

The background is a dark blue field filled with stylized, flat illustrations of people and hands. In the center, a person is being held up by two hands, with another hand reaching towards them from the left. Other figures are shown in profile or from the back, some wearing blue shirts with the UNHCR logo. Speech bubbles in yellow and light blue are scattered throughout. The overall theme is one of support, care, and community.

UNHCR
Ethics Office

ANNUAL REPORT 2023



UNHCR
The UN Refugee Agency

Ethics Office

Summary

This annual report covers the activities of the Office of the United Nations High Commissioner for Refugees (UNHCR) Ethics Office in 2023.

The Ethics Panel of the United Nations has reviewed the report 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).

This is the fifteenth annual report presented by the Ethics Office since its establishment in 2008 as a stand-alone office reporting to the UN High Commissioner for Refugees. Cementing its fundamental principles of independence and impartiality, the Ethics Office welcomed a new Director, who began her five-year tenure in November 2023.

The report details the activities and achievements of the Ethics Office in each of its mandated areas of work. The Office has a mandate to promote the highest standards of integrity of the workforce and cultivate a culture of ethics.

The High Commissioner may wish to take note of the present report by the Ethics Office and comment on progress made as well as emphasize the continuing efforts to promote a culture of ethics in the organization.

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Lebanon. Storm Norma brings misery to Syrian refugees.

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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 the Ethics Office terms of reference (“ToRs of the Ethics Office”).¹ The Ethics Office (“Ethics” or “Ethics Office” or “Office”, used interchangeably throughout this report) has since its inception set the foundation of the expected ethical conduct in UNHCR and connected the operations and members of the workforce to the UNHCR mandate by providing guidance and education related to the nine principles of the Code of Conduct. In turn, this has ensured that UNHCR is accountable and professional and that personnel are acting with integrity and in the best interests of UNHCR.
2. The report highlights the key achievements and activities of the Ethics Office in 2023 across its mandated areas: Ethics Advice and Guidance, Support Desk for Workplace Concerns, Protection against Retaliation, Code of Conduct Dialogue (CoCD) and the United Nations Financial Disclosure Programme. The report also provides details on the Office’s awareness-raising and outreach initiatives, its collaboration with other integrity entities and its participation in and engagement with the Ethics Panel of the United Nations and the Ethics Network of Multilateral Organizations.
3. The Ethics Office has six staff members, one each at the grade levels D-1, P-5, P-4, P-3 and two at G-6.
4. In 2023, the Ethics Office served the 20,195 members of the UNHCR workforce (including Affiliate staff and Interns) dispersed in 598 locations in 143 countries. The highly diverse workforce comprises 164 nationalities with 71 per cent local staff and 29 per cent international staff.

¹ [IOM/040-FOM/042/2008 Ethics Office - Terms of Reference \(unhcr.org\)](#) [Intranet link].

5. UNHCR continues its commitment to promoting a culture that values dialogue, collaboration, trust, inclusion and integrity. Considering the remarkable diversity of the personnel as noted in paragraph 4, these values are key to ensuring that, irrespective of contract type, the workforce has the tools to effectively deliver on the UNHCR's mandate while nurturing an organizational culture of openness and dialogue. In this connection, during 2023, the work of the Ethics Office was instrumental in helping the workforce to understand what working for UNHCR and the United Nations means, including the regulatory frameworks guiding activities and the expected conduct of colleagues.
6. The Ethics Office supported management and personnel in reinforcing a culture of ethics and integrity in all aspects of providing humanitarian assistance to displaced and stateless persons. The Office dedicated its resources to promoting values that foster dialogue while focusing on the importance of diversity, inclusion and expected ethical behaviour.
7. Directly connected to having a strong and effective workplace culture is the personnel's duty, as well as right, to Speak Up. UNHCR recognizes that to create an environment where personnel can raise concerns, it is key to have grievance mechanisms and internal justice processes that are confidential, respectful and professional. UNHCR encourages the freedom of its workforce to feel confident and safe to report alleged wrongdoing and/or misconduct, as timely reporting helps to safeguard accountability as well as the reputation of the organization.
8. UNHCR management has made significant investments in boosting the remit of the integrity entities – the Psychosocial Wellbeing Section, Victim Care Officer, Ombudsman and Mediator, the Division of Human Resources, Legal Affairs Service, the Inspector General's Office and the Ethics Office – which in keeping with their individual mandates as well as a coordinated team continued to provide guidance to the workforce. This included the mandatory annual Code of Conduct Dialogue programme; giving advice and guidance on how to safely and effectively report alleged wrongdoing or misconduct; and providing information to colleagues on how to navigate seeking redress or help regarding their concerns.
9. In 2023, the Ethics Office focused on ensuring that its services were easily accessible and understood by all UNHCR personnel; these endeavours will continue in the years to come.



Chad. Workers unload relief kits from the UNHCR truck for distribution to newly arrived Sudanese refugees.

