
Accountability overview

1. At its thirty-fourth meeting in May 2021, the Programme, Budget and Administration Committee of the Executive Board noted a report that provided a high-level overview of WHO's organizational accountability.¹
2. The present report provides an update on progress made since then in advancing institutional accountability. It highlights the challenges faced by the Secretariat and actions taken to strengthen WHO's business integrity functions² and their coordination, as well as efforts made to ensure greater efficiency in all aspects of organizational accountability.
3. The release on 28 September 2021 of the report of the Independent Commission on the allegations of sexual abuse and exploitation during the response to the tenth Ebola outbreak in the Democratic Republic of the Congo was a turning point in the way in which WHO organizes and fulfils its accountability functions. The Commission's report, along with the report of the Subcommittee on the Prevention and Response to Sexual Exploitation, Abuse and Harassment of the Independent Oversight and Advisory Committee for the WHO Health Emergencies Programme, highlighted systemic weaknesses in organizational accountability and systems across the three levels of the Secretariat, catalysing major reforms to the Organization's approach to preventing, detecting and responding to sexual exploitation and abuse and abusive conduct.³ It has also had a much broader impact on the Organization, promoting greater coordination and coherence across all of the Organization's accountability functions and resulting in the adoption of a joint case-management approach to tackle the challenges faced.
4. Ongoing disruptions resulting from the COVID-19 pandemic required the adoption of short-term measures to ensure business continuity as well as long-term solutions to address systemic weaknesses and guard against future shocks.

AN INTEGRATED APPROACH TO PREVENTING AND RESPONDING TO SEXUAL EXPLOITATION AND ABUSE AND ABUSIVE CONDUCT

5. In the past year, the Secretariat has intensified its efforts to prevent, detect and respond to abusive behaviour within its workforce. The approach taken illustrates new and enhanced ways in which WHO business integrity functions are working together across the three levels of the Organization and across the full continuum of policies and actions, from creating a safe and respectful workplace through to

¹ Document EBPA34/3; see also document EB149/2.

² The business integrity functions referred to in this report are: Evaluation; Compliance, Risk Management and Ethics; Internal Oversight; and the Office of the Ombudsman and Mediation Services. These functions operate in conjunction with WHO's business operations, including human resources. In addition, the Office of the Legal Counsel provides a complementary and advisory function supporting business integrity.

³ Comprised collectively of abuse of authority, discrimination, harassment, and sexual harassment.

implementing an efficient and fair internal justice system, in order to support survivors and hold perpetrators to account.

6. A review of the structures, roles, responsibilities and capacities of WHO accountability functions identified key gaps in the Organization's ability to address sexual exploitation and abuse and abusive conduct. Several actions were taken to address these gaps and strengthen the focus on and expertise and capacity in this area: a new department for the prevention and response to sexual misconduct was established to coordinate Organization-wide efforts; a specialist investigative unit was established to manage all allegations of sexual exploitation and abuse and harassment, adopting a survivor-centred approach and complementing the broader investigative functions of the WHO Office of Internal Oversight Services; and new positions on preventing and responding to sexual exploitation and abuse were created in the offices of the Regional Directors and a number of country offices. The report of the Director-General to the Seventy-fifth World Health Assembly on prevention of sexual exploitation, abuse and harassment provides more details on these Organization-wide changes and capacity-strengthening measures.¹

7. WHO's management response to the report of the Independent Commission on the allegations of sexual abuse and exploitation during the response to the tenth Ebola outbreak in the Democratic Republic of the Congo has catalysed action across all Secretariat management systems and business integrity functions and related operations, thereby strengthening overall Organization-wide accountability. The WHO Management Response Plan provides a unified framework for not only preventing and responding to sexual exploitation and abuse but also for addressing broader issues of abusive conduct, strengthening internal justice processes, promoting WHO core values, reshaping WHO's culture and aligning with human resources reforms.

