

172nd SESSION OF THE EXECUTIVE COMMITTEE

Washington, D.C., USA, 26–30 June 2023

Provisional Agenda Item 3.5

CE172/8
14 April 2023
Original: English

REPORT OF THE ETHICS OFFICE FOR 2022

Introduction

1. Established in 2006, the Ethics Office (ETH) of the Pan American Health Organization (PAHO) is one of the oldest ethics offices in international organizations and plays a key role in promoting the Organization's values and its commitment to ethical behavior, transparency, accountability, and equity. ETH is an independent entity within the organizational structure of the Pan American Sanitary Bureau (PASB), reporting directly to the Governing Bodies of PAHO through the Executive Committee. Within PASB, ETH 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. ETH performs its functions without any external influence from staff, management, or third parties outside of the Organization.
2. The Ethics Office is guided by the principles of integrity, independence, and impartiality in pursuing its mandate of ensuring the highest standards of ethical conduct in every facet of the Organization's work. ETH plays a central role in promoting and shaping a culture of ethics and integrity in PASB, providing guidance, training, and support to help personnel make the right ethical choices, and integrating the provisions set forth in the PAHO Code of Ethical Principles and Conduct (the "Code") into the daily professional practice of all personnel.
3. Access to ETH is available to all PASB personnel, irrespective of contractual status, and personnel are encouraged to seek timely 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.
4. The Ethics Office is the coordinator of the PAHO Integrity and Conflict Management System¹ (ICMS), which brings together all the resources in the Organization responsible for addressing matters of organizational integrity and conflict resolution. ICMS members meet regularly² to ensure a consistent application and interpretation of

¹ The ICMS is composed of members from the Ethics Office, Office of the Ombudsman, Office of the Legal Counsel, Human Resources Management, Information Security Officer, Office of Internal Audit, Investigations Office, Board of Appeal, and PAHO/WHO Staff Association.

² The ICMS met 24 times in 2022 with a special focus on updating the Organization's Investigation Protocol.

PAHO rules and policies, to discuss matters of mutual interest, and to suggest changes and improvements to the Organization's ethical policies, as well as in the conflict resolution system.

5. With the extension of emergency telework for most of 2022, ETH continued to carry out its activities virtually, with minimal disruption to its normal activities. Personnel at Headquarters returned to their offices with a hybrid in-person/telework schedule in the fourth quarter of 2022, and ETH provided services both in person and virtually in light of the new hybrid working arrangement.

6. ETH carried out its regular activities in 2022 but also integrated several other corporate initiatives and responsibilities into its portfolio, namely: *a)* Diversity, Equity and Inclusion (DEI), which was originally spearheaded by WHO but has recently been assigned to the regional offices; *b)* acting as PAHO Ombudsman since the departure of the former incumbent in March 2022; and *c)* Preventing and Responding to Sexual Exploitation, Abuse and Harassment, addressed in more detail in Document CE172/26.

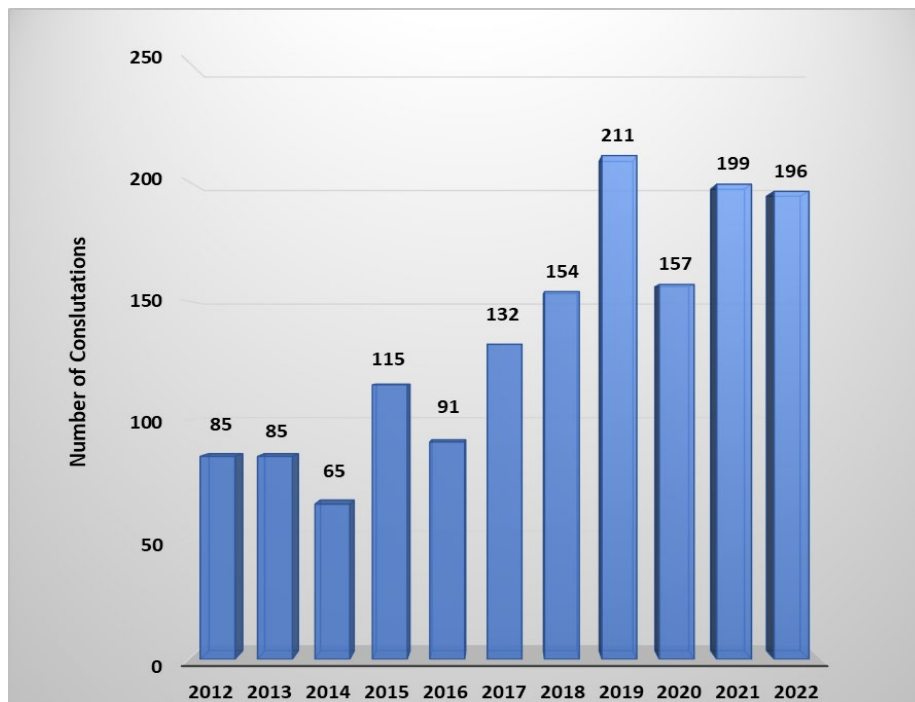
7. In this report, ETH highlights its activities, achievements, and challenges in 2022, as well as its future planned actions to further enhance the ethical culture in PASB.

