
Accountability overview

1. At its Thirty-first meeting, the Programme, Budget and Administration Committee of the Executive Board received an oral report from the Secretariat, supported by a background document (white paper), providing an overview of WHO's accountability.¹
2. WHO's approach to organizational accountability² focuses on advancing the implementation of the Thirteenth General Programme of Work, 2019–2023 – thus supporting the enshrined objectives of country impact, efficiency, results and an enabling culture which empowers staff and espouses the values of WHO. This report provides a high-level overview of WHO's approach to strengthening institutional accountability, including efforts undertaken to date across a wide range of accountability-related domains. It also describes targeted initiatives for a subset of key functions that are central to organizational accountability – referred to below as WHO's "business integrity" functions³ – reflecting the ambitious aim of strengthening their individual performance to best-in-class standards, and optimizing their collective work towards the achievement of WHO's shared purpose and vision.

ORGANIZATIONAL ACCOUNTABILITY: HIGHLIGHTING PROGRESS TO DATE

3. Guided by Member States and the Independent Expert Oversight Advisory Committee, the Secretariat has made significant strides in strengthening organizational accountability and addressing non-compliance at all levels of WHO. These efforts have been foundational, expansive, and have underpinned all aspects of WHO's work – including programmatic dimensions, such as results delivery and impact; and governance dimensions, such as Member States' monitoring and reporting; and transparency of financial flows. Much of the accountability work to date has been managerially focused. It has included: solidifying internal financial controls; compliance with administrative rules and procedures; human resources policies; financial reporting and risk management processes; and cost efficiencies. These managerial dimensions are regularly reported to WHO's governing bodies, thus ensuring that appropriate operational/financial safeguards are embedded in WHO's core business processes.

¹ See document EB146/3.

² As drawn from WHO's accountability framework, accountability exists in a decentralized environment at all levels of WHO, defined and guided by a series of pillars and principles, including: alignment of strategic direction and results with accountability; individual and collective commitment; exhibition of the highest standards of personal integrity through clear communication and application of institutional values, ethics and expected behaviours; transparency; clear definition of performance expectations balanced with capacity (i.e., authorities, skills, and resources) to deliver; and continuous monitoring/learning to improve the quality, efficiency and effectiveness of programmes, and the achievement of results in order to improve and strengthen performance.

³ The primary business integrity functions referred to in this paper are: Evaluation, Compliance, Risk Management and Ethics, Internal Oversight, and the Office of the Ombudsman. These functions operate in conjunction with WHO's business operations, including human resources. In addition, the Office of the Legal Counsel provides a complementary/advisory function supporting business integrity.

4. While an exhaustive list is beyond the scope of the present report, WHO's accountability-related reforms and transformative initiatives have striven to adopt best practices across sectors and, in doing so, have been commended by independent evaluators, including by the Multilateral Organisation Performance Assessment Network (MOPAN). Key examples include:

- the establishment and implementation of WHO's Accountability Framework, operationalized through WHO's strategic and operational planning and budgeting cycles, in tandem with the comprehensive implementation of WHO's Risk Management and Internal Control Frameworks;
- the introduction and operationalization of management dashboards across all major offices to monitor performance;
- the establishment and harmonization of compliance functions at all levels of WHO;
- through the Global Policy Group, strengthened Organization-wide coherence with improved focus on key strategic issues to enhance convergence across major offices towards delivery of common results;
- the launch of a holistic value-for-money approach with strong value propositions across the programme cycle;
- adherence to core ethical values, including the publication of an annual report on investigations; operationalization of a policy on whistle-blowing and protection against retaliation, and a policy on preventing sexual exploitation and abuse; the introduction of an "integrity hotline"; and the launch of respectful workplace initiatives;
- the implementation of the framework for strengthening evaluation and organizational learning in WHO;
- the development of a Thirteenth General Programme of Work, 2019–2023 results framework, accompanied by a system for measuring impact, by a scorecard for output measurement and by qualitative case studies.

