



UNHCR  
ETHICS OFFICE

ANNUAL  
REPORT  
2022



**UNHCR**  
The UN Refugee Agency

# SUMMARY

This annual report covers the activities of the Office of the United Nations High Commissioner for Refugees (UNHCR) Ethics Office in 2022.

The Ethics Panel of the United Nations reviewed the report on 11 April 2023, 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 High Commissioner may wish to take note of the present report from the Ethics Office in formulating the UNHCR global and operational strategies, so as to further strengthen an organization-wide culture based on ethics and integrity, as well as the implementation of, and adherence to, ethical standards and practices by its workforce. It is the fourteenth annual report presented by the Ethics Office since its establishment in 2008 as a stand-alone office reporting to the High Commissioner.

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Panama. Visit to refugees and asylum seekers  
in Colón and Panama Oeste.

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# 1

# INTRODUCTION

1. This report is submitted to the High Commissioner in accordance with Paragraph 10 of the UNHCR Inter-Office Memorandum No. 040/2008 and Field Office Memorandum No. 042/2008 of 6 June 2008, the ST/SGB/2007/11, and Ethics Office terms of reference (“ToRs of the Ethics Office”).<sup>1</sup> The report includes an overview of the key achievements and activities of the Ethics Office in 2022, as well as recommendations aimed at informing UNHCR’s engagement vis-à-vis ethical issues in the future.
2. The Ethics Office (“Ethics” or “Ethics Office”, used interchangeably throughout this report) has, since its inception in 2008, provided services and undertaken activities according to its mandate as set out in its ToRs. In 2022, the Ethics Office served the workforce consisting of more than 18,841 personnel, dispersed among 518 locations and 130 countries globally. The highly diverse workforce comprises 160 nationalities with 70 per cent national and 30 per cent international staff. While the gender breakdown of international staff was 48 per cent female and 52 per cent male, for national staff the breakdown was 39 per cent female and 61 per cent male. For the affiliate workforce, 54 per cent was female and 46 per cent male.
3. The Ethics Office has a staff of six, composed of a D1, P.05, P.04, P.03, and two G.06s.
4. The Ethics Office operates on the premise that a confidential, impartial, and independent ethics function is fundamental to fostering and contributing to an organizational culture wherein the legal framework and ethical values provide strong guidance for behaviour and decision-making, and for the effective performance and delivery of UNHCR’s mandate.

<sup>1</sup> [IOM/040-FOM/042/2008 Ethics Office - Terms of Reference \(unhcr.org\)](#) [Intranet link. Please also see annex 1 containing the ToRs of the Ethics Office.]



5. In addition, demonstrated commitments to integrity and ethical behaviour by UNHCR's management and workforce contribute to an inclusive, innovative work environment and earn the organization a trustworthy reputation with personnel, Government partners, civil-societies, donors, forcibly displaced and stateless persons, stakeholders, and the public. Trust is essential to achieving the overall strategic goals of the organization as set out in the Strategic Directions 2022–2026 and the Global Compact on Refugees (A/73/12, Part II).
6. The vision of the Ethics Office for 2022 was a UNHCR where *“ethical decision-making and values provide a strong framework for organizational culture and behaviour and guide leaders and teams in their daily work to fulfil the mandate”*.
7. This vision was composed of core building blocks intended to empower, build trust, and promote dialogue. Three pillars, or change areas, underpinned the vision:
  - a. **Leadership for change and ethical behaviour:** Modelling ethical behaviour is a shared responsibility of UNHCR's workforce and it permeates all areas of the work. Leaders, managers, and those involved in people management have an additional responsibility to model inclusive and ethical behaviour. We do this when we engage in dialogue, when we are open to several perspectives, value diversity and manage people, not only performance. When there is a commitment from leaders to have an open-door policy and to engage actively in the mandatory, annual Code of Conduct dialogue (CoCD) sessions, the sessions can be a powerful vehicle for change. Furthermore, such commitments contribute to creating spaces for the continuous promotion and modelling of our core values, for listening to colleagues, providing safe spaces for speaking up and addressing troubling issues.
  - b. **Ethics as a guide for decisions and behaviour:** Continued trust in the organization relies on the ability of colleagues to take timely decisions in complex situations, decisions which are ethical, professional, and risk-informed. To further enhance the organizational risk maturity, the Ethics Office provided colleagues with tools for handling ethical dilemmas. A re-vitalized approach to CoCD, with more emphasis on training regarding ethical decision-making, was implemented.
  - c. **An organization that cares:** The Ethics Office cooperated with management on developing a strengthened set-up for addressing workplace challenges, that is supported by data analysis, and aims at increased accountability for organizational prevention and response to workplace grievances.



UNHCR and partner staff support relocation of Ethiopian refugees from Hamdayet border reception centre in Sudan to Um Rakuba camp.

© UNHCR/Olivier Jobard



## 2

KEY  
ACHIEVEMENTS

8. For the Ethics Office 2022 was a busy year. Serving UNHCR personnel across the country offices, regional bureaus and Headquarters, Ethics continued to provide Ethics advice and guidance on a myriad of issues, including but not limited to matters that may give rise to conflicts of interest, and reviewing protection against retaliation requests. Ethics also continued to support the Code of Conduct Dialogue sessions and provide trainings in this regard.
9. Regarding accomplishments, while there have been many (as indicated throughout this report), two key achievements should be highlighted.
10. **The Support Desk:** In May 2022 the Support Desk was launched. This initiative is led by the Ethics Office. The Support Desk for Workplace Concerns (“*Support Desk*”) is a multi-stakeholder referral mechanism that offers support to the entire workforce – regardless of location and contract type – by providing advice, referring cases to the right entity, and ensuring that concerns are addressed with care and followed-up as appropriate. The Support Desk complements existing channels for addressing workplace issues, and indications to date show that it will be a beneficial avenue for concerns to be addressed in an efficient manner.
11. **Protection against Retaliation:** A revised Administrative Instruction on Protection Against Retaliation was issued in August 2022. Led by Ethics, the new Administrative Instruction on Protection against Retaliation now covers all UNHCR personnel (irrespective of contract type).
12. Further information on both these initiatives is noted in the 2022 Ethics Office review, below.



