



Pan American  
Health  
Organization



World Health  
Organization  
REGIONAL OFFICE FOR THE  
Americas

# 167th SESSION OF THE EXECUTIVE COMMITTEE

*Virtual Session, 30 September 2020*

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*Provisional Agenda Item 3.4*

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## ANNUAL REPORT OF THE ETHICS OFFICE FOR 2019

### Introduction

1. All Pan American Sanitary Bureau (PASB) personnel must work together to carry out the Pan American Health Organization (PAHO) mission of promoting equity in health, combating disease, and improving the lives of the peoples of the Americas. The core values of equity, excellence, solidarity, respect, and integrity guide the work of PASB, as well as the conduct of its personnel. Since its establishment in 2006, the Ethics Office has played a key role in strengthening these values by promoting ethical behavior, transparency, accountability, and equity.
  2. The Ethics Office is guided by the principles of integrity, independence, and impartiality in pursuing its mandate of ensuring ethical conduct and compliance with the rules and policies designed to promote the highest standards of ethical behavior. The Ethics Office performs its functions without any external influence from staff, management, or third parties outside the Organization.
  3. The Ethics Office is an independent entity within the PASB organizational structure and has a direct reporting relationship to the Governing Bodies of PAHO through the Executive Committee. Within PASB, the Ethics Office reports to the Deputy Director for performance evaluation and routine administrative matters, including biennial work plans, budget, staffing needs, and the approval of duty travel and leave.
  4. When it was established in 2006, the Ethics Office had a dual mandate: *a)* to provide guidance and advice to PASB personnel on ethical issues, and *b)* to conduct administrative fact-finding investigations into allegations of misconduct. On 1 January 2018, the investigative function was transferred to a newly established Investigations Office. However, the new Chief Investigator was not appointed until 11 March 2019 and, as a result, the Ethics Program Manager continued to oversee the investigative function in PASB until that time. Nonetheless, this report is limited to the activities of the Ethics Office in 2019, since the Investigations Office will provide its own annual report summarizing its activities for the entire year.
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5. Respect for others, integrity, trust, open communication, and tolerance for different cultures and perspectives are essential for an internal work environment in which all personnel feel valued and can perform at their highest level. The Ethics Office strives to cultivate these behaviors and provides appropriate guidance to personnel when necessary.
6. Every person who works for PASB is expected to abide by and apply the principles of the PAHO Code of Ethical Principles and Conduct (“the Code”) in their day-to-day activities, both inside and outside the workplace. The Ethics Office is tasked with promoting the high ethical standards espoused in the Code and responding to any doubts, questions, or uncertainties about these principles.
7. Access to the Ethics Office is available to all personnel in PASB, irrespective of contractual status. Personnel are encouraged to seek advice on how to comply with the principles of ethical behavior set out in the Code and in other policies that regulate the conduct of international civil servants. The Ethics Office plays a central role in promoting and shaping a culture of ethics and integrity in PASB, providing guidance and training to help personnel make the right ethical choices, and integrating the principles set forth in the Code into the daily professional practice of all personnel. The role of the Ethics Office is vital to helping PAHO convey transparency, trust, and integrity, both within the Organization and in its relationships with Member States, stakeholders, and external partners as it carries out its mission of championing health throughout the Americas.
8. By employing a variety of methods and resources such as printed materials, face-to-face training sessions, interactive technology, and multimedia tools, the Ethics Office promotes high ethical standards and awareness both in Headquarters and in the PAHO/WHO Representative (PWR) Offices and PAHO Centers. The Ethics Office stays abreast of emerging trends and shifting priorities in the areas of ethics and compliance, which enables it to develop new policies and initiatives that are then incorporated into learning activities.
9. The Ethics Office is the coordinator of the PAHO Integrity and Conflict Management System (ICMS),<sup>1</sup> which brings together all the resources in the Organization responsible for addressing matters of organizational integrity and conflict resolution. ICMS members meet regularly to ensure consistent application and interpretation of PAHO rules and policies, to discuss matters of mutual interest, and to suggest changes and improvements to the Organization’s conflict resolution system.
10. In this report, the Ethics Office outlines its activities, achievements, and challenges in 2019. Areas covered include: *a*) advice and guidance provided to PASB personnel in response to consultations; *b*) briefing and training activities to foster an improved ethical culture; *c*) new initiatives that were implemented in 2019 to improve awareness and reduce

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<sup>1</sup> The ICMS members include the Ethics Office, Office of the Ombudsman, Office of the Legal Counsel, Human Resources Management, Information Security Officer, Internal Oversight and Evaluation Services, Investigations Office, Board of Appeal, and PAHO/WHO Staff Association.

the risk of potential conflicts of interests; and *d*) future actions planned to further enhance the ethical culture in PASB.

