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REPORT OF THE ETHICS OFFICE FOR 2021

Introduction

1. Established in 2006, the Ethics Office (ETH) of the Pan American Health Organization (PAHO) works to promote the Organization's values and 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 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 regularly to ensure a consistent application and interpretation of PAHO rules and policies, to discuss matters of mutual interest, and to suggest changes and

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, Board of Appeal, and PAHO/WHO Staff Association.

improvements in the Organization's ethical policies, as well as in the conflict resolution system.

5. With the continuation of emergency telework in 2021 due to the COVID-19 pandemic, ETH continued to carry out its activities virtually, with minimal disruption to its normal activities. The main area impacted by the virtual work environment was training since face-to-face learning is generally more effective than online learning. In addition to carrying out its regular activities, in 2021 ETH prioritized: *a)* the preparation and publication of several important policies; *b)* the implementation of a process to identify and resolve conflicts of interest for new staff and consultants prior to their appointment; and *c)* serving as the PAHO focal point for various World Health Organization (WHO) initiatives, including on the prevention and response to sexual exploitation and abuse and sexual harassment, and on diversity, equity, and inclusion.

6. In this report, ETH highlights its activities, achievements, and challenges in 2021, as well as its future planned actions to further enhance the ethical culture in PASB.

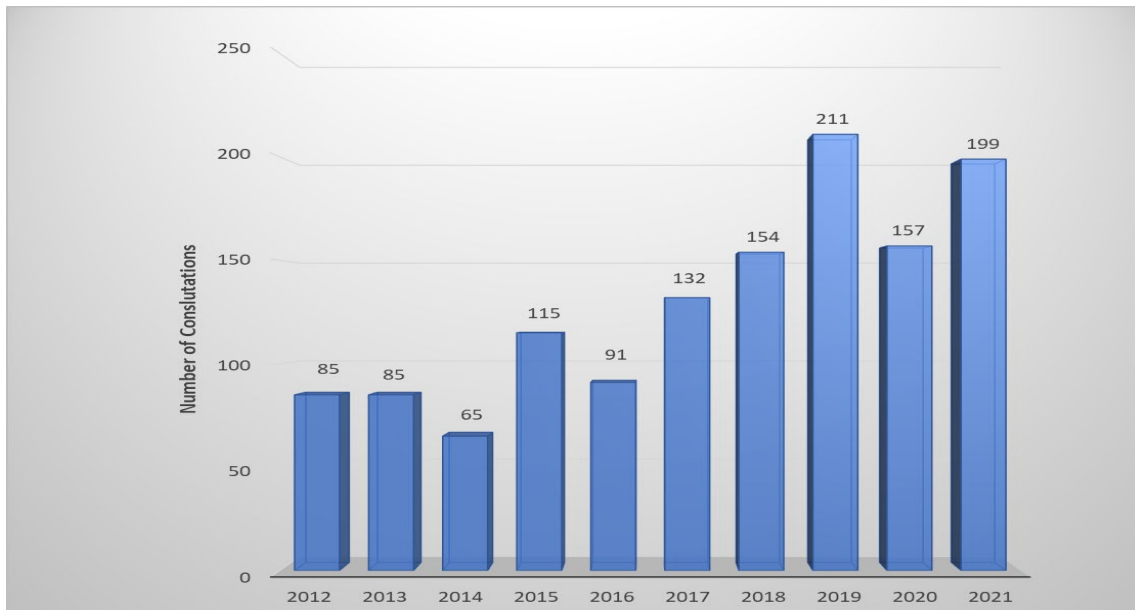
Advice and Guidance

7. 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 in order to help them make the right ethical decisions in their day-to-day work. Personnel are encouraged to seek advice from ETH 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.

8. As shown in Figure 1 below, ETH received 199 consultations from personnel in 2021 on a wide range of issues.² This number represents a substantial increase from the 157 consultations received in 2020. Of particular note is that 40 of these consultations were related to eligibility for the COVID-19 vaccine. The 199 consultations received in 2021 represent the second-highest number of consultations received in a single year and are only slightly lower than the record 211 consultations received in 2019.