Chile. UNHCR carries out the installation of a Temporary Sanitary Station 25 kilometers from the city of Iquique.

© UNHCR/Paulina Oñate



# 3

## ETHICS OFFICE REVIEW 2022

Figure 1: Ethics engagement in 2022 in numbers



**437**

Cases for Ethics Advice



**8**

Cases referred to the Ethics Office by the support desk



**46**

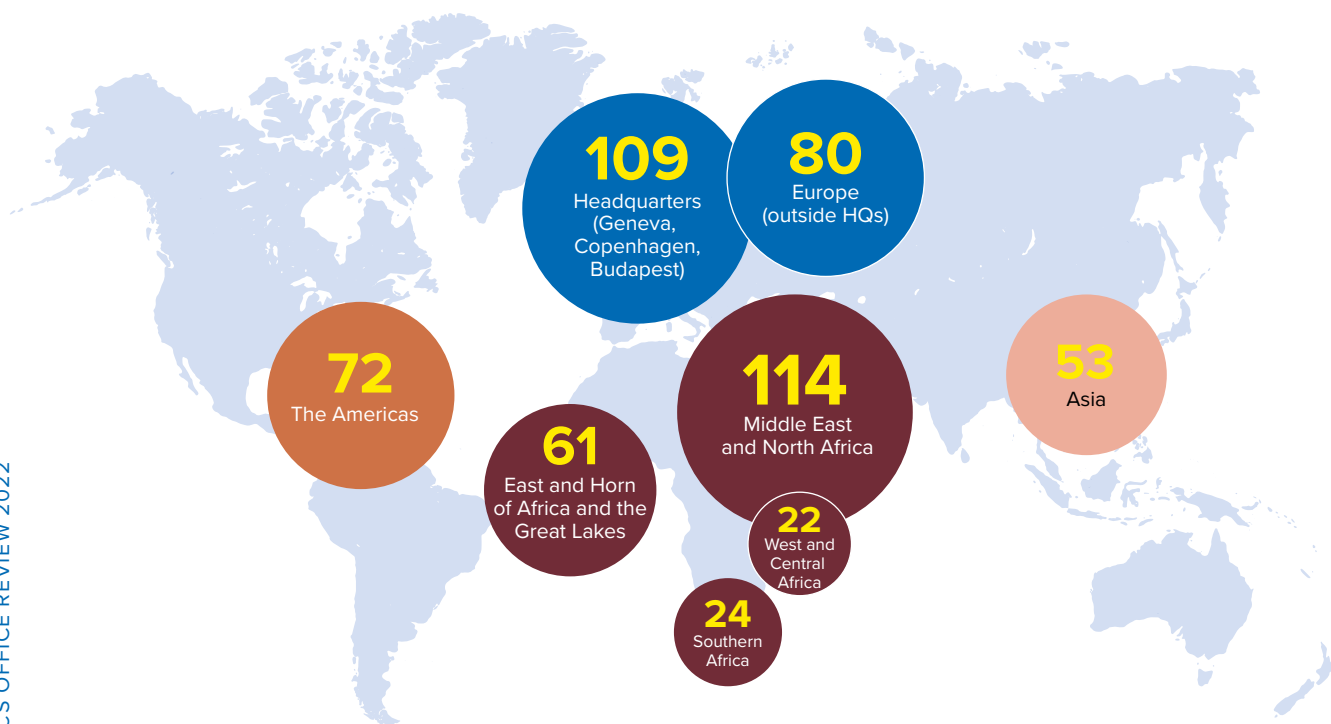
Cases for protection against retaliation



**46**

Operations were supported on CoCD sessions by the Ethics Office

**Figure 2: Regions where matters of concern originated**



\*Data on the origins of two cases was not available, and therefore could not be reflected in the above chart.

13. In 2022, the total number of advisories provided by Ethics remained steady, and is attributed to the workforce becoming more aware of the standards of conduct and their ability to secure solutions to their dilemmas; as well as the outreach efforts by the Ethics Office during the reporting period. There was a decrease of 30% in cases coming from the Africa region and an increase of 9% in the percentage of cases coming from the MENA and the Americas regions. The overall steady pace at which Ethics continues to receive cases and requests for guidance is a positive indicator. While requests for advice on managing conflicts of interest remains high, there was an increase in requests for advice related to allegations of unethical behaviour

and situations creating an untenable office environment. These included consultations by the Director of Ethics, proactively and reactively, with more than 50 managers, including Directors, Representatives, and middle managers. Follow up included giving pertinent advice and supporting the resolution of matters before they escalated and became conflicts. These shifts indicate recognition that the Ethics Office’s proactive and collaborative approach of working with management and affected personnel to refer or to resolve workplace concerns is increasingly viewed as effective.

