
REPORT OF THE ETHICS OFFICE FOR 2023

Introduction

1. The Ethics Office (ETH) of the Pan American Health Organization (PAHO) has played a key role since 2006 in promoting the Organization's values and ethical principles, ensuring transparency and accountability, and guiding personnel in their day-to-day work. ETH has a dual reporting relationship to enable it to properly carry out its mandate. On one hand, to maintain the requisite level of independence, ETH reports directly to the Governing Bodies of PAHO through the Executive Committee. On the other hand, to ensure internal accountability, it reports to the Deputy Director for performance evaluation and routine administrative matters, including biennial work plans, budget, staffing needs, and approval of duty travel and leave. ETH performs its functions without any external influence from PAHO staff and management or from third parties outside of the Organization.
2. The Ethics Office strives to embed the highest standards of ethical conduct in every facet of the Organization's work, promoting and shaping a culture of ethics and integrity; providing guidance, training, and support to help personnel make the right ethical decisions; 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. PAHO employs personnel under many different contract types and modalities, and access to ETH is available to everyone, irrespective of the type or duration of contract. 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. Among its various responsibilities, ETH is the coordinator of the PAHO Integrity and Conflict Management System (ICMS).¹ This system brings together all the resources in the Organization responsible for addressing matters of organizational integrity and conflict resolution. ICMS members meet regularly to ensure a consistent application and interpretation of PAHO rules and policies, discuss matters of mutual interest, and suggest changes to the Organization's policies and practices regarding ethics, conflict resolution, and administration of justice. In 2023, ETH led a review of the functioning of the ICMS to make the processes more efficient and transparent, achieve greater accountability, and improve the internal conflict resolution and administration of justice systems. Several meetings and retreats were held during the second semester, resulting in an analysis of different metrics and the establishment of baselines and key performance indicators. Work will continue on additional improvements to the ICMS in 2024.

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 Office, Office of Internal Audit, Investigations Office, Administrative Compliance program, Board of Appeal, and PAHO/WHO Staff Association.

5. In addition to carrying out its regular activities in 2023, ETH was active in several other areas of responsibility that were newly or temporarily assigned to it. These included the Organization's initiatives on Diversity, Equity, and Inclusion (DEI) and on Prevention and Response to Sexual Exploitation and Abuse and Sexual Harassment (PRSEAH). ETH also continued to carry out the functions of the PAHO Ombudsman after the departure of the former incumbent in March 2022.

6. This report outlines the highlights, achievements, and challenges of ETH in 2023 and presents its planned actions to further enhance the ethical culture of the Organization.