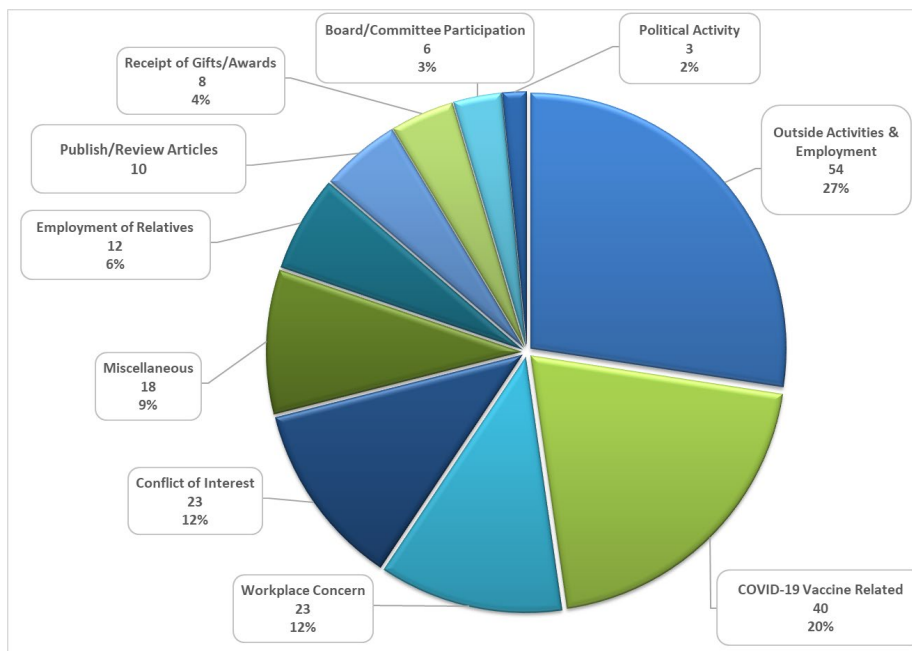
² The Ethics Office received six queries through the PAHO Helpline that were not related to the work of ETH. While responses were provided, these queries are not included in the total number of consultations handled by ETH in 2021.

Figure 1. Consultations by Year, 2012-2021



9. The types of consultations received in 2021 are shown in Figure 2 below. For the first time, more than 25% of the queries received by ETH pertained to outside activities and external employment. A combination of factors may have contributed to this increase, including personnel concerned about their financial well-being due to the precarious economic situation in the Organization in 2021 or merely wishing to increase their participation in professional and community-based activities.

Figure 2. Consultations by Type, 2021



10. Upon approval of the first COVID-19 vaccines in January 2021, PAHO Member States established vaccination schedules and priority lists for the receipt of vaccines. ETH issued a PAHO Information Bulletin in February 2021 reminding personnel to respect the vaccination schedules in their countries of residence and not to request or receive special access to the vaccine due to their status as PAHO personnel. Following issuance of this Bulletin, ETH received 40 inquiries regarding access to COVID-19 vaccines.

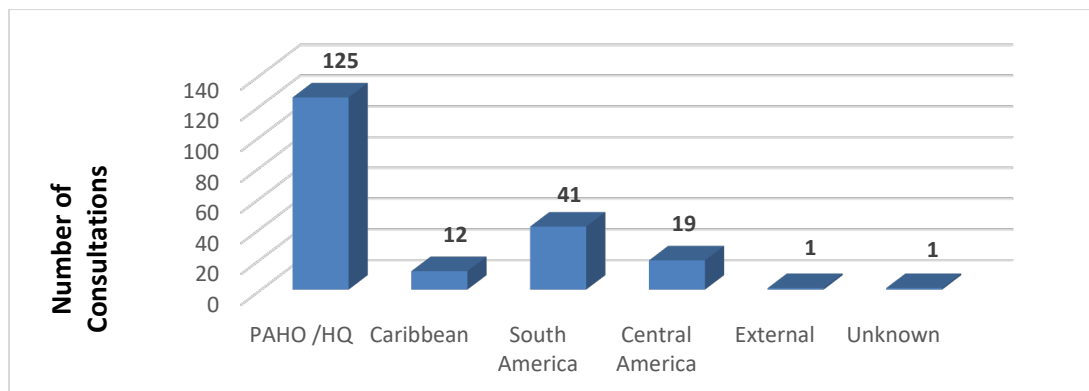
11. In addition, ETH received 23 queries in 2021 about general workplace concerns. These 23 consultations represented a continued downward trend from 2020 when 37 such consultations were received, and from 2019 when 61 queries of this nature were received. This decline is likely due to the Organization-wide mandate for telework during the past two years, which reduced day-to-day interactions among personnel and the resulting potential for interpersonal conflict. ETH will monitor this trend as the Organization moves forward with its return to premises in 2022.

