



department of
internal oversight services
annual report 2018

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About UNRWA

UNRWA is a United Nations agency established by the General Assembly in 1949, mandated to provide assistance and protection to a population of over 5.4 million registered Palestine refugees. Its mission is to help Palestine refugees in Jordan, Lebanon, Syria, West Bank and the Gaza Strip achieve their full human development potential pending a just solution to their plight. The Agency's services encompass education, health care, relief and social services, camp infrastructure and improvement, microfinance and emergency assistance. UNRWA is funded almost entirely by voluntary contributions.

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Cover photo: Palestine refugee children playing on the street in a slum in the northern Gaza Strip. © 2017 UNRWA Photo by Rushdi Al-Sarraj.

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introduction

1. In accordance with Organization Directive (OD) 14 on the internal oversight charter, this report provides an account of the works of the Department of Internal Oversight Services (DIOS) in 2018.
2. In accordance with the Charter, the mission of DIOS is to provide internal oversight services that add value to and support UNRWA in achieving its mission by strengthening accountability, transparency, integrity and learning within the Agency. DIOS fulfils its mandate through independent and objective assurance (internal audit and inspection) and advisory services, evaluation and investigation.
3. DIOS endeavors to assist UNRWA in improving management strategies, practices and operations, and reducing risk exposure by:
 - Enhancing results of the programmes, projects, strategies, and policies through evaluations;
 - Providing independent assessments of internal control systems, risk management, and governance processes;
 - Investigating allegations of misconduct which include failure to comply with UNRWA rules, regulations, policies and procedures;
 - Supporting anti-fraud and anti-corruption initiatives; and
 - Nurturing a culture of ethics, integrity and accountability.
4. This report is also submitted to the Advisory Committee on Internal Oversight (ACIO), and the Advisory Commission of UNRWA (AdCom).
5. The annual report of the Ethics Office has been separately prepared in accordance with the United Nations Secretary General's Bulletin and UNRWA's OD 30, which requires annual reporting from the Ethics Office on their activities and the implementation of related policies. The report is annexed to this DIOS report.

operational independence

6. During 2018, DIOS did not encounter any undue influences on or impairment to its operational independence in discharging its work in an independent manner, notwithstanding resource issues impacting on DIOS's desired work-load.

overall comments on oversight results

7. The year of 2018 has been challenging for the Agency due to its financial situation. This has affected all departments and DIOS has not been immune from those pressures. In addition, DIOS has been challenged due to its deteriorated staffing situation. As of 31 December 2018, 9 out of 20 DIOS positions were vacant, including the positions of Director and the Chiefs of Evaluation and Investigations. Nevertheless, DIOS has endeavored to fulfill its responsibilities in an effective and efficient manner while aligning its work with the strategic objectives and related high-risk areas of the Agency. The results and recommendations were reported to improve the delivery of services to Palestine refugees in line with the Agency's strategic objectives. DIOS has also assessed key support functions that drove the success of the Agency's activities in reaching its goals. DIOS appreciated the cooperation by staff and management of UNRWA in the conduct of its work.
8. Subsequently in 2019, a few critical posts have been filled. The Director came on board in January 2019, and 3 additional positions (Chief of Investigations, Chief of Evaluation and a senior investigator in Jerusalem) were filled and encumbered by April 2019. The recruitment process for remaining posts are at various stages and progressing well. DIOS looks forward to a more productive year in 2019 with improved staffing.

assurance and advisory services activities

Overview

9. The Assurance and Advisory Services Division (AAS) aims to add value, support achievement of the mission of UNRWA and fulfillment of its objectives, through independent and objective assurance and advisory services that assess the effectiveness and efficiency of UNRWA's governance, risk management, and controls processes.
10. In 2018, AAS completed the development of the internal audit manual, accompanied by detailed guidance material on the execution of key AAS activities. The goal was to have a comprehensive framework which provides an end-to-end birds eye view of the entire spectrum of internal audit activities: from planning to reporting, information on internal audit techniques, standardized templates, checklists and forms, audit review chain as well as more detailed guidance on steps of the audit process, standards and procedures to be followed and adhered to for audits, inspections and advisory assignments. Through incorporating the International Standards for Professional Practices of Internal Auditing of the Institute of Internal Auditors (IIA), and good practices applied by other agencies in the UN system, the manual will serve as a road map for conducting all future engagements in the AAS division.
11. Despite limited resources for a significant part of the year, having only one Senior Auditor, the division has issued five reports. A second Senior Auditor with extensive experience in operational audit and audit methodology came on-board in Q4 2018 and started to take on the implementation of the developed methodology in ongoing assignments. Piloting the new methodology remains resource intensive, in particular in terms of guidance required for documentation of audit results to a minimum standard required by the new framework.
12. Progress was made with regards to capacity building, training and professional development of auditors as the Division had the opportunity to refresh their technical knowledge by obtaining certification in COSO internal controls.

Three auditors also obtained the Chartered Institute of Procurement and Supply Level two Certificate in procurement and supply operations, to gain specified operational knowledge of high-risk processes. Lastly four auditors obtained the Certified Fraud Examiner certification, and others attended multiple (online) courses conducted by the IIA to further develop their knowledge on relevant topics.

Audits and inspections completed in 2018

- 13. Inspection of Snap Stock Take Round 2:** In order to assist the management on assessing the accuracy of the stock take quantification exercise, which is a key input into the medical procurement planning, DIOS conducted an inspection of the Snap Stock Take Round 2. The inspection indicated that though internal controls were generally established, various responsibilities should be further clarified to facilitate implementation of the controls (by issuing detailed guidelines and checklists) to ensure accuracy and completeness of this stock take exercise. Another key recommendation from the inspection was for management to ensure prompt integration of eHealth with the ERP system to aid accurate recording of (medical) consumption data.
- 14. Audit of Human Resources Recruitment processes at Jordan Field Office:** The audit focused on the major sub-processes of the area staff recruitment cycle which included: annual Human Resources planning; advertising vacancies; short-listing of candidates; developing and administering tests; interviewing candidates; roster management; hiring of daily paid; and recruitment monitoring. In addition, implementation of the UNRWA Human Resources Action Plan on Gender Parity was reviewed. The process was assessed as partially satisfactory, primarily due to potential risks from inefficient management of pre-approved rosters of candidates, and inadequate IT general and application controls in the application used for hiring (ORIS) such as lack of audit trail. Good practices identified include the use of a databank of pre-defined and approved test questions to facilitate uniform assessment criteria as well as enhancing the efficiency of the process of test administration was also identified.
- 15. Audits of Processes for Construction and Maintenance contracts at the Lebanon and Jordan Field Offices:** Two backlog audit reports from 2017/2016 were completed and issued during 2018: report for the Audit of Procurement and Construction Management Processes for Construction and Maintenance contracts at the Lebanon and Jordan Field Office, respectively.

Recommendations to Lebanon Field Office included improvements in planning of the procurement process by conducting adequate market research, updating regular cost estimates and proactive sourcing of vendors. In the Jordan Field Office, recommendations were on contractor pre-qualification, updating cost estimates, solicitation process including offer evaluation, and management of variation orders. Lastly the conflict of interest disclosure framework needed to be strengthened. Based on the lessons learned from the work done in West bank (in 2017), Jordan and Lebanon fields, AAS has incorporated relevant specific risks into the planning for similar audit in Gaza Field Office. Field work has been deferred to 2019 due to travel restrictions and this is now anticipated to be completed by Q3 2019.

- 16. Financial Audit of Microfinance Department accounts:** The financial audit on the 2017 annual financial statements for Microfinance Department (MD) accounts was completed and a report was issued in 2018. DIOS used a long-term agreement with an external service provider to perform this audit. DIOS provided technical input on the requirements of external service provider in the competitive selection process and coordinated closely with the United Nations BoA on the timely completion of the audit.