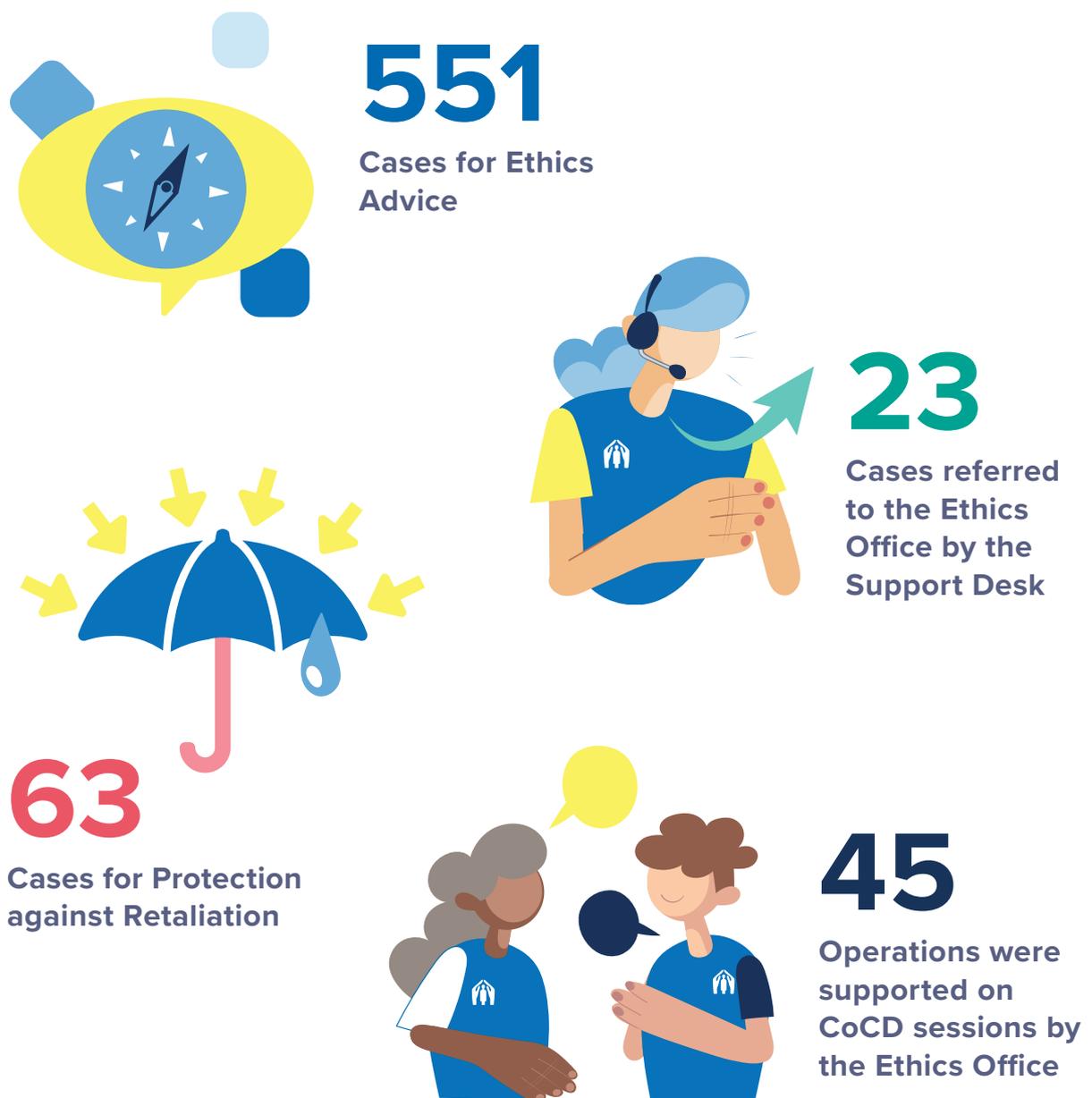
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Key Achievements

10. The year 2023 saw the following key achievements for the Ethics Office:
 - a. The Code of Conduct Dialogue (CoCD) programme, a cornerstone of the Ethics Office, ensured that 10,818 colleagues (52 per cent of the workforce) participated in at least one CoCD session. This is an increase over 2022 when 7,451 colleagues were reported to have attended a CoCD session. The increase is a direct result of the Ethics Office's increased engagement with operations to help them directly, or to facilitate their CoCD workshops.
 - b. During the year, the introduction of monthly webinar training sessions for the 521 CoCD facilitators helped to improve the quality of the sessions. The introduction of the mandatory requirement of a pre-CoCD session survey to identify the needs of each operation, entity or division also helped to improve the quality of the sessions. The pre-survey initiative was well received as it provided insights into how to better tailor sessions to respond to the ethical and other issues of concern. The pre-session surveys also allowed the Ethics Office to glean any issues facing an operation and discuss with management how best to address these and provide the needed support to the workforce.
 - c. The Ethics Office built on its aspiration to ensure that processes related to redressing misconduct, especially those related to the internal justice system, continue to be accessible to the UNHCR workforce by embarking on a review of the implementation of Protection against Retaliation (PaR). Strides were made in simplifying and standardizing the form for seeking admissibility of a claim or lodging a complaint. The Ethics Office published its first ever Periodical on Protection against Retaliation (2019–2022) in July 2023. This provided stakeholders with an overview of how the PaR processes work and what the measures are for cases where retaliation was established post-investigation. The Periodical serves as part of the Ethics Office outreach to the workforce on this important subject.
 - d. The Ethics Office facilitated four sessions for 142 new members of the workforce, called **welcome@unhcr**.

3 2023: An Overview

Figure 1: Ethics engagement in 2023 in numbers



*Data on the origins of five of the 551 cases were not available and are therefore not reflected in the above chart.

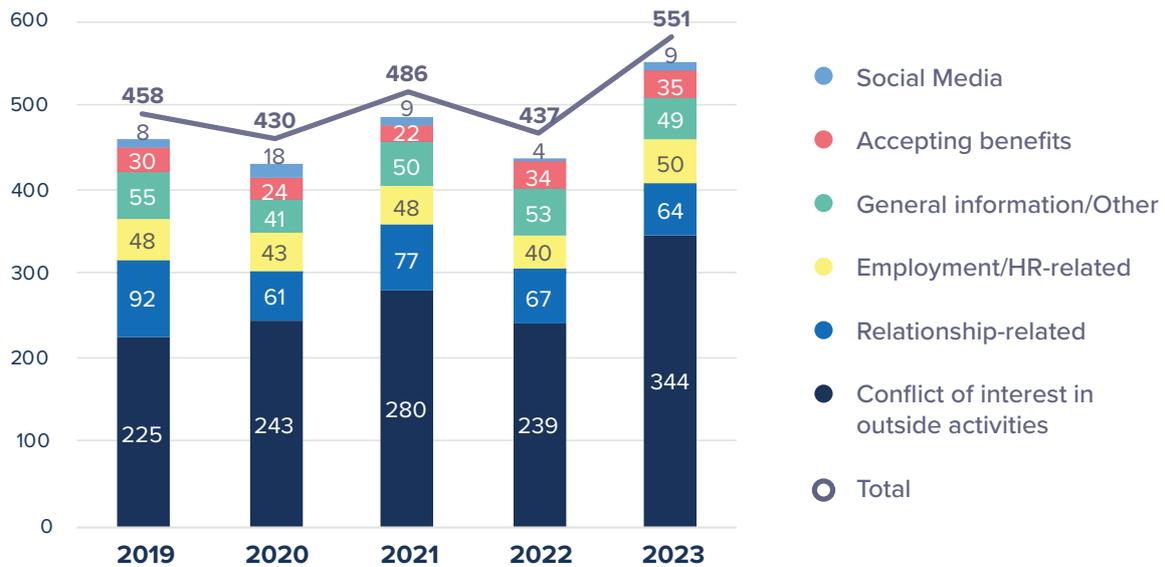
A. Confidential Ethics Advice and Guidance

11. In 2023, Ethics continued to be a trusted resource providing confidential advice across all levels of the workforce. Compared to 2022, the Office received a steady increase in the number of cases from UNHCR personnel seeking guidance and advice: it responded to 551 individual requests in 2023 as opposed to 437 individual requests in 2022. The advice sought ranged from guidance on ethical dilemmas, on matters of conflicts of interest stemming from engagement in outside activities, on lecturing and publishing in a personal capacity and on the use of social

media to complaints of abuse of authority and harassment. While requests for advice on managing conflicts of interest remained high, there was also an increase in requests for advice related to allegations of unethical behaviour and toxic situations in some offices.

