

# Annual report of the Ethics Officer (2022)



## Introduction

1. The mission of the ILO Ethics Officer is to promote a culture of ethics, integrity and respect across the International Labour Office, in line with ILO values and principles. The annual report of the Ethics Officer provides updates on the activities undertaken in 2022 in fulfilment of this mission, as well as related institutional developments.
2. At the heart of the Ethics Officer's work is the commitment to promote awareness and understanding of ILO values and the standards of ethical conduct that all ILO staff members – as well as the Office as a whole – are expected to uphold. These standards are set out in the [Standards of Conduct for the International Civil Service](#), the [Principles of Conduct for Staff of the International Labour Office](#), the Staff Regulations and the relevant internal governance documents. Furthermore, ILO values are grounded in the principles enshrined in the ILO Constitution and underlying relevant up-to-date international labour standards.<sup>1</sup>
3. The Director-General entrusted the ethics function (an integral part of the ILO's accountability framework) and the specific roles and responsibilities associated with that function to the Ethics Officer, who assumed office for the first time as a full-time post on 1 July 2022.<sup>2</sup> In exercising this function, the Ethics Officer is independent of any other official, department or organizational entity of the ILO and reports directly to the Director-General.
4. The responsibilities of the Ethics Officer include those set out below – with a number of tasks having been recently added with the creation of the full-time post starting on the second semester of 2022.

### ▶ Responsibilities of the Ethics Officer

- *Ethics advice*: Providing advice for managers and staff members on questions of ethics, such as conflicts of interest, outside activities and occupations, the prevention of sexual exploitation and abuse, gifts, etc.
- *Monitor ethics at the ILO*, including through *staff ethics surveys*, meetings with stakeholders, etc.
- *Awareness-raising and training*: Contributing to the design, promotion and implementation of training and other programmes to inform and educate staff with a view to increasing awareness of ethical issues.
- *Policy development*: Providing guidance to ensure that ILO internal policies and practices reinforce and promote the ILO's ethical standards.
- Administer and review the ILO *financial disclosure programme* in cooperation with TR/CF.
- *Whistle-blower protection against retaliation*: Receiving and handling requests for protection from retaliation from staff members who believe that action has been taken against them because they have reported misconduct or cooperated with an audit or investigation.
- *Domestic workers employed by ILO staff*: Receiving information regarding allegations of inappropriate treatment by staff members of domestic workers employed by them.
- *Research and proactive promotion of ILO values*: lead and facilitate initiatives to build and foster workplace environments that uphold the ILO values and principles underlying international labour standards.

<sup>1</sup> The applicable internal governance documents are available at [www.ilo.org/ethics](http://www.ilo.org/ethics).

<sup>2</sup> Since the establishment of the ILO's ethics function in 2006, the Ethics Officer has assumed the responsibilities related to the function on a part-time basis. The Programme and Budget proposals for 2022–23 submitted by the Director-General to, and subsequently adopted by, the International Labour Conference at its 109th Session (2021) provide for the establishment of a dedicated full-time position of Ethics Officer, as recommended by the Joint Inspection Unit.