8. An informal WHO senior management group,² chaired by the Director-General, has been established to oversee implementation of the Management Response Plan and address related matters concerning abusive behaviour within the Organization. The group, which meets on a weekly basis, coordinates activities across relevant departments; monitors progress on implementation of the plan; addresses bottlenecks; identifies systemic issues that require action; and benchmarks best practices across other organizations. This approach has facilitated a collaborative, cross-unit approach to the review, development, alignment and consolidation of WHO policies, procedures, practices, guidance and tools. Examples of such joint actions and initiatives are provided below.

9. The work of the informal senior management group is complemented by that of the WHO Sexual Exploitation and Abuse and Sexual Harassment Prevention and Response Task Team, which provides Organization-wide coordination in this area. The Task Team comprises 38 senior officials from the six regional offices and relevant headquarters departments.³

¹ Document A75/29.

² Comprises: the Director-General; Chef de Cabinet; Assistant Director-General, Business Operations; Head a.i., Investigations; Legal Counsel; Director a.i., Prevention and Response to Sexual Misconduct; Director, Human Resources and Talent Management; and Director a.i., Compliance, Risk Management and Ethics. When broader issues on accountability are discussed, beyond the implementation of the Management Response Plan, the group is expanded to include the Ombudsman; Director, Office of Internal Oversight Services; and Director, Evaluation.

³ Including representatives from: the Office of the Legal Counsel; Internal Oversight Services; Compliance, Risk Management and Ethics; the Health Emergencies Programme; External Relations and Governance; Prevention and Response to Sexual Misconduct; the Office of the Ombudsman and Mediation Services; Human Resources and Talent Management; Polio Eradication; the Evaluation Office; and the Office of the Director-General.

10. WHO's Policy on Preventing and Addressing Abusive Conduct,¹ covers abuse of authority, discrimination, and harassment, including sexual harassment (collectively referred to as "abusive conduct"). Implementation of the policy is supported by the development of communication materials and resources for the workforce; the creation of guidance tools for managers and supervisors; the development and delivery of training sessions tailored to the needs of different audiences; and the updating of related human resources instruments and processes. In March 2022, the mandatory United Nations course, "United to Respect: Preventing Sexual Harassment and Other Prohibited Conduct", was introduced for the entire WHO workforce irrespective of contractual status (staff/non-staff), after being adapted to the WHO context. WHO's new Policy Directive on protection from sexual exploitation and sexual abuse came into effect on 3 December 2021.² In addition, standard operating procedures are being developed to clarify the respective roles and responsibilities of country offices, regional offices and headquarters in the management of allegations and rumours of sexual exploitation and abuse and sexual harassment.

11. A survivor- and victim-centred approach to the prevention and management of sexual exploitation and abuse and sexual harassment is being introduced in all WHO's processes. Regular confidential case review meetings are held, bringing together the Investigation Unit, the Ethics Unit and the Department of Human Resources and Talent Management to discuss individual cases in order to find solutions.

12. Specific attention has been given to increasing the awareness and knowledge of staff, changing attitudes and behaviours and improving access to tools. The Organization-wide #NoExcuse engagement campaign was launched in March 2022 to ensure that the whole WHO workforce understands the behaviours that are not tolerated within the Organization and what action they are expected to take should they experience, witness or become aware of cases of sexual exploitation and abuse and/or sexual harassment. As part of their performance management and development plans, all WHO staff members were required to select or create a team objective related to the prevention of and response to sexual exploitation and abuse and sexual harassment in 2022. The completion rate for the mandatory United Nations training on protection from sexual exploitation and abuse has exceeded 92% for the WHO workforce. WHO-specific training on the prevention of and response to sexual exploitation and abuse and sexual harassment is being piloted and will be launched globally during the second half of 2022. Plans are in process for the development of an agency-specific risk assessment tool for sexual exploitation and abuse and sexual harassment.