12. The 26 per cent increase in the number of requests can be attributed to the workforce becoming more aware of the required standards of conduct,² as well as improved communications on the work and support services provided by the Ethics Office. This increase is taken as a positive indicator of the trust and reliance that the workforce places in the Ethics Office.

Figure 2: Number of ethics-advice cases per category in 2019, 2020, 2021, 2022 and 2023

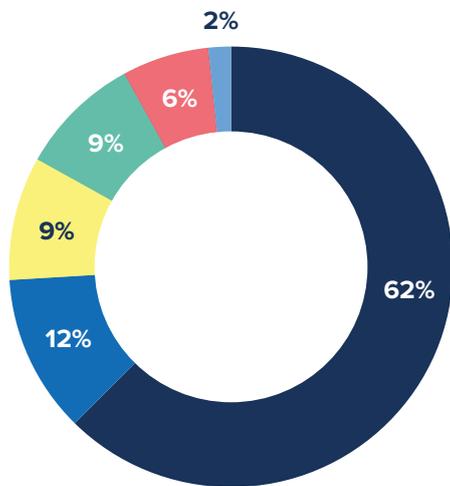


13. The Ethics Office classifies the requests coming to the office in six categories: social media; accepting benefits/gifts; general

information/guidance; employment/HR-related; relationship-related; conflict of interest in outside activities.

² See section D on Code of Conduct Dialogues and the marked increase in the number of personnel receiving the CoCD training.

Figure 3: Number of ethics advisories per category in 2023



- **1. Conflict of Interest in Outside Activities:** requests related to outside employment, business ownership, publications, voluntary engagement, board membership, political engagement and private investment.
- **2. Relationship-related:** requests concerning relationships among colleagues or with partners, governments, other entities and forcibly displaced and stateless persons.
- **3. Employment-related:** requests concerning employment of family members, the recruitment process, post-employment restrictions and the use of UNHCR assets for private purposes.
- **4. General Information:** requests for materials, where-to-go questions or general guidance on ethical considerations.
- **5. Accepting Benefits:** enquiries related to accepting benefits such as gifts, honours or awards, remuneration and invitations to events.
- **6. Social Media:** requests about the use of social media.

14. As part of its work on identifying and advising on conflicts of interest, the Ethics Office screened the employees seeking to undertake outside activities³ (including employment external to the organization or authoring publications) to prevent any potential conflict of interest. The year in review saw an increase in the number of cases where guidance was provided on conflicts of interest. There were 344 individual requests, which accounted for 62 per cent of cases received in the Ethics Advice and Guidance pillar. This was a significant increase compared to 2022 and 2021 with, respectively, 239 cases treated (55 per cent) and 280 cases treated (58 per cent).

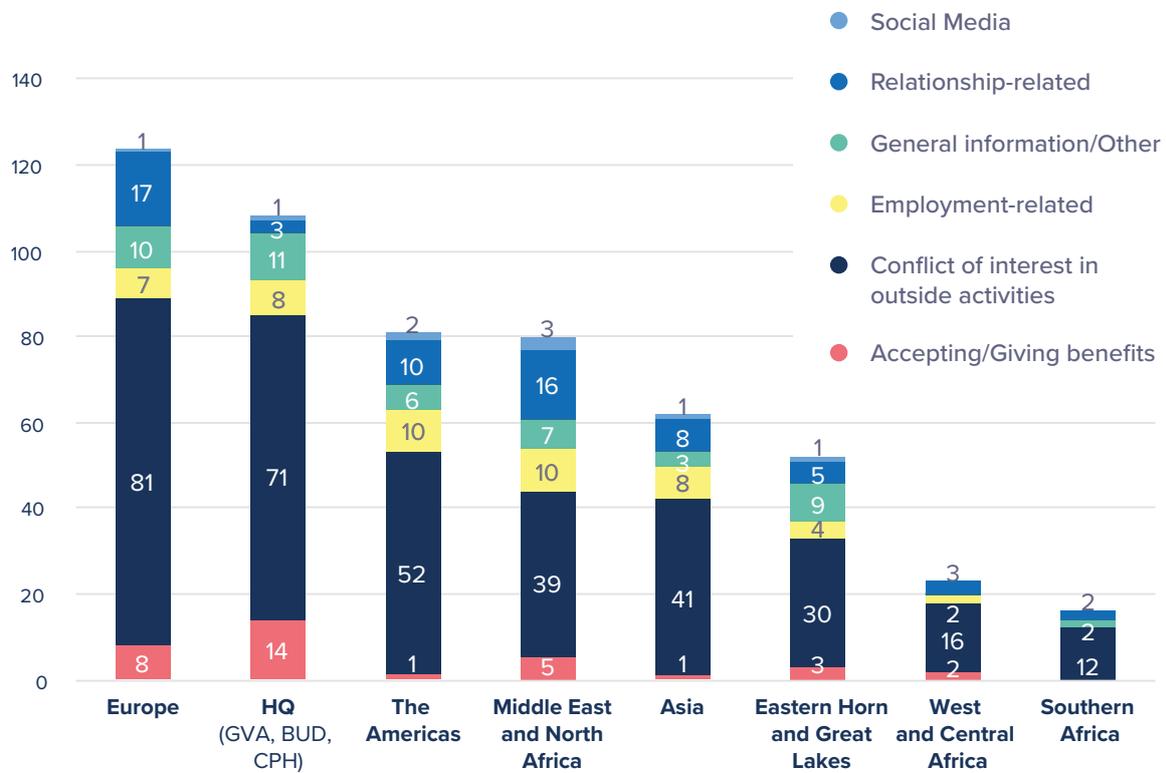
15. The second highest proportion of ethics advice (12 per cent) concerned workplace relationships, such as strained relations between supervisor and supervisees. The Ethics Office provided guidance on the formal and informal channels that are available to colleagues seeking to resolve the challenges they face. As a rule, and wherever possible, the Ethics Office encouraged colleagues to use local resources and seek support from their managers, as appropriate. In certain cases, where an issue appeared systemic or the complainant feared retaliation, the Ethics Office intervened with the management. Such interventions often illustrated the importance of managers having the support of the Ethics Office to resolve issues at a relatively early stage.

