

Compliance, risk management and ethics: annual report

Report by the Director-General

1. This report provides an update on the Secretariat's actions in 2024 to strengthen ethical standards by reviewing policies and training, enhancing fraud risk management, implementing the Framework of Engagement with Non-State Actors, acting on recommendations made during the initial evaluation of the Framework, and enhancing compliance and risk management strategies and maturity across the Organization.

Ethics¹

2. The mandate of the Ethics Unit within the Office of Compliance, Risk Management and Ethics comprises four pillars: managing conflict of interest; ethics advice and support; protection against retaliation; and education and outreach.

3. **Pillar 1: Managing conflict of interest** – The Ethics Unit received and reviewed 3999 declaration of interest forms submitted by staff participating in the annual staff declaration of interest exercise, corresponding to a compliance rate of 100%. Staff made disclosures in 123 declarations of interest, all of which have been addressed by the Ethics Unit.

4. The Ethics Unit assessed and provided guidance on the declarations made by 31 candidates under consideration for recruitment to staff positions, and by 189 candidates for recruitment to the affiliated staff workforce.

5. At the request of technical units, the Ethics Unit assessed the interests of 254 independent experts and provided guidance. Of the 2802 experts who submitted a declaration of interest form through WHO's Individual Expert System, 867 experts declared interests requiring assessment.

6. The Ethics Unit received 339 requests from staff for authorization to undertake an outside activity, of which 93 were approved, 24 were not approved, 72 did not require approval, 17 were withdrawn and 133 are pending. It also received 23 requests to accept honours, decorations or gifts, of which 13 were approved.

¹ The figures provided cover the period 1 January–31 December 2024.

7. **Pillar 2: Ethics advice and support** – The Ethics Unit received 635 individual requests for guidance and support on ethics-related matters, ranging from enquiries on the applicable declaration of interest process to complex cases of alleged misconduct.
8. The Ethics Unit received 717 messages via its publicly available email address (ethicsoffice@who.int), of which 179 required further action. Additionally, 1196 messages were received via the generic email address (informationrequest@who.int) under WHO's Information Disclosure Policy, of which 160 required further action.
9. **Pillar 3: Protection against retaliation** – Under the WHO Policy on Preventing and Addressing Retaliation, and further to a preliminary assessment by the Office of Internal Oversight Services (IOS), the Ethics Unit recommended protection measures in two cases of alleged retaliation. The recommendations involved mitigation of the potential negative impact of performance evaluation comments in one case, and the workforce member's reassignment and contract extension in the other. The Ethics Unit also continued to monitor developments in other cases of alleged retaliation where the Office of Compliance, Risk Management and Ethics had previously recommended protection measures. Monitoring was discontinued in three cases following the completion of IOS investigations and in two cases following the reporting staff members' separation from the Organization. As at 1 January 2025, the Ethics Unit was monitoring 11 cases of alleged retaliation involving ongoing investigations.
10. **Pillar 4: Education and outreach** – The Ethics Unit provided interactive ethics training and information sessions to staff at the Global Service Centre in Kuala Lumpur.
11. It also provided 19 training sessions, reaching over 1050 participants. This included inductions at WHO headquarters and the Regional Office for the Eastern Mediterranean, one field visit, and customized information sessions for regional and country offices.
12. The Ethics Unit revised the mandatory ethics empowerment training module to align with the new WHO Code of Ethics and other recent changes in the Organization's regulatory and policy frameworks.
13. **Ethics Network of Multilateral Organizations (ENMO)** – WHO hosted the 16th ENMO annual conference in July 2024, bringing together over 100 senior professionals responsible for the ethics function in 57 multilateral and intergovernmental organizations. The conference provided an opportunity to exchange information on improving the capacities, standards, practices and core responsibilities of ethics functions.
14. Within the scope of ENMO, WHO chaired the working group on outside activities, focusing on best practices to address the increased demands and diverse contractual modalities among the workforce while safeguarding organizations from conflicts of interest and possible reputational damage.
15. WHO continues to actively contribute to the regular ENMO meetings held in Geneva. In 2024, the meetings focused on addressing the recommendations of the United Nations Joint Inspection Unit outlined in its 2021 report on the review of the ethics function in the United Nations system.²

² See document [JIU/REP/2021/5](#).

Enterprise risk management

16. **Governance** – Throughout 2024, the Global Risk Management Committee (GRMC) ensured the active assessment and management of the Organization's Principal Risks in the context of the development of the Fourteenth General Programme of Work, 2025–2028 and implementation of the enterprise risk management (ERM) strategy.

17. The list of 20 Principal Risks was revised in 2024 and endorsed by the GRMC, including a detailed description of risks, internal and external factors, mitigation actions, risk levels and key risk indicators.

18. The regional risk management committees played an active role in increasing risk management awareness and overseeing risk and compliance matters. Compliance and risk management was included as a standing agenda item of the meetings of the Office of the Regional Director for the Eastern Mediterranean. In the Western Pacific Region, the Advisory Group for Accountability and Risk was re-established under the new Regional Director as the Regional Compliance and Risk Management Committee. In the African Region, country risk management committees enhanced awareness of the importance of risk management and increased accountability among Member States. In the South-East Asia Region, the activities of the Compliance and Risk Management Committee included annual country reviews and sharing of best practices for conducting reviews.

19. **Policy framework** – Advances have been made in operationalizing the ERM strategy and its risk appetite framework. Key achievements include the definition of target risk levels for the Principal Risks and levels of risk acceptability for each risk category, the development of a global risk taxonomy, and the ongoing development of training materials on risk appetite aimed at the Global Policy Group, Assistant Directors-General, Directors, Heads of WHO country offices in countries, territories and areas, Operations Officers and Risk Management Focal Points.

