builders in strengthening a speak-up culture.

28. The Ethics Office recommends that:

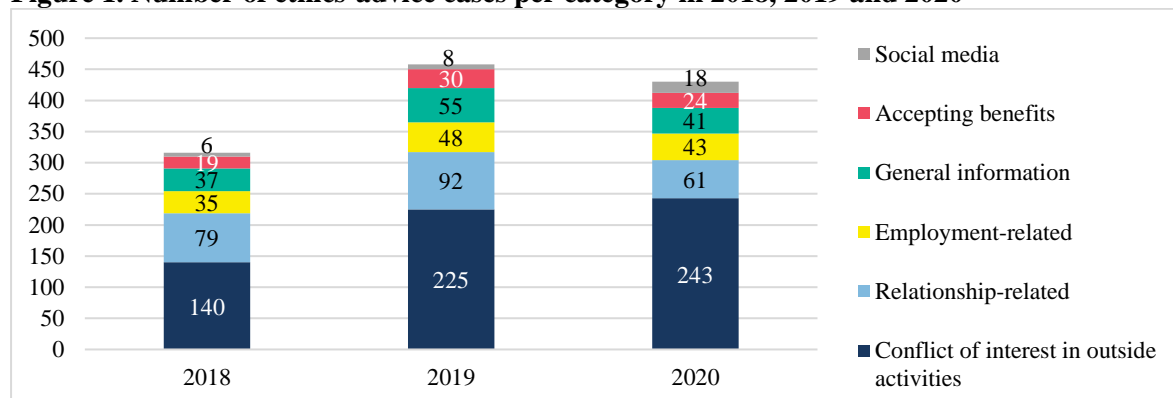
- (a) building on the principles from the 2020 victim-centred approach in the UNHCR response to SEA/SH, UNHCR strengthen its mechanisms to support and recognize colleagues who have spoken up within the framework of the AI on PaR as part of its efforts to build safer spaces for dialogue and speaking up.

## III. Activities of the Ethics Office

### A. Ethics advice and guidance

29. The Ethics Office provided confidential advice and guidance concerning ethical dilemmas and questions relating to conflict of interest to 430 colleagues worldwide in 2020. That represented a slight decrease of 6 per cent in the total number of cases in comparison to 2019 (458).

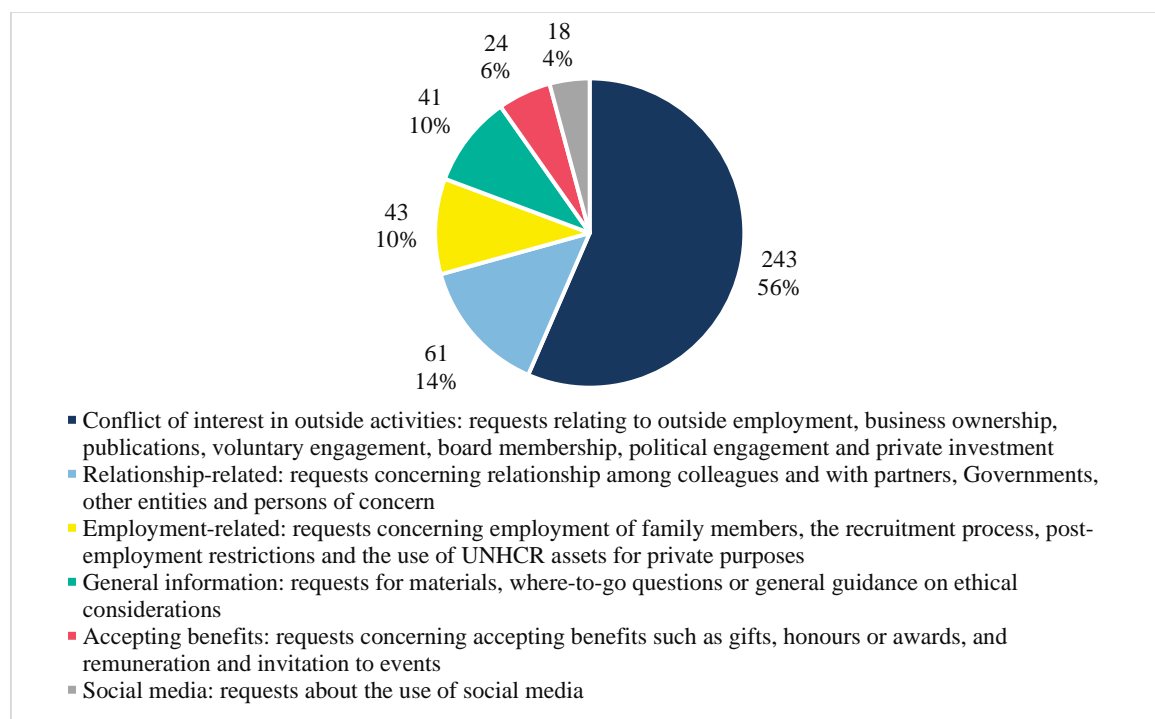
**Figure 1. Number of ethics-advice cases per category in 2018, 2019 and 2020**



30. Access to confidential advice and guidance was ensured by using various means and channels, such as email, telephone, virtual communication tools and face-to-face meetings. Having multiple channels of access and communication has proven to be a good practice, which will be continued and expanded where possible. The Office also cooperated with other entities working in the “integrity” family, such as the Peer Advisors Network (PAN)<sup>4</sup>, Risk Advisers and CoCD facilitators, to raise awareness about ethics and the role of the Ethics Office. Since the Office is based at headquarters, access, outreach and face-to-face interaction (including virtual) are areas to strengthen going forward.

31. The Ethics Office uses the six categories reflecting areas of the Staff Regulations and Rules of the United Nations in the classification of its cases. In 2020, the cases were distributed as shown in figure 2.

**Figure 2. Number and percentage of ethics-advice cases per category in 2020**



<sup>4</sup> The Peer Advisors Network (PAN) is a global network of UNHCR personnel who volunteer their time to support colleagues in need. It is supported by the Psychosocial Wellbeing Section, the Ombudsman’s Office and Ethics Office and is field focused. All Peer Advisors have been trained to provide low-intensity psychosocial support and guidance on dispute resolution and conflict management and act as ethical influencers throughout the organization. Peer Advisors deal with issues ranging from conflicts and grievances in the workplace, to the well-being and psychosocial concerns of colleagues, to responding to critical incidents.



32. Cases on conflict of interest in outside activities comprised a bigger share of the total number of cases in 2020 (243, or 56 per cent) compared to 2019 (225, or 49 per cent) and 2018 (140, or 44 per cent). While the increase is still small given the size of the UNHCR workforce, that growth in colleagues reaching out for advice is a positive sign of their engagement in ethical reflection and decision-making and compliance with the requirement of approval for outside activities. At the same time, it highlights the need for continued work on raising awareness among colleagues regarding engagement in outside activities through various channels such as the CoCD sessions and PAN. Notably, a third of all requests for authorization of outside activities (80) concerned research for publications including the thesis for master's and PhD studies, while a fifth of the requests (52) concerned outside activities such as speaking engagements or pro bono work.