³ Outside activities: This category covers questions concerning external employment and other outside activities that might interfere with the ability of UNHCR personnel to serve the organization. Prior approval is required from the Division of Human Resources on the advice of the Ethics Office before members of the workforce may engage in any outside activities.

16. Overall, in 2023, there was a substantial increase in cases, of 26 per cent over the previous year. Most of the cases were received from the Islamic Republic of Iran, Italy, Jordan, Kenya, Lebanon, Poland, and the Syrian Arab Republic. In European operations, cases more than doubled in 2023, rising by 110 per cent; this was followed by Asia with a 12 per cent increase. By contrast, relatively fewer cases were received from Headquarters, and there

was a small decline, of 1.5 per cent, in cases received from the Middle East and North Africa (MENA). In the Eastern Horn and Great Lakes regions of Africa as well as in Southern Africa, there were also declines in the number of cases (by 2 per cent), with cases from the Americas rising by 12 per cent. However, in West & Central Africa, the numbers remained stable at approximately 2 per cent.

Figure 4: Number of cases for Ethics Advice and Guidance, per region (2023)



*Data on the origins of five cases were not available and are therefore not reflected in the chart.

17. To better manage its increasing caseload, the Ethics Office upgraded its case management system towards the end of 2023. The new system was customized and is more efficient at capturing useful data to better inform the work of the Office in analysing trends among the workforce.

18. Looking ahead, and with an expectation that case numbers will continue to rise, the Ethics Office has put plans in place to expand its awareness-raising activities, especially for new recruits, for first-time managers and in emergency and high-risk locations.

B. Support Desk for Workplace Concerns

19. In its second year of operation, the Support Desk for Workplace Concerns (referred to as “SD” or “Support Desk” throughout this report) continues to be a useful mechanism for all members of the workforce. The Support Desk was designed primarily for colleagues who are unsure of where to get redress for a workplace concern or where to seek guidance or explore options for an informal resolution of their workplace concerns. The SD has proven to be an important mechanism to treat cases received through the (anonymous) [Speak Up Helpline](#) that do not reach the threshold warranting an investigation. As the Speak Up Helpline is managed by the Office of the Inspector General (IGO), cases are referred to the Support Desk by the IGO.

20. The Ethics Office serves as the Secretariat of the SD. The other members of the SD are the Division of Human Resources; Legal Affairs Service; Psychosocial Wellbeing Section; Victim Care Officer; Ombudsman and Mediator; and the IGO as an Observer. The member entities assess the concerns they receive and discuss whether a given concern is best addressed locally or by one of the SD entities. The identified member takes on the case and provides the required guidance, support and feedback to the SD when the matter is closed or resolved.

21. In 2023, the SD received 130 reports. Most of the cases were referred by the IGO either directly (48 per cent) or from the Speak Up Helpline (40 per cent), while 10 per cent

came directly through the online SD Form. Three cases (2 per cent) were referred by the Ethics Office.

22. Approximately 30 per cent of the cases were referred to the Ombudsman and Mediator’s Office as the lead entity to find a solution. Other cases were assigned to the Support Desk Secretariat (24 per cent), the Ethics Office (18 per cent), Human Resources (16 per cent), Psychosocial Wellbeing Section (10 per cent) and the Legal Affairs Service (2 per cent). Each entity received cases that pertain to their specialized functions. In at least 10 per cent of the cases, where complex or multiple issues were raised, multiple entities provided relevant support.

23. Allegations of abuse of authority and harassment were the main issues raised, in 45 per cent of the cases, while 18 per cent of cases involved complaints of a toxic workplace environment causing disharmony and poor performance amongst the affected personnel. The remaining cases concerned HR matters (14 per cent); discrimination (9 per cent); conflicts of interest (4 per cent); guidance on rules and policies (3 per cent); assault, breaches of confidentiality and privacy issues (2 per cent each); and insecurity, gross negligence and retaliation (1 per cent each).

24. In terms of geographical distribution, in 2023 most SD cases came from the Americas (23 per cent), the Eastern Horn and Great Lakes of Africa (21 per cent) and MENA (15 per cent). In terms of countries, many cases were received from the operations in the Sudan (13 per cent), Costa Rica (8 per cent), Türkiye and Colombia (5 per cent each) and Mexico (4 per cent). Nine per cent of the cases came from Headquarters locations in Geneva, Budapest and Copenhagen.

25. Some 42 out of the 130 cases were referred to the line management and addressed locally with the support of one or more of the SD entities. The referral of matters to local management has been seen as the preferred option, whenever appropriate. In all such matters, prior consent from the complainant was obtained. The tendency was for such matters to be resolved informally and quickly – resulting in satisfactory redress for the concerned parties. In most cases, this approach proved to be an effective way of resolving workplace issues as it allowed for dialogue between the parties concerned and for matters to be addressed before they escalated. Several managers expressed appreciation for being given the opportunity to discuss troubling issues and having the support to resolve such matters. In most instances, their grasp of the local context and workforce and staffing issues were key elements for understanding the issues and finding the appropriate solutions.

26. Compared to its first year of operation, the SD saw an uptake in the number of cases in 2023. On average, the SD received 11 cases every month, compared to eight in 2022. This was anticipated, as the SD became more established, and its services better known to personnel. The proportion of cases which were referred to local management increased by over 10 per cent during 2023 compared to 2022.

C. Protection Against Retaliation

27. The Ethics Office administers the organization's Protection against Retaliation policy for any member of the workforce who has reported misconduct in good faith or cooperated with duly authorized audits

or investigations, evaluations, inquiries or reviews or engaged with the Office of the Ombudsman and Mediator, and who subsequently experiences retaliation. A well-functioning system for protection against retaliation is essential for maintaining a Speak Up culture, whereby personnel can report alleged misconduct and workplace grievances without risks to their careers or well-being.

28. The relevant rules and procedures pertaining to protection against retaliation 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.

29. During 2023, the Ethics Office started reviewing its processes, with the aim of streamlining and making protection against retaliation easier to understand and more accessible to all personnel. The Ethics Office identified that the AI on PaR needs to be revised to ensure that it remains fit for purpose and robust. The planned revision is incorporated in the 2024 Policy and Guidance Pipeline of the Transformation and Change Service.