20. **Integration of risk management into operations** – The Office of Compliance, Risk Management and Ethics and its regional network provide systematic guidance on the integration of risk management into results-based planning and continue to raise awareness through targeted capacity-building sessions for country offices during operational planning processes and in the context of the system for programme management module within the Business Management System.

21. The Office of Compliance, Risk Management and Ethics, in collaboration with the Climate Change and Health Unit, developed an environmental and social safeguards risk assessment tool as part of the Environmental and Social Safeguards Framework.

22. The risk of sexual misconduct was reassessed in 2024 and maintained as a Principal Risk, with updated mitigation actions and key risk indicators.

23. **Systems and tools** – The Office of Compliance, Risk Management and Ethics and its regional network continue to collaborate in the testing of and training on the risk management module as part of the system for programme management module within the Business Management System, which is scheduled to be launched in 2025. Efforts have been made to ensure that the tool integrates target risk levels for the Principal Risks to facilitate the operationalization of the risk appetite framework.

24. **Risk capabilities and risk culture** – The risk management and compliance organizational capability framework was endorsed by the GRMC and formalized in 2024 with a view to harmonizing risk management practices across the Organization and reinforcing technical competencies and responsibilities at all levels.

25. WHO's 2024 ERM maturity self-assessment placed the Organization as entering the "established" level within the United Nations system-wide reference maturity model for some of its key pillars. It is expected that its risk management maturity level will continue to improve as the ERM strategy is implemented.

Compliance

26. Efforts to strengthen country office capacity include reinforcing of compliance and risk capacity and the development and implementation of new accountability tools. The regions continue to develop tools and approaches aimed at strengthening assurance regarding the activities delivered as part of the general programme of work. The Regional Office for Africa has developed oversight and assurance tools to support budget centres in performing their first-line responsibilities, including oversight tools for direct financial cooperation, grant letters of agreement and suboffice reviews. The Regional Office for the Eastern Mediterranean has developed a new digital tracking tool to monitor the implementation of administrative review recommendations, resulting in strengthened accountability and follow-up at the country office level.

27. The Organization has made further progress in implementing its policy on prevention, detection and response to fraud and corruption and its anti-fraud and anti-corruption framework. To reach a wider audience, the Secretariat launched a customized online training module on the policy in English and French and conducted face-to-face trainings in country and regional offices, which included participants from health ministries in the African Region.

Due Diligence and Non-State Actors

28. To advance and strengthen the implementation of the Framework of Engagement with Non-State Actors, the Due Diligence and Non-State Actors Unit has undertaken a series of strategic activities, aligned with key recommendations from the initial evaluation of the Framework and the comprehensive management response to the evaluation,³ to ensure a coherent and effective approach to further integration of the Framework across the Organization.

29. As part of these activities, the Unit has conducted targeted training sessions, developed best practices and innovative approaches to promote consistent application of the Framework, and published the second edition of the *Handbook for non-State actors on engagement with the World Health Organization*, which is available in all WHO official languages. The roll-out of the e-learning course "Introducing FENSA" has also contributed to enhancing awareness and understanding of the Framework across the three levels of the Organization. These resources have been instrumental in equipping WHO staff with practical guidance, leading to a notable reduction in the volume of enquiries previously received by the Unit.

³ [Management response to the initial evaluation of the Framework of Engagement with Non-State Actors \(FENSA\)](#). Geneva: World Health Organization (accessed 18 March 2025).

30. Recognizing the strategic importance of engagement with non-State actors across the Organization and following a shift in its mandate towards a focus on complex engagement proposals, the Unit has continued to provide guidance and recommendations at all levels of the Organization. In 2024, the Unit conducted more than 450 reviews of high-risk or complex proposals, responding to requests from technical departments and units. It also carried out risk assessment and due diligence for 250 proposals related to the designation and redesignation of WHO collaborating centres. In addition, the Unit provided strategic support to technical teams at the headquarters and regional levels by reviewing multistakeholder initiatives, including networks and partnerships, either led by WHO or of which WHO is a member.

31. In its coordinating role, the Unit further strengthened collaboration and peer learning by organizing in-person sessions of the FENSA Focal Point Network. These sessions provided a platform for members to exchange experience, address challenges and explore strategies to improve the consistent implementation of the Framework across the Organization.

32. To support the Executive Board, the Unit assessed applications from non-State actors for admission into official relations, and for triennial review, for consideration by the Board at its 156th session. In line with the Framework of Engagement with Non-State Actors, due diligence and risk assessments were conducted for each non-State actor, and entries in the WHO register of non-State actors were verified and updated, together with supporting documentation. The Unit also reviewed proposed joint collaboration plans for the consideration of Member States and annual reports on activities implemented jointly with non-State actors in official relations. At its 156th session, the Executive Board approved the renewal of official relations with 74 non-State actors that were due for triennial review, admitted one entity into official relations, deferred the review of three entities for decision at its 158th session, in January 2026, and discontinued official relations with two entities.⁶

33. The Unit remains committed to fostering a constructive, flexible and pragmatic approach to engagement with non-State actors, guided by the Framework of Engagement with Non-State Actors and supported by relevant policies and rules, while upholding the principle of transparency and ensuring a level playing field for engagement.

Action by the Programme, Budget and Administration Committee

34. The Committee is invited to note the report and to provide guidance in respect of the questions set forth below.

- What actions should the Secretariat envisage to roll out the risk management framework across the three levels of the Organization and to fully embrace the “established” level of ERM maturity in its journey towards “advanced” status?
- Which steps should the Secretariat undertake to adopt a robust case management system for ethics, exploring integration with existing platforms within the Organization, with the ultimate aim of having a single case management system?

⁶ Decision EB156(41) (2025).