Advice and Guidance

8. The principal role of ETH is to help PASB personnel meet their responsibilities and obligations under the Code while increasing their practical knowledge of the standards of conduct expected of them as international civil servants to help them make the right ethical decisions in their day-to-day work. Personnel are encouraged to seek advice whenever they have questions or are unsure of the potential implications of their actions. By providing authoritative guidance and advice, ETH helps personnel avoid potential missteps, including engaging in possible wrongdoing, thereby safeguarding both the Organization and the individuals themselves.

9. As shown in Figure 1 below, ETH received 196 consultations from personnel in 2022 on a wide range of issues.³ This number is consistent with the 199 consultations received in 2021 with the notable difference that there was a significant decline, as expected, in the number of vaccine-related queries from 40 in 2021 to only one in 2022. On the other hand, there was a corresponding increase in workplace concerns and conflict of interest questions, which can be attributed to the resumption of closer to normal operations, leading to an increase in personnel interactions and a greater involvement in outside activities.

³ The Ethics Office also received three queries through the PAHO Helpline that were not related to the work of PASB. While responses were provided, these queries are not included in the total number of consultations handled in 2022.

Figure 1. Consultations by Year, 2012–2022

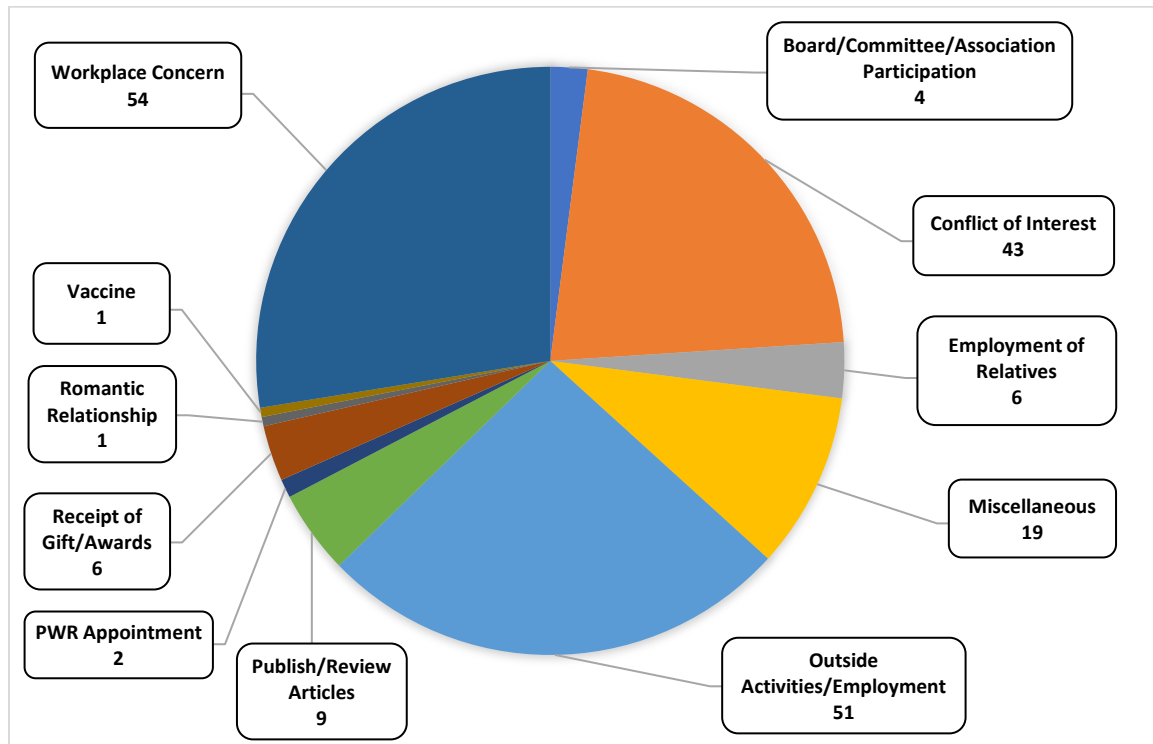
10. The types of consultations received in 2022 are shown in Figure 2 below. As was the case in 2021, queries pertaining to outside activities and employment constituted more than 25% of the queries received. The increase in consultations about outside employment during the past two years may be attributed to the economic instability generated by the COVID-19 pandemic, rising inflation, and individuals simply wishing to improve their overall financial situation.