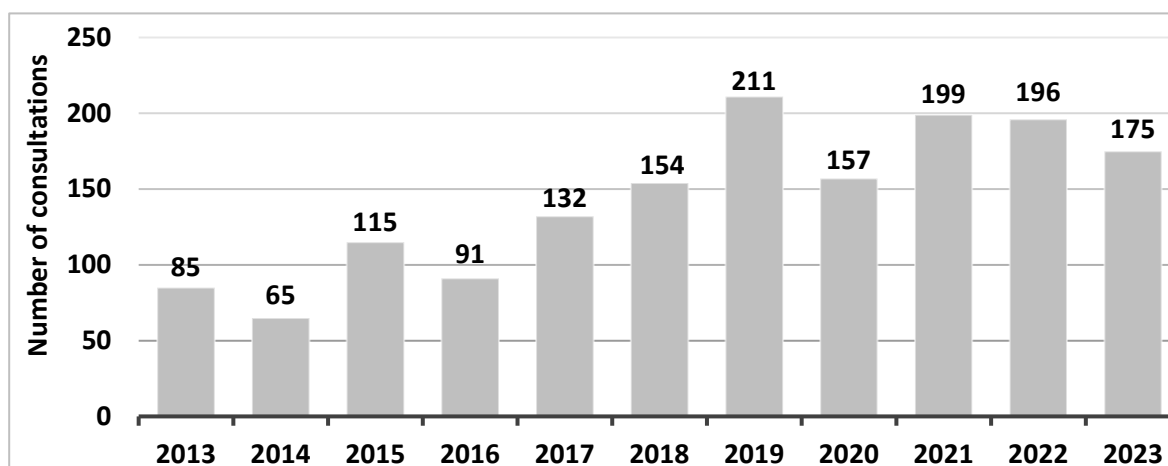
Advice and Guidance

7. The Ethics Office has 2 core responsibilities. The first is to support personnel by providing authoritative guidance and advice to help them meet their responsibilities and obligations under the Code, understand the conduct expected of them as international civil servants, and make the right ethical decisions in their day-to-day work. Personnel are encouraged to reach out for advice whenever they have questions or are unsure of the potential implications of their actions. By providing such guidance, ETH helps personnel avoid potential missteps, including engaging in possible wrongdoing, thereby safeguarding both the Organization and the individuals themselves.

8. The second core responsibility is helping to protect the reputation of PAHO. ETH contributes to the good governance of the Organization through training, outreach, awareness-raising activities, a robust declaration of interests program, promotion of a speak-up culture, an effective and fair conflict resolution system, and accountability measures, thereby helping to safeguard the Organization's image and standing in the international public health community.

9. As shown in Figure 1, ETH received 175 consultations from personnel in 2023 on a wide range of issues. While this represents a slight decrease in the total number of consultations received during the last few years, the complexity of the issues handled by ETH increased overall. In a number of instances ETH was specifically asked to intervene in its capacity as acting Ombudsman, a role that required extensive interactions, facilitations, and support. In addition, the portfolio of ETH has recently expanded in scope, especially with respect to PRSEAH and DEI, which impacted its outreach efforts in 2023. With increased staffing in the PRSEAH area, ETH will be able to intensify its outreach efforts in 2024.