11. Highlighted below are the principal activities undertaken and the results achieved by the Ethics Office in 2019 in each of the key areas described above.

### **Advice and Guidance**

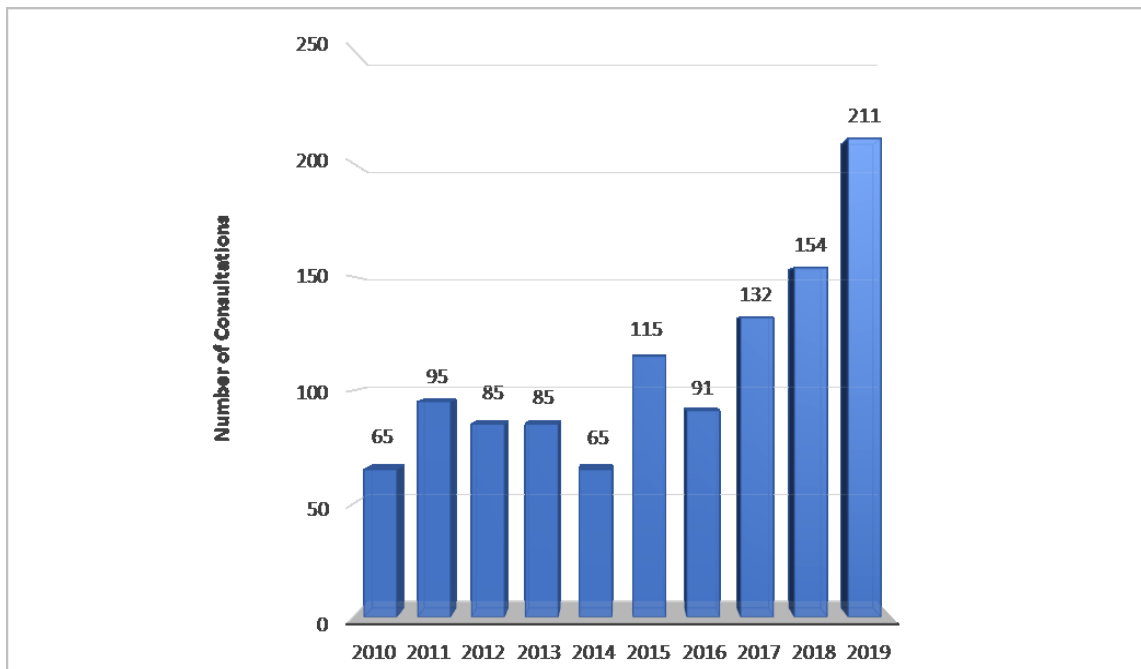
12. At its core, the main role of the Ethics Office is to help PASB personnel meet their responsibilities and obligations under the Code. All personnel are encouraged to seek advice from the Ethics Office whenever they have questions or are unsure of the potential implications of their actions. By providing authoritative guidance and advice, the Ethics Office helps personnel avoid potential conflicts of interest, thereby safeguarding the reputations of both the Organization and the individuals themselves.

13. When PASB personnel have an ethical dilemma, question, or concern, they may opt for any of several different avenues to obtain guidance from the Ethics Office. They may: *a*) consult the various written policies of the Organization, including the Code of Ethical Principles and Conduct and the International Civil Service Commission's Standards of Conduct for the International Civil Service; *b*) ask a question through the PAHO Helpline (remaining anonymous if they wish); and/or *c*) approach the Ethics Office directly (in person or by email) for guidance and advice on how to address a given situation.

14. As shown in Figures 1 and 2 below, the Ethics Office received 211 consultations in 2019 from personnel on a wide range of issues.<sup>2</sup> This represents a 37% increase in the number of consultations compared to 2018 and is the highest number of consultations received in a single year, surpassing the previous record of 154 consultations set in 2018. This upward trend indicates a sustained and increased willingness on the part of PASB personnel to seek guidance when faced with ethical considerations, as well as trust in the quality of the advice provided. The record 211 consultations received in 2019 corresponds to about 10.5% of the PASB workforce of slightly more than 2,000 individuals employed under all types of contracts.