AN INTEGRATED APPROACH TO TRACKING AND RESPONDING TO RECOMMENDATIONS

13. To strengthen WHO's accountability functions, the Secretariat is developing a consolidated recommendation management and tracking platform that aims to bring together recommendations from multiple sources and to document and track WHO management responses and their implementation. The tracking platform aims to ensure timely implementation of recommendations, greater accountability and transparency and optimized decision-making and organizational learning. The platform consolidates around 2000 recommendations from: WHO governing bodies (including Executive Board and Health Assembly resolutions and decisions and reports of the Programme, Budget and Administration

¹ WHO. Preventing and addressing abusive conduct: Policy and procedures concerning harassment, sexual harassment, discrimination, and abuse of authority. Geneva: World Health Organization; 2021 (<https://www.who.int/publications/m/item/preventing-and-addressing-abusive-conduct>, accessed 8 April 2022).

² WHO Information on Policy Directive on protection from sexual exploitation and sexual abuse (SEA), Information note, 6 December 2021 (https://cdn.who.int/media/docs/default-source/ethics/information-on-policy-directive-on-protection-from-sexual-exploitation-and-sexual-abuse-.pdf?sfvrsn=8926f2fa_19&download=true, accessed 8 April 2022).

Committee of the Executive Board); WHO evaluation and external audit reports; WHO external oversight bodies (including the Independent Expert Oversight Advisory Committee and the Independent Oversight and Advisory Committee for the WHO Health Emergencies Programme); the Joint Inspection Unit of the United Nations; high-level review panels (including recommendations relating to WHO from the Independent Panel for Pandemic Preparedness and Response; the Review Committee on the Functioning of the International Health Regulations (2005) during the COVID-19 Response; the Global Preparedness Monitoring Board; the G20 High Level Independent Panel on Financing the Global Commons for Pandemic Preparedness and Response; the Global Public Health Convention; and the G7); and the Multilateral Organization Performance Assessment Network. The platform has already played a key role in synthesizing and analysing multiple recommendations related to the response to the COVID-19 pandemic.

FOCUS ON KEY WHO BUSINESS INTEGRITY FUNCTIONS

14. In addition to the intensive and joint work on preventing and responding to sexual exploitation and abuse and abusive behaviour in the Organization, individual accountability functions have continued to implement their mandates and workplans, including in the areas of evaluation, risk management and compliance, ethics, internal oversight services and mediation.

15. **Evaluation.** The independent Evaluation Office continues to implement WHO's evaluation policy (2018), a framework for strengthening evaluation and organizational learning in WHO.¹ The framework has six key action areas: establishing an enabling environment and governance; evaluation capacity and resources; evaluation workplan, scope and modalities; evaluation recommendations and management response; organizational learning; and communicating evaluation work.

16. In January 2022, at the 150th session of the Executive Board, the Secretariat provided an update on the implementation of the WHO evaluation workplan 2020–2021 and the Board approved the Organization-wide evaluation workplan for 2022–2023.² The evaluation annual report will be submitted to the 151st session of the Executive Board in May 2022.³ In 2020–2021, the Evaluation Office conducted 18 corporate evaluations and participated in United Nations joint evaluations in select areas of shared substantive and strategic interest, thus contributing to accountability and strategic learning across the United Nations system in a cost-efficient manner. The Evaluation Office was also active in broader COVID-19-related evaluation efforts, participating in: (i) the system-wide evaluation of the United Nations COVID-19 Response and Recovery Multi-partner Trust Fund; and (ii) the evaluation of the inter-agency COVID-19 response, focusing on issues of inter-agency coordination in the health and socioeconomic response to COVID-19, commissioned by the Inter-Agency Steering Committee, coordinated by the United Nations Office for the Coordination of Humanitarian Affairs and co-managed by the Inter-Agency Humanitarian Evaluation Steering Group. At its 150th session, the Executive Board was also informed of the appointment of the new Director of the Evaluation Office, Dr Masahiro Igarashi.

17. The Secretariat is committed to maintaining a strong culture of evaluation, in which recommendations from evaluations are implemented with continuous learning and improvement in mind

¹ A framework for strengthening evaluation and organizational learning in WHO. Geneva: World Health Organization; 2018 (https://cdn.who.int/media/docs/default-source/documents/evaluation/framework-for-strengthening-evaluation-and-organizational-learning.pdf?sfvrsn=720e4c8e_2, accessed 8 April 2022).