Figure 1. Consultations by Year, 2013–2023

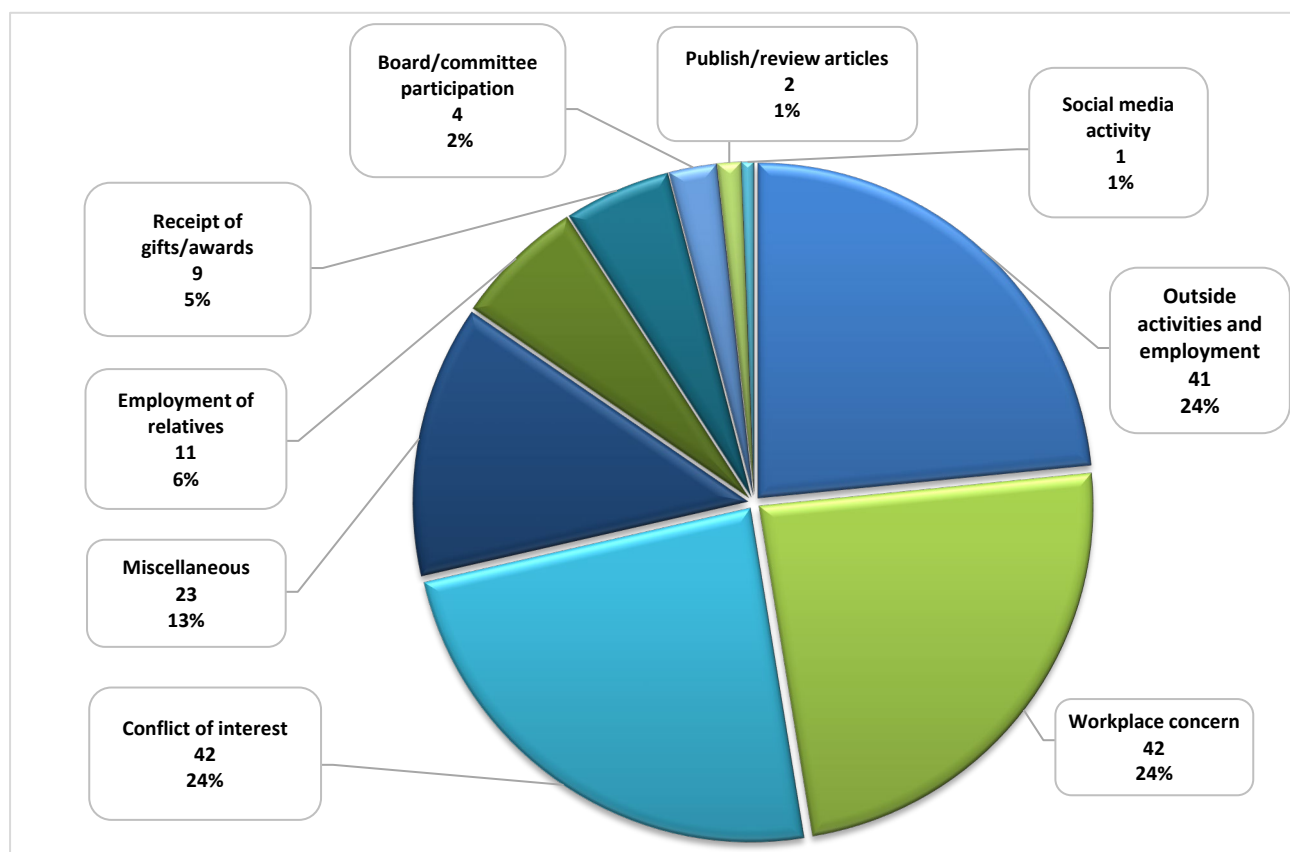


10. The types of consultations received in 2023 are shown in Figure 2. ETH continues to respond to a high number of queries regarding outside activities and employment, potential conflicts of interest, and workplace concerns. These 3 categories together amounted to 72% of all queries received.

11. The other categories of consultations remained relatively consistent with the previous year, although there was an increase in queries regarding the employment of relatives (11 in 2023, up from 6 in 2022) and a decrease in requests to publish outside publications (2 in 2023, down from 9 in 2022). The increased number of queries regarding the employment of relatives may be attributable to the various declaration of interests programs managed by ETH, which include a review of the potential contracting of family members.

12. The Ethics Office received 9 queries related to the receipt of gifts and awards, 4 about serving as a board member for an outside organization or association, 1 about social media activity, and 23 pertaining to miscellaneous issues. In 2023, no questions were received about political activities, romantic relationships in the workplace, or vaccination.

Figure 2. Consultations by Type, 2023



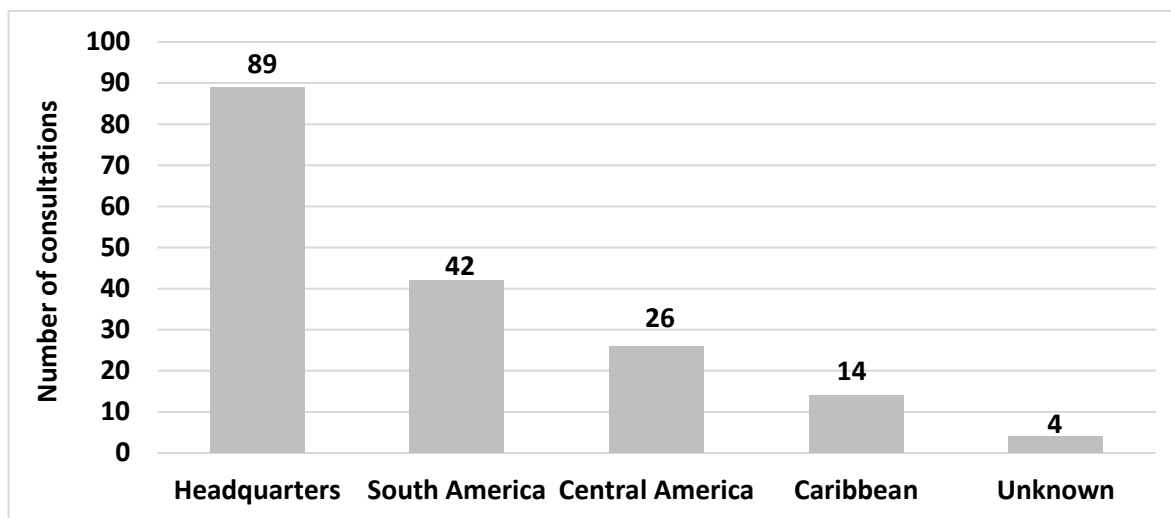
13. While most organizational helplines are limited to the reporting of suspected misconduct, PAHO is among the few international organizations that provide the option of asking questions on ethical issues, including anonymously if desired, through a helpline. To facilitate this type of

consultation, the Integrity Helpline² is bifurcated so that consultations or queries are directed to ETH while allegations of misconduct are submitted to the Investigations Office. In 2023, ETH received 6 consultations through the Integrity Helpline, 4 of which were anonymous.