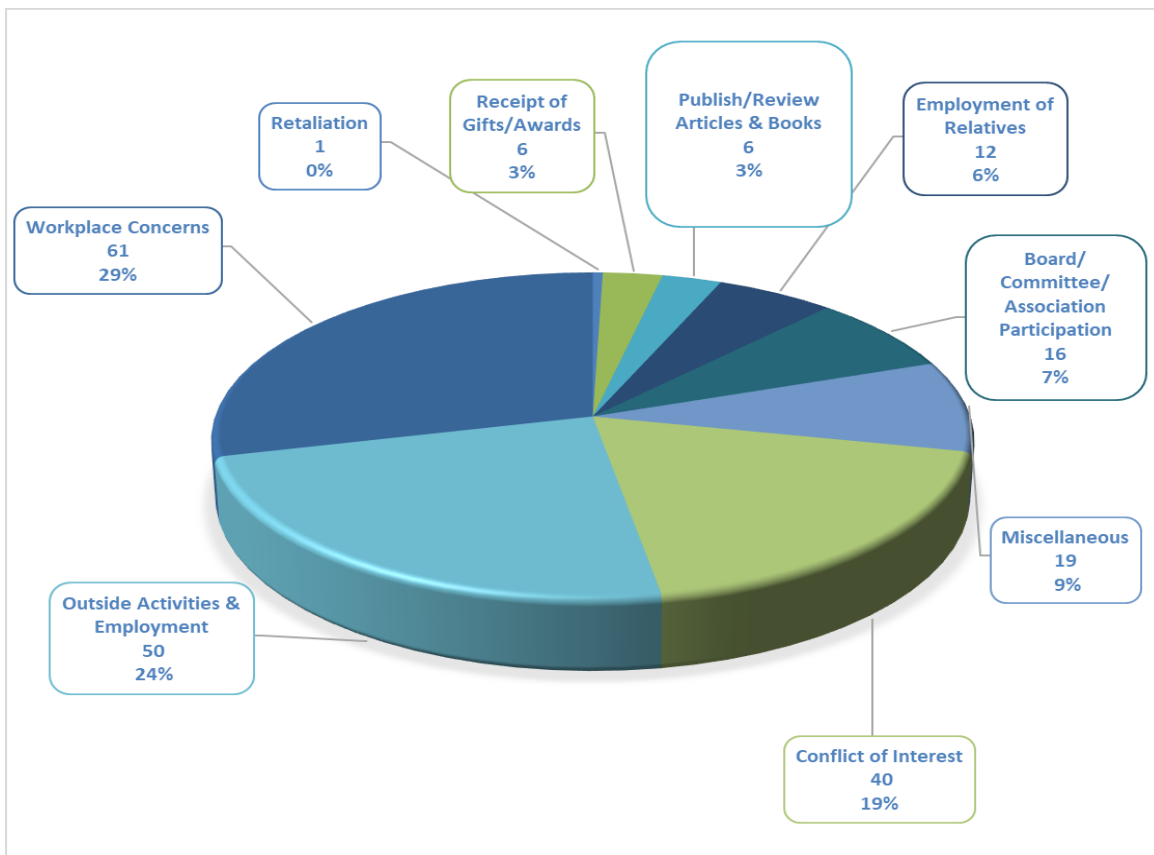
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<sup>2</sup> The Ethics Office received an additional 12 queries through the PAHO Helpline that were classified as "external non-conforming" because they were not ethics-related, but rather were questions about personal health concerns, general questions about PAHO, or other queries outside the purview of the Ethics Office.

**Figure 1. Consultations by Year, 2010-2019**

15. In 2019, the Ethics Office received 61 queries about general workplace concerns, including how to address disrespectful behavior in the workplace without having to take more formal action. One query related to whether it was appropriate for a colleague to audio-record a meeting without notifying any of the other participants. This sensitive matter is currently under review and a formal position will be elaborated soon.

16. The Ethics Office received 50 queries regarding outside activities and external employment of PASB personnel, representing a 32% increase from the previous year. Examples include whether it was acceptable to sell produce at a local farmer's market on weekends or to lecture at a university. When reviewing these types of queries, the Ethics Office determines whether the proposed activity or employment would pose a conflict of interest with the work of the Organization, create a reputational risk, or interfere with the person's ability to carry out their work in PAHO. In addition, the Ethics Office must ensure that any outside employment conforms to the individual's immigration status at their duty station.