33. In 2020, cases regarding use of social media increased for a second consecutive year to 18 compared to eight in 2019 and six in 2018. Those cases concerned various issues including alleged inappropriate private activities by colleagues at UNHCR or partner organizations on their social media accounts. Issues raised in that regard included posting contentious pictures, supporting online fundraising campaigns, and posting or reposting racist or discriminatory materials as well as dilemmas about posting/writing, or not, on politically charged subjects (in the context of Black Lives Matters demonstrations in May/June 2020), supporting political parties during local elections and streaming videos, games and live conversations on various subject areas on private social media accounts. The Ethics Office used an ethical decision-making framework to guide colleagues in solving ethical dilemmas. The model considers the relevant context, facts, rules and regulations, ethical values and principles, and the risks to the capacity and reputation of UNHCR.

34. Of the 430 cases, 10 cases were based on requests by the IGO to engage with the concerned colleagues on the compliance of their activities with CoC principles. The 10 cases concerned potential conflict of interest, including outside activities, political activities and engagement on social media. As in other such cases, the Ethics Office provided guidance to the colleagues on ethical decision-making and conflict of interest, with a view to addressing any potential or perceived conflict of interest. Where that was not possible, the IGO was informed accordingly.

35. In 2020, the Ethics Office received a total of 61 cases regarding relationship-related concerns. Forty-five of those cases concerned issues among UNHCR personnel, 8 related to issues with other entities (including suppliers), 5 concerned issues with UNHCR partner organizations and 3 pertained to relations with UNHCR persons of concern.

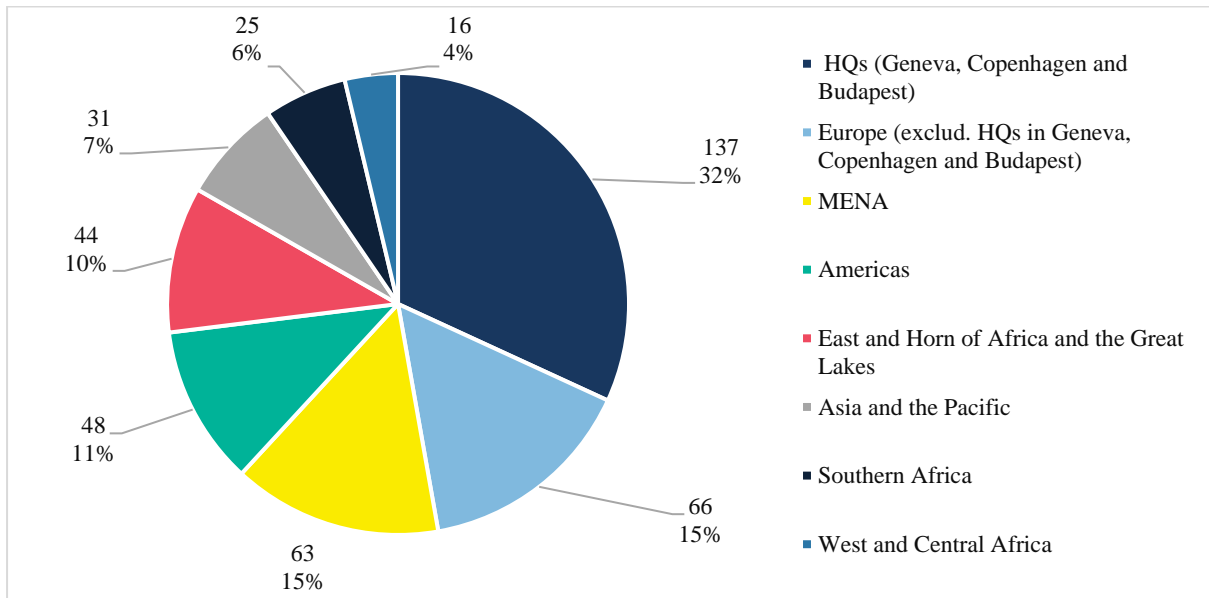
36. In response to cases concerning workplace culture and difficult workplace relations, the Ethics Office used a mix of follow-up actions including:

- (a) cooperation and outreach with other entities, including the Ombudsman's Office, the Psychosocial Wellbeing Section (PWS), the Legal Affairs Service (LAS) and the Division of Human Resources (DHR), for consulting on multifaceted concerns as well as referring colleagues to them when relevant;
- (b) active engagement and dialogue, with the aim of assisting and empowering the concerned colleague to address the issues to the extent possible in a proactive manner, including knowledgeable consultation and "walking through" an ethical decision-making model; and
- (c) proposing proactive outreach and CoCD sessions in the concerned office or team, in particular in locations where issues at a systemic level were affecting many people in the workplace. Systemic issues included staff expressing the inequity of the different types of employment contracts; managers focusing on results at the expense of people management, which in some cases included exploiting and bullying colleagues; and continued fear of speaking up or making a formal complaint because there was no trust in the system.

37. The majority of requests for ethics advice and guidance in 2020 came from colleagues in headquarters locations in Geneva, Budapest and Copenhagen (32 per cent) and other operations in

Europe (15 per cent), while there was limited uneven engagement from other regions (fig. 3). Noting that gap, the Ethics Office plans to increase outreach on, and awareness of, ethics and the role of the Ethics Office in those other regions.

**Figure 3. Number and percentage of ethics advice cases per region in 2020**



## B. Protection against retaliation

38. The Ethics Office undertakes the responsibilities assigned to it under the UNHCR AI on PaR, which was revised in September 2018. The AI on PaR aims at protecting UNHCR personnel who report misconduct or engage in other protected activities from any detrimental actions that adversely affect their working or employment conditions. The AI on PaR also aims to promote a speak-up culture within the organization.

39. 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 its mandate described above, the Ethics Office also counsels aggrieved colleagues who do not fall strictly within the scope of the AI on PaR but nevertheless feel retaliated against. In this respect, the strategy is to empower individuals to resolve their grievances by channelling them through the appropriate mechanism. Thus, in accordance with the AI on PaR, the Ethics Office work on protection against retaliation can be categorized as follows:

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

40. The Ethics Office operates under the principles of confidentiality, independence and impartiality. This means that colleagues seeking guidance and advice from the Ethics Office on protection against retaliation can do so with confidence that they can make an informed decision on if and/or how they choose to proceed with a formal retaliation complaint.