14. About one-third of all PAHO personnel work at Headquarters (HQ) in Washington, D.C., while two-thirds work in the PAHO/WHO country offices and centers. Historically, however, there has always been a higher number of consultations from HQ personnel than from personnel in the country offices and centers. In 2022, for the first time, more consultations were received from personnel in the country offices and centers than from those at HQ. There was general parity between the two in 2023, with a small uptick in the number of queries from personnel at Headquarters and in Central America. While ETH is pleased that its outreach efforts are having a positive effect on the number of consultations sought by personnel in the country offices and centers, it recognizes that the distribution should be more closely aligned with the overall staffing complement in the Organization. Therefore, outreach efforts to the country offices and centers need to increase further.

15. As shown in Figure 3, 89 queries, or 51% of the total, originated from personnel at Headquarters in 2023. Another 47% originated in the country offices and centers, disaggregated as follows: 42 (24%) from South America, 26 (15%) from Central America, and 14 (8%) from the Caribbean. In addition, 4 anonymous consultations (2%) were received through the Integrity Helpline.

Figure 3. Consultations by Location, 2023



16. In 2023, ETH referred 3 matters to the Investigations Office for consideration and action, as appropriate.

Briefing and Learning Opportunities

17. One of the core responsibilities of ETH is ensuring that the people who work in the Organization have the requisite knowledge regarding their ethical duties and responsibilities, are

² Formerly the PAHO Helpline (see paragraph 34).

aware of the available sources of guidance and advice, and are able to set positive examples for their colleagues. Therefore, an important area of work in ETH is conducting training and awareness-raising activities. Employing a range of approaches, such as printed materials, in-person training sessions, interactive technology, and multimedia tools, ETH strives to cultivate a culture of integrity and awareness across the Organization.

18. In 2023, in addition to providing training sessions on general ethics-related topics,³ ETH stepped up training activities specifically related to PRSEAH, often at the request of country offices and centers. This heightened focus responded to the establishment of the PRSEAH focal point network and growing awareness of this important issue.

19. During the year, ETH provided ethics and PRSEAH training and/or financial support to 11 country offices,⁴ many of which shared their experiences in articles posted on the PAHO intranet. Almost 600 PAHO personnel participated in these training activities.

20. In addition, ETH organized the inaugural PRSEAH focal point training workshop, which was hosted by the PAHO/WHO Country Office in Brasilia, Brazil, in February 2023. This workshop involved the participation of 39 focal points from every country office and center along with various high-level managers, including the Director of Administration, Director of Human Resources Management, Legal Counsel, and Chief Investigator. The Director of the World Health Organization Department of Prevention and Response to Sexual Misconduct and members of her team also participated in the workshop.

Prevention and Response to Sexual Exploitation, Abuse, and Sexual Harassment

21. The responsibility for preventing and responding to sexual exploitation, abuse, and sexual harassment in PAHO has been entrusted to ETH. This is a critical role, since this type of egregious conduct can have a deleterious effect on the well-being of personnel, on communities served by PAHO, and on the image and viability of the Organization.

22. To strengthen efforts to prevent and respond to PRSEAH, 2 dedicated positions were created and filled. A P-5 Senior Advisor on PRSEAH at Headquarters was appointed and began her assignment on 1 January 2024. A P-4 Advisor in the Bolivarian Republic of Venezuela was appointed and started her assignment on 18 March 2024.

23. A number of other initiatives and activities were undertaken in this area in 2023, which are fully elaborated in Document CE174/29, Update on Preventing and Responding to Sexual Exploitation and Abuse in PAHO.