Status of recommendation implementation

- 17.** In 2018, AAS led the recommendation follow up process in collaboration with the Evaluation Division and consolidated the status into one communication to the various stakeholders to streamline the process internally as well as the department's efforts to provide DIOS with the latest status of their implementation action.
- 18.** Furthermore, AAS proposed recommendations which were no longer relevant or high risk, due to a change in circumstances, to be considered overtaken by event, which is consistent with the recommendation status categorization used by the United Nations BoA. In the follow up campaign in 2018, 16 recommendations were closed (related to the Inspection of West Bank Training Centers and Cairo Liaison office primarily) and 2 considered overtaken by event. As at the end of 2018¹, 77 recommendations were outstanding, of which more than 45 per cent relate to recommendations issued in 2018. It is also important to note that for three recommendations, closure was achieved in the year of issuance, reflecting the timeliness and importance of the recommendations. Table 1 below offers a snapshot, by year, of the open recommendations for each year, as of December 2018.

Table 1: open recommendations in 2018 (Internal audit)

Year and assignment(s)	Total recommendations	Open - High risk	Open - Medium risk	Closed
2014 - Audit of the Administration of Commercial Insurance	14	-	1	13
2015 - ATM Cash Transfer Programme - Business Processes & Information Technology Controls Review (LFO)	21	-	7	14
2016	(18)	(1)	(3)	(14)
Review of hospitalization medical referral processes (LFO)	7	1	2	4
Review of the Parallel Education Programme (JFO)	11	-	1	10
2017	(53)	(8)	(22)	(23)
Inspection of the Kalandia Training Centre (WBFO)	21	1	5	15
Inspection of the Ramallah Men's Training Centre & University College of Educational Sciences (WBFO)	22	3	12	7
Audit of Procurement and Contract Administration Processes for Maintenance and Construction Contracts (WBFO)	10	4	5	1
2018	(38)	(11)	(24)	(3)
Audit of Recruitment (JFO)	11	4	7	-
Inspection of Snap Stock Check – Round 2 (JFO)	10	4	5	1
Audit of Procurement and Contract Administration Processes for Maintenance and Construction Contracts (JFO)	9	2	5	2
Audit of Procurement and Contract Administration Processes for Maintenance and Construction Contracts (LFO)	8	1	7	-
Grand total	144	20	57	67

Way forward

19. For the reporting period, approximately five local full-time equivalent resources were available as one local Auditor A took Special Leave Without Pay mid-year. In addition, another local Auditor B transferred to the Investigations Division. The second Senior Auditor at a professional P4 level was on-boarded in Q4 2018, however, the first Senior Auditor who joined at the end of 2017 resigned by year end. Though the Chief AAS incumbent was in post during the year, the resource was stretched for various necessary departmental administrative assignments, facilitated the transition of acting DIOS directors, and assisted other DIOS divisions while the Chief posts were vacant. Lastly, significant resources continue to be required to provide guidance to relevant staff in applying the professional framework to meet necessary standards, resulting in insufficient capacity to fully implement the envisaged work plan.
20. In the 2017 long form report, the United Nations BoA commented, based on a benchmark comparison, on the under-resourcing of the AAS against other United Nations Organizations, having the lowest proportion of internal audit service staff to all staff. The Board recommended, recognizing the historical resource constraints the AAS faces, that UNRWA considers exploring an alternative resource deployment strategy to strengthen the Division, and review the staffing structure to align with the complexity and growth of the Agency.
21. Moving forward, AAS intends to prioritize and address the capacity gap by filling the two area staff auditor and the one Senior Auditor posts to cope with the backlog and the upcoming work plan. This improved staffing would facilitate consideration of options for an alternative organizational structure of AAS. In addition to regular staff deployment and acceleration of recruitment of the Senior Auditor, AAS also submitted a successful business case for a Junior Professional Officer (Oversight Officer), as well as engaged (for three months) at the end of 2018, a volunteer with IT audit experience as alternative capacity. Lastly for the 2019 budget cycle, AAS outlined key requests for priority funding for external professional services needed to catch up on the backlog, which however has not yet been appropriated.
22. In addition to the continuous staffing challenges, AAS was impacted by the unprecedented funding situation UNRWA faced in 2018, which continues to be felt in 2019. Reflecting upon the work plan for the upcoming year, AAS plans to focus more on audits and other assignments scoped specifically on certain high risk areas which can have an more tangible and immediate impact in order to better fulfill our mandate; while longer term, AAS will continue to seek alternatives to strengthen capacity.

investigation activities

Overview

23. DIOS is responsible for both conducting centralized investigations into misconduct of UNRWA staff, as well as providing technical advice, guidance and training to Field Offices, and the Human Resources Department in headquarters, in the conduct of decentralized investigations, performed under the authority of the Field Director and using Field Office staff. DIOS is also responsible, under Organizational Directive No. 14, to maintain a confidential registry of all misconduct allegations.
24. In the first quarter of 2018, the DIOS Investigation Division comprised the Chief (P-5), two Senior Investigators (P-4), one Investigator position (P-3), two area investigators and one Administrative Assistant. By the third quarter of 2018, however, all but one investigator left DIOS, including the Division's Chief. This resulted in severe capacity and resource constraints. As a result, DIOS was only able to conduct a small portion of the Agency's misconduct investigations. DIOS also relied on the Office of Internal Oversight Services (OIOS) of the United Nations for support on a few occasions.
25. Tables 2 and 3 below summarize the case flow across the Agency and by Field Offices during the year, which shows a decrease in new cases, and consequently decrease in open cases in 2018.

Table 2: Newly recorded cases/ cases completed and still open cases in 2017 and 2018

Year	New recorded cases	Cases completed ²	Cases still open
2017	367	392	293 ³
2018	271	343	221

Table 3: Newly recorded cases/ cases completed and still open cases in 2018 (by entity)

Responsible Entity (Field Office)	New recorded cases	Cases completed	Cases still open
DIOS	27	35	10
GFO	90	151	47
JFO	47	62	20
LFO	47	50	41
SFO	26	11	49
WBFO	34	34	54

New cases recorded in 2018

26. In 2018, the Agency recorded 271 new cases, classified into various categories as below Table 4⁴.

Table 4: Breakdown of new cases in 2018 (by entity)

Category	DIOS	GFO	JFO	LFO	SFO	WBFO	Total
Abuse of Power	1	3			3	2	9
Abuse of Privileges and Immunities					1		1
Assault (Physical)		8	6		3	3	20
Breach of Confidentiality				2	1		3
Breach of Neutrality	2	2		2	1	3	10
Corporal Punishment	1	13	19	18	7	4	62
Entitlement Fraud			1				1
Failure to Comply with Professional Standards	9	43	6	9	3	2	72
Financial Irregularity						1	1
General Fraud	1	6	1	7	3	2	20
Harassment (not sexual)	2	2	1	4			9
Mismanagement		1				1	2
Other ⁵	1		8	1		6	16
Outside Activity		2	3			2	7
Recruitment Irregularities	2		1	2	3		8
Retaliation	2						2
Sexual Exploitation and Abuse	3	1					4
Sexual Harassment	3		1			2	6
Theft		8		2	1	6	17
Willful Damage of Agency Property		1					1
Grand Total⁵	27	90	47	47	26	34	271

27. The total number of new cases recorded in 2018 decreased by 26.15 per cent compared to the number of cases recorded in 2017 (367). The most significant changes from 2017 were the decrease in breach of neutrality cases (55 in 2017), possibly in response to the Agency's response to this issue through training and awareness. In addition, there is a decrease of corporal punishment cases (87 in 2017), also possibly resulting from increased awareness among teachers that violence against children in UNRWA schools is not acceptable. Nevertheless, the corporal punishment cases continue to be the highest type of allegation received by the Agency in all Field Offices except Gaza where category of failure to comply with professional standards increased by 89.28 per cent (from 28 in 2017 to 43 in 2018)⁶.