41. When engaging with colleagues raising actual or potential retaliation concerns, the Ethics Office does so in ways that support risk mitigation by aligning itself with the broader efforts of the Ethics Office to implement its mandate as well as the strategy of the organization to focus on people management and promote a dialogue and speak-up culture. This includes:

- (a) promoting dialogue, with the aim of actively listening to the concerns and needs of the individuals so that they increase the chance of reaching understanding and mutually agreeable resolutions;
- (b) empowering managers to engage in a timely manner when retaliatory concerns are raised locally in order to put measures in place before problems risk further escalation; and
- (c) strengthening alignment between relevant integrity entities to reach an appropriate way forward.

42. In 2020, the Ethics Office received 68 inquiries relating to protection against retaliation. Of those inquires, 55 involved requests from UNHCR personnel, which represented a 17 per cent increase from the previous year and a 72 per cent increase compared to 2018. Thirteen inquiries were related to requests received in the context of the membership of the Ethics Office in the Ethics Panel of the United Nations (EPUN), comprising 7 cases for consultation and 6 cases reviewed by the Director of the Ethics Office in his role as Alternate Chair of EPUN.

43. Of the 55 total inquiries (fig. 4), 40 (73 per cent) were requests for information and advice and were processed as follows:

- (a) Twenty-one cases were provided with information and advice or counselled to help them to identify a more appropriate channel for raising their concerns.
- (b) Eleven cases did not fall within the scope of the AI on PaR in the absence of a protected activity. Consequently, those colleagues were counselled to identify more appropriate channels through which to resolve their grievances, including the Ombudsman's Office, PWS, the IGO and management.
- (c) In eight cases, the colleagues decided not to pursue a formal retaliation complaint.

44. In nine cases, the Ethics Office responded to colleagues' concerns of risk of retaliation requiring preventative measures. Those risks included risk of physical harm, marginalization in the workplace, poor performance appraisals and post discontinuation for having engaged in protected activities. To mitigate those risks and with the consent of the colleagues concerned, the Ethics Office recommended a series of measures that were implemented by the organization as follows:

- (a) In two cases, the Ethics Office recommended a temporary reassignment to a different duty station.
- (b) In six cases, the Ethics Office worked with senior managers of the concerned individuals and other entities to implement preventative measures to mitigate retaliation risks. Measures included mediation, changing supervisory reporting lines, redistributing tasks and teams, and conflict resolution.
- (c) In one case, the Ethics Office monitored a potential risk of retaliation by counselling the individual and sharing regular updates on relevant developments.

45. In six cases (11 per cent), the Ethics Office conducted a prima facie assessment, a significant decrease from 2019 (during which 10 prima facie assessments, or 23 per cent, had been conducted) despite receiving a higher volume of total inquires in 2020 (55) compared to 2019 (43).

46. Out of the six retaliation complaints:

- (a) In two cases, the Ethics Office determined a prima facie case of retaliation and referred the cases to the IGO for a full investigation.
  - (i) In one case, the complainant had cooperated with an authorized audit. Subsequently, the complainant's position was discontinued. When applying for a newly created position with the same job description and under the supervision of the same manager, the complainant was not shortlisted despite meeting the qualifications and criteria for the post. Based on the Ethics Office recommendation, the complainant's contract was temporarily extended, pending the investigation.

- (ii) In one case, the complainant’s post was discontinued after having reported sexual harassment to the IGO, which led to the dismissal of a senior staff member. Based on the recommendation of the Ethics Office, the contract of the complainant was temporarily extended pending the preliminary assessment and the investigation.
- (b) In three cases, the preliminary assessments had not been finalized by the end of 2020.
- (i) In one case, the complainant had engaged the Ombudsman’s Office to resolve a workplace conflict with the manager. Soon after, the complainant’s post was retitled, requiring the complainant to reapply for new positions including in different duty stations.
  - (ii) In one case, the complainant had reported possible procurement fraud and at the same time had questioned whether refoulement had been facilitated in a UNHCR country office and whether that could amount to misconduct. The complainant received a negative performance evaluation, and his/her employment contract was not renewed.
  - (iii) In one case, the complainant had reported sexual harassment and abuse of authority through the management channel. The complainant received a negative performance evaluation and the contract was not renewed.
- (c) In one case, the formal request for protection against retaliation was placed on hold pending the outcome of an informal resolution.

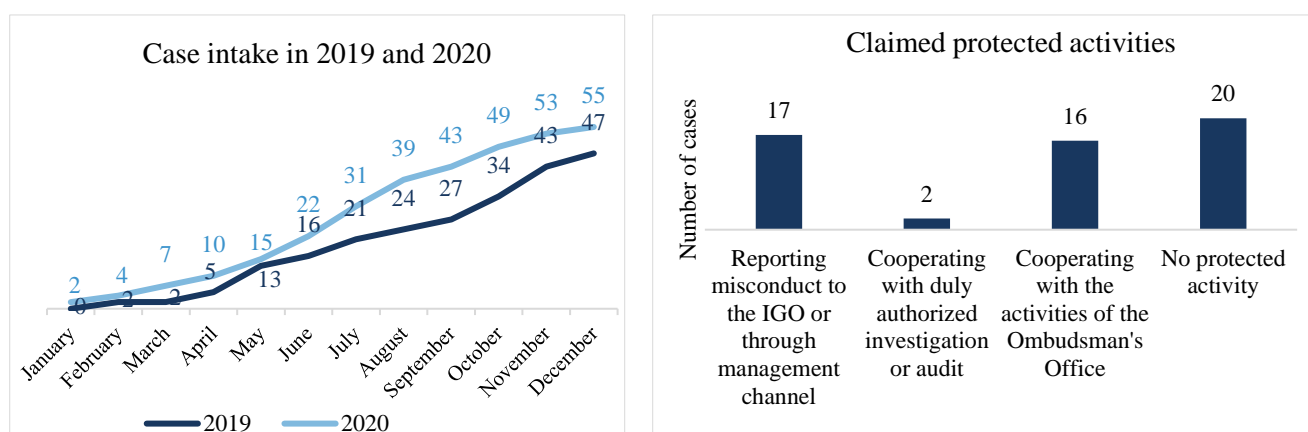
### Summary of protection-against-retaliation cases, 1 January 2020–31 December 2020