30. In 2023, the Ethics Office registered 59 cases from individuals with retaliation concerns. Of these, 42 individuals sought information and advice, five were identified as being at risk of retaliation for having engaged in a protected activity, and 12 individuals submitted official requests for protection against retaliation. In addition, four people who were in touch with the Ethics Office for information and advice in 2022 submitted their formal requests for protection against retaliation in 2023, bringing the total number of formal PaR requests in 2023 to 16 and the total number of cases handled by the Ethics Office to 63 (see Figure 5 overleaf).

Figure 5: Overview of Protection against Retaliation requests received and processed since 2018

Years	Category			
	Seeking information and advice	Risk of retaliation	Requests for protection against retaliation	Total
2018 (from Sept.)	1	7	3	11
2019	14	19	10	43
2020	38	10	7	55
2021	29	7	5	41
2022	22	20	4	46
2023	42	5	12*	59**

* In addition to the 12 cases, 4 individuals who reached out to the Ethics Office for advice in 2022 submitted their formal requests for protection against retaliation in 2023, bringing the total number of formal PaR requests received in 2023 to 16.

** Including the 4 cases from 2022, the Ethics Office handled a total of 63 cases in 2023.

31. Compared to 2022, there was an increase of 37 per cent in the total number of PaR cases received in 2023. This significant rise in the number of persons seeking guidance on protection against retaliation resulted in a four-fold increase in the number of formal requests for protection against retaliation, from 4 in 2022 to 16 in 2023. The surge in case numbers may be attributed to a combination of factors, including the continued outreach activities by the Ethics Office, such as the Code of Conduct Dialogues (CoCD), the training sessions for the CoCD Facilitators and the Peer Advisor Network (PAN). These are coupled with ongoing awareness-raising by the High Commissioner and senior management in promoting a harmonious working environment. Furthermore, the speak-up culture is clearly taking root in the organization. At the same time, it is noteworthy that during 2023 many operations underwent staffing reviews and post discontinuations due to budget constraints. Post discontinuations were cited as detrimental actions by some complainants. A total of 44 out of the 63 individuals contacted the Ethics Office

directly, while the other 19 were referred by other integrity entities, mainly the IGO and the Victim Care Officer.

32. The highest number of retaliation concerns came from the MENA region (21 cases), followed by 12 cases from Europe, 8 cases from the Americas, 7 from the Eastern Horn of Africa, 5 from Asia and 4 each from Southern Africa and Headquarters (Geneva, Budapest, Copenhagen). The fewest concerns were from West & Central Africa: 2.

33. In 2022, the MENA region also had the highest number, with 18 cases. While the number of cases from the MENA region continues to rise, an increase has also been observed in cases from operations in Europe, from 7 in 2022 to 12 in 2023. In the Americas, the numbers moved from four in 2022 to eight in 2023. In view of these developments, the Ethics Office envisions providing more support to the operations in the Americas and Europe in 2024 while continuing to provide support to the MENA region. During 2023, in response to the expressed needs of the operations, the Ethics Office facilitated Q&A sessions focused on Protection against

Retaliation for the operations in the Islamic Republic of Iran, Lebanon and the Syrian Arab Republic.

34. In terms of the profiles seeking protection, the trends remained largely similar in 2023 compared to previous years. Employees in the national category, who represent 71 per cent of UNHCR personnel, accounted for 62 per cent of cases, followed by 23 per cent in the international category, who made up 29 per cent of the workforce. The affiliate workforce represents 17 per cent of the total workforce and 5 per cent of the cases brought to the Ethics Office last year. More women than men raised retaliation concerns: 45 cases compared to 17 cases. One complainant identified as non-binary.

35. The alleged perpetrators of retaliation concerns tended to be more likely international staff, with 38 cases (60 per cent), while 14 cases (22 per cent) of the subjects were national staff. In the remaining 11 cases (18 per cent), the information is not known. In contrast to 2022, there was an increase in the percentage of female subjects/alleged

perpetrators of retaliation, from 33 per cent (15 cases) in 2022 to 44 per cent or 28 cases in 2023. At the same time, the number of male subjects decreased from 57 per cent or 26 cases in 2022 to 43 per cent in 2023.

36. Most of the cases that were brought to the Ethics Office were prompted by underlying grievances with managers or allegations of abuse of authority, combined with other causes. Harassment, grievances with peers, sexual harassment, fraud and corruption, insecurity, stress, causing ill health as well as HR-related matters were among the causes which were cited as detrimental actions. Compared to 2022, more cases in 2023 involved issues with managers and instances of abuse of authority and harassment in the workplace. However, there were fewer cases involving reports of sexual harassment or abuse and fraud.

37. As of 31 December 2023, the Ethics Office had determined that in three of the 16 official requests for protection against retaliation a prima facie case of retaliation had not been established. In five cases, there was a prima



South Sudan. UNHCR distributes relief items to returnees in transit centre.

facie case of retaliation. The five cases were referred for investigation to the IGO (Figure 6 below). Out of the five cases that were referred to the IGO for investigation, four cases are pending, (at the time of writing)

and one case is being reviewed for a final determination by the Ethics Office. The remaining eight requests are pending with the IGO for fact-finding.

Figure 6: Overview of cases where prima facie was/was not established

Years	Category			
	Prima facie case of retaliation	No prima facie case of retaliation	Cases pending fact-finding	Case withdrawn during the process
2018 (since Sept.)	0	3	N/A	0
2019	3	6	N/A	1
2020	2	5	N/A	1
2021	1	3	N/A	1
2022	2	2	0	0
2023	5	3	8	16

38. During the 2023 reporting period, the Ethics Office continued its outreach activities and in July 2023 published its first [Protection against Retaliation Periodical](#). This covered the period of 1 September 2018 to 31 December 2022, during which the former Protection against Retaliation policy was mostly in force (September 2018 to July 2022), except for the second half of 2022, when the revised AI on PaR came into effect. The aim of the Periodical is to showcase and raise awareness about the work of the Ethics Office as the designated entity for receiving requests and making determinations regarding PaR. It also provides an overview of the protection against retaliation process and how it works.

39. Throughout 2023, the Ethics Office continued to promote enhanced clarity of what constitutes a protected activity and retaliation under the revised PaR policy. An introduction to the AI on PaR and guidance on addressing and reporting workplace issues and grievances were systematically included in code of conduct sessions, the PAN facilitators were trained, and ad hoc Q&A sessions on abuse of authority were organized for operations.

D. Code of Conduct Dialogue (CoCD)

Training, outreach and awareness-raising on ethical values and standards of conduct are a critical part of the work of the Ethics Office. Its mandate is to promote a culture of ethics using the nine Code of Conduct principles as a base for ethical behaviour.