Cases completed in 2018

28. Table 5 below shows details of cases completed in the Agency in 2018:

Table 5: Breakdown of completed cases in 2018 (by entity)

Category	DIOS	GFO	JFO	LFO	SFO	WBFO	Total
Abuse of Power	6	7	2			3	18
Abuse of Privileges and Immunities					1		1
Assault (Physical)		11	5		1	2	19
Breach of Confidentiality		1			1		2
Breach of Neutrality	2	15	4	5	1	5	32
Conflict of Interest	1						1
Corporal Punishment	3	26	26	22	3	5	85
Entitlement Fraud		1	2				3
Failure to Comply with Professional Standards	5	46	7	9		4	71
General Fraud	7	10	3	3	2	2	27
Harassment (not sexual)	1	7	1	3		4	16
Mismanagement		2					2
Other	1		8			1	10
Outside Activity	1	5	2			2	10
Procurement Irregularities		1		1			2
Recruitment Irregularities	1			5	1	1	8
Retaliation	1						1
Sexual Exploitation and Abuse	3	1		1			5
Sexual Harassment	3	4	1			2	10
Theft		13	1	1	1	1	17
Waste of Resources		1				2	3
Grand Total	35	151	62	50	11	34	343

29. DIOS also examined the time to complete the investigation of the cases listed in Table 5 above. Since the length of time can vary greatly depending on the complexity of the case, from a few days or weeks, to many months, DIOS used the benchmark of six months, and calculated how many of these cases were completed within 6 months (see Table 6 below).

30. The decentralized cases (non-DIOS) took on average 325.77 days to complete (approx. 11 months), while 39.3 per cent of these cases were completed within six months, which is an improvement to the time taken in 2017 (32.6 per cent).

Table 6: Timeliness of investigation in 2018

Responsible Entity (Field Office)	Percentage Of Cases Completed Within 6 months	Average Number of Days to Complete cases in 2018
DIOS	45.7 %	212.71
GFO	37.1 %	353.06
JFO	67.6 %	173.72
LFO	22.0 %	332.12
SFO	27.3 %	350.18
WBFO	26.6%	464.57 ⁷

Cases opened at the end of 2018

31. Finally, Table 7 shows the number of cases still open at the end of 2018:

Table 7: Timeliness of investigation in 2018

Category	DIOS	GFO	JFO	LFO	SFO	WBFO	Total
Abuse of Power	1	3			11	8	23
Assault (Physical)		5	3		2	5	15
Breach of Confidentiality				2	1		3
Breach of Neutrality				1	3	2	6
Corporal Punishment		11	8	13	12	6	50
Entitlement Fraud				1			1
Failure to Comply with Professional Standards	4	17	2	10	3	7	43
Harassment (not sexual)	2		1	1	5	6	15
Harassment (sexual)						2	2
Mismanagement		1				2	3
Other	1		3	2		3	9
Outside Activity			1		1	2	4
Recruitment Irregularities	1		1	1	3		6
Retaliation	1					1	2
Sexual Exploitation and Abuse		1		1	1		3
Theft		3		2		6	11
Willful Damage of Agency Property		1				2	3
Grand Total	10	47	20	41	49	54	221

32. These figures show that the Gaza Field Office continues to be the field receiving the most allegations, and despite the considerable efforts it has made in 2018, closing over 151 cases, it still faces more than 47 open cases. The Syria Field Office is having the most difficulties coping with its caseload, with only 11 cases completed in 2018, leaving it with 49 open cases.

33. More than 30 per cent of these cases have been pending for more than one year, as shown in the chart below. In 2019, DIOS and Field Offices should focus on addressing the long outstanding cases.

Actions Taken on Substantiated DIOS Investigation Cases

34. DIOS has completed work on 35 cases in 2018. Twelve of these cases were substantiated and administrative and/or disciplinary action was recommended in these cases. The majority of the others were completed either after a preliminary assessment stage (14), or unsubstantiated following a full investigation (5). The remaining four (4) cases were recorded for information.
35. In the 12 cases where DIOS recommended action against UNRWA staff (see table 8 below), the disciplinary process is still pending for three of these cases, which include failure to comply with professional standards, outside activity and corporal punishment. While in one case of Abuse of Power, no disciplinary action was taken as the subject left the Agency.
36. Eight cases where disciplinary action was recommended and taken, one involved allegations of Sexual Exploitation and Abuse where a female patient at a health centre had been sexually exploited and abused by a practical nurse. The nurse was separated from service without termination indemnity. With respect to the other cases, in one case, the Field Office decided to separate staff from service without termination indemnity with respect to a substantiated allegation of sexual harassment. In a case of fraud where a staff member had submitted false invoices to conceal his theft from the school budget, the staff member was separated from service without termination indemnity. In a second fraud case, the staff was summary dismissed for stealing from numerous microfinance clients and creating false loan applications. In a case of breach of neutrality, the staff was also separated from service without termination indemnity.

In a second fraud case, the staff was summary dismissed for stealing from numerous microfinance clients and creating false loan applications. In a case of breach of neutrality, the staff was also separated from service without termination indemnity. In the remaining three cases, written censures were served together with fine or suspension without pay for a period of time.

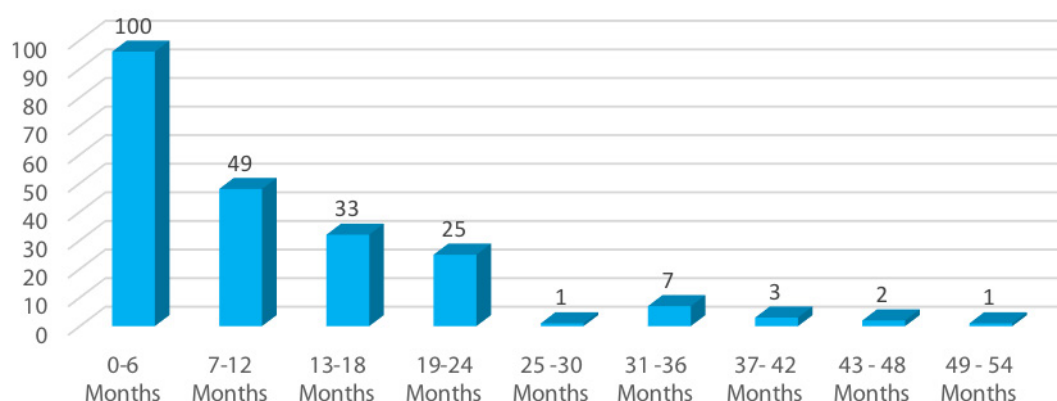
Table 8: Actions taken on substantiated DIOS investigation cases

Field Office	Allegation	Date of Report	Status (as of 13 March 2019)
GFO	Breach of Neutrality	6 June 2018	Closed
	Sexual Exploitation and Abuse	12 July 2018	Closed
JFO	Conflict of Interest	12 June 2018	Closed
	Failure to Comply with Professional Standards	12 November 2018	Pending
	Outside Activity	20 May 2018	Pending
	General Fraud	31 July 2018	Closed
SFO	Failure to Comply with Professional Standards	4 September 2018	Closed
	General Fraud	6 September 2018	Closed
	General Fraud	23 February 2018	Closed
WBFO	Sexual Harassment	15 May 2018	Closed
	Abuse of Power	28 May 2018	Closed
	Corporal Punishment	25 February 2018	Pending

Support for decentralized investigations

37. The conduct of decentralized investigations by Field Offices has raised some unique issues or challenges, while the influence and support from DIOS continued to be limited.
38. Each Field Office has an intake committee typically chaired by a Deputy Director, who reviews all allegations received in the field. The committee then makes recommendations to the Field Director as to how to handle the allegation: whether to decline allegations, initiate a preliminary assessment or an investigation, to deal with the matter as a managerial issue, or to request from DIOS to take over the investigation.