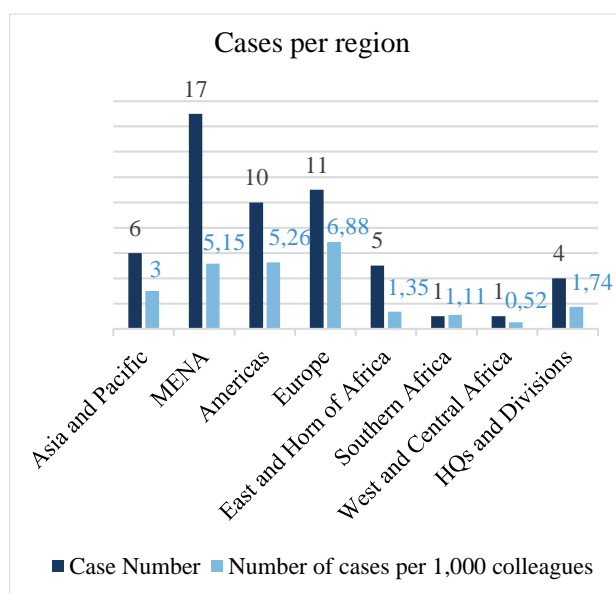
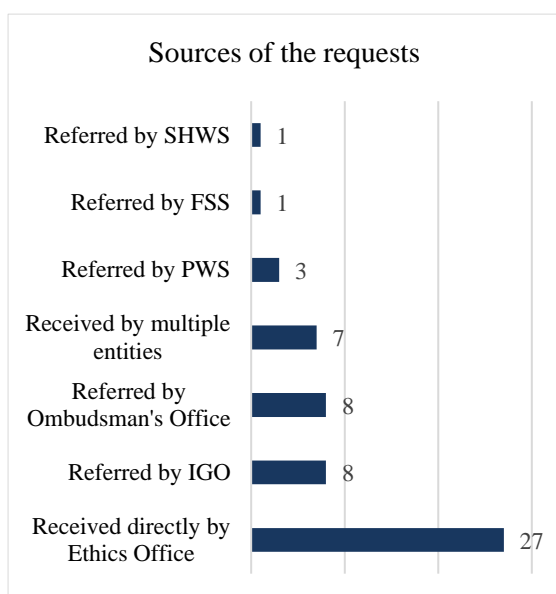
**Observation 1:** 55 enquires for protection against retaliation were received by the Ethics Office in 2020, which represents a 17 per cent (8 cases) increase from the previous year.

**Observation 2:** 72 per cent (40 cases) of enquiries were resolved through alternative channels with the support of the Ethics Office; 16 per cent (9 cases) identified a risk of retaliation.

**Observation 3:** 11 per cent (6 cases) filed a formal retaliation complaint; a prima facie case of retaliation was found in 2 cases, and 4 cases were still to be assessed at the end of 2020.

Figure 4. Cases concerning protection against retaliation in 2020





### C. SpeakUp! Helpline

47. 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. The Ethics Office continued to manage the administration of the helpline during 2020.

48. Through the external SpeakUp! Helpline, colleagues have the option to report their concerns anonymously, so their identity 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 and 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.

49. 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.

50. In 2020, with the COVID-19 pandemic, the function of the SpeakUp! Helpline was expanded to receive domestic abuse-related reports with appropriate codes to ensure protection. After revamping the intranet page, the SpeakUp! Helpline was publicized on the landing page of the UNHCR intranet to increase visibility, particularly for those who had recently joined UNHCR. The SpeakUp! Helpline was also promoted through other online channels, including UNHCR Transformation Briefs, the PAN online training sessions, and internal communications on racism and discrimination.

51. The SpeakUp! Helpline received 51 reports from different regions in 2020. The top-four reporting categories were: abuse of power, harassment, sexual harassment and human resource issues (fig. 5). Anonymous reporting remained high at 59 per cent (30 cases) (fig. 6), which demonstrated the Helpline added value of creating a safe space for reporting in confidence. Fear of negative repercussions, including concerns over confidentiality, lack of trust in the internal grievance

mechanism and fear of post discontinuation or non-renewal of contract, were the main reasons for reporters to remain anonymous.

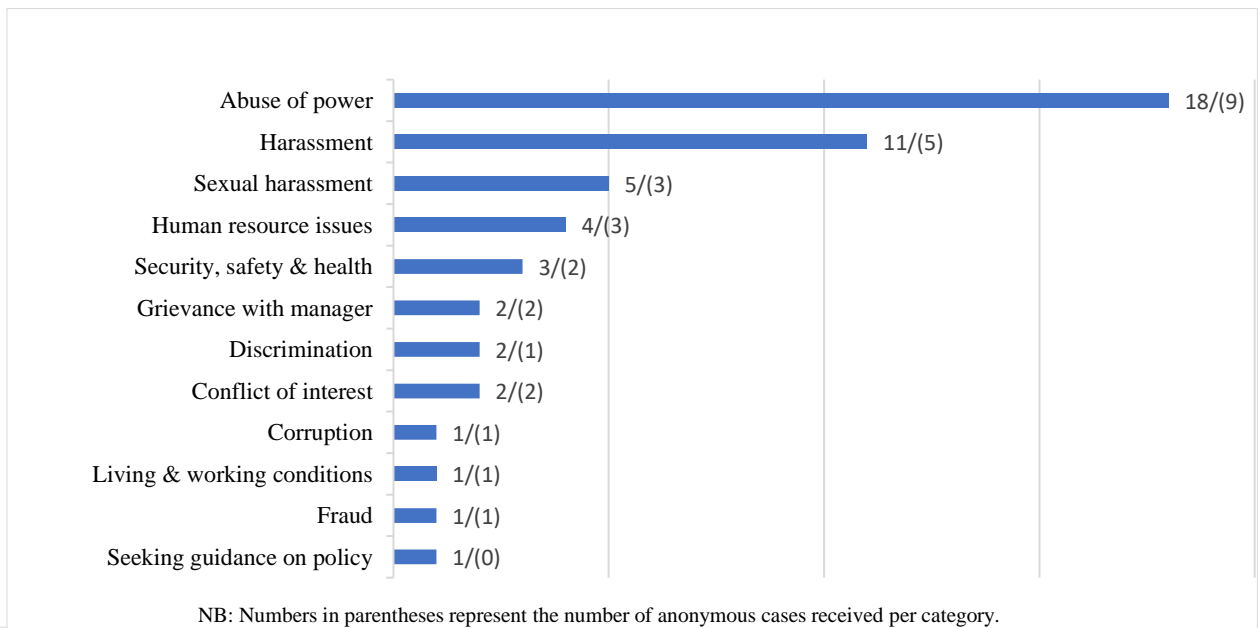
52. During 2020, 33 cases (65 per cent) were closed (fig. 7). Among those cases, 22 cases were closed with relevant resolutions, while 9 cases were closed because of non-engagement by the reporters. Two cases were closed since the reporters withdrew their reports, whereas 18 out of 22 cases (82 per cent) where the reporters engaged in the process with the assigned unit were resolved with relevant solutions.

53. For some, the SpeakUp! Helpline mechanism seems to be a reporting channel for times when colleagues are unaware of the internal reporting mechanism (almost a quarter of all reporters in 2020). In addition, the Helpline is used by both first-time reporters (50 per cent) and colleagues who had previously reported their concerns through an internal mechanism (50 per cent), mostly through the management channel and only a small fraction directly to headquarters.

