ethics office

annual report 2021
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executive summary

In 2021 the Ethics Office oversaw an identifiable increase in its services and laid a solid foundation for further engagement with staff across the Agency’s areas of operations. The Chief, Ethics Office continued to build relationships with UNRWA’s senior leadership. While attending to key responsibilities, the Chief, Ethics Office, cognizant of the Office’s independence, confidentiality, and impartiality, engaged with senior management on issues of potentially significant impact on the Agency’s culture of ethics, integrity, and accountability. In that regard, the Ethics Office, based on its mandate in relation to gender equality and prevention of gender-based violence including domestic violence, contributed to the review of the actions resulting from the hunger strike incident in Gaza. The Office also contributed to drafting the terms of reference of the Women Advisory Forum established by the Commissioner-General to provide a safe place for systematic engagement between the Commissioner-General and female staff. The Chief, Ethics Office, also participated actively in reflections on ethics and general staff wellbeing issues at the senior management retreat. Through these activities the Ethics Office established a gradual yet growing influence and impact on policy and decision-making, with the aim of building a more positive ethical culture and strong ethical leadership. Through demonstrating the Ethics Office’s availability and willingness to discuss issues of integrity holistically, and in cooperation with senior management, these interventions increased its standing and relevance.

An important development in 2021 were Ethics Office missions to the different field offices. Following a year long delay due to Covid-19, these visits raised the visibility and further instilled staff confidence in the services and staff of the Ethics Office. Direct contact remains the preferred way of communicating with personnel. The increase in the number of personnel approaching the Ethics Office, as well as the evaluation of the Ethics Refresher training launched at the end of 2021, clearly demonstrate that staff prefer in-person dialogue and training sessions. The same observation emerged from feedback received through the Office of the Special Coordinator on Sexual Exploitation and Abuse (OSCSEA) annual survey of UN personnel. The impact of the missions was demonstrated by a 92 percent increase in requests for confidential ethics advice in comparison to last year. The majority originated from staff in the fields where Ethics Office is located (Jordan) followed by the operations where the Ethics Office travelled on mission and met with personnel. It clearly shows how in-person outreach and presence is a priority for the years to come, provided sufficient financial resources are available.

The Ethics Office also strengthened its relevance by concentrating its efforts on middle management. This was pursued through training and involving the management in the field offices in re-establishing the Ethics Focal Points Network. By developing new Terms of References for the Ethics Focal Points, the Ethics Office laid the basis for a well-functioning, integrated network of focal points in each Field to assist the Ethics Office with presence and outreach. Additional time and resources are required to capacitate the Ethics Focal Points to prepare them for their role, and the Ethics Office developed a project proposal to support a workshop and funds for training and outreach activities. The Ethics Office’s efficiency and relevance will depend heavily on the presence in the field of “ethics ambassadors” who are fully motivated and will be equipped to take on this task, on a voluntary basis. Middle managers in headquarters and all areas of operation except Gaza were also targeted with a specialized information sessions on prevention and response to sexual harassment for managers. This initiative, which was rolled out virtually, generated discussion and involvement of managers on the topic of sexual harassment and emphasized the importance of ethical leadership, especially on the issue of addressing prohibited conduct of all types.

In the area of protection from sexual exploitation and abuse and sexual harassment (PSEAH) coordination, significant progress was made in the areas of prevention and response, particularly in the critical area of victim support. Activities included mapping available support services for victims of both sexual exploitation and abuse and sexual harassment (SEAH), capacitating PSEAH Focal Points, and developing a specialized training for frontline staff. The Ethics Office also revised and disseminated awareness raising materials Agency-wide targeting personnel and beneficiaries to improve knowledge of standards and reporting mechanisms. Improvements in the key area of risk mitigation were also made, with the Ethics Office working to include SEAH in the installation assessments, an Agency-wide risk assessment tool. The Ethics Office also succeeded in advancing the SEAH agenda at the highest levels to improve management and coordination. Key actions included updating
the management compact letters to ensure Director-level responsibility, and sessions on SEA in management retreats. Despite the progress, challenges remain with limited department and field capacity to strategize, develop, implement, and report on PSEAH activities, particularly policies and training.

The Ethics Office also started a major overhaul of its policies and finalized drafts of the whistleblower policy and a revised Code of Ethics which will be rolled out in 2022. Work was also started on revising the PSEA policy, which requires consultation and agreement with several departments and field offices. Given that the previous Ethics e-course was very long, the Ethics Office revised the Ethics e-course, and shortened it significantly. Given that not all personnel have easy access to computers, the challenge of providing basic ethics training in person persists due to inadequate human resource capacity as well as reduced financial resources for Ethics Office personnel to travel. In 2022, with additional project funding, the Ethics Office aims to address the gaps in mandatory training completion for staff without computers and to establish a longer-term training strategy.