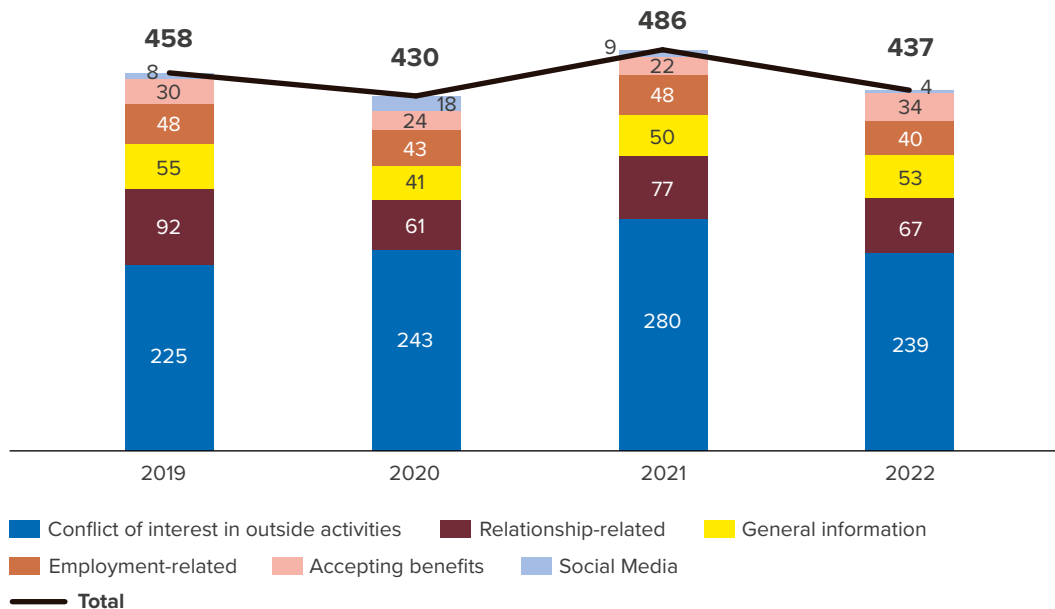
## A. ETHICS ADVICE AND GUIDANCE

14. UNHCR’s workforce’s access to confidential advice and guidance from the Ethics Office is ensured through various means and channels. These include via email, telephone, virtual communication tools, face-to-face meetings, and the Support Desk which started operating in May 2022. Having multiple channels of access and communication, along with the newly introduced Support Desk, proved to be good practice, which will be continued and expanded. Ethics cooperated closely with other informal groups such as the Peer Advisors Network (PAN),<sup>2</sup> Risk Advisers and Code of Conduct Dialogue (“CoCD”) facilitators, and they engaged in the prevention of issues thereby reducing escalation. Collaboration among the groups facilitated work on addressing staff-related concerns, as well as raising awareness about

ethics and the role of the Ethics Office. Given the importance of its advisory role, the Ethics Office made significant efforts to raise awareness of its services across UNHCR. In addition to providing action-oriented, reliable, and pragmatic guidance, Ethics maintained its commitment to providing same-day acknowledgments of all requests for advice and to issue clear and practical advisories in an efficient manner.

15. Throughout 2022 and in keeping with its role, Ethics provided support to 437 colleagues worldwide who came directly to the Ethics Office, and eight which came through the Support Desk. By providing support, Ethics gave confidential advice and guidance on an array of ethical dilemmas and issues, including but not limited to, conflict of interest concerns stemming from outside activities, relationship-related situations, and use of social media.

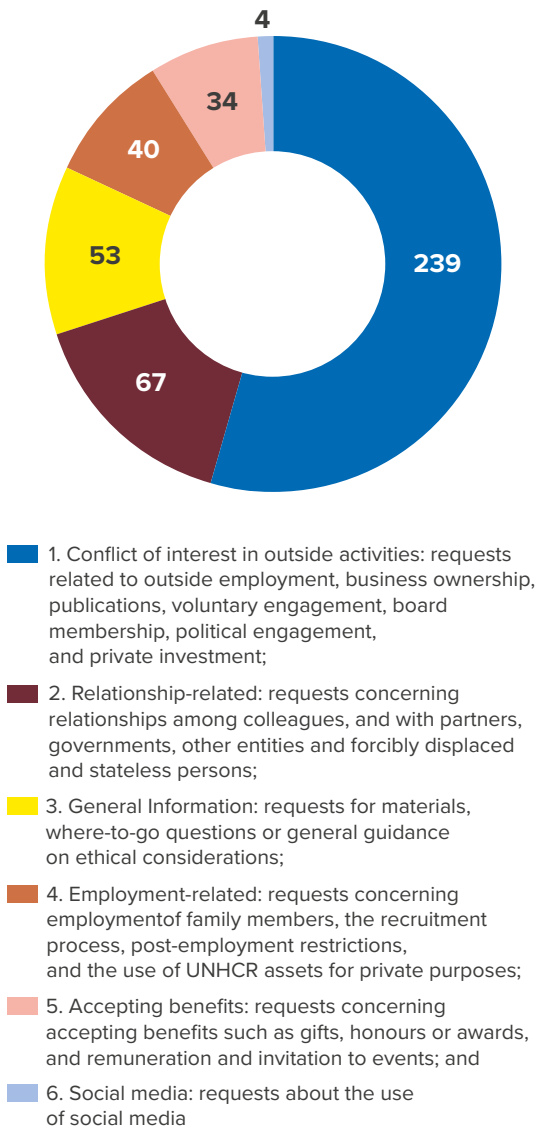
**Figure 3. Number of ethics-advice cases per category in 2019, 2020, 2021 and 2022**



<sup>2</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 a Coordinator under the guidance of a Steering Committee, comprising the Psychosocial Wellbeing Section, the Office of the Ombudsman and Mediator and Ethics Office and it 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.



**Figure 4. Number of ethics advisories per category in 2022**



16. In classifying its cases, the Ethics Office used the six categories established in the UN Staff Rules and Staff Regulations.<sup>3</sup> In 2022, the cases were distributed as shown in Figure 4.
17. Conflict of interest matters relating to outside activities continued to represent the biggest share of the total number of cases in 2022, amounting to 239, or 55 per cent of cases, which was similar to 2021 (58 per cent) and 2020 (56 per cent). The relative stability in

the number of staff reaching out for ethics advice is a positive sign about the impact of the Ethics Office work on raising awareness regarding ethical reflection, decision-making and compliance with the Staff Regulations and Rules. In view of the steady number of outside activities requests received, Ethics will continue to work on awareness-raising and education, via various channels, including the CoCD sessions and PAN, among others. Ethics also plans to address any guidance gaps on outside activities that the Organization may currently have.

18. In 2022, the Ethics Office received 67 cases regarding relationship-related concerns including 11 cases that involved staff who wanted to host Ukrainian refugees.
19. For cases that raised concerns regarding the workplace culture and difficult workplace relations, the Ethics Office used a combination of providing direct support and follow-up actions, including:
- a. cooperation and outreach with other entities on integrity issues, (familarly referred to as the “integrity family”), including the Psychosocial Wellbeing Section (PWS), the Office of the Ombudsman and Mediator, the Legal Affairs Service (LAS), the Victim Support office, and the Division of Human Resources (DHR), for consulting on multifaceted concerns as well as referring colleagues when appropriate;
  - b. enabling the affected staff member to engage in an informal resolution process, by providing guidance on how to have dialogue and address the matter proactively in a safe and informed manner;
  - c. proposing proactive outreach and CoCD sessions in the concerned office or team, particularly in locations where issues at a systemic level were affecting many people in the workplace and creating a toxic environment. Systemic

<sup>3</sup> UN Secretary General’s Bulletin, *Staff Regulations and Staff Rules, including provisional Staff Rules, of the United Nations*, ST/SGB/2023/1, <https://digitallibrary.un.org/record/4002120>