Figure 1: Aging of DIOS and Field Offices open cases



In 2018, one DIOS investigator participated in each Field intake committee. This has helped to achieve a more consistent handling of allegations, but this is limited by the advisory nature of the intake committee, and full consistency could not be assured, consequently. In addition to the risk of inconsistent handling of allegations, multiple intake committees also prevent DIOS from being able to quickly and efficiently provide statistical information upon request, as the information from the case management system must be verified with the Field Offices.

39. In addition to on-going guidance on specific investigations, in 2018, DIOS held a technical session on the preparation and presentation of investigations documents and the key investigator's roles. Also, DIOS conducted a basic Investigation training.

Way forward

40. DIOS has managed to cope with capacity issues and handled serious cases of misconduct in the Agency in a satisfactory manner, both qualitatively and quantitatively. All the same, a substantial amount of investigations have been carried out by Field Offices, many of which by staff who are non-professional investigators and have their own full-time responsibilities. Since it is critical that the staff who conduct investigations have the requisite skills and experience, the management decided at the end of 2018 to establish two full-time investigators posts for each field (10 investigators posts in total for five fields). This will provide much needed capacity to deal with in particular corporal punishment cases, and mitigate risks in certain field offices that legal officers be responsible for investigations while subsequently finding themselves in the position to give legal advice on those same cases. DIOS has been providing the support for the recruitment process in terms of the assessment of the applicants' technical competencies.
41. DIOS will continue its dialogue with management to explore alternative models for the investigation function for the Agency, including centralization of some (e.g. intake) or all of the function to DIOS, or significantly strengthening its ability to oversee investigations conducted in the fields. In the meantime, it will continue to support the Field Offices through dedicated staff participating in intake committees and providing technical support.

evaluation activities

Overview

42. The evaluation function in UNRWA is governed by an institutional framework comprising the Organizational Directive (OD) 14, which sets out the objectives of all oversight functions, and the Evaluation Policy, which describes Evaluation at UNRWA, including its mandate, roles and responsibilities and key processes of the evaluation cycle (planning, follow-up etc.). The Evaluation Policy is supplemented by the 'Standards and Procedures for Quality Assurance in Evaluation' document which describes processes in more detail, while offering basic tools for the conduct of evaluations.
43. Organizational commitments towards Evaluation, including in terms of dedicated financial resources, are embedded in the documents mentioned above, as well as the management response to the professional Peer Review of UNRWA's evaluation function (conducted in 2015) and UNRWA's Medium Term Strategy 2016 – 2021 (which includes, in annex, a medium-term evaluation plan).
44. The evaluation function strengthens accountability towards internal and external stakeholders and supports and contributes to learning within the Agency. To achieve these purposes, evaluations seek to determine the relevance, effectiveness, efficiency, impact and sustainability of on-going and completed projects, programmes, emergency responses, strategies and policies. Evaluations may examine expected and achieved accomplishments, results chains, processes, contextual factors and causality.

Results in 2018

45. In 2018, four evaluations were completed (1 centralized and 3 decentralized).
46. The centralized evaluation was to assess the relevance and appropriateness, effectiveness, efficiency and sustainability of the Social Safety Net programme (SSNP) and the effects that UNRWA's transition to the e-card modality in the Jordan, Lebanon and West Bank fields ('food to cash') has had on the SSNP. The evaluation confirmed that the SSNP provides a critical, albeit small, lifeline for impoverished Palestine refugees, protecting them from slipping further into poverty and contributing to meeting their basic needs. While also confirming the appropriateness of the transition to the cash assistance modality in the three fields, the evaluation provided evidence of shortcomings. These included, among others: reduced clarity of programme objectives after the transition to cash assistance; the low amount of the transfer which limits the SSNP's social protection potential; social workers' limited time for casework and referrals; and the costs of the targeting process. The evaluation developed eight recommendations, all of which were agreed or partially agreed by the UNRWA Relief and Social Services department (RSSD).
47. The other two centralized evaluations which had been planned for 2018, including the mid-term evaluation of the Medium-Term Strategy (MTS) 2016-2021 and the evaluation of the UNRWA Education Reform, were not conducted due to lack of funding for consultancies, and staffing issues within the Evaluation Division. Both evaluations have been carried forward to the Evaluation Division's 2019/2020 work plan.
48. Three decentralized evaluations finalized in 2018 are as below:
 - Evaluation of the 'Equality in Action - Gender Initiative Programme' – The evaluation addressed the relevance, efficiency, effectiveness, impact and sustainability of a large multi-donor programme supporting women's empowerment in the Gaza strip (Gaza Field Office, issued in March 2018). This evaluation provided evidence of how the programme's different components were relevant to women's needs deriving from social restrictions, gender-based violence and unemployment, as well as the Agency's strategy at large.

The evaluation found that the programme yielded effects at the individual level, increasing women's self-confidence, skills and awareness, while suggesting there was room for enhancing further its effects at the community-level.

- Evaluation of the 'Engaging Youth' (EY) project – The evaluation assessed the relevance, efficiency and effectiveness of a European Commission-funded intervention targeting Palestine refugee youth in Syria (Syria Field Office, issued in June 2018). Evaluation findings pointed to the project's general alignment with the challenges faced by Palestine refugee youth in Syria, and their desires, yet suggested that less systematic attention had been given to what youth and the market actually needed for the future competitiveness of EY 'graduates'. The evaluation identified specific opportunities to strengthen new programming cycles that this intervention may generate in the near future.; and

- Evaluation of the 'Replacing rented schools at Jabal-al-Taj' project - The evaluation covered the relevance, efficiency, effectiveness and sustainability of a US-funded intervention that replaced five rented schools with one school building in Amman (Jordan Field Office, issued in September 2018). Findings from this evaluation suggested that the project was generally successful in increasing access to an improved teaching and learning environment and in mitigating the adverse effects of Programme-Fund shortages on the operation of JAT schools. Nevertheless, the evaluation highlighted the need to strengthen planning, monitoring, beneficiary participation and risk assessment.

49. Additionally, two decentralized evaluations were initiated in 2018, including an evaluation of the 'Child and family protection services through case management approach' project (Jordan Field Office) and the 'Maintaining the resilience of Palestine refugees from Syria in Jordan and Lebanon' project ('MADAD' project) (Lebanon Field Office). These evaluations are expected to be finalized (inclusive of management response) early 2019. In both cases, the DIOS's Evaluation Division supported the field offices through quality-assurance of key evaluation deliverables and processes.

Status of recommendation implementation

50. Table 9 below offers a snapshot of the open recommendations for each year, as of December 2018. Upon on-boarding of the new Chief, DIOS intends to prioritize the recommendation follow up, and also assess the relevance of inclusion of de-centralized recommendations and revise the methodology accordingly in order to increase accountability and efficiency.

Table 9: open recommendations in 2018 (Evaluation)

Year and Assignment(s)	Total recommendations	Open	Closed
2011 - Centralized - UNRWA Fleet Management	12	7	5
2016	25	10	15
Centralized - Evaluation of the e-health project	7	3	4
Centralized - Evaluation of the Security Risk Management Programme	18	7	11
2017 - Decentralized (JFO) - Improvement of living conditions of vulnerable Palestine refugees in Jerash camp	25	19	6
2018	88	88	-
Decentralized (GFO) - Equality in action - Gender initiative programme in Gaza	28	28	-
Decentralized (JFO) - Replacing rented schools at Jabal Al Taj	37	37	-
Decentralized (SFO) - Engaging youth project in Syria	15	15	-
Centralized - Transition to the e-card modality in the Jordan, West Bank and Lebanon fields	8	8	-
Grand Total	150	124	26

NB – The most recent recommendation follow-up was conducted in February/March 2019.