**Figure 2. Consultations by Type, 2019**

17. In 2019, 40 queries referred to potential conflicts of interest, a 38% increase from the previous year. One inquiry pertained to whether staff could approve their own transactions under a delegation of authority, and another person inquired whether staff could hire a PAHO consultant working in their unit for a personal project. In both instances, the Ethics Office determined that these actions would constitute a conflict of interest and, therefore, did not approve the requests.

18. The Ethics Office received 12 queries related to the employment of family members or relatives of serving PASB personnel, which represented a small reduction from the 15 such queries received in each of the previous two years. In order to avoid even the appearance of nepotism, the Organization does not normally allow the employment of family members or relatives in PASB unless the person undergoes a competitive selection process, the position requires specialized skills, and no other equally qualified candidate is available.

19. Fifteen queries were received in 2019 about serving as a board member of an outside organization or association. This is a notable increase in relation to 2018, when only seven such queries were received. As part of the review process, the Ethics Office ensures that the person's participation would not create a conflict of interest with the

mandate or work of the Organization, that it does not interfere with the person's duties and responsibilities in PAHO, and that no PAHO resources are used to undertake the activity.

20. Six consultations were received regarding gifts from suppliers or vendors. The Code stipulates that a gift from an outside source may only be accepted if it is "infrequent and of minimal value." Accordingly, PASB personnel are required to decline substantial gifts to avoid any perception of preferential treatment and any expectation of reciprocity from the vendor in the future.

21. Six queries related to the publication of books, and 19 other queries pertained to miscellaneous issues.

22. This was the first year that a link to the Helpline was placed on the PAHO public-facing website, thereby making it accessible to people outside as well as inside the Organization. While the intent was to permit external parties to contact the Ethics Office with any questions or concerns about the ethical behavior of PAHO personnel, partners, or vendors,<sup>3</sup> this measure had the unintended consequence of inviting questions from outside parties about their personal health, general public health issues, and other matters unrelated to ethics. In 2019, the Ethics Office received 18 inquiries from outside parties through the Helpline, 12 of which did not raise any ethical issues. Nonetheless, all inquirers received a response explaining the purpose of the Helpline and, if appropriate, directing them to other resources that might be available to assist them.

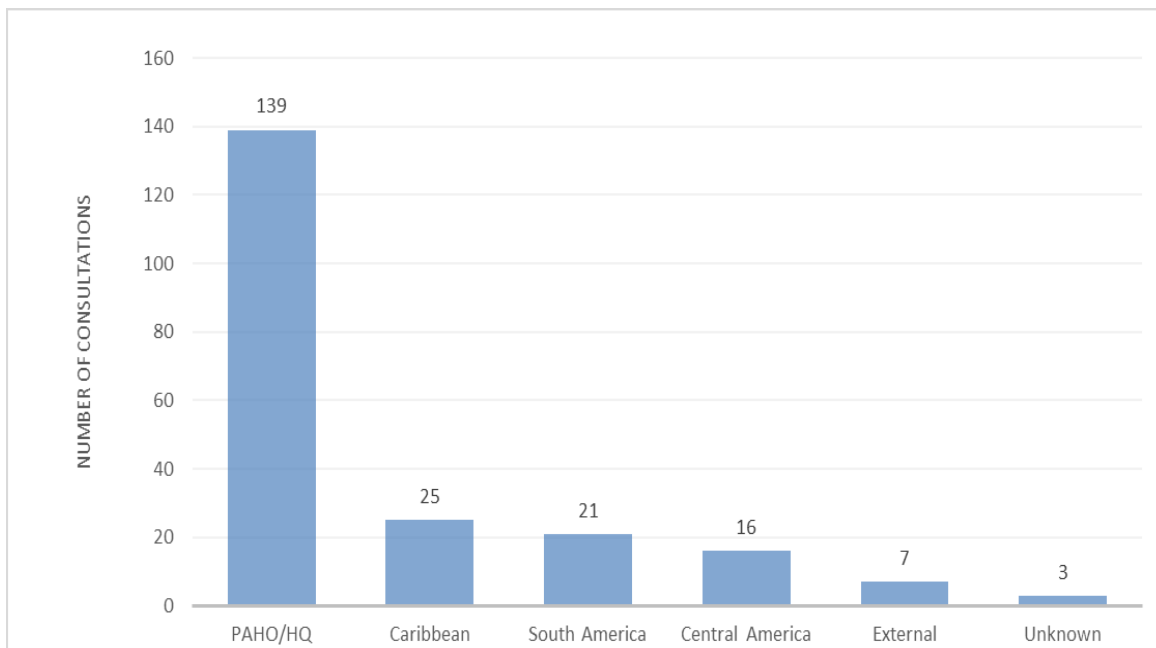
23. The Ethics Office also received one claim of retaliation by a supervisor. The claim was reviewed in accordance with the PAHO Policy to Protect Against Retaliation for Reporting Wrongdoing or Cooperating in an Investigation or Audit and was forwarded to the Investigations Office for consideration.