12. The Ethics Office also received 23 queries related to potential conflicts of interest in 2021. ETH took proactive steps to reduce the possibility of conflicts of interest by expanding its declaration of interest program to include new hires and consultants.

13. In addition, ETH received 12 queries related to the employment of family members or relatives of serving PASB personnel; 10 queries related to the publication of books; eight queries concerning gifts from suppliers or vendors; six queries about serving as a board member of an outside organization or association; three questions related to political activities; two questions about social media activity; and 18 other queries pertaining to various miscellaneous issues.

14. Figure 3 below shows that 63% of all consultations originated from personnel at PAHO Headquarters, while 36% were from personnel in the PAHO/WHO Representative Offices and Centers, disaggregated as follows: 20% from South America, 10% from Central America, and 6% from the Caribbean. One consultation came from an external source, and one was of unknown origin.

Figure 3. Consultations by Location, 2021



Briefing and Learning Opportunities

15. 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 PAHO/WHO Representative Offices and Centers.

16. In 2021, ETH provided online training for all PAHO/WHO country representatives on the different institutional resources that are available to assist them in the area of integrity and conflict resolution, in navigating difficult political environments, and in the new conflict of interest disclosure forms for new hires and consultants.

17. In addition, online training on a wide range of ethics-related topics was carried out for the following entities and Country Offices:

- a) Health Systems & Services/Health Services & Access
- b) Country & Sub-Regional Coordination
- c) External Relations, Partnerships & Resource Mobilization
- d) Barbados
- e) Haiti
- f) Honduras
- g) Jamaica
- h) Nicaragua

Other Actions and Initiatives

18. One of the main achievements in 2021 was the issuance of three policies under the responsibility of ETH.

19. First, a new policy on the prevention and response to sexual exploitation and abuse (SEA) was issued in April 2021. The prevention and response to SEA became an urgent priority in late 2021 due to the release of the report of the Independent Commission on SEA during the WHO response to the 10th Ebola outbreak in the Democratic Republic of Congo. The Ethics Program Manager of PAHO serves as a member of the WHO Global Task Team and assisted WHO in drafting its management response letter to the findings of the Independent Commission. Based on lessons learned, action is being taken to update the PAHO SEA policy, to create new training material, and to develop an awareness campaign to send a strong message that PAHO has zero tolerance for SEA and zero tolerance for inaction.

20. Second, a new policy against fraud and corruption was issued in June 2021. This policy aims to promote a culture of integrity and underscores the Organization's commitment to prevent, detect, and respond to cases of fraud, corruption, and other dishonest practices and activities. The policy:

- a) identifies what constitutes fraud, corruption, and other dishonest acts (collectively referred to as "prohibited activities");
- b) addresses the managerial framework and responsibility for preventing prohibited activities; and
- c) outlines the available mechanisms to report and respond to suspected prohibited activities.

21. Third, a revised protection against retaliation policy was issued in September 2021. The policy was updated to:

- a) make it easier to submit a retaliation complaint;
- b) expand the scope of protection to include people who seek advice or assistance to resolve a workplace concern or who file an appeal against an administrative or disciplinary decision;
- c) specify the right of recourse for individuals who wish to challenge a decision regarding the merits of their retaliation complaint; and
- d) outline the key role ETH plays in protecting individuals from retaliation.