A TARGETED FOCUS: EFFORTS TO STRENGTHEN WHO'S BUSINESS INTEGRITY FUNCTIONS

5. **Business integrity functions.** These have been identified as imperative not only for purposes of robust business operations, but also for providing an enabling environment for staff, for elevating institutional performance, and for upholding the values and integrity of the Organization. This set of independent functions, situated in the Director-General's Office, is critical to setting an appropriate organizational "tone" and to supporting management in shaping WHO's culture. Recognizing their importance as a cornerstone of the Organization's accountability, the Director-General and senior management are committed, in this next phase of WHO's accountability work, to strengthen and optimize these functions, and drive towards a more human-centric approach to corporate services and to WHO's accountability. Similar to the wide range of initiatives described in the previous section to improve WHO's accountability, specific initiatives to strengthen each of these business integrity functions individually have been advanced. Key elements are described below.

6. **Evaluation and organizational learning.** In implementing the revised evaluation policy, approved by the Executive Board,¹ the Evaluation Office has operationalized independence, impartiality and objectivity in every stage of the evaluation process, from the selection of the topics to be evaluated to the evaluation design, conduct of the evaluation, and the response to evaluation reports and their recommendations. This approach ensures that the most critical areas are evaluated and are assessed in an evidence-based manner, revealing organizational strengths as well as shortcomings for corrective action. A process to anchor organizational learning has also been introduced for the implementation of recommendations made during audits, evaluations and reviews. This systematic approach, in conjunction with all the business integrity functions, takes into consideration the consolidated findings and recommendations from the different independent exercises and leads to an identified shortlist of recurring, systemic cross-cutting issues and potential root causes to be addressed by key business owners. It thus ensures a more analytical, integrated and effective approach to organizational improvement.

7. **Risk management and compliance.** Building on the work undertaken and lessons learned in risk management to date, WHO is in the process of defining an enhanced and more ambitious risk management approach to serve the objectives of the Thirteenth General Programme of Work, 2019–2023. A risk management awareness campaign is planned for 2020; the campaign which will provide an opportunity to reinforce a refined “risk culture” with optimized risk-based mechanisms and global staff risk management training. WHO’s fraud prevention policy is being revised with a view to strengthening the Organization’s ability to effectively manage the risk of fraud and corruption, complemented by the fraud prevention training that will be rolled out later in the year.

8. **Ethics.** Significant efforts are being made in conjunction with a range of relevant internal stakeholders, including the department of Human Resources, the Office of the Ombudsman, and Staff Health and Well-being, as well as regional office colleagues, to ensure elevated awareness and effective implementation of WHO’s ethics-related policies, including the code of ethics, whistle-blowing and protection against retaliation, sexual exploitation and abuse, and management of declarations of interest.

9. A consultative process to adopt a new policy on preventing and addressing sexual harassment and sexual violence was launched in 2019. The draft prepared was based on the United Nations model policy and international best practices. The Secretariat has put in place a participatory approach to: (i) enable extensive discussions and raise awareness among staff; and (ii) build on best practices, such as the Violence and Sexual Harassment Convention, 2019 (No. 190) of the International Labour Organization. This has taken longer than was envisaged, but has led to a stronger and more inclusive process as a result. In the meantime, all sexual harassment issues leading to formal complaints have been prioritized for investigation by the Office of Internal Oversight Services, and protection measures have been extended to all those concerned. The draft policy places people affected by sexual harassment at the centre of the process, prioritizing their well-being and protection and delineating options available for addressing the situation. It maps out the responsibilities and obligations of all staff, with particular focus on senior managers. The draft policy introduces concrete and significant new mechanisms to address sexual harassment fully:

- no time limits are set for reporting sexual harassment; different options are available to seek confidential advice and support, report and address issues either managerially, formally or informally;

¹ See document EB143/2018/REC/1, decision EB143(9) and Annex 4.