1. **Introduction**

1. The present report is submitted pursuant to UN Secretary-General Bulletin ST/SGB/2007/11 and the UNRWA Organizational Directive 30 (Terms of Reference of the Ethics Office), requiring annual reporting on the activities of the Ethics Office and any related evaluations and assessments. It is the twelfth report since the designation of an Ethics Officer in UNRWA in January 2008 and the eleventh since the establishment of the UNRWA Ethics Office in September 2009. In accordance with Section 24 of the OD 30, the draft report was shared for review and advice with the Advisory Committee on Internal Oversight (ACIO) and the UN Ethics Panel. The report will be submitted to the Commissioner-General and to the Advisory Commission on UNRWA.

2. In accordance with the mandate of the Ethics Office to nurture a culture of ethics, integrity and accountability within the Agency, the present report provides an overview and assessment of its work and achievements during the reporting period.

2. **Background and general information**

3. The Ethics Office in UNRWA was first established in 2009 after the promulgation of the instruction from the Secretary-General to all separately administered organs and programmes, including UNRWA, to establish their own separate ethics offices (ST/SGB/2007/11).

4. Since the updated Organizational Directive 30 (Terms of reference of the Ethics Office) in October 2020, the Ethics Office has been administratively attached to the Executive Office but functions with full independence, impartiality, and confidentiality. The updated OD 30 reafirms the “operational independence” of the Ethics Office and specifies the authority of the Chief, Ethics Office, to “initiate, carry out and report on any action, which he/she considers necessary to fulfil the Office’s responsibilities for ethics as set forth in this Directive”. The Chief, Ethics Office, has also informal access to the Advisory Commission on UNRWA. In line with the OD 30, the Chief, Ethics Office met regularly with the Commissioner-General to discuss issues of concern.

5. In 2021, the Chief, Ethics Office, participated in quarterly meetings with the ACIO and kept the Commissioner-General appraised of the performance of the ethics function. The Chief, Ethics Office, also participated in Senior Management team meetings and in meetings with the Advisory Commission in June and September 2021.

6. The overall objectives of the Ethics Office are (i) to assist the Commissioner-General in promoting a culture of ethics, integrity and accountability, (ii) to create an environment free of harassment, including sexual harassment, and abuse of power, and (iii) to enhance the trust in and the credibility of UNRWA, both internally
and externally. The Ethics Office fulfils this mission by providing services to management and individual staff members in six areas:

- confidential advice and guidance to personnel and management on ethics issues;
- policy support and standard setting;
- ethics training, awareness-raising and outreach;
- administration of the financial and outside interest disclosure programmes for international and area staff;
- administration of the protection against retaliation policy; and
- coordination of initiatives on preventing and responding to Prohibited Conduct (Discrimination, Harassment, including Sexual Harassment, and Abuse of Authority) and Sexual Exploitation and Abuse.

7. The Ethics Office is comprised of the Chief, Ethics Office, at P-5 level, a Sexual Misconduct Task Force Coordinator at P-4 level (Project funded), and an Ethics Officer (Area Officer at the Grade 17). In 2021, using the Ethics Office budget, an Administrative Officer B (Area Staff level Grade 13) was recruited on a Daily Paid basis. The Administrative Officer is tasked with office management and logistics, assistance with case management, record keeping of training events, and administrative correspondence.

8. In 2021, the Ethics Office successfully advocated for and received approval through the ACABQ for the creation in 2022 of a P-3 Ethics Officer position. With support from the Department of Human Resources (HRD), during the last quarter of 2021, the Ethics Office received a Policy Officer (at P-4 level) seconded for six months from RedR Australia to update and develop sexual misconduct policies.

9. An ongoing issue of concern has been the continuation and predictability of funding of the Sexual Misconduct Task Force Coordinator. The position received donor funding until the end of March 2021, after which the Agency used internal funds to maintain the position. Its creation was not included in the 2022 ACABQ proposal but was prioritized in the Agency’s request to the ACABQ for creation of a post in 2023.

10. In 2021, the Ethics Office continued to rely on interns for assistance to meet its objectives and work plan. Interns were tasked with researching and collating comments on whistle blower policies, development of ethics-related tools and legal referencing and collating comments of the updated Code of Ethics (formerly Ethics Handbook).

11. Despite these budgetary challenges, the year 2021 was marked by significant efforts towards developing stronger policies, providing quality trainings and meaningful outreach to strengthen capacity and to further increase awareness, understanding and compliance with UNRWA’s guiding principles and standards of conduct.

12. As the Covid-19 pandemic evolved in 2021 and posed several challenges, the Ethics Office worked to minimize the disruption of its services to staff across all five field areas. It continued to adapt to the Covid-19 restrictions and made use of online platforms to promote ethical standards, provide advice and guidance, training and awareness-raising.
13. In line with the Ethics Office mandate, requests for services covered a broad range of categories:

- Ethics advice (174 confidential ethics advice and 61 Ethics Office alerted, totaling 235 requests);
- Training, education and outreach (217 - comprising 40 sessions in addition to 177 training and outreach activities);
- Protection against retaliation (PaR) for reporting misconduct and for cooperating with duly authorized audits or investigations (13 requests);
- Policy support and standard-setting: 31 documents and forms in total;
- Financial and outside interest disclosure: UNFDP: 10 and ASDIP: 22 (totaling 32 inquiries); and
- Coherence (39 items).