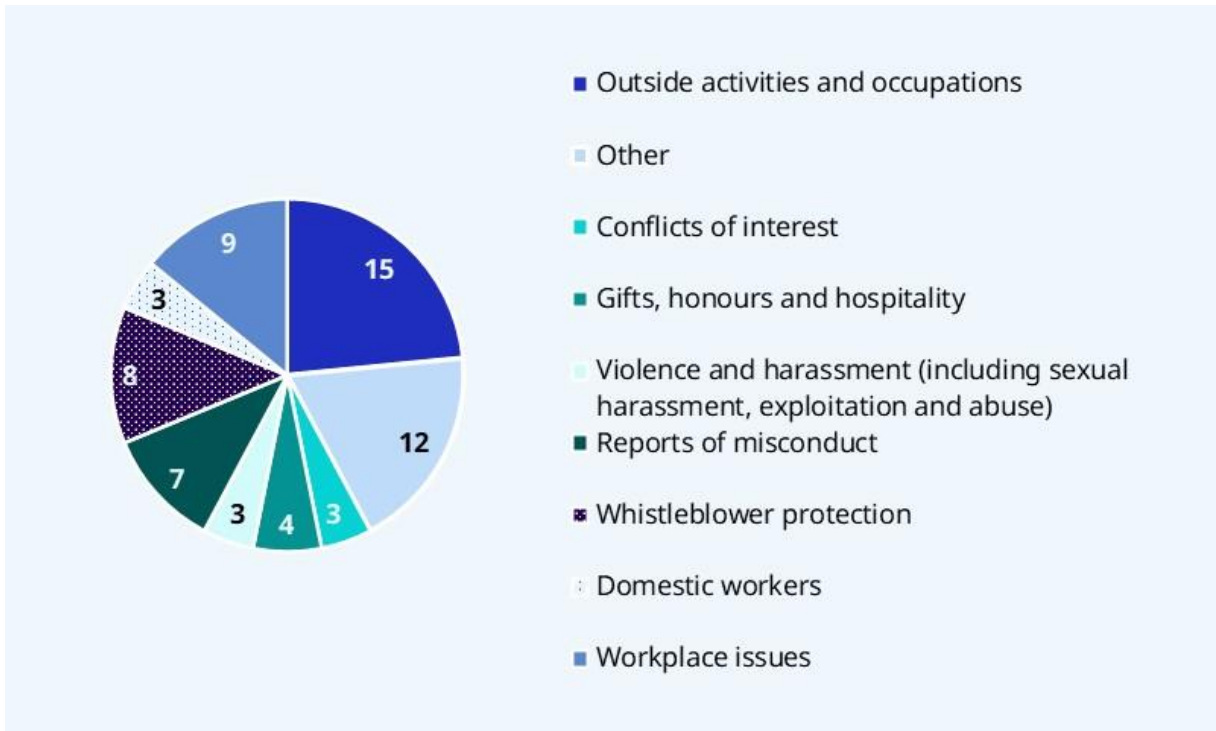
- Represent the ILO in international ethics forums, such as Ethics Network of Multilateral Organizations.
- ILO Ethics Officer is entrusted with assuming the ethics function for the *International Training Centre of the ILO in Turin, Italy*.
- Act as ILO focal point for the implementation of the UN inter-agency action plan on the *prevention of sexual exploitation and abuse*.

## Ethics advice

5. Upon request, the Ethics Officer provides confidential ethics advice to staff members. This is a 360-degree advisory function, since it embraces both the ILO Administration and individual staff members. Ethics advice is intended to support and guide staff in making decisions in accordance with the ILO's ethical standards of conduct.
6. The number of staff members seeking and receiving ethics advice during 2022 was 64, compared with 40 in 2021. An increase of the advisory activity can be associated with the assumption of the full-time Ethics Officer post from July 2022 onward (46 receivable advice requests were submitted and addressed within the second semester of the year).
7. Of the 64 colleagues who consulted the Ethics Officer in 2022, 28 were from headquarters – where 33 per cent of ILO staff work – and 36 were from field offices – accounting for the remaining 67 per cent of ILO staff.<sup>3</sup> It is the first time that consultations and interventions in field offices are more than those coming from headquarters, in line with the regional outreach policy of the Ethics Office. Of the 64 requests for advice or support, 13 were made by management.
8. During 2022, 15 requests for ethics advice concerned issues related to outside activities and occupations. Advice was also sought on matters concerning workplace issues (nine cases); whistle-blower protection procedures (eight cases); gifts, honours and hospitality (four cases) and other potential conflicts of interest (three cases). Fewer colleagues inquired about other issues, as shown in figures 1–5 below.
9. It is worth noting that for the first time the Ethics Office was contacted on allegations of inappropriate treatment of domestic workers by an ILO official. Pursuant to the Office Directive *Employment of domestic workers by ILO officials*, IGDS No. 479, the Ethics Officer referred the allegations to the Human Resources Development Department (HRD) for investigation.
10. Finally, a number of staff members sought information on channels for reporting other misconduct, or wished to report misconduct. As appropriate, those staff members were referred to the [applicable misconduct reporting mechanisms](#), notably the Office of Internal Audit and Oversight (IAO).

<sup>3</sup> These numbers are those as of 31 December 2022, when the ILO had 3,605 staff members, of which 1,189 were based at headquarters and 2,416 in field offices. See [GB.347/PFA/INF/7](#).