Way forward

51. The Evaluation Division did not have full staff capacity during 2018, which will continue in 2019 for an extended period. Also, there is no consultancy fund available for evaluation. The combination of these two factors will have a serious adverse impact on the 2019 work plan. In this regard, however, with arrival of a new Chief in April 2019, and recruitment of two evaluation officers, expected to be completed by 2nd / 3rd quarter, DIOS looks forward to exploring ways for conducting centralized evaluation by Evaluation Division staff without dependence on unpredictable availability of consultancy funds. Also, DIOS will reflect upon the most appropriate arrangement for DIOS support for the decentralized evaluation functions.

annex i

ethics office

I. Introduction

1. The present report, the tenth since the designation of an Ethics Officer in UNRWA in January 2008 and the ninth since the establishment of the UNRWA Ethics Office in September 2009, is submitted pursuant to UN Secretary-General Bulletin ST/SGB/2007/11 and UNRWA Organization Directive 30, requiring annual reporting on the activities of the Ethics Office and the implementation of related policies. The report also responds to the request of the UNRWA Advisory Committee on Internal Oversight (ACIO)⁸ to be kept regularly informed about the work of the Ethics Office.
2. In accordance with its mandate to help nurture a culture of ethics, integrity and accountability within the Agency, the present report provides an overview and assessment of the work and achievements of the Ethics Office over the reporting period.
3. A draft of the report was reviewed by the Ethics Panel of the United Nations (EPUN) in accordance with ST/SGB/2007/11. The report will be appended to the annual report of the Department of Internal Oversight Services and will be submitted to the Commissioner-General and to the UNRWA Advisory Commission.
4. The Ethics Office is administratively attached to the Department of Internal Oversight Services (DIOS), although it operates independently and with full impartiality and confidentiality as required by ST/SGB/2007/11 and Organization Directive No. 30. The Chief of the Ethics Office has full and unrestricted access to the Commissioner-General and has the opportunity to refer matters to the Chairperson of EPUN, of which the Chief, Ethics Office is a member.
5. The Chief of the Ethics Office provides regular updates of the office's work plan and achievements to the ACIO, which represents a measure of oversight with respect to its functioning and further enhances the independence of the office. In 2018, the Ethics Office provided briefings to the ACIO during its face-to-face meeting in November.
6. The overall objective of the Ethics Office is to assist the Commissioner-General in nurturing a culture of ethics, integrity and accountability, and thereby to enhance the trust in and the credibility of UNRWA, both internally and externally. The Ethics Office fulfills this mission by providing services to management and individual staff members in five areas:

- a. Confidential ethics advice and guidance;
- b. Financial and outside interest disclosure;
- c. Protection against retaliation;
- d. Training, education and outreach;
- e. Policy support and standard setting.

II. Background and general information

4. An increased emphasis on integrity and ethics within the United Nations is a crucial component of the Secretary-General's ongoing efforts to reform and strengthen the organization. This comes at a time when organizations all over the world, both public and private, are taking a closer look at organizational ethics. Against this backdrop, the Secretary-General established an Ethics Office at the United Nations Secretariat in 2006. This was followed in 2007 by an instruction to all funds and programmes, including UNRWA, to establish their own separate ethics offices (ST/SGB/2007/11 refers).
5. Following the promulgation of this instruction, the Commissioner-General initially designated the Agency's General Counsel as Ethics Officer in addition to the latter's regular duties. Effective 1 September 2009, a separate Ethics Office was established in UNRWA, with its terms of reference contained in Organization Directive 30, promulgated on 11 April 2011.
6. The Ethics Office also has a number of responsibilities related to the Agency's policies on protection from sexual exploitation and abuse (SEA) of beneficiaries¹⁰ and on the prohibition of discrimination, harassment – including sexual harassment – and abuse of power in the work context, hereinafter collectively referred to as Prohibited Conduct.¹¹ As these cut across other aspects of the Office's mandate, related activities are reported under the main headings mentioned above. Statistics on allegations of SEA and Prohibited Conduct are provided in the annual report of DIOS.
7. The Ethics Office comprises the Chief, at P-5-level, an Ethics Officer (grade 17) and an Administrative Assistant (grade 11). In addition, an intern supported the work of the office during part of the year.

11. In 2018, UNRWA faced an unprecedented financial crisis when the Agency's long-term largest donor dramatically reduced its contribution. Austerity measures introduced in response have significantly impacted the Agency's programmes as well as support services. As part of these measures, much of the Ethics Office's non-staff budget for the year was frozen, resulting in adjustments to the work plan (especially with respect to training and outreach to Fields).

III. Activities of the Ethics Office

12. In 2018, the office received a total of 293 requests for its services, a slight decrease in comparison to 2017. As reflected in Figure 1 below, the demand for the Office's services has stabilized during the last five years. The Ethics Office continued to be increasingly approached by managers with requests for advice, training and other support. After the initial focus, during its first five years of operations, on raising general staff awareness of the standards of conduct, ethical decision-making and avenues for addressing staff concerns, the focus over the past years has shifted to the development of ethical leadership and other support to managers and supervisors.

13. In line with the mandate of the Ethics Office, requests for services covered a broad range of categories: ethics advice (167 requests), training and outreach (38), protection against retaliation (PaR) for reporting misconduct and for cooperating with duly authorized audits or investigations (12), requests from EPUN members (coherence) (12), policy support and standard setting (10), matters in respect of which the Ethics Office was alerted (33), requests related to SEA and Prohibited Conduct policies (11) and general information and other (10). Figure 2 provides a breakdown of requests by category. In addition to recorded requests for services, the Ethics Office has also responded to a large number of emails and phone calls with respect to the administration of the UNFDP, the Area Staff Declaration of Interest Programme, and the roll-out of the ethics e-course and the e-course on social media and neutrality.

14. In early 2018, an UNRWA-wide sexual misconduct task force, coupled with individual field office based sexual misconduct working groups, were established to: (i) ensure that the Agency adheres to UN Secretary-General and Chief Executive Board initiatives, standards and reporting requirements related to the prevention and response to SEA and sexual harassment (SH); and (ii) go beyond system-wide efforts in ensuring that Palestine refugee needs are met within an environment that is free from SEA and SH. The Ethics Office has been extensively involved in supporting the work of the task force and working groups as detailed in sections D and E, below.

Figure 1: Overall requests for Ethics Office services by year (2008 – 2018)

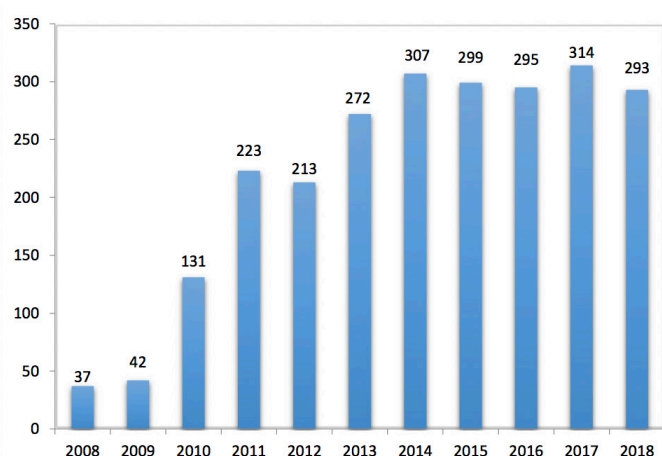
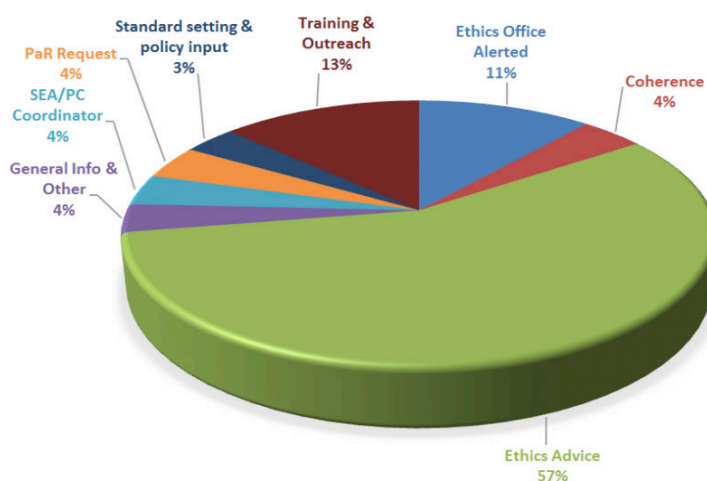