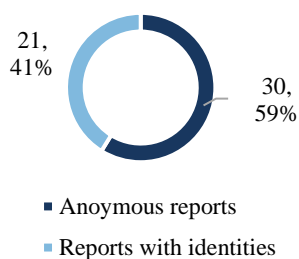
54. Almost three quarters opted to report online rather than by phone or app (fig. 8) and did so in English, with the remaining 25 per cent reporting in French, Spanish, Portuguese or Arabic.

### SpeakUp! Helpline overview, 1 January 2020–31 December 2020

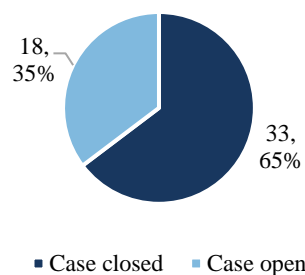
**Figure 5. Types of incident reports**



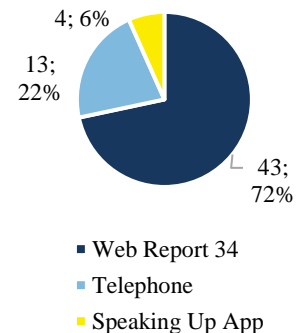
**Figure 6. Anonymous report rate**



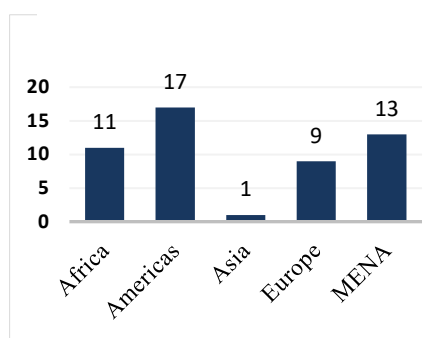
**Figure 7. Case closure**



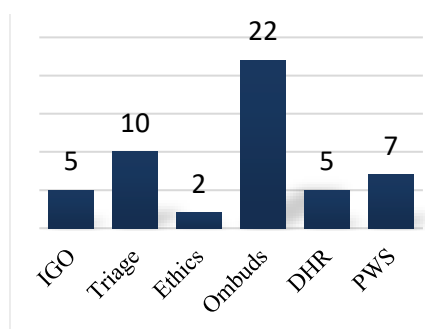
**Figure 8. Reporting methods**



**Figure 9. Reports by region**



**Figure 10. Assignment of reports**



## D. Outreach, training and education

55. The CoCD sessions are at the centre of the Ethics Office outreach to the workforce. The sessions provide a dialogue space on building trust and collaboration and for engaging with ethical dilemmas. In 2020, the adaptation to a virtual environment prompted further reflection on how to reach colleagues in remote locations. Three approaches were taken:

- (a) develop more flexible and adaptable outreach material, including generic CoCD slides on principles and where to seek support and advice and report misconduct; posters on the SpeakUp! Helpline; among others, video messages; voice-over slide-presentations; and, more recently, exploration of quizzing on CoC via a phone app;
- (b) embed CoCD messages and learning approaches in other learning programmes and outreach. That led to joint Ethics Office and Enterprise Risk Management outreach to risk managers regarding support needs; collaboration with the Global Learning and Development Centre regarding the Certification in Human Resources Programme and Reflective Leadership Dialogue, among others; and collaboration with the Senior Inclusion and Diversity Adviser on outreach sessions specifically dedicated to countering unconscious bias. The Ethics Office also continued its outreach and support to PAN, where 50 sessions were held jointly during 2020 with the Ombudsman's Office and PWS; and
- (c) engage in outreach on the Ethics Office intranet site and on two different Yammer group platforms. One Yammer group platform connected 358 CoCD facilitators as a community of practice where they can share lessons learned and raise questions and where relevant updates and information are also shared. The other, aimed at the entire workforce and entitled Ethics in Action, provided a platform for information-sharing and a dialogue space for exchanging thoughts relating to ethics. The platform is in its early stages of development and currently connects 67 colleagues.

## E. Code of Conduct dialogue sessions

56. In 2020, the Ethics Office supported 358 CoCD facilitators with the carrying out of the annual dialogue sessions. Overall, 13,282 colleagues in 120 operations were reached in those sessions. The main purpose was to provide the UNHCR global workforce with a space for open dialogue and collaborative learning on applying CoC principles and to foster an organizational culture that upholds ethical and value-based behaviour.

57. In the challenging environment of COVID-19, the main achievements included moving all CoCD activities to a virtual setting as well as training facilitators in holding sessions virtually. Rapid adjustment to the virtual setting was a key enabler in achieving the objectives of the dialogue. That was supported by training and support from the Ethics Office, in particular on adjusting the content to virtual facilitation tools as well as the use of those tools. A total of 199 facilitators were trained in virtual CoCD facilitation in French and English through webinars over the second and third

quarters, and further webinars were held on the 2019/20 theme to develop the facilitation skills of the newly elected CoCD facilitators. In the virtual environment, it was possible to achieve an average participation rate of 90 per cent in dialogue sessions. Participant feedback, however, highlighted the overall preference for face-to-face sessions, where possible, to maintain the experiential nature of the dialogue sessions.

58. CoCD facilitators adapted remarkably fast to the new circumstances and were able to deliver meaningful dialogues, with the majority of sessions in 2020 being held online. However, challenges arose particularly given the limited experience with virtual facilitation throughout the organization as well as the high level of facilitation skill required to create engaging and experiential dialogues. The need for more training in high-quality and experiential facilitation in virtual settings was consistently highlighted and needs to be further supported.

59. The theme for 2019/20 was “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 main purpose of the theme was to promote discussion within teams and self-reflection, and strengthen trust and collaboration to deliver stronger results, manage risks and support people management in UNHCR. Through the dialogues, colleagues become better 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. Complementing a compliance approach, this entails a change of culture towards engaging, empowering and trusting everyone at all levels to become involved in contributing individually and as part of a team to an ongoing dialogue on ethics, communicating that “Your actions matter”.

### **Global network of facilitators: Backbone of the Code of Conduct dialogue**

60. While the primary responsibility for the CoCD lies with Representatives, sessions are organized, and often facilitated, by the network of facilitators supported by the Ethics Office. As part of engaging in more proactive follow-up and assistance to operations, the Ethics Office strengthened contact and exchange with the network of facilitators to support the planning and facilitation of the CoCD session in their operations in 2020. The Ethics Office stayed in close conversation with the facilitators to address their needs and develop relevant materials for CoCD sessions. In 2020, 358 focal points were identified in 117 countries, compared to 103 focal points identified at the end of 2019.

61. COVID-19-related travel restrictions meant that the Ethics Office communicated regularly in the virtual space in a closed community of practice consisting of 391 colleagues (facilitators, co-facilitators and the ethics team) to share materials and examples of good practices and connect facilitators across the world. There was a significant increase in interaction, mainly about material requests and exchanges but also the sharing of inspirational resources pertaining to ethics, such as videos or articles. In addition, the platform was used to promote guidance materials in different languages and to provide support on virtual facilitation or the reporting of CoCD sessions.