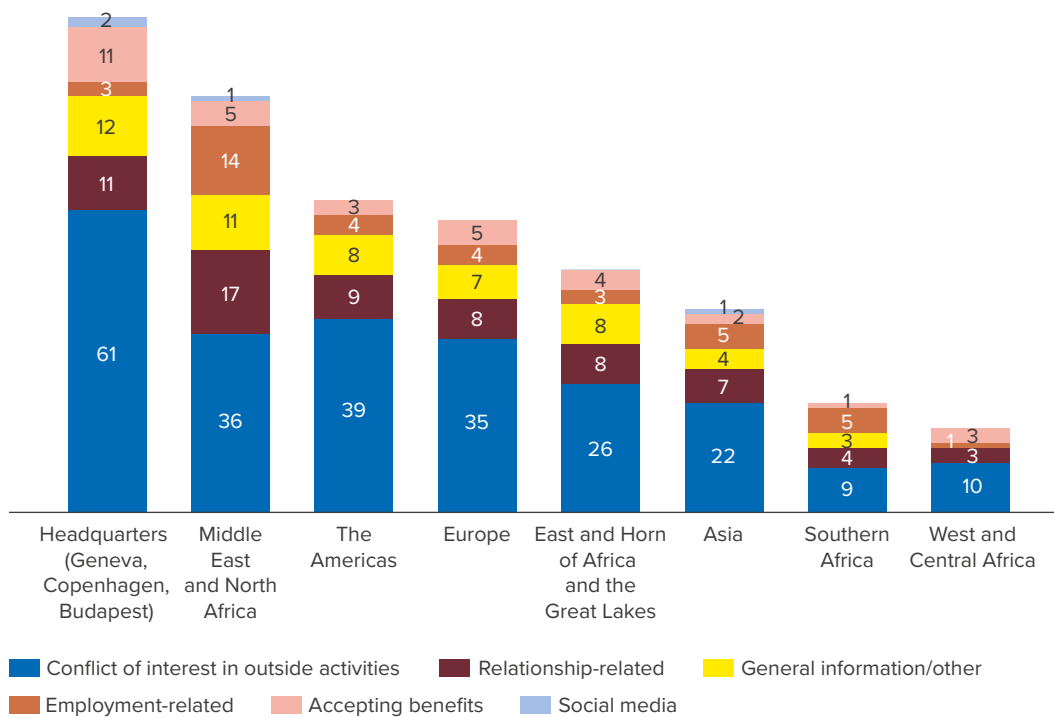
issues included personnel expressing concerns regarding the inequity of employment contracts; unclear reporting lines; managers focusing on results at the expense of people management, which in some cases included exploiting, harassing and bullying colleagues; and a pervasive fear of speaking up or making a formal complaint because there was no trust that the system would have a fair resolution.

20. Most cases seeking ethics advice and guidance in 2022 came from Headquarters, in Geneva, Copenhagen and Budapest. In addition, an increase in cases coming from the Americas and MENA region was

observed, with an increase of 12.5 per cent and 6 per cent respectively as compared to 2021. Simultaneously, a minor decrease in the number of cases coming from the Africa region was noted.

21. Concerning interventions by the Ethics Office: henceforth, there will be more awareness-raising on PaR, as well as on the importance of promoting the constant need for dialogue and clear communication among colleagues and with their supervisors, especially around budget cuts resulting in the correct sizing of offices and operations. These awareness-raising sessions will serve to inform the workforce about matters that affect them and encourage a “Speak Up” culture.

**Figure 5. Number of ethics advice cases per region in 2022**



## B. SUPPORT DESK FOR WORKPLACE CONCERNS

22. Led by the Ethics Office, the Support Desk for Workplace Concerns (“*Support Desk*”) is a multi-stakeholder referral mechanism that offers support to the entire workforce – regardless of location and contract type – by providing advice, referring cases to the right entity, and ensuring that concerns are addressed with care and follow-up as appropriate. The Support Desk became operational in May 2022 and complements existing channels for addressing workplace issues. It was launched on a new Intranet site which serves as the first joint portal for “where to go with workplace issues”. The Support Desk aims to be a safe space where staff, who are not sure where to seek help, can bring forward workplace issues in an informal way.
23. The Support Desk is a collaborative effort between the Ethics Office, the Office of the Ombudsman and Mediator, the Legal Affairs Service, the Division of Human Resources, the Psychosocial Wellbeing Service, and the Victim Care Officer. The Inspector General’s Office has observer status, and the Ethics Office serves as the Secretariat for the Support Desk.
24. Staff can reach out to the Support Desk using a web form from the UNHCR Intranet. The Support Desk meets weekly to discuss new cases and assign them to the entity mandated to best address the issues raised. When appropriate, cases can also be referred to the management of the Operation or Regional Bureau where the staff member contacting the Support Desk is based, to facilitate the workplace issue being addressed or managed locally; the Secretariat nevertheless maintains a regular follow-up. By creating a multi-stakeholder forum to discuss workplace issues amongst all relevant entities, the Support Desk aims to ensure that workplace issues raised by staff are dealt with in a timely

and efficient way and by the most relevant entity, sometimes in coordination with more than one Service.

25. From May to December 2022, the Support Desk processed 65 cases. Approximately 30 per cent of these cases were referred to the Office of the Ombudsman and Mediator; the remainder were distributed amongst other entities, while several remained with the Secretariat for further action.
26. The workforce generally reached out to the Support Desk to raise issues related to abuse of authority, workplace-related grievances and human resources concerns, including perceived unusual recruitment practices and poor communication around downgrading and the discontinuation of posts. Most of the cases were brought by staff based in the MENA and the Horn and East Africa and the Great Lakes regions.