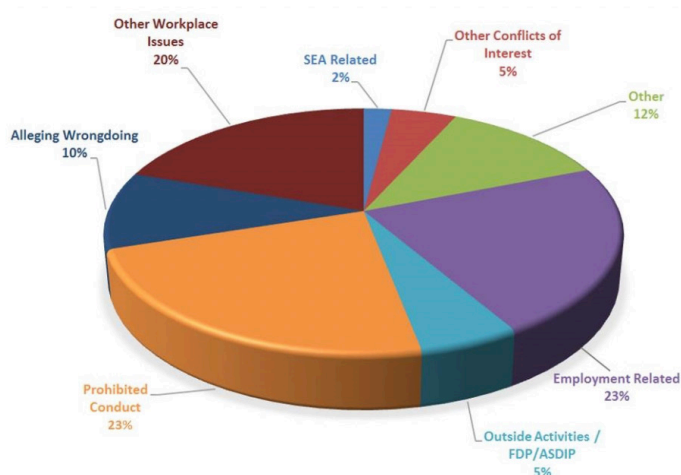
Figure 2: Requests for services from the Ethics Office (2018)



A. Advice and guidance

15. The Ethics Office serves as an independent, confidential and impartial office that represents neither management nor staff and remains neutral and advisory in nature. The Office assists managers and other staff in upholding the highest levels of integrity, efficiency and competence by providing confidential advice on relevant standards of conduct and by clarifying staff and Agency obligations. In helping staff make decisions consistent with the values and rules of the Agency, the Ethics Office provides an essential risk prevention function.
16. The Ethics Office advises staff on various concerns, including actual or perceived personal conflicts of interest, engagement in outside activities, Prohibited Conduct, workplace issues and employment-related concerns. While providing a secure and confidential resource for staff, the Office does not replace existing mechanisms for reporting of misconduct or resolving of grievances. The independent and confidential nature of the Office facilitates its approachability and builds trust.
17. During the reporting year, the Ethics Office responded to 167 requests for confidential ethics advice, a slight decrease in comparison to 2017. Figure 3 provides a breakdown of the various types of advice request. The Office continues to respond to requests related to prevention and/or mitigation of potential or actual conflicts of interests, including requests related to gifts and honours, outside employment and other outside activities. UNRWA has a decentralized system for the approval of requests for outside employment and outside activities, and related questions are mostly answered by HR offices at field offices, which explains the relatively low number of advice requests on such matters reaching the Ethics Office. The Ethics Office continues to be regularly consulted by HR managers in relation to outside activity and outside employment requests.
18. Other categories of advice requests, which as in previous years continue to make up the largest percentages of the various request-types made to the Office, related to Prohibited Conduct, other workplace issues, and employment related concerns. In the UN and the other funds and programmes, such issues are frequently referred to the organizational ombudsperson, although the respective ethics offices deal with queries of this nature as well. In the absence of an ombudsperson at UNRWA, the Ethics Office has continued to deal with such requests within the confines of its mandate. Because the Ethics Office does not have the mandate to directly engage in the resolution of individual staff member grievances, the guidance provided by the Office was limited to drawing attention to the applicable policies, advising about options to address concerns through supervisors or other offices and/or referral to such offices. Where appropriate, the Office encouraged complaining staff to speak up and make use of these resources.

Figure 3: Ethics advice requests (2018)



B. Financial and outside interest disclosure

19. UNRWA joins the UN and other funds and programmes in requiring staff members who are in positions of authority or who hold specific positions which entail financial decision-making authority to annually disclose personal financial assets and outside affiliations and interests. Any international staff required to disclose are required to do so by participating in the United Nations Financial Disclosure Programme administered by the UN Ethics Office with support from the UNRWA Ethics Office. The UNRWA Ethics Office administers a separate programme for (locally-recruited) area staff required to disclose outside affiliations and interests. Both programmes promote staff awareness of conflict of interest situations and preserve and protect the integrity of the organization and participating staff, thereby maintaining and enhancing public trust in UNRWA. The Ethics Office, or a designated party in the case of international staff, reviews these disclosures in order to identify real or potential conflicts of interest, and provide advice accordingly.
20. 116 international staff members were required to file financial disclosure statements. This includes all staff members at the D-1 level and above, all staff (regardless of grade) whose principal duties include procurement and investment functions, and all staff with access to confidential procurement or investment information. All but one had fully complied with their filing obligations at the end of the programme closing date. Appropriate follow-up action was taken with respect to the one non-compliant staff member.
21. Of the area staff, those required to file a Declaration of Interest Form covering their outside affiliations and other interests include all those whose principal occupational duties involve procurement or investment functions, all those responsible for requisitioning and certifying requisitions of significant quantities of goods and/or services, and all those serving on contract committees. Based on these criteria and guidance from the Ethics Office, Field Office Directors and Headquarters Department Heads identified 650 staff members from headquarters and field offices, a 22 per cent decrease compared to 2017 which was caused by the exclusion of the Gaza Field Office due to the prevailing conditions in the Gaza Strip. By the end of the year, 614 staff members had submitted completed declaration forms, representing a 94 per cent compliance rate. The non-compliant staff were all from two Field Offices and the Ethics Office requested the respective Field Offices to follow-up with the non-compliant staff members.
22. All 614 submitted forms were reviewed by staff from the Ethics Office. 203 potential conflicts of interests were identified, mostly related to family relationship issues, in addition to outside activities. Upon careful review of the disclosure forms and additional documentation, as well as consultation with the concerned staff members, the Office determined that in 186 cases no action was required. In 17 cases, proactive advice was provided to safeguard against a potential conflict of interest giving rise to problems in the future.