² Document EB150/35; see also summary records of the Executive Board at its 150th session, eleventh meeting, section 3.

³ Document EB151/4.

and lessons learned are used in policy- and decision-making in order to improve performance. Timely development of management responses and monitoring of their implementation are key to enhancing accountability. Three examples from 2021 highlight the contributions made by evaluations in this regard. First, the formative evaluation of WHO transformation, published prior to the 149th session of the Executive Board in May 2021, provided a set of recommended actions to accelerate the pace and success of desired organizational changes, to which the Secretariat published its management response in July 2021. Secondly, a first meta-analysis and synthesis of seven country programme evaluations previously conducted between 2017 and 2020¹ identified eight key cross-cutting lessons, recurrent issues, achievements, challenges and areas for improvement, and documented best practices and innovations of WHO's country work that could be used by WHO management to improve corporate processes and guidance. Lastly, the evaluation of the integration of gender, equity and human rights in the work of the Organization identified actions to strengthen this area of work and related capacities within WHO; these not only underpin achievement of the results relating to the Thirteenth General Programme of Work, 2019–2023, but also contribute to creating an organizational and development environment that aims to prevent sexual abuse and exploitation. The management response to this evaluation is driving the development of a new gender, equity and human rights policy and strategy within WHO.

18. **Risk management and compliance.** In order to reach WHO's targets set out in the Thirteenth General Programme of Work, 2019–2023 in an increasingly complex environment, WHO has launched several reviews in the areas of risk management, internal controls and compliance. The outcomes of the reviews are being analysed and will inform a new risk management and compliance strategy geared towards enabling countries to more effectively manage the risks they are facing, while strengthening WHO's global assurance mechanisms through more integrated monitoring and compliance. In addition, the definition and operationalization of WHO's risk appetite will ensure greater alignment and coordination in the management of risks across WHO programmes, including the WHO Health Emergencies Programme. Furthermore, WHO has developed a new risk assessment and mitigation tool for sexual exploitation and abuse and sexual harassment that will be implemented in 2022.

19. **Ethics.** Lessons learned during 2021, particularly those stemming from the Independent Commission on the allegations of sexual abuse and exploitation during the response to the tenth Ebola outbreak in the Democratic Republic of the Congo, have served to reinforce the Secretariat's commitment to a zero-tolerance approach to sexual exploitation and abuse and sexual harassment, as well as any other type of misconduct. The Ethics Unit within the Office of Compliance, Risk Management and Ethics plays a key role in promoting this commitment.

20. The Ethics Unit, together with the Office of the Legal Counsel and the Department for Prevention of and Response to Sexual Misconduct, is part of the WHO Sexual Exploitation and Abuse and Sexual Harassment Prevention and Response Task Team's policy review group, which is revising existing policy provisions covering whistleblowing and protection against retaliation and the Code of Ethics and Professional Conduct; these reviews should be finalized in 2022. Additionally, the Ethics Unit has streamlined its activities, with its mandate now focusing on the following four pillars: (i) declarations of interest (including for the annual staff exercise, individual experts, outside activities, consultants and pre-employment); (ii) ethics advice (provision of advice and guidance to the WHO workforce and, as applicable, to external parties, including on confidential matters); (iii) whistleblowing and protection against retaliation; and (iv) education and outreach.

¹ India, Kyrgyzstan, Myanmar, Romania, Rwanda, Senegal and Thailand.

21. The Ethics Unit continues to develop the e-learning course on ethics empowerment. The course will be mandatory for the entire WHO workforce irrespective of contractual status (staff/non-staff). The aim of this course is to reinforce awareness of and adherence to the ethical and professional conduct expected in the workplace. It will also educate the WHO workforce on the different challenges that may arise at work and empower WHO staff members to effectively address and report issues and challenges when they arise.