14. Overall, in 2021, the Ethics Office’s request for services have more than doubled, from 286 last year to 567 in 2021. This increase is mainly attributable to the Ethics Office’s proactive approach towards outreach and training activities. With the same number of staff as in 2020 for most of the year, the Ethics Office continued to adapt and to innovate in delivering its services. Below are some of highlights of the Ethics Office activities across its range of services.
3. **Activities of the Ethics Office**

1. **Advice and guidance**

15. The Ethics Office serves as an independent, neutral, and impartial office and operates autonomously from the management and staff. It assists managers and other staff in upholding the highest levels of integrity, efficiency, and competence by providing confidential advice on relevant standards of conduct and by clarifying staff and Agency obligations. The Ethics Office supports staff in making decisions that are consistent with the values and rules of the Agency and provides an essential risk prevention function.

16. The Ethics Office advises and provides guidance staff on a broad range of issues, including conflicts of interest, engagement in outside activities, prohibited conduct, workplace issues and employment-related concerns. It also provides advice and support to management to ensure that the Agency’s rules, policies, procedures, and practices reinforce and promote the standards of integrity enshrined in the Charter of the United Nations. It does not replace existing mechanisms for reporting misconduct or resolving grievances.

17. During the reporting year, the Ethics Office responded to 235 requests for confidential ethics advice including where the Ethics Office was alerted on ethical issues, an increase of 92 percent in comparison with 2020. It therefore also largely exceeded its Key Performance Indicator set at 180 requests for 2021. Figure 3 provides a breakdown of the various types of advice requested.
18. The individual requests for confidential ethics advice indicate that 50 percent of the requests came from female staff, and 44 percent of the requests from male staff (Figure 4). 72 percent came from Area staff, while 22 percent came from International staff and 6 percent from anonymous or external sources (Figure 5). A breakdown by location (Figure 6) shows that most of the of requests came from Headquarters Amman, representing 33 percent of the requests, followed by 21 percent from the Jordan Field Office, 20 percent from Lebanon Field Office and 11 percent from Syria Field Office. There were fewer requests from the other field offices, with the fewest requests from the West Bank Field Office. The physical presence of the Ethics Office staff in Jordan, and the missions it conducted to Lebanon and Syria with the opportunity this provided for face-to-face approaches probably explains the higher prevalence of requests from Headquarters and the Jordan Field Office, and those field operations.
19. The increase in requests for confidential ethics advice is very likely related to the easing of pandemic workplace restrictions. In 2020, many staff members telecommuted from home for most of the year. In the third quarter of 2021, staff returned to the office with few exceptions. Furthermore, the Ethics Office conducted three field missions, to Lebanon, Syria and Jordan offices, where it provided in-person advice and established trust with staff members. Most requests were still related to prohibited conduct and employment, such as issues relating to managerial actions, conditions of work and contractual matters. The managerial issues were mainly the result of harassment and abuse of authority, with a growing number of online disrespectful communications and an increasing perception of gender discrimination. A breakdown of the number of cases of prohibited conduct reported demonstrate that 52 percent were reported by male staff, while 45 percent were reported by female staff. In addition, 70 percent were reported by Area staff, and 27 percent by international staff (see Figures 7 and 8).
20. The Ethics Office Case Management System (CMS) is on IMTD’s roadmap but has faced delays due to recent developments, namely an assessment of whether the CMS should be integrated into a wider Agency database (subject to data confidentiality requirements). In the interim, to better manage and track all lines of ethics services, the Ethics Office created its own comprehensive online, Case Management System (CMS). The system enables the recording of all requests received, including confidential ethics advice, broken down by sub-categories. This allows for an in-depth analysis of confidential ethics cases by field, staff level and nature of the case. The CMS will allow for a better informed 2022 Ethics Office workplan, especially in the field of outreach, capacity-building (including standard-setting) and training. The data for all cases received in 2021 have been entered into the new CMS which is accessible only to the Ethics Office staff.

21. Following the establishment of the Office of the Ombudsman in the third quarter of 2021, the Ethics Office has discontinued its previous facilitation of discussions between two parties over employment related issues.