11. A total of 54 people reached out to ETH with workplace concerns in 2022. This represented more than twice the number of reports received in 2021 (which totaled 23) after a two-year downward trend for these types of issues. Of the 54 requests for guidance and/or assistance, four individuals reached out specifically to ETH in its role as acting Ombudsman. In addition to these four requests, it is likely that a number of workplace concerns raised by personnel in 2022 would have been handled by the Ombudsman had an incumbent been in position. The return to premises likely contributed to the upswing in workplace concerns, given that personal interactions increased accordingly.

12. The Ethics Office received 43 queries in 2022 related to conflicts of interest, almost twice the number of consultations received in 2021. The increase in this type of consultation may be linked to the recent implementation of conflict of interest declaration forms for both new hires and consultants, which has increased awareness about the importance of avoiding and disclosing actual or potential conflicts of interest.

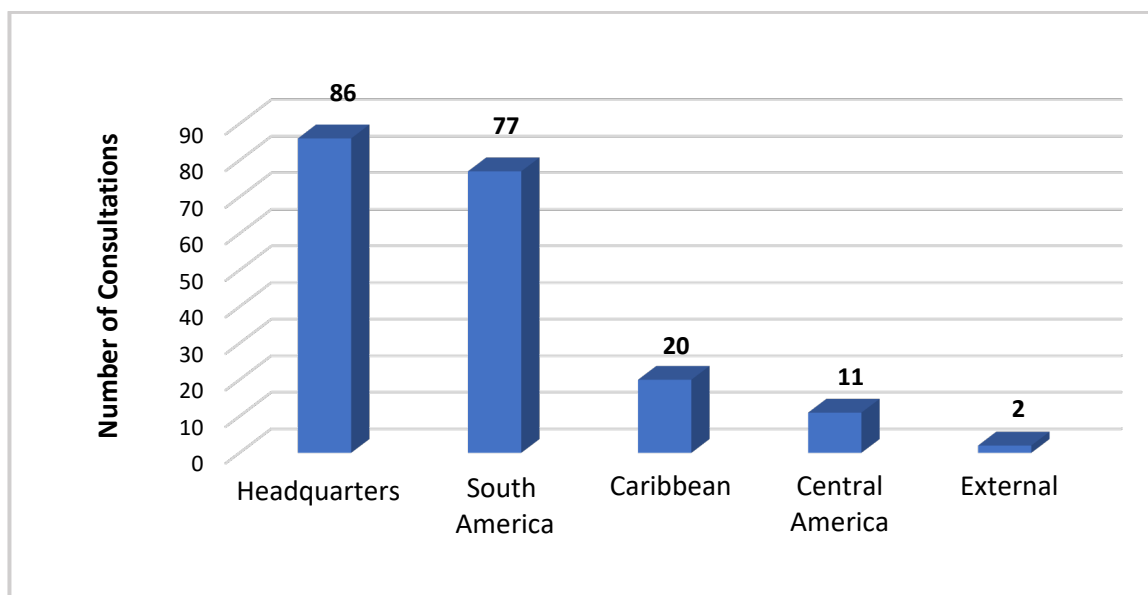
13. In addition, ETH received nine queries relating to the publication of books; six queries concerning gifts from suppliers or vendors; six queries relating to the employment of family members or relatives of serving PASB personnel; four queries about serving as a board member on an outside organization or association; two questions about the appointment of a PAHO/WHO Representative; one question about romantic relationships in the workplace; and 19 other queries pertaining to miscellaneous issues.