Diversity, Equity, and Inclusion

24. The Ethics Office has been designated as the coordinator for the Organization's efforts on Diversity, Equity, and Inclusion. Various activities were carried out in 2023, including DEI-themed

³ Ethics training covers a wide variety of topics including standards of conduct, conflicts of interest, harassment, fraud and corruption, protection against retaliation, and others.

⁴ Brazil (in addition to the PRSEAH focal point meeting), Colombia, Costa Rica, Ecuador, El Salvador, Guatemala, Mexico, Panama, Paraguay, Suriname, and Venezuela (Bolivarian Republic of).

screensavers in all 4 official languages, the creation of a mailbox for DEI-related activities, and a campaign entitled “PAHO – Where you can show your true colors,” which kicked off the Director’s Dialogue in September 2023. Based on feedback, these activities were very well received by personnel and represent a good starting point for highlighting the importance of a diverse and inclusive workforce.

25. Leadership and tone from the top are essential for the success of any initiative, and DEI-related initiatives have received unqualified support from PAHO senior management. Actions in 2023 included lighting the PAHO Headquarters in rainbow colors for Pride Month; a personalized message from the Director to all personnel in support of the International Day Against Homophobia, Biphobia, and Transphobia; publication of a series of video interviews with a diverse group of PAHO colleagues; and inclusion of DEI in the PAHO Forward Plan of Action.

26. The Ethics Office works closely with PAHO GLOBE.⁵ The Deputy Director of PAHO was recognized with the first PAHO Globe Rainbow Award for her commitment to support the LGBT community and for championing the principles of diversity, inclusivity, and equality.

27. In addition, the DEI Working Group in PAHO continued to contribute to the DEI activities of the World Health Organization (WHO), which now has a dedicated team in this important area. PAHO contributed to the WHO DEI Strategy draft document by providing strategic and technical recommendations, including anticipated PAHO activities and the potential for DEI financing from WHO.

Managing Conflicts of Interest

28. In October 2023, ETH carried out the Organization’s annual declaration of interests exercise, which requires all senior managers and staff in designated employment categories—including executive management, country representatives, center directors, 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 216 staff members and had a 95% response rate. All responses were reviewed and action taken, as appropriate.

29. The Ethics Office also manages the conflict of interests disclosure program for candidates who have been selected for fixed and short-term positions in PAHO. This helps to identify any actual or potential conflict of interest prior to the person joining the Organization. In 2023, ETH reviewed 154 disclosure forms for these candidates and coordinated with them and their prospective supervisors to address any issues that were identified.

⁵ PAHO GLOBE is a PAHO affinity group that advocates for the equity and inclusion of LGBT PAHO personnel. PAHO uses the acronym LGBT according to Resolution CD52.R6 (2013), Addressing the Causes of Disparities in Health Service Access and Utilization for Lesbian, Gay, Bisexual, and Trans (LGBT) Persons. It is important to note that the acronym has changed over the years to include other sexual orientations and gender identities. For example, the United Nations uses LGBTQI+ for Lesbian, Gay, Bisexual, Transexual, Queer, Intersex, and (+). The symbol (+) intends to reach a broader range of sexual orientations and gender identities (asexual, pansexual, among others).

30. In addition, ETH manages the conflict of interests disclosure program for all international and national consultants. In 2023, ETH reviewed 568 disclosure forms from consultants and addressed over 300 situations where there were potential conflicts of interests. Many of these situations arose when consultant candidates reported having other full-time or part-time employment that could detract from their time commitment to PAHO and potentially affect the timeliness and quality of their work. Another issue regularly flagged through this disclosure program was the contracting of government employees. In these instances, ETH ensured that a release letter had been issued by the government entity to ensure full transparency. In cases where a consultant was unable or unwilling to modify time commitments or mitigate another type of conflict of interest, ETH pointed out to management the conflict of interest and risks of proceeding with the contract.

Other Actions and Initiatives

31. In November 2023, PAHO became one of the first United Nations organizations to implement criminal background and sex-offender registry checks for all new fixed-term and short-term staff. These background checks, which will help keep our personnel and community members safe, are carried out by a third-party vendor specializing in worldwide background security checks. ETH is considering broadening the screening process to include consultants, especially those whose work brings them into contact with the public.