### **Putting values into action**

62. Members of the Ethics Office had a role in the facilitation of CoCD sessions for 13 operations and divisions including large field operations such as those in South Africa and Syria and in headquarters locations such as Copenhagen and Geneva. In those sessions, participation of Ethics Office colleagues ranged from facilitating the entire session, to facilitating an activity or Q&A session, to giving a presentation on the new approach to ethics. The Ethics Office assisted another 37 operations and headquarters divisions closely through reviewing session content or customizing the agenda and activities for the session.



## Figure 11. CoCD statistics at a glance

### Key indicators

13,282\*

Colleagues reached in the 2019–2020 CoCD themed  
“Values in action: Trust and collaboration”

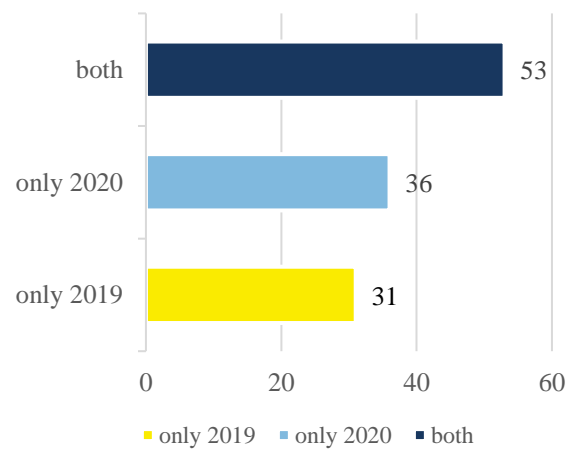
89%

Average participation rate of CoCD sessions held in 2019  
2020 cycle

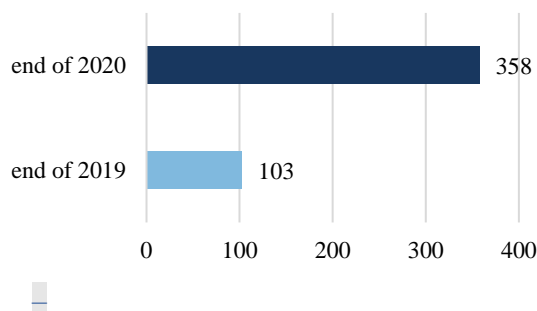
### 199 in 7 webinars

CoCD facilitators trained in virtual facilitation and the  
2019–2020 CoCD theme to enable the transition to online  
CoCD sessions during COVID-19

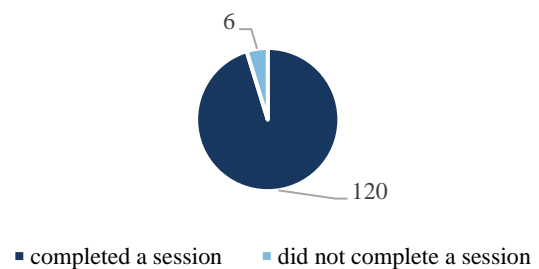
### Number of sessions held by country operations in 2019, 2020 or both



### Number of CoCD facilitators



### Country operations in the 2019–2020 cycle



\* Please note that this number is in part based on an estimate since many headquarters entities and a few country operations did not report attendance for their CoCD session.

63. Around 13,282 colleagues, representing about 74 per cent of the total workforce of 17,942, were reached through a CoCD session (fig. 11). The participation rate (i.e., the percentage of participants in those sessions out of the total workforce in the offices) for sessions held in 2020 was 90.47 per cent, compared to a participation rate of 86.76 per cent in 2019. Virtual sessions in 2020 seemed to have reached significantly more people, per session, than face-to-face sessions had in 2019, which accounts for the high overall participation rate. That is a striking increase in comparison to the 60 per cent attendance rate in 2016 and 80 per cent in 2018. While 100 per cent of the workforce was not reached, the target of an 80 per cent participation rate in the CoCD sessions by 2019 set by the Ethics Office and included in a recommendation in its 2017 annual report was not only reached but exceeded.

64. A total of 120 out of 126 country operations (around 95.24 per cent) reported participation in the mandatory CoCD sessions. The goal set in 2018 of having 100 per cent of operations offices and divisions hold a CoCD session was thus not reached. The discrepancy between the high participation rate of an average of 90 per cent in sessions and the significantly lower head count of 13,282 colleagues overall can be explained through lower compliance and reporting of sessions with

Divisions at HQ Geneva and some of the Bureaux, as well as lower attendance rates in some of the largest operations that make up a large part of the UNHCR workforce.

### **Continued efforts to strengthen integrity, diversity, equity and inclusion in 2021**

65. The 2020 CoCD sessions overall proved to be well received and appreciated by colleagues, as highlighted in a feedback survey that was shared with participants after the sessions. The responses from 1,569 colleagues in 72 operations highlight the broad agreement on the importance of the theme, the relevance for our work in UNHCR and affirmation of the new dialogue format.

66. Increasingly, operations and divisions held their session on the link between trust and collaboration and conversations about race, equity and inclusion. The CoCD team supported operations in holding those sessions in 2020 and will continue to do so in 2021 in collaboration with different initiatives working on diversity, equity and inclusion in UNHCR. Regarding work on race and racial discrimination, the Ethics Office started to engage in a series of workshops on diversity, equity and inclusion, with a particular focus on racial discrimination. The aim is to strengthen the conversation in the organization on race and racism and work towards a value-based organizational culture.

67. In the last CoCD cycle, the Ethics Office strengthened the link between personal values and those of the organization through in-depth training. A pilot training programme, attended by 40 CoCD facilitators, was run by external experts in positive psychology and the methodology of “value-spotting”, which is used to learn how individual personal values as strong drivers of behaviour are at play in team settings and can be used to strengthen trust and collaboration. It is foreseen that the strengthening of this work will continue in 2021, in particular for managers.

68. As one of the most-mentioned integrity risk-mitigation tools, the CoCD remains important in building a risk-aware organization. The Ethics Office has worked and will continue to work towards creating awareness of the interlinkages of integrity risk mitigation and the achievement of operational results. Hence, in 2021, ensuring that CoCD sessions can address ethics issues that are relevant to the operational context and create risk-informed CoCD sessions remains important.

69. In addition to the mandatory annual sessions, the new approach encourages ongoing dialogue among colleagues on ethical decision-making, and the Ethics Office supports this process through its Ethics in Action interactive platform on Yammer and SharePoint, which was launched as a pilot in 2020. This approach aims at equipping colleagues with the resources to educate, reflect and contribute, which will help UNHCR transition to more value-based management and decision-making in managing ethical dilemmas and a value-based organizational culture.