2. Financial and outside interest disclosure

22. UNRWA has strict requirements for disclosure of actual and potential conflicts of interest related to procurement, recruitment, investigations and programme eligibility and entitlement areas (‘transactional disclosure’). UNRWA joins the rest of the UN system in requiring staff members who are in senior positions of authority or who hold specific positions which entail financial decision-making authority to annually disclose personal financial assets and outside affiliations and interests. Any international staff required to disclose must do so by participating in the United Nations Financial Disclosure Programme administered by the UN Ethics Office with support from the UNRWA Ethics Office. The Ethics Office administers a separate programme for area staff required to disclose outside activities and other interests. As part of the Area Staff Declaration of Interest Programme (ASDIP) staff members are requested to annually submit a Declaration of Interest Statements. Both programmes promote staff awareness of conflict-of-interest situations and preserve and protect the integrity of the organization and participating staff, thereby maintaining and enhancing public trust in UNRWA. The Ethics Office, or a designated third party in the case of international staff, reviews these disclosures to identify real or potential conflicts of interest and provide advice accordingly.

23. A total of 58 international staff members were required to file financial disclosure statements, representing a compliance rate of 100 percent. This figure includes all staff members at the D-1 level and above, all staff (regardless of grade) whose principal duties include procurement and investment functions, staff from the Ethics Office and all staff with access to confidential procurement or investment information.

24. In 2021, the Ethics Office finalized and launched the Area Staff Declaration of Interest online Form, thereby automating the financial disclosure programme for Area Staff. This was successfully done in coordination with IMTD using SharePoint as a platform. Area staff required to file a Declaration of Interest Form covering their outside affiliations and other interests include (i) all those whose principal occupational duties involve procurement or investment functions, (ii) all those responsible for requisitioning and certifying requisitions of significant quantities of goods and/or services, and (iii) all those serving on contract committees. The purpose of the online ASDIP form is to streamline and make the process more efficient. Technical issues with staff access to the Active Directory (AD) presented challenges and so far, 40 percent of the 1,160 staff have completed the form. The Ethics Office is working with the various field offices to ensure that staff without an AD will be able to complete the on-line form in Q1 2022. It is expected that IMTD will create AD accounts for each UNRWA staff member in 2022 which will help ensure a smoother process for the next filing cycle. The submitted forms have been reviewed by the Ethics Office and by the end of 2021, 22 staff were issued
advisories where a possible conflict of interest was detected, mostly related to family relationship issues in addition to outside activities.

25. Upon careful review of the disclosure forms and additional documentation, as well as consultation with the concerned staff members, the Ethics Office determined that in all cases no action was required. This corroborates the 2020 results and provides further evidence that UNRWA staff are aware of the policies and requirements related to outside activities and conflicts of interest.

3. Protection against Retaliation

26. UNRWA encourages personnel to report misconduct and/or cooperate with authorized audits or investigations without fear of reprisal. To protect those who make such reports, UNRWA has a policy for protection against retaliation. In accordance with the policy, the Ethics Office receives requests for protection against retaliation and conducts preliminary assessments to determine whether a complainant has engaged in a protected activity and, if so, whether the protected activity was a contributing factor in causing the alleged retaliation. If the Office determines that a prima facie case of retaliation has been established, the matter is normally referred to DIOS for investigation.

27. In 2021, there was an increase compared to the previous year in requests for protection against retaliation (13 vs. eight in 2020). The Ethics Office completed nine out of the 13 cases. Out of the nine completed cases, there were two prima facie cases referred to DIOS and four interim protective measures were taken. The majority (77 percent) of cases involved female staff and are located in offices where the Ethics Office has presence or has travelled on a mission. As with the requests for confidential advice, the increase in requests for protection against retaliation highlights the importance of field missions through which the Ethics Office enhanced its visibility in the field, successfully increased awareness and built trust during in-person meetings and trainings with staff members. Nonetheless, the Office has experienced some delays in responding to complaints of retaliation due to the lack of human resource capacity, especially where those requests were in Arabic and therefore could only be assessed by the Ethics Officer.

28. At the end of 2021, the Ethics Office started the review and update of the Protection against Retaliation (PAR) policy. The new policy will replace the current PAR policy which was first issued in 2007. It draws on extensive research on best practices from other UN Agencies, the JIU recommendations set out in “Review of whistleblower policies and practices in United Nations System Organizations” (JIU/REP/2018/4) and the UN Secretary-General’s Bulletin “Protection against retaliation for reporting misconduct and for cooperating with duly authorized audits or investigations” (ST/SGB/2017/2/Rev.1). The revised PAR policy proposes to broaden its coverage to include as protected activities the protection for staff, including interns, and those, under certain circumstances and time limits, who have left the Agency. The policy will better articulate temporary protective measures, whilst also designating which activities are not considered as protected activities such as the legitimate application of regulations, rules or administrative policies or the mere expression of disagreement regarding work performance. Given that the previous policy only took into account DIOS, which the Ethics Office was administratively part of, it will now articulate the specific role of the Ethics Office as an independent office, with clear processes and timelines. The expected completion and issuance of the PAR policy is anticipated in 2022.
4. Training, education and outreach

29. The Ethics Office adapted to the pandemic-related restrictions through investing in online training and outreach. In 2021, a major focus of the Ethics Office was the development and launch of three blended trainings on Anti-Fraud and Anti-Corruption (AFAC), Harmonious Workplace and Ethical Leadership with final tests, certificates, and translation into Arabic for the Ethical leadership. In total, 12,788 sessions were completed. For each of those stand-alone self-learning modules, 4,152 staff members completed the Harmonious Workplace training; 4,463 staff members completed the Ethical Leadership training and 4,173 staff members completed the AFAC training.