Figure 2. Consultations by Type, 2022



14. PAHO is one of the few international organizations that provides the option to personnel of asking questions on ethical issues while remaining anonymous. To facilitate this type of reporting, the PAHO Helpline is bifurcated so that consultations or queries are directed to ETH while allegations of misconduct are directed to the Investigations Office. In 2022, ETH received 15 consultations through the Helpline, four of which were anonymous.

15. For the first time since the establishment of ETH in 2006, a greater number of consultations originated from personnel at the PAHO/WHO Representative (PWR) Offices and Centers than from personnel at Headquarters. Figure 3 below shows that 44% of all consultations originated from personnel at PAHO Headquarters, while 55% were from personnel in the PWR Offices and Centers, disaggregated as follows: 39% from South America, 10% from the Caribbean, and 6% from Central America. Two consultations (1%) came from individuals external to PASB.

Figure 3. Consultations by Location, 2022

16. Based on issues that were brought to its attention in 2022, ETH referred five matters to the Investigations Office for consideration and action, as appropriate.

Briefing and Learning Opportunities

17. A workforce that is informed and aware of the expectations for proper conduct is more likely to make the right ethical decisions, ask questions, and serve as positive role models for peers and colleagues. To this end, one of the principal functions of ETH is to conduct learning and awareness raising activities. ETH utilizes a variety of methods and resources to achieve this objective, including printed materials, face-to-face training sessions, interactive technology, and multimedia tools to promote high ethical standards and awareness both at Headquarters and in the PWR Offices and Centers.

18. In 2022, ETH implemented a new mandatory online training course developed by the United Nations (UN), entitled “Prevention of Sexual Exploitation and Abuse (PSEA).” As of the end of 2022, more than 86% of PASB personnel had completed the course. In addition, ETH provided an information session on Preventing and Responding to Sexual Exploitation, Abuse and Harassment (PRSEAH) to all PWR Offices in the Caribbean and Central America. More detailed information about PRSEAH activities can be found in Document CE172/26, Update on Preventing and Responding to Sexual Exploitation and Abuse in PAHO.

19. Furthermore, online training on a wide range of ethics-related topics, including appropriate ethical behavior during the Election of the Director, was carried out for *a)* PAHO/WHO Representatives, *b)* Communications Country Focal Points, and *c)* personnel in the PWR Offices in Brazil and Honduras.

20. Toward the end of 2022, ETH resumed travel to conduct in-person training sessions. Face-to-face training is more effective, engaging, and informative than virtual training and typically generates more questions from participants. In-person ethics training was conducted for PASB personnel in the Eastern Caribbean countries, in the Subregional Program for the Caribbean, and in the PWR Office in Bolivia.

Other Actions and Initiatives

21. In the fourth quarter of 2021, an Ethics and Climate Survey was conducted throughout the Organization by NAVEX Global, an outside service provider. NAVEX Global presented the results of the survey, along with its recommendations, to Executive Management in April 2022. In June 2022, the survey results were shared with PASB personnel during two general staff meetings, one conducted in English and the other in Spanish, with interpretation into French and Portuguese. Recordings were made of these sessions and posted to the PAHO intranet, so that anyone absent from the sessions could watch at their convenience. Action is being taken to address the survey results (see paragraph 33 below).

22. As the Coordinator of the PAHO Integrity and Conflict Management System (ICMS), ETH worked closely with the ICMS members to make changes to the PAHO Investigation Protocol, which culminated in the issuance of an updated Protocol in early 2023. Noteworthy changes made to the Protocol include a new requirement to fully investigate all allegations of a personal nature—including claims of sexual exploitation and abuse, sexual harassment, personal harassment, discrimination, and retaliation—and to submit investigative reports to management for consideration.

23. Given that 2022 was an election year for a new PAHO Director, ETH issued an Information Bulletin to personnel informing them that they must remain neutral and objective, could not publicly endorse a candidate, and could not organize any social events in support of a particular candidate. In the end, the election proceeded smoothly, and ETH was not made aware of any issues or concerns.