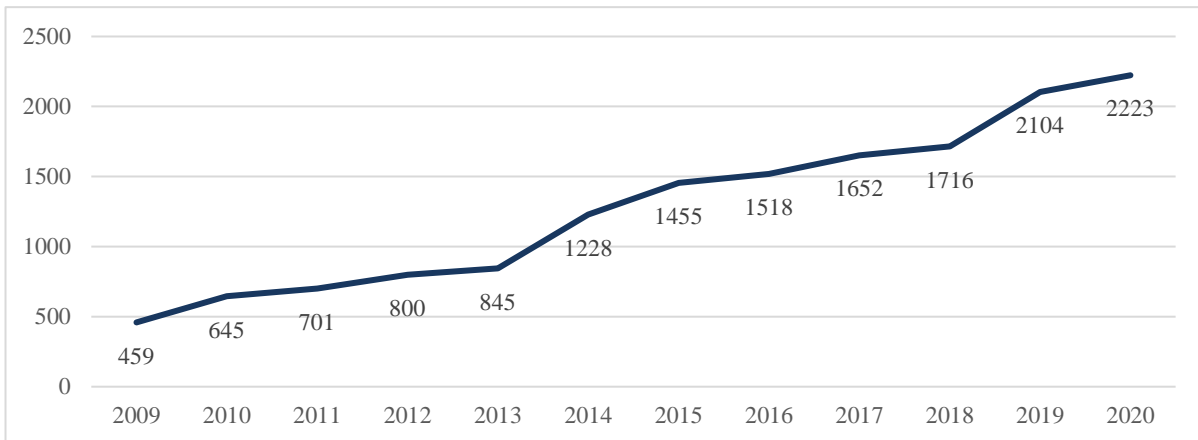
## **F. United Nations Financial Disclosure Programme**

70. 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. The UNFDP 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. It 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.

71. 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 2020 annual filing cycle, reporting on the previous year (1 January–31 December 2019), 2,223 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 above the 50 per cent increase in the UNHCR global workforce since 2013 (fig. 12).

**Figure 12. UNFDP participants, 2008–2020**



72. A total of 1,498 filers (67.39 per cent) submitted their disclosures within the deadline (compared to 1,102 filers, or 52.37 per cent) in 2019, and 722 filers (32.48 per cent) submitted them after the expiration of an extended deadline, often following receipt of a multitude of reminder messages, making the compliance rate 99.87 per cent. Only 3 filers (0.13 per cent) did not submit their disclosures, up from two in 2019. One of the non-compliant staff retired from UNHCR, and two had been unable to process the submission for technical reasons.

73. 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 managers of filers, and performing searches in human-resource databases as needed. The Office received around 200 requests from participants regarding eligibility, change of duty station, UNHCR personnel being unaware of their required participation and requesting clarifications, lack of receipt of a password or password not working, access to the website, confirmation of submission and compliance follow-up to ensure timely submission.

74. A total of 61 UNHCR filers were selected for the Verification Process in 2020 compared to 110 in 2019. Of these 61 filers, one did not provide the required verification documents and the file was considered incomplete. Consequently, that filer will be included in the verification process again if the staff member is required to participate in the 2021 filing cycle.

75. 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 76 actual or possible conflicts of interest involving financial activity (16), family relationships (14) and outside activities (46).

76. Regarding the implementation of measures to mitigate conflict of interest, the external reviewers made 83 mitigation recommendations to filers, 75 of which filers accepted and had either implemented or were in the process of implementing by the end of the filing cycle. By contrast, during the 2019 filing cycle, 71 possible conflicts of interest were identified, and the external reviewers issued 72 mitigation recommendations to filers, 55 of which were accepted by filers.

77. Some filers demonstrated a lack of understanding regarding their obligations under the UNFDP. Examples include filers who (a) were unclear that they are obliged to make annual disclosures under the UNFDP even if the same disclosures had been made in previous years, (b) were unaware of the requirement of authorization of outside activity, or (c) were not always familiar with Staff Regulations and Rules regarding family relationships within the United Nations, namely, the need to recuse themselves from any direct interaction in an official capacity with relatives working as United Nations staff members or in positions with the potential for interaction with the United Nations, or avoiding financial activities with entities or individuals with ongoing or likely interaction with the United Nations, including Government entities and vendors.

78. The recommendations of the external reviewers 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 United Nations 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. The Ethics Office has been working on those recommendations and will continue to engage in that regard.

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

79. The year 2020 saw an increased use of streamed townhall sessions with senior managers and the High Commissioner. For that purpose and based on the outreach with colleagues in different locations and the day-to-day Ethics Office work, ethics-related messages and reflections were shared with the High Commissioner regarding issues such as “ethics consideration for balancing duty of care with duty of service at a time of COVID-19”, ethical dilemmas of colleagues, widespread fear of speaking up and the role of first-line managers to address issues early.

80. In line with the responsibility of the Ethics Office for disseminating and promoting ethics-related policies and guidelines, the Office contributed comments and observations to the “Policy on a victim-centred approach in UNHCR’s response to sexual misconduct (sexual exploitation and abuse and sexual harassment)” and the “Policy for enterprise risk management in UNHCR”. The Office also engaged with the team carrying out the “evaluation of UNHCR’s approach to learning and development for workforce and partners” as it relates to the CoCD outreach and learning.

81. The Ethics Office continued to co-chair the UNHCR Informal Conflict Management Support Group comprising the 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. Coordination with the Ethics Panel of the United Nations and professional networking with other ethics committees**

82. In 2020, the Director of the Ethics Office continued to participate in monthly meetings of EPUN. 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.

83. The Director assumed the role of Alternate Chair of EPUN for the period March to August 2020. In that role and as Alternate Chair pro tempore, he conducted several independent reviews of contested protection-against-retaliation determinations. He also led the work of the EPUN Subgroup on Future Directions.

84. The Ethics Office also remained an active member of the Ethics Network of Multilateral Organizations (ENMO), composed of ethics officers from United Nations system entities, affiliated international organizations, and international financial institutions, and participated in the ENMO 2020 virtually held annual meeting. In that context, the Ethics Office co-led a panel discussion on emerging changes and innovations in ethics training and awareness.

85. The year 2020 saw an increase in invitations to external webinars and speaking engagements on the UNHCR value-based approach to ethics and integrity. The activities helped to shape and sharpen the approach and knowledge of the Ethics Office itself. That included talks with ethics and compliance colleagues at the European Central Bank, a meeting of the peer network of ethics experts in the Mont Blanc Circles, and a presentation at the General Assembly for health-care ethics and compliance experts. Engagement with ethics scholars also took place during 2020, which included the team lead of independent researchers working on creating trustworthy artificial intelligence and a lecture to students in business ethics at the Geneva School of Economics and Management. Towards the end of 2020, four junior colleagues in the Ethics Office entered and won the yearly Ethics and Integrity Challenge for presenting an ethics approach for comprehensive organizational culture change to enable colleagues to feel safe and supported to speak up.