40. The CoCD sessions are based on the premise of promoting a culture of ethics and integrity with the aim of:

- a. providing 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.

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

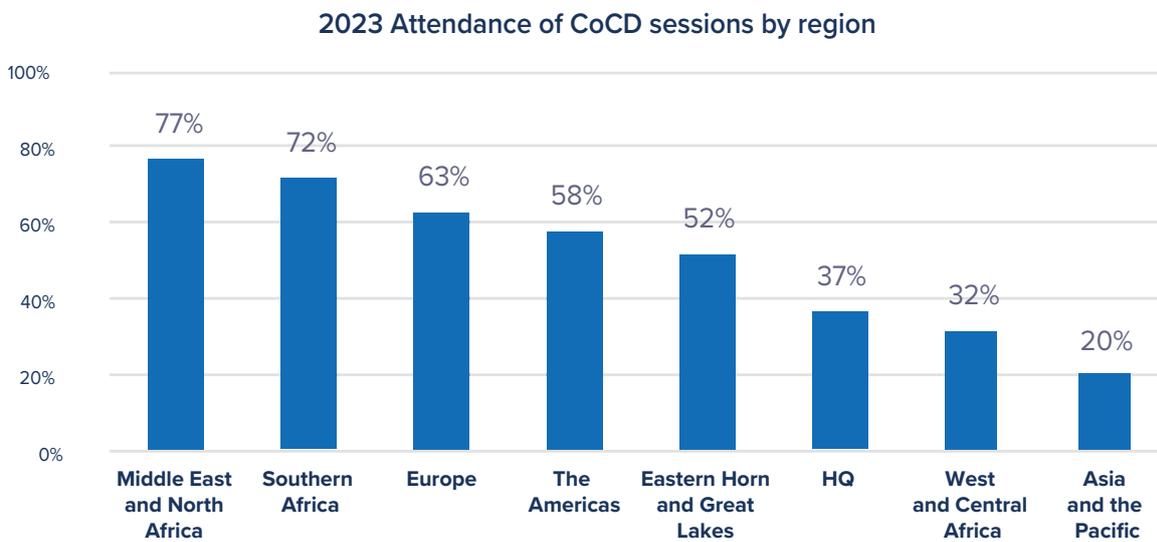
41. Trust and collaboration are the foundations for a culture based on ethics. In 2023, UNHCR operations and offices were asked to have at least one mandatory CoCD on “Values in Action – Trust and Collaboration”, as well as complementary sessions on specific themes including, but not limited to, use of social media, political activities and guidance on receiving gifts/honours and awards. The more systematic use of pre-session surveys allowed operations to tailor their CoCD sessions to the needs of their workforce.

42. During 2023, 1,175 employees in 20 operations identified three themes as priority issues of concern at the workplace: abuse of authority, protection against retaliation and managing conflicts of interest, closely followed by the ethical use of social media, harassment, and discrimination.

43. Based on the Ethics Office pre-survey findings, the CoCD theme for 2024 will focus on managing conflict of interest (including giving and receiving gifts, engagement in political activities, ethical use of social media and dealing with personal relationships in the workplace).

44. In 2023, 10,818 colleagues (52 per cent of the workforce) are reported to have participated in at least one CoCD session. Sessions were held in 124 country operations and bureaux and 13 HQ entities/divisions. This is an increase from 2022 where 7,451 colleagues were reported to have attended a CoCD session in 117 country operations and bureaux and 15 HQ entities/divisions.

Figure 7: Overview of CoCD participation in various regions including Headquarters



45. Significant efforts were made to improve the impact of the outreach activities and give support to operations holding CoCD sessions. In 2023, compared to 2022, there was a 14 per cent increase in the number of colleagues (550) who volunteered to be facilitators or focal points to deliver CoCD sessions. In 2022, 480 colleagues had volunteered: in 2021, 389.

46. The Ethics Office delivered 26 webinars throughout the year to support the network of facilitators in running their sessions. The webinars provided training on a range of related topics and were attended, on average, by 34 colleagues in each session.

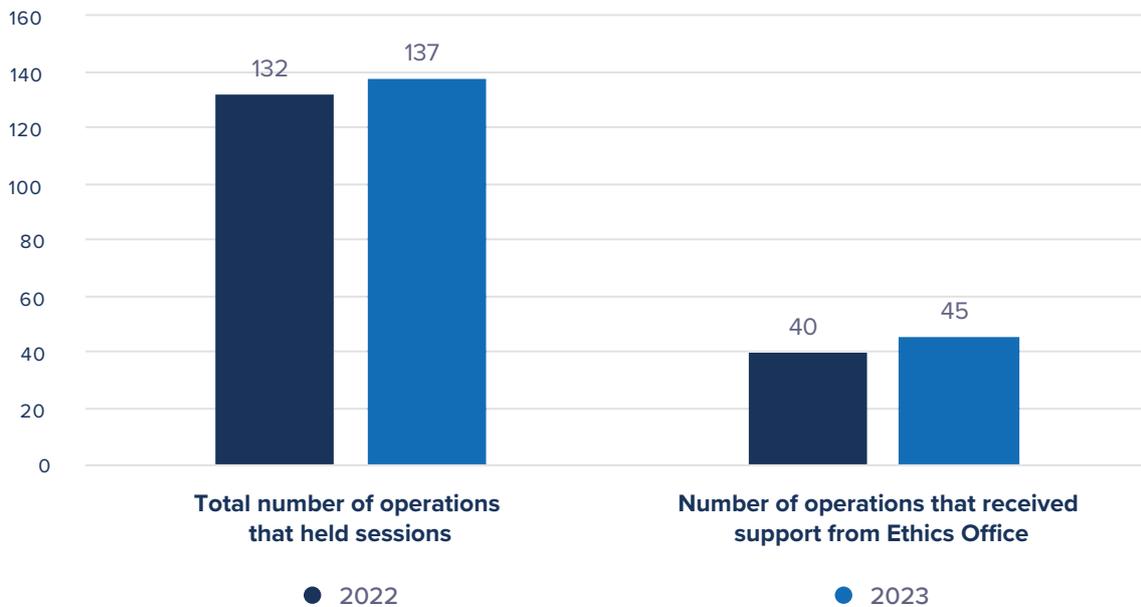
47. In 2023, the Ethics Office supported 54 sessions in 45 operations and Headquarters entities through either full in-person

facilitation (8), full online facilitation (13), online co-facilitation (4) or co-creation of the session (29). This is similar to the total number of operations and Headquarters entities supported in 2022. In 2022, 46 operations were directly supported, 31 through co-facilitation, 9 through in-person sessions, 22 online and 15 in the co-creation of their sessions.