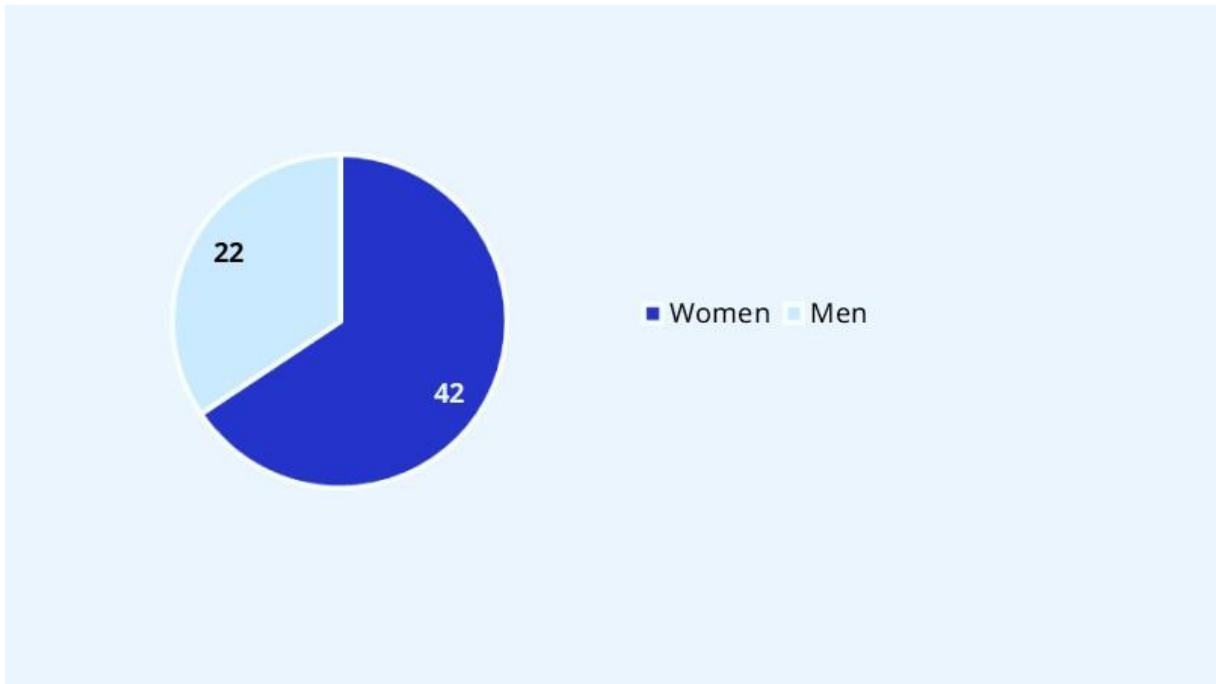
► Figure 1. Number of requests for ethics advice, by subject area, 2022



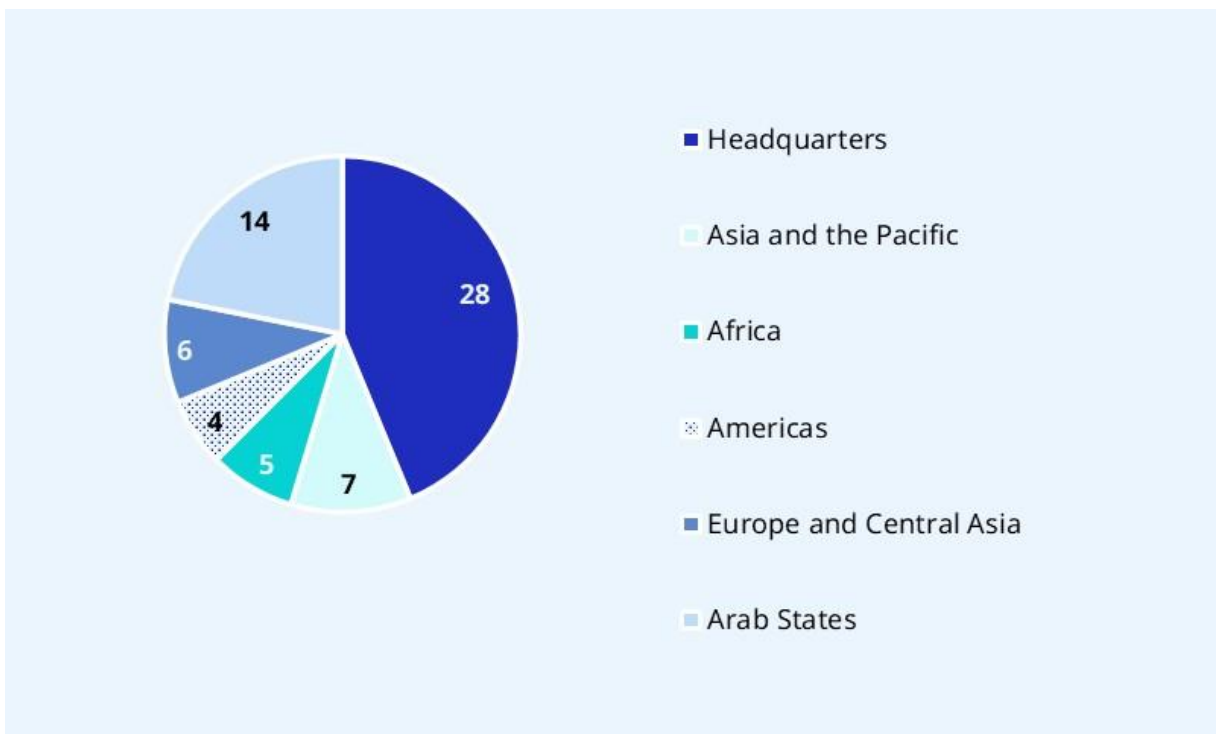
► Figure 2. Number of requests for ethics advice, by staff category, 2022



