
REPORT OF THE INVESTIGATIONS OFFICE FOR 2023

Introduction

1. The Investigations Office (INV), established on 1 January 2018, plays a key role in fostering good governance of the Pan American Health Organization (PAHO) by conducting administrative fact-finding investigations into allegations of wrongdoing involving Pan American Sanitary Bureau (PASB) personnel or third parties who perform services or activities contracted or financed by PAHO. Investigations undertaken by INV are administrative in nature and are intended to uncover the facts in an impartial, objective, and timely manner. Findings and conclusions issued by INV provide management with a factual basis upon which to make informed decisions and take appropriate action, disciplinary or otherwise.
2. This annual report of INV outlines the work, achievements, and lessons learned in 2023. The areas covered include: *a)* background on INV; *b)* analysis of the work of INV; and *c)* future actions to be taken to further enhance the integrity and reputation of the Organization and PASB personnel.

Background

3. To allow for an independent exercise of its functions free from reprisal and outside influence, INV has a direct reporting relationship with the Governing Bodies of PAHO through the Executive Committee. In addition, INV has a reporting relationship with the Deputy Director of PASB for administrative matters and receives advice from the Audit Committee. Staff assigned to INV must demonstrate personal integrity, objectivity, and confidentiality, and INV must perform its mandate without external influence. Investigators in INV are all certified fraud examiners, and INV has in-house language capability in 3 of the 4 official languages of PAHO: English, Portuguese, and Spanish.
4. Allegations or concerns about suspected wrongdoing may be reported to INV through various channels, including by email to investigations@paho.org and through the PAHO Integrity Helpline. The Helpline is administered by an independent outside company and provides a secure line of communication accessible through a dedicated and secure website. It is available in the Organization's 4 official languages and allows parties or uninvolved observers to submit reports anonymously, if they wish, without fear of retaliation.
5. In addition to its primary function, INV serves as secretariat of the Standing Committee on Asset Protection and Loss Prevention,¹ which meets quarterly to discuss cases of fraud, theft, and loss

¹ The Standing Committee on Asset Protection and Loss Prevention has the following members in addition to INV: the Director of Administration (the Chair), the Departments of Financial Resources Management and of General Services Operations, the Office of the Legal Counsel, the Office of Internal Audit, and the Ethics Office.

of PAHO property. INV is also a member of the PAHO Integrity and Conflict Management System (ICMS),² which addresses matters of organizational integrity and conflict resolution. In addition, the Chief Investigator chairs the Investigations Coordinating Committee, which also includes the Director of Human Resources Management and the Legal Counsel. This Committee meets to consider interim actions to support INV in completing an investigation.

Analysis of Progress Achieved

6. In 2023, INV conducted investigations into allegations of wrongdoing, including fraud, harassment, sexual harassment, and inappropriate workplace behavior, among other possible breaches of PAHO regulations, rules, and policies. Typical steps taken in an investigation include the following: *a)* intake, *b)* preliminary assessment, *c)* investigation, and *d)* submission of an investigation report.

7. Upon receipt of a complaint or allegation, INV acknowledges receipt of the report and assigns the matter to an investigator in a process called “intake”. Intake is normally followed by a preliminary assessment to ascertain whether the complaint is within INV’s authority and competence to investigate. In some instances where a report does not pertain to PAHO whatsoever, the matter will be closed at intake.

8. During the preliminary assessment, INV examines the credibility and sufficiency of the information provided to determine whether there is enough basis to initiate an investigation. In instances of alleged sexual harassment and sexual exploitation and abuse, INV investigates all allegations. INV ensures that information and documentation gathered during a preliminary assessment, including detailed work products, notes, recordings, and other evidence are properly maintained in its official records. If there is insufficient basis to investigate, INV notifies the complainant of its decision to close the matter. Where appropriate, INV may also refer the matter to a relevant department within PASB.

9. In accordance with the Investigation Protocol, updated in 2022, when complaints of harassment, discrimination, or retaliation are made and INV determines that there is insufficient information to investigate, INV then shares the findings of its preliminary assessment with management. After reviewing the findings, the Department of Human Resources Management notifies the complainant of INV’s decision not to investigate, granting the complainant recourse.

10. If INV determines that there is sufficient basis upon which to proceed, it initiates an investigation, which includes a comprehensive review of pertinent documentation and interviews with people who may have relevant information to provide about the issue under investigation.