- after completion of an investigation, and after decisions are taken by the Director-General, the situation of individuals concerned will be monitored at regular intervals to ensure their well-being and make certain that no party is subjected to retaliation. Implementation of any ensuing administrative and/or disciplinary measures will be closely monitored;
- to enable the Organization to act even in the absence of a formal complaint, an ethics warning will be given to an alleged offender. The ethics warning is a confidential reinforcement of the policy, kept in the records of the ethics team. It may lead to an investigation and disciplinary sanction;
- The possibility is also under consideration of introducing a clause requiring senior managers to act in good faith to address, in any of the different ways set out in the draft policy, all issues of sexual harassment that come to their knowledge.

10. Further to a period of staff consultation where all staff across the Organization will have the opportunity to provide their comments confidentially/anonymously, the aim is to publish the policy later this year. Opportunities for Member State engagement in finalizing the policy are also being explored. In addition, a mandatory, comprehensive training package on ethics is under development, building on mandatory training modules on sexual harassment and sexual exploitation and abuse which are already in place. These modules are targeted to specific, inappropriate behaviours and focus on “real-life” scenarios, to ensure resonance across the Organization. The ethics team is also preparing to launch an internal yearly ethics report to be disseminated across WHO, together with a yearly voluntary staff survey to enable the ethics team to assess general perceptions of ethical dilemmas in the workplace.

11. **Internal oversight.** Strengthened approaches to internal audits are helping to improve operational accountability. An increased focus on reviews of cross-cutting areas represents a more institutional approach in this area, as does regularly performing quality assurance assessments of the audit and investigation functions for compliance with industry standards and best-in-class operations. In consultation with the Independent Expert Oversight Advisory Committee, a recent external review was commissioned to assess the current practices and procedures of the investigation function against best-in-class benchmarks and to consider the resource implications of implementing the proposed best-in-class structure. The report of the review was delivered in December 2019. Its key findings include:

- due to the significant increase in the number of allegations, the report reiterated that more investigators are required, together with the necessary investment in information technology, to increase the efficiency of the investigation process;
- considering the large number of open cases and the increase in new cases, there is a need to strengthen the Office of Internal Oversight Services’ investigation workforce further, including by exploring the establishment of one, or several, outposted offices to focus on regional support;
- investigation-specific training modules, such as interview training, and training plans identifying core and elective training, should be developed, to enhance the collective skills set of the investigation team;
- the specialization of investigators could be considered, for example investigators specialized in offences against assets, such as fraud and corruption; and investigators specialized in offences against people, such as harassment, sexual harassment, sexual exploitation and abuse etc.;

- finalize the deployment of information technology tools and the eDiscovery methodology, so as to be equipped with international state-of-the-art eDiscovery and data analytics.

12. Additional key workstreams being explored to further strengthen internal oversight as a business integrity function include: development of a new investigations policy to reflect responsibilities, functions, and best practices, including the processes and procedures for a central intake of cases and referral to other departments and regions, as appropriate; prioritization of resources for timely consideration of reported allegations of misconduct – including strengthening support for regional issues and delegated authority for lower priority cases; and a more proactive approach to the sharing of results of internal audits and investigation findings internally, and with external stakeholders.

13. **Office of the Ombudsman and Mediation Services.** Intensified efforts are being made to enable the Office of the Ombudsman to facilitate conflict resolution better, including by providing better support to staff and sharing information on areas of concern; by designing measures to address potential systemic issues; and by devising potential solutions to individual problems, thereby preventing escalation. Workstreams are being advanced to promote, and make accessible, informal resolution mechanisms, and significant focus has been placed on cross-departmental initiatives, including regular and systematized interactions with relevant departments, as a means to strengthen internal coordination and share relevant information. Strengthened and more comprehensive annual reports aim to improve transparency, while outlining the priority, systemic issues and deeper analyses of the Administration's response to the recommendations for improvements. In addition, best practices are being implemented through strengthened cooperation with regional ombudsmen and reinforcing the WHO ombudsmen network: the Ombudsman and the regional ombudsmen, with a view to allowing all staff members to enjoy similar access to informal resolution of work-related issues, regardless of their location.