24. To help facilitate the reporting of ethical concerns and suspected misconduct, the telephone component of the PAHO Helpline was reinstated in 2022. In addition to asking a question or filing a report online, people both within and outside of PAHO now have the option of calling a toll-free number from any country in the Region of the Americas and speaking to a live operator. This additional feature, which is available with simultaneous interpretation into any language, will make it easier for people to access the Helpline, especially those in communities served by PAHO who might not have easy access to computers and smartphones.

25. In September 2022, ETH carried out the Organization's annual Declaration of Interests program, which requires all senior managers and staff in designated employment categories—including Executive Management, country representatives, department directors, unit chiefs, administrative officers, and all procurement and finance personnel—to complete a questionnaire and disclose any personal or outside activity that could give

rise to a conflict of interest. The questionnaire was sent to 215 staff members in PASB, and 207 responses were received and reviewed.

26. The Ethics Office also manages the conflict of interest disclosure program for newly selected staff, which helps to identify any actual or potential conflict of interest prior to someone joining the Organization. In 2022, ETH reviewed 112 disclosure forms for new hires and coordinated with candidates and their prospective supervisors to address any issues that were identified.

27. The Ethics Office also recently implemented a new conflict of interest disclosure program for all international and national consultants. In 2022, ETH reviewed 604 disclosure forms from consultants and addressed over 175 situations where there were potential conflicts. A large percentage of the conflicts addressed by ETH arose because many consultant candidates reported having other full or part-time employment which could detract from their time commitment to PAHO, and potentially impact the timeliness and quality of their work. Another issue regularly flagged through this disclosure program was the potential contracting of family members, which is normally not permitted by the Code. In these cases, as well as others where a consultant was unable or unwilling to modify time commitments or mitigate another conflict of interest, ETH pointed out to management the conflict of interest and risks of such contracts.

28. The Ethics Office continues to oversee the Organization's Diversity, Equity and Inclusion (DEI) initiative, including participating in the PAHO Regional Catalyst Group and working to increase DEI across the various areas of the Organization.

29. 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 members from 49 international organizations and financial institutions exchange information and experiences and collaborate on issues of common interest. The 2022 annual conference was held in person, for the first time since 2019, at the Headquarters of the United Nations Educational, Scientific and Cultural Organization (UNESCO) in Paris, France. The PAHO Ethics Program Manager continues to play an important role in the network through participation on the ENMO Executive Committee.

Future Actions

30. While work continued in 2022 on the development of a new code of ethical conduct, progress was delayed due to a number of competing activities and priorities, including serving as acting Ombudsman and focusing on PRSEAH activities. A renewed focus is now being placed on the new code, and it is expected to be finalized and issued in mid-2023. This modernized code is designed to be more engaging and informative and should set the tone for ethical conduct in the Organization for years to come.

31. PRSEAH and the safeguarding of victims continues to be a priority for PASB and the focus of several activities undertaken by ETH. A new senior professional post dedicated to preventing and responding to sexual misconduct was established in 2022 in ETH and a

short-term professional was appointed to the post in November 2022. Further information on this topic is provided in Document CE172/26, Update on Preventing and Responding to Sexual Exploitation and Abuse in PAHO.

32. In early 2022, PAHO began using the UN Clear Check database to screen candidates who were employed or contracted in the UN system and who were terminated or disciplined for engaging in sexual misconduct. To further expand the screening of candidates, PAHO will be partnering with an outside company that has the capability to carry out worldwide criminal background checks and sexual offender registry list verifications. This will help to prevent disreputable individuals from entering the Organization in the first place.

33. The 2021 Ethics and Climate Survey revealed that only 68% of PAHO personnel were aware of the Helpline, where individuals can ask questions on ethical issues or report suspected misconduct and remain anonymous if they wish. Additional measures are being taken to ensure that personnel are aware of the Helpline by making it more visible and accessible, simplifying reporting forms, and raising awareness at every opportunity through increased outreach and training.

34. At present, PAHO has separate policies on the prevention and response to sexual exploitation and abuse and sexual harassment, which is included as a stand-alone section in the PAHO Policy on the Prevention and Resolution of Harassment in the Workplace. In 2023, a single comprehensive policy encompassing all types of sexual misconduct will be developed and the PAHO Policy on the Prevention and Resolution of Harassment in the Workplace will be modified accordingly and brought up to date by incorporating the latest best practices.

Action by the Executive Committee

35. The Executive Committee is invited to take note of this report and provide any comments it deems pertinent.

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