30. In the second quarter of 2021, a two and a half hour Ethics Refresher course was created and delivered by the Ethics Office both in person and virtually to the field offices and several departments totaling 657 staff.

31. The work on training development and roll out is considered key to laying the foundations for efficient, targeted and impactful training to be undertaken under the leadership of the Ethics Office.

32. A significant undertaking by the Ethics Office in 2021 concerns the creation of the Ethics e-Course. The Ethics Office reviewed, updated and adapted the script of the “Ethics and Integrity at UNICEF” e-Course. UNRWA e-Course includes real case scenarios and references to the UNRWA formal and informal reporting systems. In 2021, funds were successfully identified for the creation of the online course (including voice-over, design, and animations) as well as for the translation of the new Ethics e-course. The Ethics e-course will be finalized and launched online in 2022.

33. Another important initiative was the development of an in-depth training session (with donor funding), for PSEA Focal Points, and a condensed version for frontline staff. The training was intended to be provided in-person but due to ongoing pandemic restrictions, it was rolled out virtually to PSEA Focal Points. As part of the training package, a shorter session is included as a training resource for PSEA Focal Points to roll out to all staff, either virtually or face-to-face. Following its finalization, it was translated into Arabic. Despite plans to start rolling out the PSEA training to frontline staff in the fourth quarter, this was put on hold for two reasons namely, the staff union opposition to spend the scarce financial resources on in-person trainings in the wake of further deteriorating Agency’s financial situation and the limits of the Ethics Office’ staff capacity.

34. The Ethics Office surpassed its target of the year of 40 training sessions on sexual misconduct, with a total of 4178 sessions provided. 26 of the sessions were provided in-person or virtually on the Ethics Refresher course and the information sessions for managers on “Preventing and Responding to Sexual Harassment in the Workplace”, while 4152 sessions were provided online through the Harmonious Workplace online self-learning course. In this regard, the target of 1,000 staff trained was also surpassed, with a total of 4,832 staff trained. This includes 680 attendees of the virtual or in-person sessions and 4,152 who completed the online Harmonious Workplace session). In addition to the trainings covering sexual misconduct, the Ethics Office administered an additional 8636 sessions of the two other online courses, Anti-Fraud and Anti-Corruption and Ethical Leadership. In 2022, the training indicator will be revised to encompass all training currently rolled out by the Ethics Office, and not only the sexual misconduct training.

35. To increase its outreach in 2021 and beyond, the Ethics Office also reviewed its network of Ethics Focal Points (EFPs) and agreed upon and updated their terms of reference. The EFPs will provide information to help UNRWA staff navigate the ethics issues they may be facing in their day-to-day work. They will also provide limited support to the Ethics Office in training staff in the field. The Ethics Office also introduced Key
Performance Indicators which include quarterly training targets and provision of ethics information. There were initial delays in the nominations of the EFPs due to management concerns with staff members “double hatting” and increasing their workloads. Despite these challenges, two EFPs were appointed in most fields by October 2021. Provided additional funding, the Ethics Office will organize a joint workshop for PSEA Focal Points and EFPS to capacitate them on all aspects of their work. Most of the groundwork for the EFPS will be laid in 2022. Their role will be essential in the upcoming years to support and amplify the work of the Ethics Office in the field.

36. Field missions are equally essential to build trust and enhance the visibility of the Ethics Office as well as to provide effective training in person. During the second half of 2021, the Ethics Office conducted field visits to Syria, Lebanon and Jordan. The success of these missions can be partly observed by the increased reach of ethics services. Unfortunately, due to the events in Gaza in May 2021 and the emergence of new Covid-19 variant at the end of the year, planned missions to Gaza and the West Bank were postponed until 2022. Another contributing factor to the postponed field visits was the ongoing financial crisis and the staff union’s refusal to allow in person training sessions until staff salaries were paid. In 2022, the Ethics Office will attempt to go on mission to every Field, budget resources permitting.

37. The Ethics Office further expanded its outreach activities beyond traditional training. In February, the Ethics Office held a Facebook live session on the closed Facebook group for UNRWA personnel on the theme of conflict of interest which reached 2,200 views. The Ethics Office also sent out to all UNRWA members of personnel two “Focus on Ethics” notes, one related to the personal use of social media (April) and the other on returning to the Office (July).