C. Protection against retaliation (PaR)

23. UNRWA policy for protection against retaliation¹² encourages UNRWA personnel to report misconduct and/or cooperate with authorized audits or investigations, without fear of reprisal. In promoting and providing protection for such reporting and cooperation, the policy enhances the Agency's ability to investigate and remedy conduct that if otherwise left unaddressed could cause significant damage to the Agency's operations and reputation. In accordance with the policy, the Ethics Office receives requests for protection against retaliation and conducts preliminary assessments to determine whether a complainant engaged in a protected activity and, if so, whether the protected activity was a contributing factor in causing the alleged retaliation. If the Office determines that a *prima facie* case of retaliation has been established, the matter is normally referred to DIOS for investigation.
24. The Ethics Office received twelve new PaR requests and referrals - one case referred by DIOS and two cases referred by different Field Legal Offices - during the year, the same number as during 2017. The Office also continued to work on preliminary assessments with respect to eight cases carried forward from 2017. The various requests and referrals pertained to staff from all five fields of operations as well as headquarters.
25. The Ethics Office began the year with an expedited review of cases carried forward from 2017. It found *prima facie* evidence of retaliation in two cases, one of which was referred to DIOS for investigation. In the second case, the Field Director, upon being informed of the outcome of the preliminary assessment, agreed to rescind the alleged retaliatory decision (transfer of complainant to another office), and hence an investigation was not necessary. Four cases were concluded with a determination that the allegations did not amount to a *prima facie* case of retaliation. In one of these cases, complainant requested a further review of the Ethics Office's determination by the Chair of EPUN in accordance with Section 4.3 of ST/SGB/2007/11. The Chair confirmed the determination by the Ethics Office. The remaining two cases were closed in consultation with complainants, after the subjects of the complaint left the Agency.
26. With respect to the 2018 cases, in three cases the Ethics Office concluded the preliminary assessment with a determination that the available evidence supported a *prima facie* case of retaliation and it subsequently referred the cases to DIOS for investigation. In two of the cases, the Ethics Office intervened with management to protect the interests of the complainant. In one of these cases, the Ethics Office requested the intervention of the Commissioner-General - only the second time since the establishment of the Ethics Office - to suspend the termination of an international staff member pending the investigation of that staff member's prohibited conduct and retaliation complaints (as well as a number of complaints against the staff member). The response to the request was positive and the staff member's contract has been extended to await the outcome of the investigation. In the second case, the Ethics Office intervened with the Field Director, as a result of which the subject of the alleged retaliation was transferred to another position at the Field Office, thereby resolving the ongoing retaliation.
27. Three other cases related to staff members from the same office who had acted as witnesses in an investigation against their supervisor, who was subsequently disciplined. Two of these staff members reported threats of retaliation ahead of and subsequent to the supervisor's return from special leave (initially pending investigation and subsequently as part of the disciplinary measure). During its assessment of the cases, further reports of alleged retaliation and other misconduct were received by the Ethics Office, which prompted it to intervene with the concerned Field Director requesting that the supervisor once again be placed on special leave. During the subsequent investigation into the new allegations, the supervisor submitted his resignation, which was accepted with modalities of separation determined by the outcome of the investigation.
28. With respect to the third staff member/witness, the Ethics Office was alerted by the Field Legal Office to implicit serious threats against that staff member which a second subject (a former supervisor at the same office) in the same (initial) investigation had made during the subject interview and the disciplinary process. The Field Office intended to terminate this second subject for misconduct and was concerned about possible retaliatory action after the termination, and against this backdrop requested the support of the Ethics Office. As the case involved possible retaliation outside the work environment,

the Ethics Office consulted colleagues from the Department of Security and Risk Management and the Protection Division/Gender Unit, based on which specific advice was provided to the Field Director (and through the Field Director to the subject) and to the staff member. To date no actual retaliation or further threat thereof has been reported.

29. Another case referred by a Field Legal Office to the Ethics Office concerned alleged retaliation by a staff member who was the subject in an ongoing investigation against a witness from the refugee community. Based on a rapid assessment of the available information, the Ethics Office recommended that the allegations of retaliation be included in the ongoing investigation, which the Field Office accepted. Four other cases were closed with a determination that the allegations did not amount to prima facie cases of retaliation. This included one case referred by DIOS. One case was pending at the end of 2018.
30. In 2017, the UN Joint Inspection Unit (JIU) initiated a whistleblowing policy review focusing on policies and practices for reporting misconduct and protecting those who report from retaliation across UN system organisations. During the reporting period, the Ethics Office coordinated the Agency's response to the JIU's draft report. In parallel, the Office commenced work on a revision of General Staff Circular No. 05/2007, containing the Agency's PaR policy, in light of the JIU recommendations and the updated PaR policy of the UN Secretariat (ST/SGB/2017/2/Rev.1). An initial draft was circulated for comments, with consultations ongoing at the end of the reporting period.

D. Training, education and outreach

31. As part of the increased Agency focus on preventing and addressing sexual misconduct, raising staff awareness of SEA and SH had been identified as a key priority. The Ethics Office engaged with the sexual misconduct task force and working groups on a number of initiatives that were implemented during the reporting period.
32. The Ethics Office worked in close cooperation with the Jordan Field Office Protection Unit and the HQ Protection Division/Gender Unit in developing a one-day training workshop on SEA and SH in a GBV framework for key field staff, including GBV lead staff, Field Investigators, members of Field Intake Committees and SEA/SH focal points. As part of the preparation for this workshop, agreement was reached on a framework integrating SEA and SH in the Agency's GBV response and referral system. The framework and the training build around it were piloted at the Jordan Field Office in September and subsequently rolled out in Lebanon, Syria and the West Bank, with training in Gaza and Headquarters scheduled to take place early in 2019. As a result of the training, participants are able to detect and identify cases of SEA and SH, as specific forms of GBV, and to make referrals both for accountability as well as for assistance and support to survivors. Participants also constitute a cadre of SEA/SH trainers who are in a position to replicate training for other colleagues as well as members of the community.
33. Shorter versions of the training, were delivered by the Ethics Office (for Field management teams) and by the Jordan Field Office (for 'frontline' staff). Feedback has been very positive. A component on SEA and SH was also integrated in other training conducted by the Ethics Office in the Gaza Strip, Jordan, Lebanon and Syria (for manual workers, see below) and by the Syria Field Office (as part of workshops on GBV). In total 3,518 staff and other personnel benefitted from training with respect to SEA and SH during 2018. Building on SEA/SH training for staff, the Jordan Field Office has also conducted a number of information sessions for members of the community, including UNRWA students, on GBV, including SEA, with a focus on reporting and services available for survivors, for a total of 3,264 participants.
34. To raise further staff awareness of SEA and SH, and to support the work of the sexual misconduct task force and working groups, the Ethics Office developed a modest microsite containing key UN, IASC and UNRWA resources with respect to SEA and SH. The Ethics Office coordinated the adaptation of the UN SEA "No Excuse" flyer and worked with the Department of Legal Affairs, Communications and the Executive Office in having it launched during the 16-Day campaign on activism on violence against women. The flyer is also being distributed during training and through other outreach initiatives. A pocket card with similar messaging is currently under preparation, jointly with the initiative on addressing violence against children (AVAC). Finally, the Ethics Office issued an all staff broadcast on sexual misconduct; similar messages were also sent by the Commissioner-General and Field Directors.
35. Beyond training on sexual misconduct, the Ethics Office continued to facilitate and monitor the roll-out of the e-learning course on social media and neutrality, launched in 2017. This 90-minute interactive course was developed as one of the responses to requests from staff and unions for training and precise guidance on social media and neutrality. Roll-out of the course was extended to the Gaza Strip, Lebanon and the West Bank. In response to concerns that manual workers and other junior staff had difficulty accessing the e-course, the Ethics Office provided facilitated training to this category of personnel on social media and neutrality (in addition to SEA and SH, see above) in the Gaza Strip, Jordan, Lebanon and Syria. During the reporting year, 20,037 staff members and other personnel successfully completed either the e-course or the face-to-face training, bringing the total since the launch of the e-course to 28,228, amounting to 92 per cent of the total workforce.
36. The Ethics Office conducted missions to the Gaza Strip, Jordan, Lebanon, Syria and the West Bank, primarily to conduct the aforementioned training (in Gaza, it also conducted another workshop on Ethical Leadership), and to have meetings with field management teams, field sexual misconduct working groups, ethics focal points – who continue to provide an additional resource that staff members can turn to for confidential advice related to the Agency's policies on SEA, Prohibited Conduct and PaR – in addition to individual meetings with a range of managers and other staff members. Ahead of field missions, the Ethics Office sends a message to all staff in the respective Field alerting them of the visit and the opportunity to schedule in-person consultations.

37. Newly recruited personnel continue to be required to take the Agency's comprehensive ethics e-learning course, which was first launched in 2013. In addition, the Ethics Office provided individual briefing sessions to 23 newly appointed international staff members and other personnel. The Ethics Office also continued the distribution of its handbook (for managers and supervisors) and shorter booklet (for other staff) on ethics and the standards of conduct and related materials.