48. In addition, the Ethics Office ran Q&A sessions on Abuse of Authority and Protection against Retaliation for three operations. Two

in-person three-day facilitator trainings (in Uganda and in Dakar for West and Central Africa) and two online facilitator trainings for Colombia and Uganda were conducted. The Office also supported two operations in their sessions for non-UNHCR personnel, namely partners and interpreters. There are constant expressions of interest in having the Ethics Office facilitate in-person CoCD sessions and provide training to facilitators to increase the capacity in field locations and in emergency settings.

Figure 8: Comparative overview of CoCD participation and support provided by the Ethics Office in 2022 versus 2023



49. Additionally, in 2023 the Ethics Office re-started its focused training for senior managers and leaders by undertaking training sessions in Türkiye and for first-time Representatives. The Office will be developing further training for these specific groups in 2024, building on the positive feedback.

50. To gauge the impact of the CoCD sessions on the workforce, the Ethics Office asked all operations to obtain post-session feedback

through a specially designed post-session survey. This survey was completed by 1,064 respondents, and the results showed that:

- a. 94 per cent had a clear understanding of the CoC principles.
- b. 94 per cent understood what type of conduct would be considered as crossing the red line.
- c. 87 per cent found the session was worth their time.

- d. 85 per cent felt that the session improved their understanding of where to go for help/advice if they could not resolve an issue locally.
- e. 80 per cent believed that the session encouraged colleagues to engage in more dialogue.
- f. 75 per cent felt that the session empowered them to resolve issues locally.
- g. 73 per cent indicated that the session made them more comfortable to speak up in the office if/when the situation arises.
- h. 66 per cent replied that the CoCD had a positive impact on their work environment, while 14 per cent believed it did not have any impact, 19 per cent were not sure and 0.3 per cent felt that it had a negative impact.

The Ethics Office found the feedback extremely important in understanding how the workforce connected with the training and in gauging whether the materials continue to be relevant and useful.

E. United Nations Financial Disclosure Programme

51. The UNHCR Ethics Office worked closely with the United Nations Ethics Office (New York), which administers the UNHCR Financial Disclosure Programme (UNFDP) for eligible UNHCR colleagues. This includes, those

whose grade is D1 and above, procurement officers, those involved in investment of UN assets, members of contract committees, all Ethics Office personnel and all colleagues who approved spending of a yearly cumulative amount of \$100,000 in 2023. The primary purpose of the UNFDP is to protect the integrity and reputation of the organization by identifying, managing and mitigating the risks of personal conflicts of interest.

52. 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. The participation of UNHCR in the process ensures that participating 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.

53. During the 2023 annual filing cycle, from 1 March 2023 until 31 December 2023, 1,638 UNHCR colleagues participated in the UNFDP. Eligible UNHCR Colleagues included grades D1 and above, procurement officers, those involved in the investment of United Nations assets, members of contract committees, all Ethics Office personnel and all colleagues who approved an increased spending cap of a yearly cumulative amount of US\$ 500,000.

Figure 9: UNFDP participants, 2009–2023

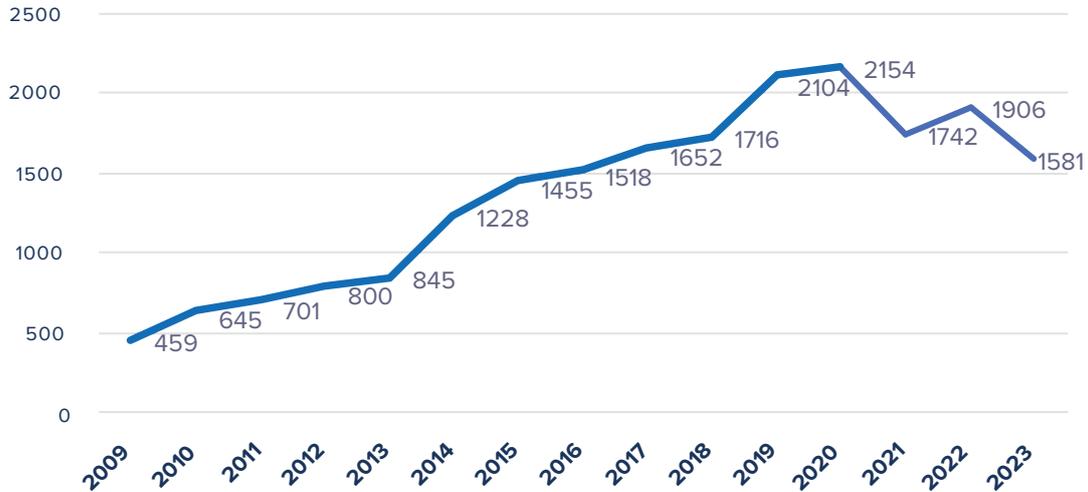
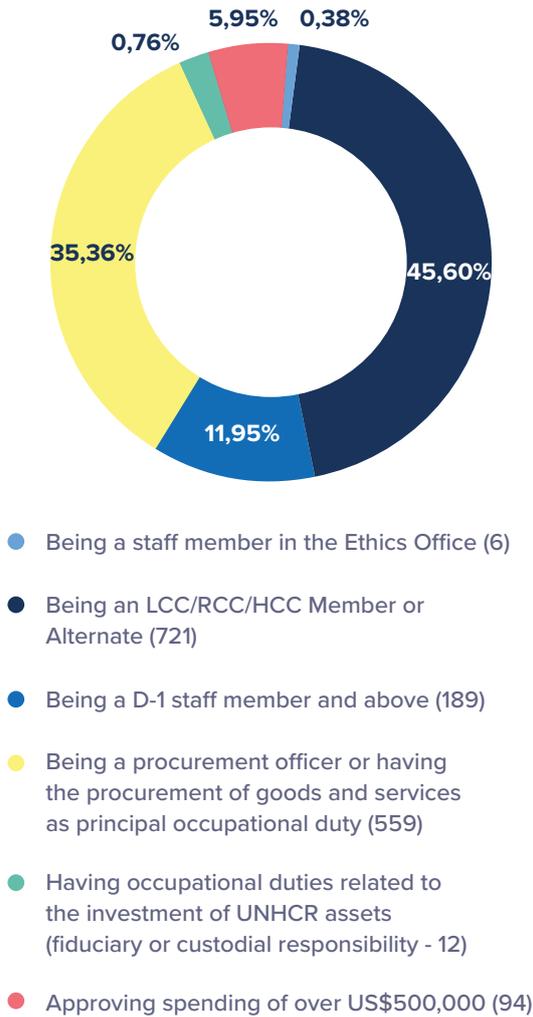


Figure 10: Criteria for UNFDP participation for the 2023 cycle



54. A total of 1,543 filers (94.20 per cent) submitted their disclosures by the deadline of 31 March 2023, compared to 1,271 filers (67.57 per cent) in 2022. The remaining 95 filers (5.79 per cent) all submitted theirs by the extended deadline of 30 September 2023. Of the 1,581 filers, 46 potential conflicts of interest were identified compared to 67 in 2022. In addressing the 46 potential cases of conflicts of interest, the Ethics Office (New York) recommended the following mitigation measures:

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

55. 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.