ACCOUNTABILITY 2.0: DRIVING TOWARDS A NEW ERA FOR WHO'S BUSINESS INTEGRITY FUNCTIONS

14. As noted in the preceding sections, while there have been formative efforts in strengthening key areas contributing to WHO's performance and accountability, significant challenges remain if a bold vision is to be realized, including:

- achieving a more corporate and holistic accountability operating model, not only to protect the Organization from the misuse of assets and the contravention of rules, but also to uphold its values and integrity;
- transforming WHO so that it is not only a rule-based environment but also a value-based, impact-focused, learning Organization, supported by strong, capacitated and harmonized business integrity functions;
- providing corporate services that foster a safe and enabling environment, allowing staff to be more productive and effective.

15. The challenges associated with achieving this bold vision are substantial, and overcoming them will require considerable innovation, investment and, in many cases, fundamental changes. Some examples of the types of fundamental issues that will need to be tackled include the following:

- The Organization has traditionally harboured a conservative risk appetite. A more coherent approach to organizational risk appetite must be developed, by reinvigorating WHO's approach to risk management with the aim of integrating more dynamic and proactive methods in its

business processes. This includes weighing operational risks against the risk of not achieving stated objectives: for example, the risk of not achieving the Thirteenth General Programme of Work, 2019–2023.

- While initiatives to improve accountability and compliance across the Organization continue to be reflected positively overall at headquarters, in regional offices, and in global cross-cutting areas, more focused efforts are required to enhance internal controls at country offices, and particularly at those offices based in challenging operating environments. This also suggests that there is a need to further strengthen the operational support provided by headquarters and regional offices to country operations, particularly in the context of emergency operations.
- The backlog of investigation cases and the systemic issues causing them must be addressed. The Organization continues to struggle to get ahead of the curve, and is at risk of falling behind further still.
- Bottlenecks could be addressed by decentralizing corporate functions to regional or country level, while ensuring the requisite standard of quality assurance and quality consistency across all levels of the Organization. Decentralized approaches are already being explored in areas such as investigation, but could be instigated in respect of other business integrity functions. Appropriate capacity and investment will be required in order to ensure that performance is not compromised, but rather strengthened to meet best-in-class standards.
- Issues related to the burden of proof in sexual harassment claims, including the threshold for that burden.
- The transformation into a true learning Organization, where lessons and recommendations from robust evaluations are inculcated into programmatic approaches and managerial operations.
- Institutionalizing a step-change down to the individual, people-centric level, by enhancing awareness and understanding of the practical applications of this, thereby improving the performance of all staff members and through them, that of the Organization as a whole.

16. These are fundamental questions and challenges. They are not simply about introducing new processes or procedures, but rather represent deep-seated issues with which organizations across sectors continue to struggle in different ways. Solutions inevitably call for a methodological and content-based approach, as well as the requisite investment, systems and structures, to ensure they are appropriately operationalized.

17. To this end, WHO has commissioned external, independent support to assist with examining how best to maximize the impact of the business integrity functions. The intention is not to unify these discrete functions structurally within the Organization – but rather to explore how to harmonize their roles and responsibilities, and leverage the interdependencies of the functions, in order to enable them to work better together towards a joint vision. The focus is therefore on the interface between them, and on improving their speed and responsiveness, to enhance their contribution to achieving the triple billion targets. The work will take account of short, medium and long-term opportunities, and will capitalize on digital solutions and continuous measurement. It will be guided by international best practices across sectors, robust analytics, and the identification of key gaps. It will require resources.

18. The ultimate aim is a step-change in the scale, operations and impact of WHO's approach to accountability/business integrity. It is a bold vision, and achieving best-in-class status will require strong engagement from Member States – not only to ensure the requisite resources and capacity for the business integrity functions, but also to support fundamental shifts in thinking, and provide expertise from Member States' own national contexts in successfully addressing these issues.

ACTION BY THE PROGRAMME, BUDGET AND ADMINISTRATION COMMITTEE

19. The Committee is invited to take note of this report.

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