² The ICMS has the following members in addition to INV: the Ethics Office (the Chair), the Office of the Ombudsman, the Office of the Legal Counsel, the Department of Human Resources Management, the Information Security Office, the Office of Internal Audit, the Administrative Compliance program, the Board of Appeal, and the PAHO/WHO Staff Association.

11. After the investigation is completed, INV normally submits a report of its findings to the Director of Human Resources Management or, in matters concerning a contractor, vendor, or supplier, to the Director of Administration. INV therefore acts as the fact-finder, while the Director of Human Resources Management or the Director of Administration, depending on the nature of the allegation, serves as the decision-maker.

12. In 2023, INV received 90 reports, more than double the number of reports received in 2022. As shown in Table 1 below, an average of about 52 reports per year were received over the past 5 years. Combined with the 12 reports carried over from 2022, in 2023, INV reviewed a total of 102 reports and resolved 87 matters.

13. The number of investigative work products containing findings and conclusions that were submitted to management in 2023 has grown threefold compared with 2022. INV resolved 10 of the 87 matters after conducting preliminary assessments, the findings of 7 of which were shared with management because the allegations involved harassment, discrimination, or retaliation. INV conducted full investigations into 10 matters, later submitting 10 investigation reports to PASB management.

Table 1. Case Management Statistics, 2019–2023

Item	2019	2020	2021	2022	2023
<i>Reports reviewed:</i>					
Reports carried over from previous year(s)	14	10	5	6	12
Reports received in the given year	54	49	32	37	90
Total number of reports reviewed in given year	68	59	37	43	102
<i>Reports resolved:</i>					
Reports closed at intake or referred elsewhere*	26	23	17	21	67
Unsubstantiated allegations of harassment, discrimination, or retaliation; findings shared with management	–	–	–	–	7
Unsubstantiated reports of other types of misconduct closed by INV with a notification to the complainant and an internal closure note	22	25	10	5	3
Reports resulting in an investigation report	10	6	4	5	10
Total number of reports resolved in given year	58	54	31	31	87
Reports carried forward to the following year	10	5	6	12	15

* The Investigations Office closes reports at intake when they fall outside of its remit.

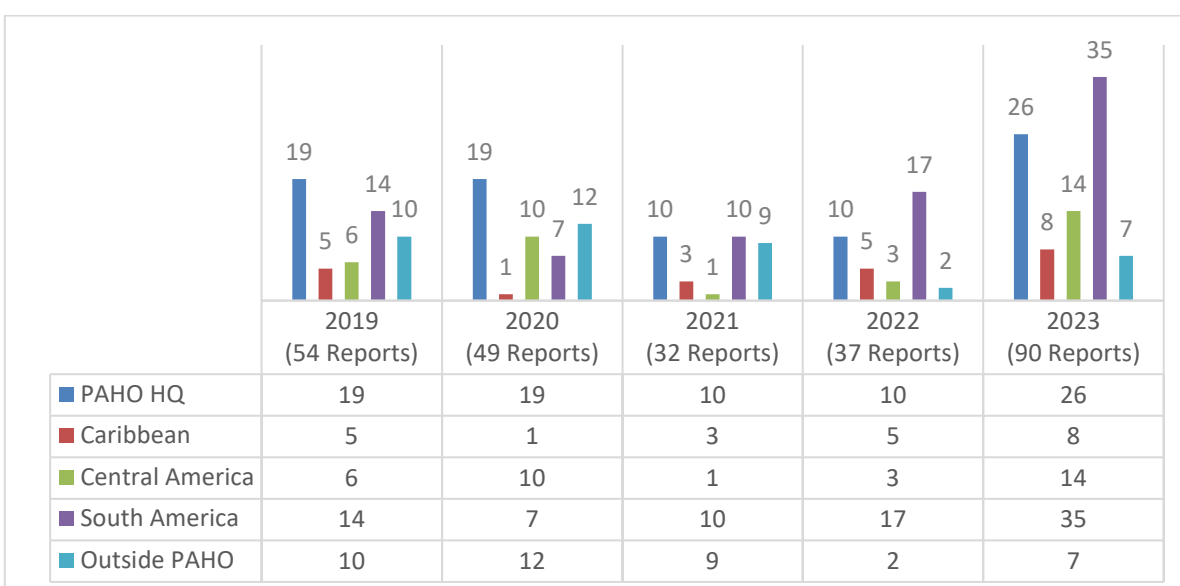
14. The Investigations Office records all reports submitted to it, even when the matter concerned falls outside of its purview, such as when the matter does not relate to potential misconduct or is unrelated to PAHO. INV does not disregard or eliminate any complaint it receives. In 2023, 67 reports (66%) of the 102 reports reviewed by INV were closed at intake or referred elsewhere. Since 2019, the percentage of total number of reports reviewed in a given year that were closed at intake has steadily increased from 38% in 2019 to 65% in 2023. INV attributes this increased efficiency to an increase in staffing to address matters reported as well as continued coordination with other PASB departments to