38. The Ethics Office Intranet page was updated to facilitate navigation, find relevant contacts, policy, and guidance, and gain a quick understanding of the different services provided. Outreach materials on “What is Ethics?”, “The Ethics Office” and the “ethical decision-making model” as well as a template for monthly communications on specific ethics topics were created. All materials are downloadable. A culturally appropriate three-minute video on “Sexual Harassment” was developed set in an UNRWA working environment. It was “soft launched” at the Information sessions for managers on “Preventing and Responding to Sexual Harassment in the workplace” which took place in different field offices and was shared through additional messages from the Commissioner General and the Ethics Office. The video has been included in UNRWA’s Ethics Refresher training as a learning tool. A poster on “Zero Tolerance for Sexual Misconduct” highlighting the difference between SEA and SH was finalized and additionally, in coordination with AVAC, the Ethics Office assisted with the design and review of pocket cards on reporting misconduct. The posters on sexual misconduct and the pocket cards were distributed to all field offices in 2021, and the Ethics Office supported the Chief of Staff to send a message to the Directors to introduce the distribution in their Field Management meetings to help set the “tone from the top”. The Ethics Office plans to follow up on implementation in 2022.

39. To ensure the systematic coverage of awareness-raising material on SEA/SH, and reporting misconduct in UNRWA installations, the Ethics Office worked to include its awareness-raising posters and Focal Points in the revised checklist for quarterly installation assessments that are being introduced Agency-wide through the Humanitarian Principles project. This process will ensure that each UNRWA installation visibly displays information on SEA/SH standards of conduct, as well as on how to report misconduct that will be accessible to both staff and beneficiaries. It is expected to be rolled out in 2022.
40. The Ethics Office created a training evaluation form and distributed it to all staff who had received the Ethics Refresher course. The evaluation form includes knowledge questions based on gained theoretical and scenario-based training. It also elicited the staff’s opinion on future forms of training. A total of 64 percent of the 296 training participants responded to the evaluation. The key conclusion from the evaluation is that staff had better memorized scenario-based information from the training but had not well integrated abstract knowledge. Staff also overwhelmingly stated that they prefer in-person training. In 2022, the Ethics Office aims to integrate more scenario-based information in all the trainings it will provide.

41. During a Senior Management Retreat, the Chief, Ethics Office, submitted a two-page proposal on “management conversations on ethics” as recommended by the Retreat’s report. Some recommendations related to ethical leadership capacity-building while others offered an opportunity for ethics advice to be sought through the revised governance structure.

5. **Standard-setting and policy support**

42. A major activity in 2021 was the development of the new UNRWA Code of Ethics. This Code of Ethics includes references to the humanitarian principles and updates in relation to gender-based violence, including domestic violence as a form of misconduct. It will be aligned with good practices from other UN Agencies in terms of structure and language. During the fourth quarter, the Ethics Office finalized the legal referencing of the revised Code of Ethics (previously called the Ethics Handbook, first issued in 2013). The revised Code of Ethics will be reviewed by DLA, translated into Arabic, and sent to a graphic designer before it can be launched by the third quarter of 2022. IMTD will support with the digitalization of the Handbook so it can be made accessible and searchable from desktops, tablets, or smartphones. This will make the new Code of Ethics a more accessible, easy to understand, and searchable tool for anyone seeking information, help or support with ethics issues.

43. In parallel, the Ethics Office surpassed its Key Performance Indicator by carrying out fifteen policy support and development assignments for the year. These include contributions to the Gaza Field Office After Action Review, Investigations Policy, Gender Advisory Board Terms of Reference, Compact Letters for Managers, AMEX Internship agreement, Administration of Justice Review, Social Media Use Policy, Protection Review, the Procurement Framework, Addressing Violence Affecting Children (AVAC) Output indicators, installation inspection SOPs, the revised protection audit, and Measures and Mechanisms for Preventing and Addressing Racism and Racial Discrimination in the Institutions of the United Nations System. Additionally, the Ethics Office provided inputs to the Human Resources Department on the Onboarding booklet and materials, proposing new language in relation to the Standards of Conduct in the Offer of Appointment and Letter of Appointment templates, which is expected to be rolled out in 2022. Provision of guidance on Conflict of Interest is dependent on HRD revising Area rules and regulations and, staff capacity in the Ethics Office.

44. In the third quarter, the Chief, Ethics Office presented to the Inter-Staff Union Conference (ISUC) on neutrality and how to interact with the media about labour disputes. The issue has been highly debated and although the principles and standards are clear, their application has been challenging. Expected resolution of this matter is pending Agency updates to the ISUC charter and the Framework for Union media participation.

45. In coordination with the Education Department (AVAC Coordinator), Central Support Services Division and the Legal Affairs Office, the Ethics Office revised a draft Commitment to Non-Violence to be signed by Canteen Contractors and their staff as part of the Contractor’s Service Contract agreement with UNRWA. The draft includes language on the prohibition of all forms of violence committed by staff against beneficiaries and
staff alike. The Commitment to Non-Violence and the UN Supplier Code of Conduct will now be annexes to the Canteen Service Contract. Expected roll-out for the Commitment to Non-Violence is before the 2022/23 academic year.