## C. PROTECTION AGAINST RETALIATION

27. In UNHCR, any member of the workforce who reports misconduct, cooperates with a duly authorized audit, investigation, evaluation, inquiry, or review, and engages in the Office of the Ombudsman and Mediator’s activities is protected against retaliation for their involvement. This is sometimes called “whistle-blower protection”. A well-functioning system of protection against retaliation is essential for creating a Speak Up culture, whereby staff can report misconduct and workplace grievances without risk to their careers or well-being.
28. Following on from complaints and problems raised by personnel to the Ethics Office, the need to revise the rules and procedures on protection against retaliation was identified. The rules and procedures are set out in the revised [Administrative Instruction on Protection against Retaliation UNHCR/AI/2018/010/Rev.1](#) (“AI on PaR”), which came



into force on 2 August 2022. The key changes in the new AI on PaR include:

- a. expanding the scope of staff covered to include interns;;
  - b. setting out the expanded involvement of the IGO to conduct fact-finding on retaliation claims at the preliminary stage;
  - c. aligning itself with UNHCR’s policy on the *Victim Centered Approach* by including a new provision to protect victims of sexual misconduct even when they choose not to report misconduct; and
  - d. explicitly authorizing the Ethics Office to make the same recommendations both during the interim period of the preliminary review and the investigation period to prevent or mitigate any retaliation that is occurring.
29. In parallel, and in collaboration with the Inspector General’s Office, the Ethics Office developed standard operating procedures (SOPs) for reviewing requests for protection

against retaliation in line with the revised AI so as to facilitate preliminary assessments. As these are living documents, the Ethics Office continues to revise and update its internal procedures by working in close consultation and collaboration with the Offices of the Inspector General, Legal Affairs, and Human Resources.

30. In 2022 the Ethics Office registered 46 individual cases (Figure 6 below) with retaliation concerns. Of these, 22 sought information and advice, 20 were identified as being at risk of retaliation for having engaged in a protected activity, and four persons submitted official requests for protection against retaliation. The Ethics Office determined that in two of the four official requests for retaliation, a prima facie case of retaliation had not been established, while in the other two cases, a prima facie case of retaliation was established, and those cases were referred for investigation to the IGO (Figure 7 below). Both cases are pending the outcome of the investigation at the time of drafting this report.

**Figure 6. Overview of Protection against Retaliation requests received since 2018**

Years	Category			
	Seeking information and advice	Risk of retaliation	Requests for protection against retaliation	Total
2018 (since Sep.)	1	7	3	<b>11</b>
2019	14	19	10	<b>43</b>
2020	38	10	7	<b>55</b>
2021	29	7	5	<b>41</b>
2022	22	20	4	<b>46</b>

**Figure 7. Overview of cases where prima facie was/was not established**

Years	Category						Total
	Prima facie case of retaliation	No prima facie case of retaliation	Retaliation complaint substantiated	Retaliation complaint unsubstantiated	Pending investigation	Case withdrawn	
2018 (since Sep.)	0	3	0	0	0	0	3
2019	3	6	2	1	0	1*	10
2020	2	5	0	1	0	1**	7
2021	1	3	0	1	0	1*	5
2022	2	2	0	0	2	0	4
<b>Total</b>	<b>8</b>	<b>19</b>	<b>2</b>	<b>3</b>	<b>2</b>	<b>3</b>	

\* In two cases the complainants withdrew their requests for protection against retaliation before determination.  
 \*\* The Ethics Office found a prima facie case of retaliation and referred the matter for investigation. After the complainant left the Organization, the investigation into the alleged retaliation was discontinued.

- 31. In terms of numbers and profiles, the trends remained largely similar in 2022 compared to previous years. Staff in the national category accounted for the highest number of cases (26 cases), followed by staff in the international category (14 cases), and five members of the affiliate workforce approached the Ethics Office with retaliation concerns.
- 32. The main alleged underlying incidents that prompted retaliation concerns were as follows: Grievance with a manager (12 cases), sexual harassment (10 cases), abuse of authority (six cases), fraud (three cases), security and health (three cases), appointments and posting (two cases), benefits and entitlements (two cases), harassment (two cases), conflict of interests (two cases), gross negligence (one case), grievance with a peer (one case), sexual exploitation and abuse (one case) and no incident (one case).
- 33. Service providers do not fall within the scope of the policy, but one such individual was referred to the Ethics Office with a retaliation concern.
- 34. Women were twice as likely to raise retaliation concerns (31 cases), compared to men (15 cases).
- 35. Most retaliation concerns came from the MENA region (18 cases), followed by the East and Horn of Africa (nine cases), Europe excluding Headquarters (seven cases), Asia and the Americas (four cases each), and West & Central Africa and the Headquarters (GVA, BUD, CPH) with the fewest (two cases).
- 36. The subjects of retaliation concerns tended to be men (25 cases) compared to women (15 cases). Six complainants did not reveal the subject of their complaints.
- 37. The Ethics Office continued its outreach activities and created the first ever Protection against Retaliation Periodical covering the period under which the former protection against retaliation policy was in force (September 2018 to July 2022) as well as during the second half of 2022 when the revised AI on PaR came into effect. The Periodical is due to be published in the third quarter of 2023; its aim is to showcase the work of the Ethics Office regarding protection against retaliation. The Periodical is a unique opportunity to provide personnel with information regarding retaliation matters that Ethics and the IGO work on and address. It also allows for more transparency among the workforce and encourages and enables

personnel to report misconduct as part of the desired Speak Up culture. The Digest complements the all-staff broadcasts of the High Commissioner's disciplinary actions in matters of misconduct, and the Inspector General's Office Report on the outcome of investigations.

38. In 2022, the Ethics Office took action to promote enhanced clarity of what constitutes a protected activity and retaliation under the revised PaR policy. The Office developed training materials to provide clear and straightforward information to all staff related to the PaR policy, while ultimately focusing on ensuring that the perceived lack of understanding of the protection from retaliation process does not deter colleagues from speaking up. The Ethics Office gave briefings and training on the prevention of retaliation to the Peer Advisors for each of the seven regions, as well as experiential learning on abuse of authority, harassment, and retaliation, thereby giving colleagues more confidence to raise concerns.

## D. CODE OF CONDUCT DIALOGUE (COCD)

39. The Ethics Office has adopted a values-based approach to ethics since 2018, with the intention of promoting a move from one mandatory annual refresher session on the nine Code of Conduct principles to continuous dialogues. Ethics identified the benefit of having multiple CoCD sessions throughout the year, noting that they provide for ongoing dialogue, enable colleagues to reflect and make ethics and value-based decisions, while simultaneously fostering a culture of ethics and integrity throughout UNHCR.
40. The CoCD sessions are based on the premise of promoting an ethics culture with the aim of:
- a. stewardship and using resources well;
  - b. treating the people we serve in a dignified and respectful manner; and
  - c. managing people in a way that builds trust and collaboration.