ensure the best equipped entity can address the matter in question. While most cases reviewed by INV in 2023 did not progress to an investigation, the 35 reports (34%) it assessed and investigated represents an increase on the 22 reports it examined in 2022.

15. In 2023, 63 (70%) of the 90 new reports that INV received were submitted by email, while 25 (28%) were submitted through the PAHO Integrity Helpline. In addition, INV initiated one report based on the findings of a previous investigation conducted by INV,³ and it received another report via a Microsoft Teams call from a staff member. This statistic reflects the accessibility and ease of communicating directly with INV and the effectiveness of awareness-raising carried out not only by INV, but also by other resources of the PAHO Integrity and Conflict Management System, which emphasize the use of the Helpline.

16. The figure below shows a comparison of the reports received in the past 5 years, by subregion. In 2023, 26 reports came to INV from Headquarters, 8 reports from the Caribbean subregion, 14 reports from the Central America subregion, and 35 reports from the South America subregion. In addition, 7 reports were received from outside of PAHO.

Figure. Location of Alleged Wrongdoing, by Subregion, 2019–2023



Note: In 2021, INV received 1 report that entailed allegations involving 2 subregions and is therefore counted in both categories for that year.

17. In 2023, there was a two-fold increase in the number of reports received from all 3 PAHO subregions. This is a further indication that PAHO personnel are aware of the resources available to them for reporting suspected misconduct.

³ The Investigations Office is empowered to initiate new reports when its fact-finding suggests additional or new issues related to possible misconduct.

Table 2. Reports of Alleged Wrongdoing Received, by Type, 2019–2023

Type of alleged wrongdoing	2019	2020	2021	2022	2023
Fraud	15	2	9	6	4
Corruption	0	0	0	2	2
Harassment	10	11	3	5	18
Sexual harassment	0	0	0	2	3
Discrimination	0	1	0	0	2
Attendance/failure to work appropriate hours	2	0	0	0	0
Conflict of interest	3	2	0	0	2
Inappropriate workplace conduct	8	11	5	1	5
Retaliation	1	0	0	0	3
Rumors	1	1	0	0	0
Hiring practices; selection processes	0	1	0	2	6
General workplace concerns	0	0	0	0	0
G-5 domestic worker issues	0	0	0	0	0
Improper termination	0	2	1	0	0
Miscellaneous	14	18	14	19	45
Total	54	49	32	37	90

18. As shown in Table 2 above, reports related to fraud decreased for the second year in a row, from 6 in 2022 to 4 in 2023. None of the 4 reports received in 2023 pertained to alleged fraud committed by third parties who perform services or activities contracted or financed by PAHO. This is an indication that PASB should strengthen efforts to understand where fraud may occur and carry forward initiatives relating to fraud prevention and detection.

19. The Investigations Office received 18 reports of alleged harassment, more than a threefold increase on the 5 reports received in 2022. With the end of emergency teleworking and a return to premises, staff have readjusted to the work environment, which has in turn presented interpersonal challenges. Furthermore, for most of 2023, PAHO did not have a dedicated Ombudsman and complaints may have been escalated to INV without first going through informal conflict resolution channels. Moreover, in 2023, INV received 3 reports of sexual harassment. PASB must continue to place an emphasis on accountability so as to encourage more people to come forward and report alleged misconduct that is sexual in nature.

20. In 2023, 6 reports of alleged misconduct received by INV pertained to concerns regarding hiring practices and selection processes, while 4 reports pertained to inappropriate workplace conduct.