46. Throughout 2021, the Ethics Office contributed to a variety of policy documents and Agency initiatives across other UNRWA departments. In addition to providing inputs to the culture change pillar of the digital transformation strategy, the Ethics Office also provided key support and participated in drafting the Terms of Reference of the newly established Women Advisory Forum (WAF). The Terms of Reference will be reviewed and agreed upon by the Field Directors. The Forum provides a platform to exchange views and take initiatives to advance gender equality and strengthen gender sensitivity in the Agency, through broad consultations at the field level with established women’s groups. The WAF will equally examine the achievements and challenges to update the Gender Equality Strategy, which expires in 2022. The Chief, Ethics Office, was also part of the team organizing the retreat that took place in September 2021 for the Management Committee members. In accordance with its mandate to coordinate efforts to prevent and respond to sexual misconduct, including forms of sexual and gender-based violence committed by staff, participated in an Agency-wide “After Action Review” of the case of the hunger strike that took place in Gaza. The Ethics Office focused on taking a critical look and formulating recommendations in relation to Gender-Based Violence and a Victim-Centred Approach. The After-Action Review (AAR) recommendations focused primarily on strengthening policy, guidance, and support to victims of gender-based and domestic violence.

47. The Ethics Office also chaired the internal Research Review Board (RRB) in 2021 reviewed through the Board 15 requests for approval of research requests, coordinating the inputs from the different departments and fields.

48. The Ethics Office values the significant contribution that the Ethics Panel of the United Nations made to achieving coherence in ethics standards and practices in 2021. This includes inputs to policies and practices on outside activities, conflicts of interest and retaliation. The Ethics Office benefitted significantly from access to comparative ethics guidance, information and practice tools though its participation with this interagency panel.

49. The Chief, Ethics Office was elected as the Alternate Chair of EPUN as of October 2021 and will serve in this capacity for more than a year. In this role the Chief, Ethics Office received a number of requests from Staff in the UN Secretariat and Secretariat-administered entities to review protection against retaliation determinations made by the UN Ethics Office.

50. The Ethics Office also continued its active participation in the Ethics Network of Multilateral Organizations (ENMO), it attended the annual meetings which took place early July 2021 and in November 2021.

6. **Sexual Exploitation and Abuse and Sexual Harassment**

1. Both SEA and sexual harassment remain priority issues for the UN with a growing number of system-wide initiatives on prevention and response. The Ethics Office continued its active participation in inter-agency fora including the CEB Task Force on Sexual Harassment and the UN SEA Working Group. Following internal coordination with departments and field offices, the Ethics Office revised the Agency’s PSEA Action Plan in accordance with a new structure and submitted it to the Office of the Special Coordinator on SEA (OSCEA) in July 2021. The Ethics Office also coordinated the drafting of the Commissioner General’s annual attestation to the Secretary-General on PSEA and provided input to the Secretary-General’s annual Special Measures Report on SEA. In 2021, the Ethics Office was also involved in the drafting process of a UN-wide definition of a
victim-centred approach to Sexual Harassment and engaging with UNRWA’s sexual misconduct task force on its application in practice.

2. The Ethics Office also made efforts to promote UNRWA’s participation in the OSCSEA’s annual survey on sexual misconduct which is an important tool to understand progress made as well as risk areas with respect to staff knowledge on PSEA. The Ethics Office sent two all-staff email messages, made announcements on the UNRWA staff Facebook page, encouraged messages from PSEA Focal Points and department heads, and supported a final all-staff message in September from the Commissioner-General. The messages also reminded staff of their obligations to take the mandatory e-courses on PSEA and PSHAA and one included the awareness-raising video on sexual harassment to address a key risk area identified at UNRWA from the results of the 2020 survey. The Ethics Office also coordinated the completion of the annual CEB organizational survey on sexual harassment, providing answers to the CEB Task Force from across different departments. The Ethics Office plans to present an analysis of the results and key findings to senior management in 2022 to inform the 2022/23 Action Plan on PSEA.

3. The Ethics Office continued to lead coordination of Agency-wide sexual misconduct initiatives. In the area of management and coordination, the Ethics Office also succeeded in advancing the SEAH agenda at the highest levels. Management compact letters for Directors ensure high-level responsibility for sexual misconduct and ensuring field action plans are in places. The introduction of an SEA case study in a management retreat session helped sensitive senior managers on issues and gaps. Engagement in this area with senior management is expected to continue in 2022, with additional sessions planned for senior management meetings.

4. The Ethics Office also played an integral role in providing technical advice and support to field offices and in leading capacity building of PSEA Focal Points to support increased field office activity in this area. Agency-wide mappings of key activities and support services for SEA and SH victims were also completed and gaps identified. In compliance with audit recommendations, the PSEA Focal Point list at field office level was finalized with at least one male and female focal point per field office. The Coordinator held regular meetings with the PSEA Focal Points to discuss the development of field action plans, provide capacity building sessions, and provide technical support on initiatives including complaint mechanisms and referral pathways. The presence and engagement of PSEA Focal Points has been critical for implementing prevention and response initiatives relating to SEA in the Fields.