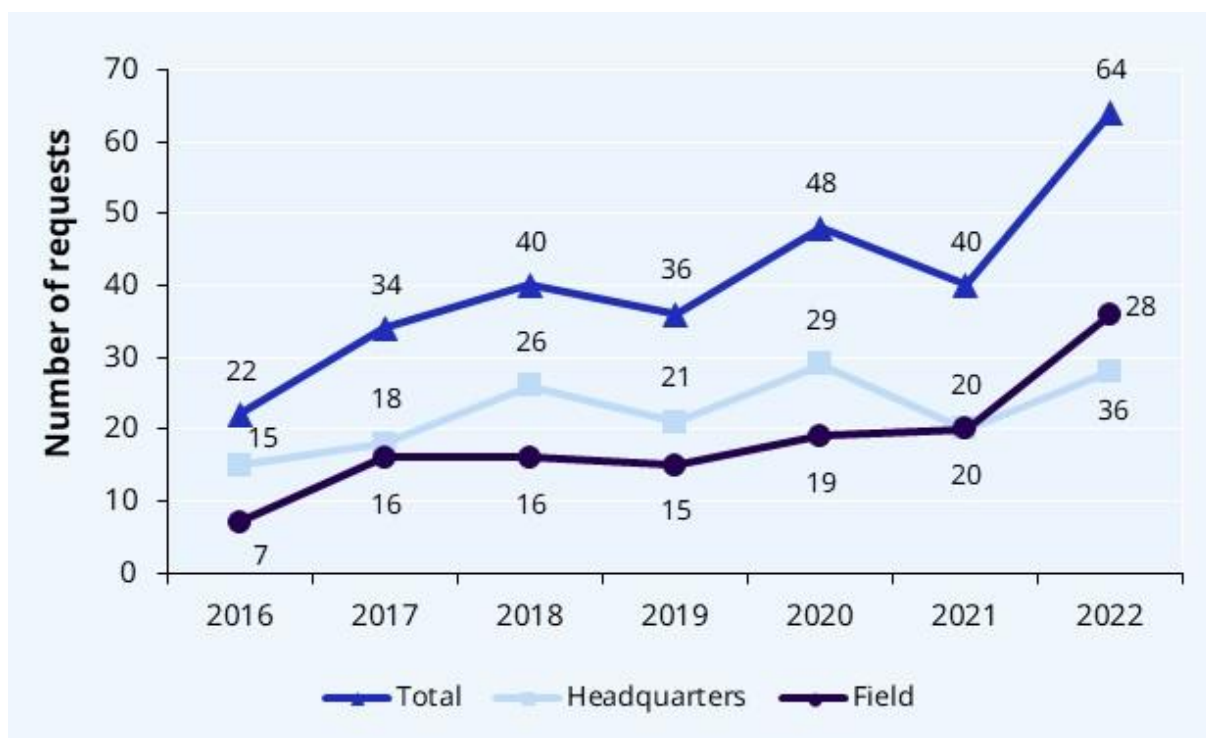
▶ **Figure 3. Number of requests for ethics advice, by sex, 2022**



▶ **Figure 4. Number of requests for ethics advice, by region, 2022**



► **Figure 5. Number of requests for ethics advice, 2016–22**



## Monitoring ethics: Survey for 2023

11. The Ethics Officer meets regularly with Office stakeholders to monitor ethics at the workplace and make recommendations in the context of discharging its other responsibilities, such as training, awareness-raising and policy development.
12. A new “Ethics at the ILO” survey is being prepared for 2023 (the last survey was conducted in 2018 and the first one in 2013). Having held consultations with internal stakeholders to maximize the value of the survey, more focus will be made on the promotion of ILO values and the identification of related risks. The results of the survey are to inform Ethics Office workplan, as well as the process to review the ILO Principles of Conduct and a new online Ethics training.