### Sudan. Aid agencies respond to humanitarian needs of flood affected communities.

© UNHCR/Vanessa Zola





As such, the CoCD sessions are directly linked to the broader accountability framework of UNHCR.

41. Since trust and collaboration are the foundations for a culture based on ethics, operations and offices were asked to have one mandatory CoC dialogue on “Values in Action – Trust and Collaboration”, which aimed at reconnecting colleagues with UNHCR’s core values and facilitating an opportunity to co-create behaviour and insights about how each person can contribute. The idea was to offer the opportunity for colleagues to “Stop Pause and Reflect” on their own role and contribution to a value-based, organizational-wide culture that upholds ethical behaviour and provides a space for open dialogue and collaborative learning.
42. The planned approach also invites operations and offices to have specialized and tailored CoC dialogue sessions on themes of relevance to their context. Findings from pre-session surveys were used to show the relevance of a tailored approach. Results from several pre-session surveys (496 responses across nine operations), showed that operations had different needs, which confirmed the usefulness of making the sessions tailor-made.
43. To support tailored dialogue sessions, three adaptive modules were used in 2022:
  - a. Conflict of Interest
  - b. Inclusion and Diversity
  - c. A workplace free from abuse of authority, harassment, and retaliation

A fourth module (still being developed) on Speaking Up on Fraud and Corruption was piloted in 2022.
44. Last year, 117 country operations and bureaus, as well as 15 headquarters offices, totaling 132 operations and offices, reported having had a mandatory CoC dialogue session, and 7,451 colleagues are reported to have participated in those sessions.
45. Furthermore, significant efforts were made to increase outreach and give support to offices in their planning for, and enacting of, the CoC dialogues. In 2022, 65 focal points and 414 facilitators worldwide were part of the network, as compared to 389 facilitators in 2021 and 358 in 2020. The number of colleagues who were connected via the CoCD facilitators rose to 521 on the Yammer group, compared to 476 the year before. The Yammer group was used to share information, offer webinars, and encourage interaction among facilitators.
46. With this increased outreach and support, the Ethics Office was able to directly support 46 operations: 31 through co-facilitation, nine in-person sessions, 22 online, and 15 in the co-creation of the agenda or their sessions.
47. Moreover, in 2022 concerted efforts were made to engage senior managers in the CoCD exercises. These included outreach to:
  - a. Representatives in emergency settings,
  - b. locations where there were many new recruits,
  - c. managers who were recruited from outside UNHCR, and
  - d. Representatives who championed the new approach, so that they could share key CoCD messages with other Representatives at the Global Representatives Meeting, as well as complete an Ethical and Values-Based Leadership course.
48. This engagement with leaders and managers as well as the promotion of a collaborative approach involving other entities, had a positive impact, since the data available to the Ethics Office shows that management was involved and actively participated in arranging 44 sessions in 28 operations. In addition, PWS, Office of the Ombudsman and Mediator, DHR and Peer Advisors Network played prominent roles in the planning and execution of CoCD sessions with the Ethics team.

49. Other collaborative efforts of the Ethics Office addressing day-to-day complaints and workforce problems were with:

- a. The Global Staff Association or local Staff Councils: 43 sessions in 30 operations
- b. Peer Advisors: 30 sessions in 11 operations
- c. PSEA or GBV focal points: 28 sessions in 14 operations
- d. Psycho-social Support (Staff Welfare): 18 sessions in four operations
- e. Risk Advisors: nine sessions in six operations
- f. Office of the Ombudsman and Mediator: four sessions in three operations
- g. Diversity and Inclusion Office: two sessions in two operations

## E. TRAINING, OUTREACH AND EDUCATION

50. In addition to the mandatory and ongoing Code of Conduct dialogue sessions, which all operations and offices are required to undertake, Ethics proactively facilitated training, outreach, and learning, and prioritized areas where there was less regional engagement, all of which centered on the following three areas:

- a. Promoting and developing ethical and values-based leadership;
- b. Building capacity in support of ethics and integrity among teams in operations and offices so that ethical behaviour continues to be at the forefront of personnel's decisions and conduct;
- c. Imbedding the messages of ethics and integrity in guidance and policy documents.

### Promoting and developing ethical and values-based leadership

51. In 2022, the Ethics Office completed its arrangement with the Human Resources' Global Learning and Development Center's leadership section and the Norwegian

company, MIND A/S, which involved leadership and organizational development, as part of the roll out of the Ethical and Values-Based Leadership (EVBL) course. The EVBL course used an approach to personal and organizational change based on positive psychology and a focus on human strengths and resources. These build on research on the underlying psychological mechanisms of behavior change, which they translated into practical ways of aligning personal values with organizational values, culture and change processes. The course had an enrollment of 276 senior and middle managers in two cohorts, of whom 140 were in the 2022 cohort. It had a relatively high completion rate and the feedback from the course was very positive.

52. The EVBL course-aligns with the Ethics Office's strategic aims of promoting a culture where the workforce experiences and contributes both to an organizational culture that values trust, inclusion, collaboration, dialogue, and integrity, and to ethical decision-making where personal and professional decisions are based on the values of the UN and UNHCR and are compliant with organizational rules.

### Building capacity in support of ethics and integrity in operations and offices

#### *Dialogue facilitation*

53. A network of more than 400 CoCD facilitators were kept abreast of developments by more than 25 outreach and response messages in the CoCD Yammer group and through online and face-to-face learning events. The messages were seen on average by 200 colleagues. To support the facilitators, CoCD tools were shared, and webinars held on the planned approach. In addition, direct support was provided to 46 individual CoCD sessions. A regional, face-to-face skills development workshop for 30 colleagues from operations in the East and Horn of Africa region took place in September, building the capacity of facilitators both at the regional and operational levels. An

intranet story captured the key learnings and reflections from the event.

### *Engaging with others*

54. Since 2021, it has been a priority to increase collaboration between the Ethics Office and the Enterprise Risk Management Service and the Risk Focal Points in order to ensure a more risk-informed approach to implementing ethics and integrity activities, such as the CoC Dialogues. Significant progress was made on this in 2022, leading to increased engagement from the Risk Focal Point Network in ethics and integrity work.