24. Figure 3 shows that 66% (139) of all consultations came from personnel at PAHO Headquarters, while 30% (62) came from personnel in the PWR Offices and PAHO Centers, disaggregated as follows: 10% (21) from South America, 8% (16) from Central America, and 12% (25) from the Caribbean. Seven consultations originated from people who had previously worked in PASB, and three consultations did not include any identifying information.

25. These figures reflect increased efforts by the Ethics Office to train personnel at Headquarters and in the Caribbean; however, it is noted that efforts need to be maintained throughout the entire Organization.

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<sup>3</sup> The PAHO Helpline also allows external parties to contact the PAHO Investigations Office with any allegations of misconduct on the part of PAHO personnel, partners, or vendors.

**Figure 3. Consultations by Subregion, 2019**

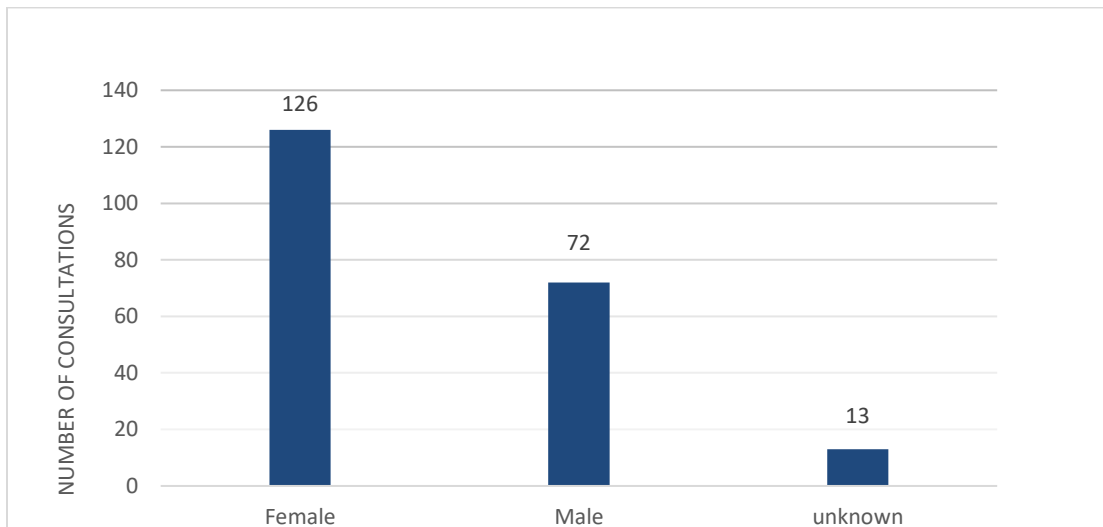
26. Figure 4 shows that female personnel accounted for about 60% of the total number of consultations received. This is consistent with their representation in the PAHO workforce, which is made up of 60.1% women.<sup>4</sup> Of the 126 consultations received from women, 94% (118) were from holders of United Nations (UN) contracts, while only 4% (5) originated from female personnel who are non-UN staff.<sup>5</sup> Figure 4 also shows that men accounted for 34% of all consultations in 2019 while representing 39.7% of the PAHO workforce. Of the 72 consultations received from men, 97% (70)<sup>6</sup> were from holders of UN contracts, while no consultations were received from male non-UN contract holders. Thirteen consultations did not disclose gender.

27. For the most part, the breakdown of consultations by gender approximates the demographic situation in the Organization. However, the relatively low number of consultations from non-UN staff indicates that additional outreach efforts must be made to sensitize these personnel about the organizational resources that are available to assist them and to ensure that they are comfortable asking questions. The experience of the Ethics Office is that the tenuous nature of non-staff contracts serves as a perceived barrier for individuals who may wish to approach the Ethics Office but who fear they may be putting their contract status at risk if they are viewed as complainers or problematic personnel.