E. Standard-setting and policy support

38. During the reporting period, the Ethics Office provided policy-related and technical comments in respect of drafts of a new Data Protection and Data Disclosure Policy, a Code of Conduct for Health Professionals, and a Do's and Don'ts on Social Media guide. As mentioned earlier, the Ethics Office coordinated the Agency's response to the JIU's draft report of its review of whistle-blower policies and practices in UN system organizations, and the Office subsequently drafted an update of the Agency's retaliation policy. The Office also drafted the Terms of Reference for an UNRWA Research Review Board and Ethical Standards in Research involving Individuals. Consultations on the two drafts were ongoing at the end of the reporting period.

39. As mentioned earlier, a sexual misconduct task force was established at the beginning of 2018 to find innovative ways to ensure that UNRWA meets UN Secretary-General and Chief Executive Board initiatives, standards and reporting requirements but also go beyond and tailor UN-wide efforts to prevent SEA and SH in UNRWA's context and beneficiary community. The task force is led by the Department of Legal Affairs and the Ethics Office, in its capacity as the Agency's senior focal point for SEA, has been actively supporting its work, contributing to the development of its terms of reference, initial gap analysis, and due diligence exercise and participating in the various meetings. Whilst on field missions, meetings were held with field sexual misconduct working groups to help guide them in implementing the due diligence exercise, answer their questions and pave the way for the sexual misconduct training that was rolled out during the year (see section D, above).

40. The Ethics Office has also continued to participate in the UN working group on SEA and in the Inter-agency Standing Committee Task Force on Accountability to Affected Populations and PSEA. In this capacity it has coordinated input in, or implementation of a number of UN initiatives, including updating the Agency's SEA action plan, aligned with the priorities of the sexual misconduct task force, UNRWA's participation in the UN system-wide SEA survey, the Agency's input into the development of the 'Clear Check' database, intended to prevent rehiring of personnel who have been found guilty of SEA or SH, and strengthening assistance to survivors/victims of sexual misconduct. In respect of the latter, building on the guidance extended in the UN Victim Assistance Protocol, significant progress was achieved during the reporting year as a result of the development of the sexual misconduct training, mentioned earlier. As part of the preparation for this training, agreement was reached on a framework firmly integrating SEA and SH into the Agency's GBV response and referral system. As a result of this, SEA and SH are now recognized by the Agency's GBV staff as specific forms of GBV requiring a GBV response, including referral of survivors for services, as appropriate, in addition to referral for accountability.

41. The Ethics Office also coordinated the visit of the new Victim's Rights Advocate¹³ on SEA to UNRWA in Lebanon and Jordan and facilitated her participation in one of the meetings of the sexual misconduct task force. The Ethics Office also participated (remotely) in a special consultation convened by the VRA focusing on the principal elements of a victim-centred approach and discussed its integration into complaints mechanisms, reporting, investigations, victim support and communication with victims. Other UN initiatives with UNRWA input coordinated by the Ethics Office include a video clip by the Commissioner-General as part of a video loop displayed at the UN Secretariat during the high-level segment of the General Assembly, a UN fact sheet, and the Commissioner-General's annual certification letter with respect to SEA. The Ethics Office participated in a five-day training-of-trainers on inter-agency community-based complaints mechanisms organized by the International Organization for Migration. Finally, the Ethics Office has been providing input into responses to queries from donors and other interlocutors with respect to SEA and SH, including in the aftermath of the Oxfam scandal.

IV. Ethics Panel of the United Nations and Ethics Network of Multilateral Organizations

42. The UNRWA Ethics Office participated in the monthly video conferences of the Ethics Panel of the United Nations (EPUN) but was unable to attend the annual face-to-face meeting and the annual conference of the Ethics Network of Multilateral Organizations (ENMO) due to the Agency's financial crisis. The collaboration with EPUN and ENMO members has continued to facilitate the sharing of experiences and best practices. The collaboration with EPUN members, in particular, has served to promote coherence of UNRWA's ethics-related policies, strategies and standards with those of the UN Secretariat and the other funds and programmes in accordance with ST/SGB/2007/11. Further information on the work of EPUN is provided in the Report of the Secretary-General on the Activities of the Ethics Office presented at the seventy-third session of the General Assembly.
43. Effective 1 November 2018, the Chief of the Ethics Office took up a one-year tenure as Alternate Chair of EPUN. This role entails replacing the EPUN Chair in case of absences in addition to carrying out reviews of determinations of EPUN members in cases where the Chair has a conflict of interest in accordance with ST/SGB/2017/2/Rev.1 paragraph 7.7 or of determinations by the UN Ethics Office in accordance with paragraph 9.1 of the same bulletin. During the reporting year, no such reviews were conducted.

V. Conclusion and recommendations

44. Although the overall number of requests for services has been stable, the number of requests for protection against retaliation has increased substantially. As many of those requests are accompanied by voluminous documentation, often in Arabic, requiring translation, the Ethics Office has frequently been unable to carry out the preliminary assessments with respect to retaliation cases within the deadline set out in Organization Directive No. 30. Whilst the Ethics Office continues to strive to deal with retaliation complaints expeditiously, it recognizes that within existing resource constraints, and the inability to obtain additional resources due to financial austerity, it is likely to continue to lag behind with respect to its PaR case load.
45. In view of the considerable demand for services that in other organizations are provided by an organizational ombudsperson, the Ethics Office reiterates its earlier recommendation that the Agency consider ways to provide ombuds-services to UNRWA personnel. In 2011, the Agency appointed a panel of trained mediators to conduct mediation with respect to workplace disputes. As a result of staff turn-over, currently only a handful of the designated mediators continue to be in the Agency's employ. The Ethics Office recommends that additional mediators are identified and certified as a matter of priority.
46. The Ethics Office will undergo transition in 2019 with the retirement of both its Chief and the Ethics Officer. This development was discussed with the ACIO, which recommended that in filling the vacant Chief position, the Agency introduce term-limits to strengthen the Office's independence, as recommended by the JIU.¹⁴ The Ethics Office supports this recommendation. Also, at the end of 2018, the Ethics Office lost its Administrative Assistant who separated on Early Voluntary Separation, with the implication that the post was abolished. As the Ethics Office is in need of dedicated administrative support, it is recommended that the abolition of the position be reconsidered.

footnotes

1. The number of outstanding recommendation includes follow up conducted at the beginning of 2019, which led to closure of 23 recommendations.
2. Case completed refers to those case for which the investigation has been completed.
3. The figure reflects corrections made to the figure reported in 2017 AR.
4. Data retrieved from case management system and supplemented by field offices.
5. Abusive behavior, assault, threat by anonymous, conducts not befitting a UN Staff Member, using social media platform to discuss a matter that's solely the business of the Agency could be included under "other".
6. Most cases of failure to comply with professional standards are concerned with personal debts cases. These cases increased in Gaza last year due to the deteriorating economic situation.
7. This is primarily due to high percentage of old cases (cases initiated in 2014, 2015, 2016 and 2017) that were closed in 2018.
8. The ACIO is an advisory body of the Agency regulated by Organization Directive 24. It is composed of four external oversight experts and its remit includes the functions performed by the Ethics Office.
9. The Advisory Commission comprises representatives of the Agency's host countries and major donors.
10. General Staff Circular No. 7/2010 – Sexual Exploitation and Abuse Complaints Procedure.
11. General Staff Circular No. 6/2010 – Prohibition of Discrimination, Harassment – including Sexual Harassment, and Abuse of Power.
12. Incorporated in General Staff Circular No. 5/2007 on Allegations and Complaints Procedures and Protection against Retaliation for Reporting Misconduct and Cooperating with Audits or Investigations.
13. In early 2017 and as part of his new approach on addressing SEA, the Secretary-General appointed Ms. Jane Connors as Victim's Rights Advocate. See <https://www.un.org/preventing-sexual-exploitation-and-abuse/content/victims%E2%80%99-rights-advocate>
14. JIU/REP/2010/3; recommendation #6.



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for palestine refugees in the near east

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اللاجئين الفلسطينيين في الشرق الأدنى