### *Peer Advisors Network*

55. The Peer Advisors Network (“PAN”) is a global network of UNHCR personnel who volunteer their time to support colleagues in need. They are trained to provide low-intensity psychosocial support and guidance on dispute resolution and conflict management, and they act as ethical influencers throughout the organization. The network is field focused, supported by a Coordinator who works under the supervision of the Steering Committee,

comprising the Psychosocial Wellbeing Section, the Office of the Ombudsman and Mediator, and the Ethics Office. The UNHCR PAN is a unique model of PEER support within the UN. In 2022, the PAN Coordinator contributed to the development of similar frameworks within the UN.

56. The Ethics Office participated in 53 of the regular PAN meetings, giving briefings and promoting ethical principles, and delivered 14 dedicated presentations to the network. The Ethics Office also supported the development of the first ever PAN virtual training, including aspects of organizational values and ethical decision-making, which all elected Peer Advisors are required to complete.

### **Embedding the messages of ethics and integrity in guidance and policy documents**

57. During the year, the Ethics Office had the opportunity to review and provide input for several organization-wide policies, reviews, and reports. Reviews and input

## Greece. UNHCR ramps up support after fire destroys Moria reception centre.

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were provided to policies like the UNHCR People Management Excellence Learning Portfolio, the Certification Programme in HR Management (CP-HRM); an Induction course for Ukraine Operation; the Policy on Flexible Work; the Information Security Policy, the Policy on Registration; Identity Management and Biometrics; the Policy on the UNHCR Office of the Ombudsperson and Mediator, the Policy on Planning for, Getting and Showing Results; the Protocol on Governance, UN-SWAP 2021 Reporting; the JIU Review of the Ethics function and the Staff Regulations and Rules. The involvement of the Office led to, for instance, better reflection of the values-based approach to ethics in organization-wide documents, as well as helping to ensure specific reporting. One of the most important areas of work in 2022 for the Ethics Office was the revision of the Administrative Instruction on Protection against Retaliation.

58. Additionally, Ethics contributed to the review of the International Civil Service Standards of Conduct.

## F. COOPERATION WITH UNHCR ENTITIES ON INTEGRITY ISSUES

59. The Director of the Ethics Office continued to chair the UNHCR Informal Conflict Management Support Group (ICM-SG) comprising the Directors from the IGO, LAS, PWS, DHR, and the Office of the Ombudsman and Mediator. This group reviews and discusses concerns, including those that come through the Support Desk that relate to UNHCR's senior staff. During 2022, monthly informal consultation meetings were held as a confidential platform for discussion and consultation in order to:
- a. strengthen synergies between services and be an interlocutor for UNHCR leadership in the early identification and prevention of dysfunctions requiring appropriate action;

- b. harmonize corporate messages to support conflict management and unethical behaviour; and
- c. support related policy reviews in UNHCR.

## G. UNITED NATIONS COHERENCE

60. During 2022, the Ethics Panel of the United Nations (EPUN), chaired by the Director of the Ethics Office of the UN, continued to serve an essential function in promoting the coherent application of unified ethical standards throughout the system.
61. As is customary, the Director of Ethics contributed to the coherence of the UN system mainly through regular interaction with the members of EPUN, such as participating in monthly EPUN and *ad hoc* meetings, including the Working Groups on Outside Activities and Gifts and Honours. The Ethics Office contributed to three reviews of determinations by the UN Ethics Office on retaliation matters on behalf of the Alternate Chair of the Ethics Panel.
62. In addition, the Director was 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 the Director participated in the annual ENMO 2022 meeting at UNESCO in Paris. In that context, the Ethics Office co-led a panel discussion on Conflict of Interests. At the same time, the Director actively contributed to the debates and discussions of the informal "Geneva chapter of ENMO".
63. The Director accepted several speaking engagements and activities that helped to shape and sharpen the approach and knowledge of the Ethics Office. These included talks with ethics and compliance colleagues in the public and private sector, a peer network of ethics experts in the Mont Blanc Circle, and interaction with master's students at the DIHAD Humanitarian College,



University of Murcia, Spain, on International Humanitarianism – International Humanitarian Law and Ethics.

## H. UNITED NATIONS FINANCIAL DISCLOSURE PROGRAM

64. 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 to assess actual, apparent or potential conflicts of interest of UNHCR staff, who are required to file an annual financial disclosure statement so that appropriate advice may be provided. It helps to ensure that UNHCR colleagues observe and perform their functions in a way

that is 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.

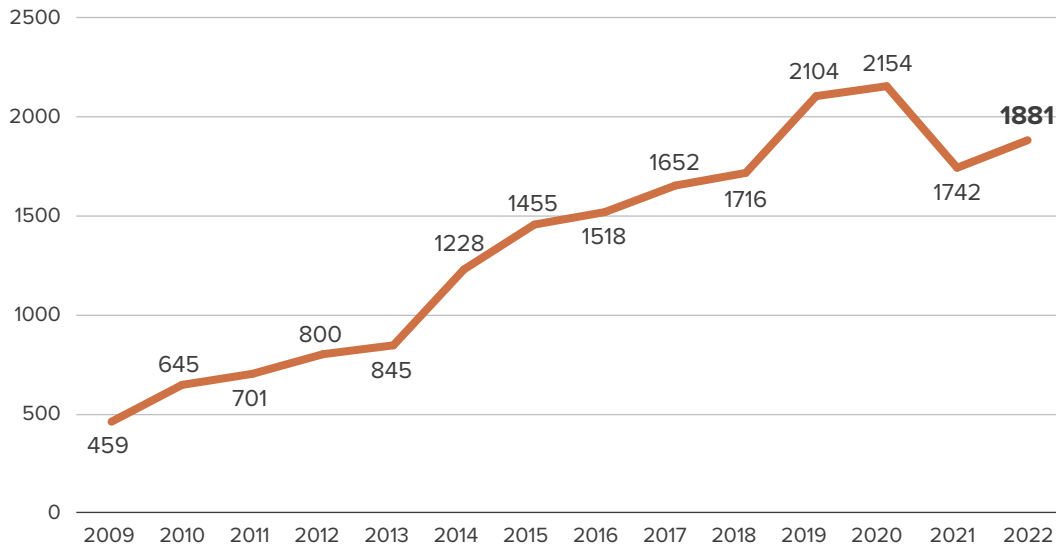
65. The UNHCR Ethics Office worked closely with the United Nations Ethics Office (New York), which administers the UNHCR FDP for eligible UNHCR colleagues, that is, those whose grade is D1 and above, procurement officers, those involved in the investment of United Nations assets, all members of contract committees, all Ethics Office personnel and all colleagues who approved spending of a yearly cumulative amount of \$100,000 in 2022. During the 2022 annual filing cycle, conducted from 1 March 2022 until 31 December 2022, the number of UNHCR colleagues who participated in the UNFDP reached 1,881.