32. In November 2023, ETH carried out an Organization-wide nomination process and an election to reconstitute the PAHO Board of Appeal. As required by the Board of Appeal rules of procedure, 8 staff members are elected by staff and another 8 staff members are appointed by the Director. ETH managed the entire election process, and the Board of Appeal is now fully constituted with 16 members and an external chairperson. All of the new Board members received training in January 2024.

33. PAHO continues to play a leadership role in the Ethics Network of Multilateral Organizations (ENMO). ENMO serves as a forum in which members from more than 50 international organizations and financial institutions exchange ethics-related information and experiences and collaborate on issues of common interest. The PAHO Ethics Program Manager serves as a member of the ENMO Executive Committee, is taking the lead to develop standards of practice and core responsibilities for the network, and chairs a working group on protection from retaliation. The Ethics Program Manager and Ethics Advisor participated in ENMO's 15th annual conference, hosted by the Asian Development Bank in Manila, Philippines, in July 2023.

34. Efforts also continued in 2023 to make the Helpline more visible and accessible. An information bulletin announced a new name, the "Integrity Helpline," and reminded personnel that phone access is now available in every country. Individual communications were also sent to personnel in every country office and center with detailed dialing instructions for their specific duty station.

35. In terms of staffing, ETH was able to strengthen its capacity by contracting temporary administrative support and a consultant to assist with various operational, logistical, and budgetary matters. In light of ongoing needs, approval was granted for the establishment of a short-term administrative support position. In addition, the P-3 post of Ethics Specialist was reclassified to the P-4 grade as Ethics Advisor to accurately reflect the scope, complexity, and nature of the work required of that post.

36. Finally, ETH continued acting as the Organization's Ombudsman throughout 2023. It welcomed the formal appointment of a new Ombudsman in January 2024 that brought its duties as acting Ombudsman to an end.

Future Actions

37. The Ethics Office is poised to make greater contributions in 2024 to the ethical climate and culture of the Organization. The appointment of 2 qualified and experienced staff to handle PRSEAH matters will allow PAHO to focus on this important area and reinforce its policy of zero tolerance for sexual misconduct and zero tolerance for inaction. It will enable PAHO to develop country-specific actions plans, awareness campaigns, training sessions and innovative policies and practices to bring the Organization to the forefront of best practices in international organizations.

38. The appointment of the 2 dedicated staff in the PRSEAH area, as well as the appointment of an Ombudsman, will also allow the other members of the team of ETH to refocus their efforts and devote more attention to other important initiatives. These include finalizing the new Code of Ethical Conduct and developing a new online course on ethical conduct in the workplace, which will include new and emerging issues such as those related to PRSEAH and DEI.

39. With additional staffing, ETH will also be able to strengthen its training activities. In-person training is critical in helping personnel understand the standards of conduct expected of them as international civil servants, recognize the boundaries of ethical behavior, and feel comfortable raising their concerns or those of colleagues. It is also imperative to build trust and a safe space so that personnel know whom to contact and have full confidence that their concerns will be addressed fairly and expeditiously. While ETH has made a concerted effort since the end of the COVID-19 pandemic to deliver in-person ethics and PRSEAH training, it will redouble its training activities in 2024 in both the country offices and centers and at Headquarters as well.

40. In September 2021, ETH conducted a survey to assess the ethical climate in the Organization and identify changes that may help improve the ethical tone in the workplace. Using this survey as a baseline, ETH plans to conduct the survey again in 2024 to determine where improvements have been made and where additional efforts are still required.

41. Barriers to reporting possible misconduct and other ethical concerns persist within the Organization. Personnel remain apprehensive about the risk of retaliation and may wonder whether reporting a concern will lead to concrete action. Further measures are needed to encourage personnel to speak up about ethics concerns in a safe and supportive environment. ETH will take action to reinforce the protections available to personnel who report concerns and to promote an "upstander" culture to reduce the barriers to such action.

Action by the Executive Committee

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