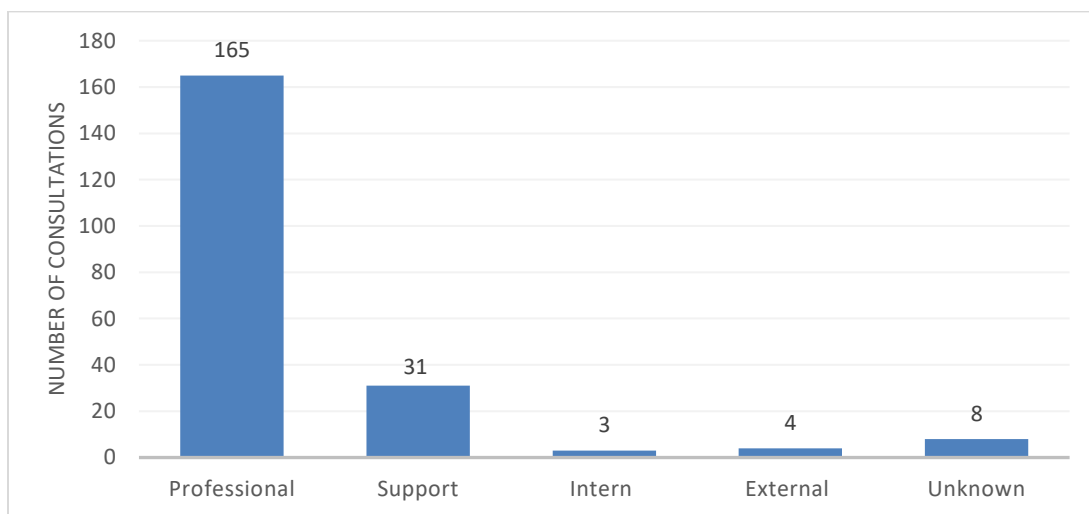
<sup>4</sup> Based on a total personnel count of 2,200 on 31 December 2019 as provided by the Department of Human Resources Management (HRM).

<sup>5</sup> Three of the consultations from women originated outside PASB.

<sup>6</sup> Two of the consultations from men originated outside PASB.

**Figure 4. Consultations by Gender, 2019**

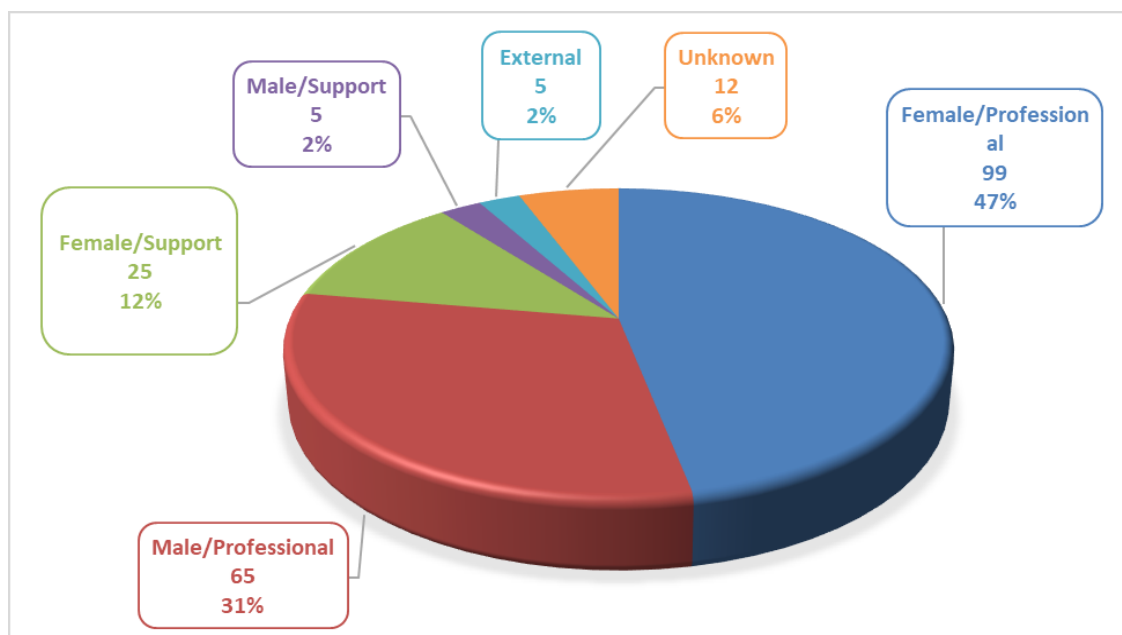
28. Figure 5 shows the number of consultations by employment category. While personnel in the professional category make up 55% of the total PAHO workforce, they were responsible for 78% (165) of consultations in 2019. In contrast, support personnel make up 45% of the PAHO workforce but accounted for only 15% (31) of consultations. While it is reasonable to expect a higher number of questions from staff in the professional category due to their participation in professional committees, boards, and associations, this discrepancy continues to be a challenge for the Ethics Office in trying to achieve a more balanced representation between these two categories of personnel.