## Awareness-raising, training and outreach

13. The Ethics Officer delivers ethics briefings and training sessions, both at headquarters and for external offices, to raise awareness and understanding of ethical standards of conduct, the implications for managers and staff, and the role and responsibilities of the Ethics Officer. In this regard, the Ethics Officer continued to collaborate with HRD, the IAO and the Office of the Legal Adviser.
14. The Ethics Office launched a new outreach strategy, including a new e-learning on ethics, which is to be developed in 2023–24, building on the lessons learned and empirical findings of the ILO ethics survey planned for 2023.

## Policy development: Review of the ICSC Standards and of the Principles of Conduct for Staff of the International Labour Office

15. The Ethics Officer has been designated as ILO focal point for the review of the Standards of Conduct for the International Civil Service of the International Civil Service Commission (ICSC),

whose latest update was undertaken in 2013. The review is scheduled to be completed in 2024, and its outcome will be reflected in the update of the ILO Principles of Conduct, to be carried out after the conclusion of the ICSC Standards review.

16. In parallel, internal consultations are envisaged to prepare the update of the ILO Principles of Conduct from 2009. The update will seek to give effect to pending External Auditor's recommendations, improve both on communication and guidance concerning ILO values and processes, and reflect the latest developments both in the ILO's Internal Governance Documents System, as well as in the UN system approach to codes of ethics in general and the prevention and response to sexual exploitation and abuse in particular. The update will also benefit from the results of the ethics survey planned for 2023.
17. Furthermore, in 2022 the Ethics Officer continued to provide advice to ensure that ILO internal policies and practices reinforce and promote the ILO's ethical standards. For example, inputs and advice were provided in the process of updating the medical entry form for newly hired officials (concerns had been raised with the Ethics Office as to the appropriateness of certain elements contained in the pre-existing decades-old form). The Ethics Office also provided advice to give effect to a pending External Auditor's recommendation on expanding the Office's conflicts of interest policy to include internal conflicts and incompatibilities.

## Protection from retaliation

18. Ensuring a culture of integrity requires the involvement of all staff members. This includes not only knowing and complying with the ILO's internal rules and regulations, but also bringing misconduct and wrongdoing to the attention of the IAO, which is the ILO authority competent for receiving such reports. Instances of harassment, including sexual harassment, are reported to HRD.
19. To enable staff to report misconduct and cooperate with investigations or audits without any fear of retaliation, the ILO has put in place a specific policy for the prevention of and protection from retaliation. This policy was strengthened with the issuance of Office Directive *Reporting misconduct and protection from retaliation*, IGDS No. 551, which sets out the channels for reporting misconduct and the available protection against retaliation for having done so.
20. IGDS No. 551 entrusts the Ethics Officer with responsibility for receiving complaints from staff members concerning retaliation. In such cases, the Ethics Officer undertakes a preliminary review of the situation. Where the Ethics Officer concludes that there is a prima facie case of retaliation, the case is referred to the IAO for investigation. If it is concluded, on the basis of the investigation report, that retaliation has occurred, the Office is required to take measures aimed at correcting negative consequences suffered as a result of the retaliatory action. Cases are also referred to HRD for consideration of disciplinary action against the official who engaged in retaliation.
21. One complaint concerning retaliation was received by the Ethics Officer in 2022. After undertaking a preliminary review of the case, the Ethics Officer considered that there was a prima facie possibility of retaliation and referred the case to the IAO for investigation. The IAO investigation report, however, concluded that the allegations of retaliation were unsubstantiated. The evidence gathered attested to the fact that the Organization would have taken the same actions regardless of the protected activity and that such actions were not made for the purpose of punishing the staff member. Therefore, retaliation could not be deemed to have occurred in that case.