21. The Investigations Office received 3 complaints of retaliation and 2 complaints of discrimination. The Organization makes sincere efforts to protect personnel who cooperate in investigatory activities through the PAHO Protection against Retaliation Policy; however,

the Organization lacks guidance and governance materials on anti-discrimination. INV shared this observation with the PAHO Integrity and Conflict Management System, with a view to ensuring that this omission may be rectified in forthcoming revisions of the relevant policies.

22. In 2023, 45 of the reports received were categorized as miscellaneous because they fell outside of the remit of INV. Such reports usually involve allegations or grievances not related to the Organization and its personnel. INV nevertheless addressed all incoming queries and, whenever possible, it redirected complainants to the appropriate internal sources of redress, such as the Department of Human Resources Management and the Ethics Office, and to external sources such as the national authorities best suited to dealing with their issues.

23. The Investigations Office submitted 10 investigation reports to PASB management in 2023. Of those investigation reports, 4 examined allegations of fraud, 4 addressed allegations of harassment, and 2 addressed allegations of sexual harassment, as shown in Table 3 below. The submission of 10 investigation reports exceeds the 5-year average of 7 investigation reports.

Table 3. Investigation Reports Submitted, by Type, 2019–2023

Type	2019	2020	2021	2022	2023
Fraud	8	0	0	4	4
Harassment	0	2	3	0	4
Sexual harassment	0	0	0	0	2
Discrimination	0	0	0	0	0
Conflicts of interest	0	1	0	0	0
Inappropriate workplace conduct	1	3	1	1	0
Retaliation	0	0	0	0	0
Breach of national laws	1	0	0	0	0
Total	10	6	4	5	10

24. Regarding the 10 matters that resulted in investigation reports, Table 4 (below) sets out the location of the alleged wrongdoing, whether at Headquarters (HQ) or at one of the PAHO/WHO country offices. It also indicates the nature of each allegation.

Table 4. Investigation Reports Submitted, by Location and Nature of Alleged Wrongdoing, 2023

Location	Alleged wrongdoing	Outcome of investigation
HQ	Fraud	Unsubstantiated
HQ	Fraud	Substantiated
HQ	Fraud	Substantiated
Country office	Fraud	Unsubstantiated
Country office	Harassment	Unsubstantiated

Table 4. Investigation Reports Submitted, by Location and Nature of Alleged Wrongdoing, 2023 (cont.)

Location	Alleged wrongdoing	Outcome of investigation
Country office	Harassment	Substantiated
Country office	Harassment	Substantiated
Country office	Harassment	Substantiated
Country office	Sexual Harassment	Substantiated
Country office	Sexual Harassment	Substantiated

25. All cases of fraud, theft, damage, and loss of PAHO property must be reported to the Standing Committee on Asset Protection and Loss Prevention. In its role as secretariat of the Standing Committee, INV keeps a record of all such matters within PASB. Staff are held responsible for replacing or repairing any equipment that is lost, stolen, damaged, or destroyed owing to negligence or willful misconduct. This requirement encourages PASB personnel to care for the Organization's property as if it were their own. Reports of theft and loss of PAHO equipment are made to the Department of General Services Operations, which determines the applicable value of the reported item and reviews the reported circumstances of the loss, theft, or damage. The Department of General Services Operations then advises the Standing Committee on whether reasonable measures were taken to protect the property or equipment from loss or theft. If it determines that such measures were not taken, staff members may then be required to reimburse the Organization for the cost of the missing or damaged asset. If the Department of General Services Operations determines that the theft or loss was due to gross negligence or willful misconduct, it refers the matter to INV for review.

26. In 2023, 20 cases related to fraud, theft, damage, or loss of property were reported to the Standing Committee. The total value of losses reported was US\$ 9304.89.⁴ PAHO recovered \$5277.99 of this amount, leaving a net loss of \$4026.90 to the Organization. The details of those cases are as follows:

- a) Seventeen cases concerned theft, damage, or loss of attractive property, such as laptops and cell phones, in country offices and Headquarters. The total net loss to the Organization amounted to \$4026.90.
- b) One case involved alleged occupational fraud on the part of PASB staff, resulting in an investigation by INV. The amount of the loss to the Organization was \$3959, which was recovered in full.
- c) Two cases involved fraudulent transactions made by people outside the Organization who used corporate travel credit cards belonging to PASB staff members. The issuing financial institutions reimbursed the fraudulent charges, totaling \$18.99, in full.