**Figure 5. Consultations by Employment Category, 2019**



29. Figure 6 shows the disaggregation of data by both gender and employment category. The highest number of consultations in 2019 were from female professional personnel, who accounted for 47% of all consultations while making up only 31% of the total workforce. The next highest group was male professionals, who had 31% of all consultations while accounting for 24% of total personnel. In contrast, male support personnel had the lowest rate in 2019, accounting for only 2% of the total number of consultations while representing 16% of the overall workforce.

**Figure 6. Consultations  
by Gender and Employment Category, 2019**



### Briefing and Learning Opportunities

30. The objectives of the Ethics Office in providing briefing and learning opportunities for PAHO personnel are: *a)* to impart a sound knowledge of the Code and the Organization's expectations in terms of appropriate behavior; *b)* to provide tools and resources that enable PASB personnel to address ethical concerns and to know when and how to seek guidance and assistance; and *c)* to lay the groundwork for establishing a strong ethical culture and respectful workplace.

31. In 2019, the Ethics Office conducted training sessions on proper ethical behavior, conflicts of interest, fraud prevention and detection, use of social media, personal and sexual harassment, and whistleblower protection in five Headquarters departments and one PWR Office/Subregional Office (table below). In view of the financial situation in PASB during the latter part of 2019, the Ethics Office was compelled to curtail its regular travel schedule to PWR Offices; however, it hopes to resume its missions in 2020 as these visits provide field staff with a valuable opportunity to engage with the Ethics Office both during

the training sessions and in one-on-one private meetings. The Ethics Office also hopes to provide more training sessions to Headquarters personnel in 2020.

**Table 1. Entities beneficiaries of trainings in 2019**

PWR/Subregional Office	Headquarters Departments
Barbados/CPC	Financial Resources Management (FRM)
	General Services Operations (GSO)
	Health Systems and Services (HSS)
	Human Resources Management (HRM)
	Procurement and Supply Management (PRO)

32. Together with the Office of the Ombudsman, the Ethics Office also provided sexual harassment training to one office and three departments at Headquarters: Internal Oversight and Evaluation Services, Information Technology Services, Planning and Budget, and Procurement and Supply Management. This training program aims to provide a better understanding of what constitutes sexual harassment, how to avoid behavior that might give rise to an allegation of sexual harassment, and the available resources in PASB to prevent and address sexual harassment in the workplace.

33. In 2019, the Ethics Office also provided briefings to a new group of PAHO administrators and a group of interns at PAHO Headquarters.

34. The Ethics Office is a regular presenter for the PLUS@PAHO orientation program for new personnel, which had sessions in the spring and fall of 2019. By participating in this program, the Ethics Office has the opportunity to highlight the importance of ethical behavior and to emphasize that PAHO is an ethical organization with high values and standards.

35. Finally, the Ethics Office curriculum on the iLearn platform had over 1,000 enrollees. The 2.5-hour curriculum comprises three activities: *a*) a United Nations course on Prevention of Harassment, Sexual Harassment, and Abuse of Authority in the Workplace; *b*) a UN video entitled *To Serve with Pride: Zero Tolerance for Sexual Exploitation and Abuse*; and *c*) a user survey. The curriculum is mandatory for all PAHO personnel, regardless of position or type of contract.

### **Other Actions and Initiatives**

36. The Ethics Office took action on several fronts in 2019 to ensure a smooth transition and a proper separation of the ethics and investigative functions. These actions included updating both the Ethics intranet and internet sites and revising all relevant policies to account for the separate offices and their distinct functions. In addition, the PAHO

Helpline<sup>7</sup> was bifurcated so that users who wish to ask a question on an ethical issue are directed to the Ethics Office, while users who wish to report suspected misconduct are channeled to the Investigations Office. These changes were announced to personnel via a PAHO Information Bulletin (PIB-HQ-CO-Centers-19-3073).

37. The Ethics Office also placed a quick link to the Helpline on both the PAHO Intranet and Internet homepages to ensure visibility and easy access for all PASB personnel and people outside the Organization.