F. Training, Outreach and Education

56. In 2023, alongside the CoCD pillar, the Office engaged in a number of education and outreach initiatives, starting with PAN. The Ethics Office, in collaboration with the Ombudsman and Psychosocial Staff Welfare Section, undertook two trainings of over 60 PAN Advisors in Budapest and Pakistan. The impact of the training, measured through the feedback received, was positive.

57. In 2023, as noted in paragraph 49, the Ethics Office trained first-time Representatives. The Director of the Ethics Office provided the training in November to over 20 such Representatives. Furthermore, the Ethics Office collaborated with the Legal Affairs Section and Human Resources and delivered training to the Yemen Operation in which 265 personnel participated.

58. In December 2023 the first advisory on gifts was issued by the Ethics Office to all personnel. The key objective of an all-Staff broadcast message on "gifts" was to provide guidance to the UNHCR workforce to mitigate the potential negative consequences or perceptions because of conflicts of interests related to employees being offered or accepting gifts, awards and honours. Following the positive feedback received about the broadcast, the Ethics Office will issue annual reminders to colleagues.

G. Building Capacity in Support of Ethics and Integrity

Engaging with others

59. Some of the outreach activities which the Ethics Office was involved in included:

- a. Panel Discussion for First-Time Representatives (online) – delivered by the Director of the Ethics Office (20 participants).
- b. Awareness-raising on Ethics for the Evaluation Service – delivered by the Director of the Ethics Office (20 participants).
- c. Introduction to the Ethics Office for the Global Learning and Development Centre (GLDC) – delivered by the Director of the Ethics Office (20 participants).

Peer Advisors Network

60. PAN is a global network of UNHCR personnel who volunteer their time to support colleagues in need.

61. PAN members 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 and 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.

62. To strengthen ethical values and respect for confidentiality and to clarify the application of the AI on PaR, the Ethics Office co-facilitated training for 70 peer advisors. The trainings took place in Pakistan for the country operation, and two regional PAN trainings were organized for the Regional Bureau for Europe. These hands-on trainings were co-facilitated with the Office of the Ombudsman and Mediator and the Psychosocial Wellbeing Section.

H. Ethics Office: Engagement with External Stakeholders

63. The Ethics Office continued its active engagement with the Ethics Network of Multilateral Organizations, (ENMO) which serves as a broad forum of ethics functions

from UN systems entities, affiliated international organizations and international financial institutions. The Network aims to provide an essential function in promoting the coherent application of unified ethical standards.

64. The Ethics Director continued to collaborate with the Ethics Panel of the United Nations and the Ethics Network of Multilateral Organizations to share best practices and promote coherent standards for ethical conduct, transparency, and accountability at UNHCR.

65. The Director of Ethics participated in monthly Ethics Panel meetings as well as ad hoc meetings, including with 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.



Armenia. Refugees arrive in Armenian border town.

4 Observations and the Way Forward

66. The Ethics Office is the leading voice in fostering the Speak Up culture and promoting ethics and integrity at UNHCR.

67. The UN Joint Inspection Unit, in its report of 2021/5 titled: ‘Review of the ethics function in the United Nations system,’⁴ in its assessment of the independence of the Ethics Office, recommended that the annual report of the head of the ethics function, or summary thereof, goes to the governing body with any comments of the executive head thereon;

68. To continue effectively supporting UNHCR and its personnel, the Ethics Office will undertake several awareness-raising campaigns throughout 2024 and 2025, in addition to proposing updates to the AI on PaR.

69. Following the positive reactions and early positive performance indicators of the Support Desk, Ethics will promote additional information campaigns to be jointly undertaken in 2024–2025 with other entities from the integrity system that are part of the Support Desk. At the same time, Ethics will closely monitor matters once they are referred to entities to ensure that they are addressed and closed in a timely manner.

70. Communication and outreach materials will continue to be a focus in 2024, as tools to create and raise awareness of ethics

and integrity at UNHCR. The Ethics Office will leverage use of internal and external communications platforms in 2024. In early 2024, the Ethics Office launched its external facing website (www.unhcr.org/us/about-unhcr/governance-and-oversight/ethics-office). The website will increase transparency with partners, member States and the public. It will provide key information on the various workstreams of the Ethics Office and links to the Code of Conduct materials.

71. The feedback from CoCD focal points continues to be positive. It also expresses a need for specific subjects to be addressed (for example, social media and political activity). Furthermore, Ethics will give more targeted training for the PAN and CoCD focal points and, where appropriate, will include other members of the integrity family.

72. In 2024, the Ethics Office will strategically and more systematically share advisories and guidance on various topics, including receiving gifts, outside activities, the UNFDP and political activities.

73. Based on its observations from 2023, the Ethics Office will introduce a new CoCD theme for 2025 that is focused on managing conflicts of interest, and it will update the CoCD materials to be launched in 2025.

⁴ 2021/5 UN Joint Inspection Unit Review of the ethics function in the United Nations system
https://www.unjui.org/sites/www.unjui.org/files/jiu_rep_2021_5_english.pdf



Chad. UNHCR and partners relocate Sudanese refugees living in makeshift shelters at the border in Chad to new refugee site Alacha.

5

Abbreviations and Acronyms

AI on PaR	Administrative Instruction on Protection against Retaliation
CoCD	Code of Conduct Dialogue
DHR	Division of Human Resources
IGO	Inspector General Office
MENA	Middle East and North Africa
PAN	Peer Advisors Network
PAR	Protection Against Retaliation
SD	Support Desk
UNFDP	United Nations Financial Disclosure Programme



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