Afghanistan. A refugee returnee family receives a cash grant and other support in Kabul.

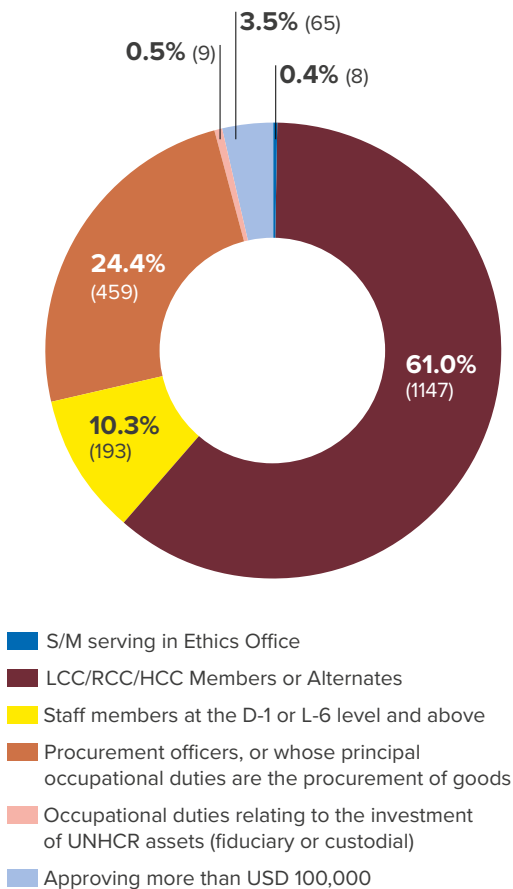
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**Figure 8. UNFDP participants, 2009–2022**



**Figure 9. Criteria on UNFDP participation for 2022 cycle**



66. A total of 1,271 filers (67.57 per cent) submitted their disclosures by the set deadline of 31 March 2022 (compared to 1,212 filers or 70.30 per cent in 2021); the remaining 610 filers (32.43 per cent) all submitted theirs by the extended deadline of 30 September 2022. For the first time in many years, all filers submitted their disclosure statements by the extended deadline. Of the 1,881 filers, 67 potential conflicts of interest were identified compared to 41 in 2021. In addressing the 67 potential cases of conflicts of interest, the Ethics Office (New York) recommended, without being limited to, the following mitigation measures:

- a. Divesting, freezing or selling financial assets;
- b. Terminating engagement in certain outside activities if proper authorization has not been obtained;
- c. Obtaining recusal from working with particular vendors or in specific job functions;
- d. Requesting and receiving approval from their head of entity (or appropriate delegated authority) to engage in their outside activity, employment, or occupation.

67. In 2022, the Ethics Office (New York) also conducted a verification process of the declarations submitted. Ninety-four UNHCR filers, compared to 78 in 2021, were selected for verification. Eighty-four filers complied with the verification process. The outstanding 10 will be included in the 2023 verification process and referred for appropriate follow-up.

68. Going forward, the Ethics Office will continue to raise awareness regarding the importance of the UNFDP exercise. Ethics will also continue to support filers in following up when they are not able to comply with the requirements before the set deadline; as well as proactively address conflicts of interest stemming from filers' personal relationships, and obligations to seek approval for certain types of financial activities.



Honduras. UNHCR staff member interacts with a child at a community centre in Tela, San Pedro Sula.

© UNHCR/Daniel Dreifuss



## 4 CONCLUSION

69. Ethics is the bedrock of any organization. In UNHCR, ethics provides and cultivates a safe space for everyone, irrespective of their contract type, to raise their concerns and to speak up. It also ensures that the Organization, alongside its workforce, remains transparent and in line with its values.
70. Ethics has determined that in order to continue to effectively support UNHCR and its personnel, it will undertake a number of awareness-raising campaigns throughout 2023 and 2024, including on the updated PaR. As regards the PaR, the awareness-raising will serve to inform the workforce of the main policy changes and to encourage a stronger and more effective Speak Up culture.



71. Considering the positive reactions and early positive performance indicators of the Support Desk, Ethics will discuss additional information campaigns to be undertaken in 2023–2024 with other integrity family members that are part of the Support Desk. Additionally, Ethics will closely monitor matters once they are referred to entities to ensure that they are addressed and closed in a timely manner.
72. In terms of the Financial Disclosure Policy, guidance will be published on the rationale of the exercise and why it is mandatory and necessary. Ethics has identified this as a need.
73. Having observed the success and continued need for the Code of Conduct (CoC) education, Ethics will expand its CoC education and outreach program. This will be undertaken by missions in identified field locations with a specific focus on the most sensitive areas of UNHCR. In parallel, Ethics will also work on identifying the most cohesive and best performing teams, learn how they operate, and feed this knowledge into the Ethics education and outreach initiatives.
74. The feedback from CoC dialogue focal points continues to be positive, and there is expressed need on specific subjects (for example, social media and political activity). Furthermore, Ethics will give more targeted training for the Peer Advisors Network (PAN) and CoCD focal points, and where appropriate will also include other members of the integrity family thereby providing a more cohesive training package.
75. Ethics Office will continue to be involved and play a role in monitoring Management Implication Reports (MIR) to identify certain patterns/trends in operations/regions and to offer support.
76. In order to increase transparency with our member states, stakeholders and the public, a dedicated Ethics internet site on the UNHCR main public page will be developed, showcasing the mandate of the Ethics Office and how it operates.





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