38. In 2019, the Ethics Office, assisted by the members of PAHO's Integrity and Conflict Management System, finalized the drafting of a new, comprehensive anti-fraud and corruption policy to address the various types of fraud and risk factors and to highlight the proactive measures that can be taken to reduce the incidence of fraudulent activity. This policy is in the final stages of the internal review process and will be issued in 2020.

39. Due to challenges with the existing platform for the automated Declaration of Interests (DOI) program, the Ethics Office worked with the Information Technology Services Department to develop an automated platform within the PASB Management Information System (PMIS). This project is ongoing, with the expectation that the DOI program will be relaunched in September 2020.

40. As a result of the 2019 Personnel Engagement survey, PAHO entities were asked to review their results and develop action plans for achieving increased personnel engagement. The Ethics Office was invited by various managers to help support them in implementing their follow-up plans and activities.

41. As part of its efforts to stay abreast of developments in the ethics field, PAHO participates in the Ethics Network of Multilateral Organizations (ENMO). ENMO serves as a forum in which to exchange information and experiences and collaborate on issues of common interest. At the ENMO annual meeting in Munich in 2019, PAHO led panels on two different topics: *a*) Due Diligence during Recruitment of New Employees: Assessing Conflicts of Interest; and *b*) Whistleblower Protection and Retaliation.

### **Future Actions**

42. The Ethics Office has two main priorities in 2020. The first will be to implement the Organization's new anti-fraud and corruption policy through an awareness campaign and specific training activities.

43. The second priority will be to develop a new code of ethical principles and conduct. In 2019, the Ethics Office received proposals from various companies to assist with the development of a modernized code that will also be more visually engaging. A company has been selected for this undertaking, and preparations are underway to start the development process for the new code.

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<sup>7</sup> PAHO Helpline is available at: [www.pahohelpline.org](http://www.pahohelpline.org).

44. In addition, the Ethics Office will continue in 2020 with its comprehensive review of the PAHO Policy to Protect Against Retaliation for Reporting Wrongdoing or Cooperating in an Investigation or Audit, which was issued in 2009. This review takes into account the latest best practices as well as the recommendations of the Joint Inspection Unit following its review of whistleblower policies and practices in UN system organizations.

45. Lastly, the Ethics Office will finalize the Candidate Disclosure form, which will be used to identify existing and potential conflicts of interest by candidates who have been selected for positions in PAHO. The Candidate Disclosure form will be included in the appointment package provided to candidates by Human Resources Management. The Ethics Office will review all forms, identifying any real or perceived conflicts of interest, and will work with candidates to resolve them prior to appointment.

**Action by the Executive Committee**

46. The Executive Committee is invited to take note of this report, solicit additional information or clarification on the work and activities of the Ethics Office in 2019, and provide additional guidance to the Organization as it sees fit.

Annex

## Analytical Form to Link Agenda Item with Organizational Mandates

1.	<b>Agenda item:</b> 3.4 - Annual Report of the Ethics Office for 2019
2.	<b>Responsible unit:</b> Ethics Office (ETH)
3.	<b>Preparing officer:</b> Mr. Philip MacMillan
4.	<b>Link between Agenda item and <a href="#">Sustainable Health Agenda for the Americas 2018-2030</a>:</b> Not applicable.
5.	<b>Link between Agenda item and the <a href="#">Strategic Plan of the Pan American Health Organization 2020-2025</a>:</b> <i>Outcome 27.</i> Leadership and governance Strengthened PASB leadership, governance, and advocacy for health
6.	<b>Link between Agenda item and the <a href="#">Program Budget of the Pan American Health Organization 2020-2021</a>:</b> <i>Outcome 27.</i> Leadership and governance: Strengthened PASB leadership, governance, and advocacy for health <i>Output 27.2.</i> The Pan American Sanitary Bureau operates in an accountable, transparent, compliant, and risk management-driven manner, with organizational learning and a culture of evaluation <i>OPT Indicator 27.2.d.</i> Proportion of personnel who believe that PAHO has a strong ethical culture
7.	<b>List of collaborating centers and national institutions linked to this Agenda item:</b> Not applicable.
8.	<b>Best practices in this area and examples from countries within the Region of the Americas:</b> Not applicable.
9.	<b>Financial implications of this Agenda item:</b> This Agenda item has no specific financial implications, but the Ethics Office continues to rely on the requisite level of funding to enable it to fulfill its mandate.