⁴ Unless otherwise indicated, all monetary figures in this report are expressed in United States dollars.

Other Activities

27. In 2023, the Chief Investigator served as a panelist in the inaugural PAHO Preventing and Responding Sexual Exploitation, Abuse, and Harassment training workshop, held in Brasília, Brazil. In addition, INV staff participated in the PAHO-United Nations System Staff College Leadership and Management Certificate Program for Managers and Supervisors and in the United States Equal Employment Opportunity Commission's Anti-Harassment Program Manager Training.
28. The Investigations Office continues to recognize the value and importance of fostering relationships with its peer group and of sharing expertise among investigative entities that are part of the larger United Nations system and with multilateral financial institutions. INV is actively engaged in United Nations system-wide forums, such as the United Nations Representatives of Investigative Services and the Conference of International Investigators.
29. Investigations Office staff take advantage of courses and symposiums on fraud, harassment, and other notable topics, offered annually by the United Nations Representatives of Investigative Services and the Conference of International Investigators. INV personnel are fully engaged in these forums and, during the 2023 annual conference of the Conference of International Investigators, led a workshop on the theme "Unique challenges of small investigations offices."
30. Toward the end of 2023, INV conducted an awareness-raising session for 18 participants in the PAHO/WHO Country Office in Jamaica. Whenever the opportunity arises, INV will continue to raise awareness among PASB personnel of how to report alleged wrongdoing.

Future Actions

31. The Investigations Office is pleased with the overall increase in reports of suspected misconduct and its response time in addressing these matters. INV has set key performance indicators for the time it takes to respond to a complaint, as well as for the time it takes to complete an investigation, thereby ensuring that INV is accountable for its work and any challenges that may interfere with its efficiency.
32. The number of reports of harassment and sexual harassment received in 2023 increased compared with the previous year, and this trend is expected to continue. The Organization will continue to benefit from dedicated training by INV on the prevention and detection of sexual misconduct.
33. For the second year in a row, the Organization has not received any reports of sexual exploitation and abuse, which may indicate a greater need for outreach efforts to beneficiary populations. INV continues to prepare itself to investigate allegations of sexual exploitation and abuse should they arise. It also continues to support Organization-wide initiatives to raise awareness about how to identify and report suspected incidents of sexual exploitation and abuse and to encourage reporting. In 2024, INV expects that its personnel will receive tier-2 and tier-3 certifications in sexual exploitation, abuse and harassment investigation theory, part of a 3-tier certification program entitled "Investigator Qualification Training Scheme," sponsored in part by the United States Agency for International Development.

34. In 2023, the number of reports of fraud decreased compared with 2022, and INV did not receive any credible allegations related to third parties who perform services or activities contracted or financed by PAHO. In 2024, there is a need for greater efforts to prevent and detect fraud and for greater understanding of the external fraud risks to PAHO. INV will continue to support the Organization by proactively identifying trends and patterns in reports received and in investigations. Investigations conducted by INV can serve as a deterrent and help to uncover fraud losses. INV plays a key role in the overall PASB risk management framework to help protect the Organization's reputation and safeguard its financial well-being. To this end, INV will continue to engage with the Standing Committee on Asset Protection and Loss Prevention and other oversight offices to share experiences and themes observed with regard to closed cases.

35. Cognizant of INV's increasing workload, management has approved a short-term P-3 investigator post to bolster the capacity of INV. Recruitment for this position will take place in 2024.

36. The Investigations Office will continue to participate in discussions with the PAHO Integrity and Conflict Management System in order to update policies and develop anti-discrimination initiatives. INV will also continue working on updates to the reporting form for the PAHO Integrity Helpline. This will make the Helpline more accessible and simpler to navigate.

37. In 2024, INV will take the first steps toward developing a case management system, with a view to organizing and streamlining its internal data. It will also work to develop a dashboard to publicize its investigative data, with a view to increasing awareness and transparency. Also in 2024, INV will participate in a peer review activity to obtain feedback on how to improve its processes and maintain consistency with best practices among investigatory bodies in multilateral agencies.

38. The Investigations Office continues to recognize the importance of awareness-raising activities. It will explore opportunities to continue its outreach to entities in Headquarters and in country offices when opportunities arise. For instance, it may collaborate with other PAHO Integrity and Conflict Management System resources to provide joint presentations or participate in virtual question-and-answer sessions.

Action by the Executive Committee

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