5. Furthermore, in 2021, the Ethics Office strengthened the support mechanisms for victims of sexual violence and began the process of revising the sexual exploitation and abuse policy (from 2010), developing a draft flowchart on the reporting and management of SEA allegations. The policy revisions will be ongoing into 2022, including consultation and testing with key stakeholders. The revision of the sexual harassment policy (from 2010) is also planned to start in 2022.

6. The Ethics Office is continuing to support an ad hoc process for Clear Check until clear procedures for reporting and human resources capacity can be agreed upon. UNRWA has uploaded a total of 18 cases (17 SEA and one SH) into the database, dating back to 2013, with four of the substantiated SEA cases uploaded in 2021.

7. During the fourth quarter, the Ethics Office welcomed the contribution for six months of a RedR Australia consultant, who will be working on updating the sexual misconduct policies and developing related procedures to bring UNRWA in line with current system wide policy developed over the last eleven years. The
policies will need to reflect updated standards from the HLMC adopted by the Heads of Agencies including UNRWA. These include the Model Policy on Sexual Harassment as well as the recently issued and adopted definition of a victim-centred approach to sexual harassment.

8. A campaign “We say no to sexual misconduct” is under development to be launched in 2022 with support from the Commissioner General and Executive Office.

4. Conclusion and recommendations

9. The period covered by this report continued to be challenging given the combined impact of the Agency’s financial constraints and Covid-19 on staff and operations. The Ethics Office nevertheless demonstrated resilience and outperformed on several of its objectives related to trainings and awareness-raising, provision of confidential ethics advice, policy support and standard-setting, and coordination of protection from sexual misconduct. Furthermore, it completed several key initiatives such as the automation of the Area Staff Declaration of Interest Programme (ASDIP) online form, the creation of training evaluation questionnaires and the creation of the Ethics Case Management System. The Ethics Office also actively contributed to and supported Agency-wide initiatives such as the Senior Management Retreat, the After-Action Review and the Women’s Advisory Forum. These strategic initiatives are essential to strengthen coordination in furtherance of the long-term development of a strong organizational culture of ethics, integrity and accountability. In 2022, the Ethics Office will be participating in a “Basket of Issues” meeting with key stakeholders involved in the internal justice system and the overall accountability and integrity framework in the Agency, which is expected to play an active role in improving Agency culture. The Ethics Office recommends that this initiative continue to be supported by senior management, including the recommendations that will come from it.

10. Through the creation and roll-out of three blended online training courses, the Ethics Refresher e-Course, the information session for managers on sexual harassment, and specialized capacity building sessions for the PSEA Focal Points, the Ethics Office successfully delivered over 12,000 training sessions and addressed the considerable need for information and dialogue on ethics. In 2022, the Ethics Office aims to broaden its impact, namely by providing more face-to-face trainings through Ethics and PSEA Focal Points and addressing gaps in mandatory training completion for staff without computers.

11. The increase in requests for confidential ethics advice is clear evidence of the effectiveness of the Ethics Office’s meaningful engagement with staff members across the Agency’s areas of operation. The Ethics Office was able to foster a safe space and nurture enhanced confidence among staff members. Provided sufficient resources are available in 2022, the Ethics Office will continue its outreach efforts to staff, including field missions, and will also prioritize the availability and capacity of the Ethics Office team to address all requests in a timely and effective manner.

12. In 2021, the Ethics Office laid a solid foundation for preventing and responding to sexual misconduct, particularly in strengthening victim-support. In 2022, the Ethics Office will roll out the tools that it developed throughout 2021 (ie. information sheets for victims and staff, and the SEA allegation flowchart) and update the policies that form the basis for these tools. The Ethics Office will also launch a full scale and year-long “We say no to sexual misconduct” campaign with townhall events, video messages from senior managers and Facebook live sessions which will contribute to greater awareness and clarity around the prevention and response to sexual misconduct. The Ethics Office aims for these innovative actions to continue raising greater awareness on sexual misconduct and empowering personnel and beneficiaries to come forward with sexual
misconduct issues and concerns. The Ethics Office recommends the continuation of the engagement with senior managers to help strengthen the “tone from the top”.

13. Finally, the Ethics Office strengthened its relevance through the re-establishment of Ethics Focal Points which aims to provide more visibility of the Ethics Office in the field, as well as the solidification of the PSEA Focal Point system. The Ethics Office is grateful for both the Ethics and PSEA Focal Points’ motivation and commitment and truly optimistic that their role will provide meaningful assistance in the long term with presence and outreach across the five field areas. The Ethics Office recommends continued Director-level support for the Focal Points and their work.