22. **The Office of Internal Oversight Services.** The Office of Internal Oversight Services provides independent and objective audit, investigation and advisory services, designed to add value to and improve the Organization's operations as a trusted business partner. A separate report on Internal Oversight Services is submitted to the Health Assembly.¹

23. In the past year, the Secretariat's capacity to receive and investigate complaints and allegations of sexual exploitation and abuse and sexual harassment has been strengthened, driven by the report of the Independent Commission. A Head of Investigations ad interim was appointed in November 2021 to focus on sexual misconduct cases and strengthen the specialized expertise needed to handle such cases effectively and efficiently within WHO. The Head of Investigations is supported by a qualified team of 15 staff members, mostly women, who manage investigations into allegations of sexual exploitation and abuse and abusive conduct, prioritizing allegations of sexual misconduct by the Secretariat's workforce. The increased investigative capacity has been used to address the backlog of sexual exploitation and abuse and sexual harassment cases and will ensure the timely completion of investigations of all new cases. In addition, the reporting hotline (the "Integrity Hotline") has been moved into the Investigations Unit to streamline the reporting process. Furthermore, the Secretariat has contracted an independent provider to undertake an audit of the case management of all allegations and complaints of sexual exploitation and abuse and sexual harassment, together with a random sample of allegations and/or complaints of harassment, received by the Office of Compliance, Risk Management and Ethics or the Office of Internal Oversight Services between 1 August 2018 and 30 September 2021. The findings of the audit will inform the revision of internal reporting mechanisms and the management of suspicions, alerts and complaints.

24. Due to COVID-19-related travel restrictions, internal audits in 2021 continued to be conducted from headquarters. The audit process benefited from the Office's previous experience in conducting desk reviews and from updated approaches to: testing internal control effectiveness; auditing certain areas without recourse to travel; and dealing with the risks associated with COVID-19 and sexual exploitation and abuse. Despite the challenging operating environment in the context of COVID-19, at 72%, the overall percentage of effective controls remained stable in 2021 compared with 2020, with 3% of controls found to have a high level of residual risk. The Office continues to provide key updates on recurring issues and the status of implementation of audit recommendations to management through the global risk management committee.

25. **Office of the Ombudsman and Mediation Services.** The Ombudsman's main role is to assist staff members in dealing with work-related concerns through informal means, thereby preventing conflict and providing alternative means for resolving issues. In addition, the Ombudsman: monitors trends in support of early detection of potentially significant issues and provides feedback to senior management; supports preventive action; and fosters a workplace culture that upholds WHO's fundamental values, most notably a respectful workplace environment.

¹ Document A75/36.

26. As the primary pillar for informal resolution, the Office of the Ombudsman and Mediation Services has made renewed efforts to expand the use of informal resolution across WHO by engaging with other relevant teams within the Organization, such as: Human Resources and Talent Management; Staff Health and Wellbeing; Compliance, Risk Management and Ethics; Internal Oversight Services, the Office of the Director-General; and the WHO Staff Associations, with a view to addressing issues of concern and sharing information. It is also participating in the global efforts to prevent and respond to sexual exploitation, abuse and harassment, coordinated at headquarters. The Office of the Ombudsman and Mediation Services aims to strengthen the WHO network of ombudsmen with the participation of all regional ombudsmen as a means to ensure equal access to informal resolution across WHO.

27. The report of the Ombudsman to the 150th session of the Executive Board¹ highlighted how the COVID-19 pandemic has changed ways of working, bringing new challenges to efforts to ensure an enabling and respectful working environment. The Office of the Ombudsman and Mediation Services has sought to address those challenges by reaching out to staff members more proactively through webinars and presentations and working in close association with other support services, particularly Staff Health and Wellbeing, to address potential problems early on, with special emphasis on addressing the impact of the current situation on the mental health of staff members.

THE WAY FORWARD

28. In the past year, the Secretariat has adopted new ways of working and has revised its policies, procedures and structures to address new challenges, including, among others, those posed by abusive conduct among the WHO workforce. Lessons learned from the Organization-wide response to abusive conduct can inform the strengthening and reshaping of broader WHO accountability functions, including by adopting a holistic approach with more integrated, coordinated, fully resourced and transparent processes.

ACTION BY THE PROGRAMME, BUDGET AND ADMINISTRATION COMMITTEE

29. The Committee is invited to note the report.

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¹ Document EB150/INF./4.