22. An Ethics and Climate Survey was launched in September 2021 to better understand the Organization's ethical climate and work environment. This was the first time that a survey of this nature was carried out in PAHO. The survey, consisting of 16-20 questions, was administered by an outside company to over 2,400 personnel at all levels of the Organization, and 1,163 responses were received. ETH has received the survey results and will disseminate them to management and staff in 2022.

23. In 2020, ETH developed a conflict-of-interest disclosure form specifically designed for newly selected staff. This form is required to be completed by all selected candidates for fixed-term posts in the Organization. In 2021, ETH reviewed 125 disclosure forms for new hires and ensured that action was taken to resolve any actual or potential conflict of interest prior to each person joining the Organization.

24. In 2021, a similar conflict-of-interest disclosure form was also implemented for all international and national consultants. During the year, ETH reviewed 155 such disclosure forms and addressed situations where there were potential conflicts.

25. In 2021, PAHO joined the WHO Diversity, Equity and Inclusion (DEI) initiative, which aims to create a better workplace, where differences are embraced, everyone is included, and all personnel are fully engaged and treated with respect. ETH has been collaborating in the initiative by issuing a survey to all PAHO personnel and by hosting a

forum for personnel with the WHO DEI team and their outside specialists to explain the survey results and provide the next steps of the DEI initiative.

26. In addition, ETH issued eight Organization-wide bulletins in 2021, which addressed a variety of issues of interest to PAHO personnel, as follows:

- a) *8 February 2021*: To remind personnel to follow the vaccination schedules and priority lists established by the local health authorities and not to use their status in the Organization to receive preferential treatment.
- b) *24 May 2021*: To remind personnel how to use the PAHO Helpline to ask questions on ethical issues or to report suspected misconduct.
- c) *15 June 2021*: To inform personnel about the new PAHO Sexual Exploitation and Abuse policy, and about the allegations of sexual exploitation and abuse involving WHO personnel.
- d) *15 July 2021*: To inform personnel about the participation of PAHO on the WHO dedicated Task Team on the Prevention and Response to Sexual Exploitation, Abuse, and Harassment.
- e) *21 September 2021*: To launch the Ethics and Climate Survey.
- f) *1 October 2021*: To inform personnel about the release of the Report of the Independent Commission on Sexual Exploitation and Abuse³ during the response to the 10th Ebola outbreak in the Democratic Republic of the Congo.
- g) *28 October 2021*: To solicit expressions of interest from staff to serve as Secretary to the PAHO Board of Appeal.
- h) *13 December 2021*: To share the results of the WHO Diversity, Equity and Inclusion Survey and invite personnel to attend a briefing session on the results and next steps of the initiative.

27. 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 about 45 international organizations and financial institutions exchange information and experiences and collaborate on issues of common interest. Philip MacMillan, the Ethics Program Manager at PAHO, served as Chair of the 13th ENMO Conference, which was hosted virtually by the European Central Bank and took place in July and November 2021.

Future Actions

28. One of the remaining priorities for ETH is to issue a new code of ethics. With the assistance of an external partner, work commenced in 2021 on this initiative, and the new

³ The report is available at:
<https://www.who.int/publications/m/item/final-report-of-the-independent-commission-on-the-review-of-sexual-abuse-and-exploitation-ebola-drc>

code is scheduled to be finalized in mid-2022. This modernized code is designed to be more engaging and informative, and it is expected to set the tone for ethical conduct in the Organization for years to come.

29. The prevention and response to sexual exploitation and abuse will remain at the forefront of activities undertaken by ETH. A new senior professional post dedicated to preventing and responding to SEA will be established in 2022 and located in ETH. All personnel will be required to take online training developed by both the United Nations and WHO. ETH will also implement awareness campaigns for personnel and for the communities served by PAHO.

30. Following the issuance of three important institutional policies in 2021, ETH will lead a comprehensive review and update of the PAHO Policy on the Prevention and Resolution of Harassment in the Workplace.

31. Finally, as the scope of work carried out by ETH continues to evolve, the Office will consider whether additional staffing and financial resources are necessary to improve its overall effectiveness and to better respond to the increasing demands of PAHO personnel, management, and Member States.

Action by the Executive Committee

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

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