## IV. Observations and 2020 recommendations

### A. Observations

#### Implementation of pending 2017–2019 and 2020 Ethics Office recommendations

No.	2017 Recommendations	Status	Comments
1	Foster greater engagement with the field to strengthen ethics learning globally. To that end, it is suggested that support at field level be formalized and ethics staffing capacity be added to regional hubs with existing LAS/PWS/IGO presence in locations such as Bangkok and Nairobi.	Closed	The Ethics Office received additional substantial temporary staffing and financial resources in 2018, 2019 and 2020 supporting the delivery of CoCD learning globally. An integrity mapping exercise led to a recommendation to improve support to 1 <sup>st</sup> and 2 <sup>nd</sup> line management support, and to mainstream ethics considerations in UNHCR activities and operations. The initial plan of decentralizing the Ethics Office was thus not pursued further.
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 2021.

No.	2018 Recommendations	Status	Comments
1	Achieve 100 per cent compliance regarding mandatory CoCD sessions for the UNHCR global workforce.	Partly implemented	The 2019-2020 CoCD is a two-year cycle; a total of 120 out of 126 country operations reported the participation in the mandatory CoCD sessions, representing around 95.24 per cent of country operations. Around 13,282 colleagues, representing about 74 per cent of the total workforce of 17,942, were reached through those sessions.
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 Executive Committee, and (c) reporting to the UNHCR Internal Audit and Oversight Committee.	Partly implemented	A review of the Ethics Office terms of reference is planned for 2021.
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 an effort to professionalize the Ethics Office, an additional P3 position was created in the Ethics Office and additional resources were provided for temporary staffing for the Office.
4	Increase efforts to make ethical-behaviour competencies integral parts of recruitment, job descriptions and performance management.	Partly implemented	DHR is leading the UNHCR review of requirements regarding recruitment procedures, job descriptions and performance management. This will include competencies pertaining to integrity and ethical behaviour.

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.
---	---	--------------------	--

No.	2019 Recommendations	Status	Comments
1	Take steps to acknowledge the role that ethics and the CoCD have as an integral part of leadership and risk management.	Partly implemented	Efforts were made in 2020 to strengthen the links between ethics and risk, including by providing input to risk guidance, use of the risk register to identify integrity risks and to use the CoCD as a risk-mitigation measure. More is needed, however, to integrate ethical considerations into risk management and as part of leadership competencies.
2	Strengthen the case-management system available to the workforce when seeking advice and support or reporting issues.	In progress	Based on the integrity mapping, an initiative by DHC is under way to improve the set-up for the workforce when seeking advice and support or reporting issues. A victim-centred approach policy was also adopted for victims of sexual misconduct, and the Ethics Office has been tasked with leading a mapping of the integrity-case data needs, gaps and potential solutions.
3	Follow up on the work to provide one platform for the workforce seeking information.	In progress	The Ethics Office has been tasked with leading the creation of a one-stop-shop on the intranet, with information tailored to UNHCR and providing information on

			avenues available to all members of the workforce.
4	Provide further and sustainable staffing and fully implement the 2017 and 2018 recommendations.	In progress	In 2020, a P3 and a G6 position were created as a start to further regularize temporary positions in the Ethics Office, a process that needs to be continued in 2021.

## B. 2020 recommendations

86. The integrity mapping highlighted four areas for organizational focus to improve the integrity work and made recommendations in those areas:

- (a) enhancing the workforce grievance system;
- (b) strengthening the integrity efforts in operations (1st line and 2nd line management);
- (c) strengthening an institutional approach to people management; and
- (d) investing in organizational integrity and ethics.

87. In this regard, the Ethics Office commends the organization for the efforts to improve the collection, analysis and use of integrity-case data and 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. The Ethics Office recommends that a periodic integrity progress report be issued, and that people management be fully integrated as a core competency for leaders and managers, with strengthened support as well as accountability and oversight. One area recommended for further organizational review to support this is the impact that differences in contract status and type have on inclusion, trust and collaboration in teams, and the consequences for a speak-up culture.

88. Considering the regionalization and decentralization efforts of the organization, the Ethics Office recommends a stronger emphasis on the role of 1st and 2nd line managers when it comes to promoting an ethics culture and engaging in mitigating integrity-related risks in operations globally. This should be one element in a more explicit commitment to ensuring that ethical decision-making is embedded at all levels of the organization and could include multifunctional, integrity-risk-focused CoCD teams in all operations, with accountability oversight of the Director, Representative or Head of Office. To facilitate the work of such CoCD teams and to ensure effective engagement with the sessions, it is also recommended that connectivity technology be further strengthened for the entire workforce and that resources and efforts be put into building future-focused skills across the organization to manage and facilitate virtual dialogue, meetings and learning events in support of an organization-wide dialogue culture.

89. An organizational culture of ethics requires commitments from the senior levels of management and modelling of the desired behaviour. The Ethics Office recommends that the High Commissioner and senior managers at the headquarters, regional and national levels continue to confirm the commitment to integrity by modelling good people management, engaging proactively in integrity-risk mitigation and a CoCD culture, and explicitly practising value-based ethical decision-making.

90. The Ethics Office will continue to require the strengthening of its staffing (including sustainable staffing) for its role in responding effectively and in a timely manner to individuals seeking advice and support and for taking on an enhanced role in providing the management of the organization with data-informed and value-based recommendations to ensure a global, field-driven ethics culture in the organization. Full implementation of the 2017– 2019 recommendations will assist in achieving this objective.



## V. Conclusion

91. In coordination with the DHC's Office, the Ethics Office in 2020 completed a large-scale mapping of the integrity landscape in UNHCR. It found that parts of "the integrity work" in UNHCR are well developed, while other parts are less developed and require attention. The strong commitment to integrity formulated by senior managers is evident and important though insufficient without further action to embed it in the organizational culture. This requires, among other things, a shift from focusing primarily on preventing and responding to misconduct to strengthening the role of day-to-day management and the efforts to build strong value-based leadership skills to promote and model the desired behaviour as well as a better alignment of efforts concerning leadership, people management, vision, values and culture work. A shift supported by the active involvement of the DHC's office in work on the integrity landscape and culture of the organization.

92. Among the persistent challenges requiring immediate attention is the need to deal effectively and in a timely manner with workforce grievances. In particular, more is needed to address unwanted managerial behaviour that does not meet the threshold of misconduct.

93. The Ethics Office contributions are 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 United Nations system and governance structures in 2021 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
FSS	Field Security Service
GLDC	Global Learning and Development Centre
IGO	Inspector General's Office
LAS	Legal Affairs Service
MENA	Middle East and North Africa
OIOS	Office of Internal Oversight Services
PAN	Peer Advisors 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
SHWS	Staff Health and Welfare Service
UNFDP	United Nations Financial Disclosure Programme
UNHCR	Office of the United Nations High Commissioner for Refugees