## Financial disclosure

22. As an additional role introduced with the new full-time post from July 2022 onward, the Ethics Officer was entrusted with a role in the administration of the ILO's financial interests and related party disclosures programme (RFI), in line with the recommendations of the Joint Inspection Unit (JIU).<sup>4</sup>
23. As a first task – also pursuant to JIU recommendations – the Ethics Office undertook a full review of the RFI with the support of and in collaboration with the Office of the Treasurer and Financial Comptroller (TR/CF).<sup>5</sup> The review concluded that the ILO system could be considered both effective and efficient, as well as providing good value for money – it being much less costly than the financial disclosure systems of other organizations – and ensuring a full compliance rate with the disclosure obligations set out in Office Directive *Register of financial interests and related party disclosures*, IGDS No. 116 and Office Procedure *Register of financial interests and related party disclosures*, IGDS No. 117. Moreover, as a result of the review, it was proposed that, in line with JIU recommendations, the Ethics Officer would participate in the administration of the financial disclosure programme. While TR/CF will continue operating the process as it has done successfully since its inception, the Ethics Officer will be given full access to the system; participate in its design and updates, as well as monitoring; and focus on the identification and prevention of potential conflicts of interest – giving advice and providing an additional layer of review.
24. Furthermore, and having also examined the comparative practices of other international organizations, the review of the ILO's financial disclosure system concluded with a proposal to slightly expand the scope of the ILO register of financial interests and related party disclosures. In order to enhance the capacity of the disclosure exercise to assist in identifying and preventing conflicts of interest, the review suggests to add a broader question to disclose involvement in any activity, whether or not it is subject to approval/remunerated, that could have an impact on the objectivity or independence of the staff member in the performance of duties, affect the image or reputation of the Organization, or otherwise lead to potential conflicts of interest. In case of doubt, staff members are encouraged to reach out to the Ethics Office. Changes resulting from the review are envisaged to be implemented in cooperation with TR/CF for the upcoming 2023 exercise.

## Prevention of and response to sexual exploitation and abuse

25. As of July 2022, the Ethics Officer was also designated ILO Focal Point for the implementation of the UN inter-agency action plan on the prevention of sexual exploitation and abuse. Under this new role, in consultation with a wide range of stakeholders at headquarters and regional levels, the ILO plan to prevent and respond to sexual exploitation and abuse was updated for 2023. The plan includes a focused risk-based approach in light of the nature of ILO activities – for example, adding specific PSEA measures as to official meetings, etc.; following-up through an enlarged working group of Office stakeholders; emphasizing on victim-centred approaches,

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<sup>4</sup> See [JIU/REP/2017/9](#) and [JIU/REP/2021/5](#).

<sup>5</sup> The latest JIU report on the Ethics Function (JIU/REP/2021/5) included as one of four recommendations that: “The executive heads of the United Nations system organizations who have not yet done so, supported by the ethics functions of their respective organizations, should, at the latest by 2025, evaluate the effectiveness and efficiency, including ‘value for money’, of their financial disclosure and declaration of interest programmes and, on the basis of the findings, propose changes to the relevant policies where appropriate.”

bearing in mind the recommendations of the Multilateral Organisation Performance Assessment Network (MOPAN).

26. As to the reporting and investigation of sexual exploitation and abuse allegations, one case of alleged sexual abuse by an ILO official was reported to the ILO in 2022, which was investigated by the IAO and whose report was about to be issued at the time of preparing this report. One case of sexual exploitation (solicitation of transactional sex) involving an implementing partner was also reported in 2022. It was subsequently investigated by the IAO and led to the separation of the subject from the hiring entity. Access to UN system-wide information on reported sexual exploitation and abuse can be accessed through the following [link](#).

## Relations with the Independent Oversight Advisory Committee

27. The Ethics Officer has unrestricted and confidential access to the Independent Oversight Advisory Committee (IOAC) of the International Labour Office, and vice versa. The Ethics Officer holds regular exchanges with the IOAC. At its 14 September 2022 meeting with IOAC, the new Ethics Officer sought the advice and guidance of the IOAC on the implementation of its workplan, as summarized in this report.

## The Ethics Network of Multilateral Organizations

28. The ILO Ethics Officer is a member of the Ethics Network of Multilateral Organizations (ENMO), which seeks to promote system-wide collaboration on ethics-related issues, with a specific focus on the coherent application of ethical standards and policies across the United Nations system. ENMO is an important forum at which ethics officers of international organizations share their first-hand experiences and learn from each other, which is vital for maintaining and fostering a culture of ethics within the United Nations family.
29. The Ethics Officer attended the 2022 annual meeting of ENMO, hosted by UNESCO in Paris from 5 to 8 July 2022. The discussions at the meeting focused on a variety of thematic areas, including as to conflicts of interest (exploring the distinctions between personal, semi-official and official roles); lessons from behavioural science to increase ethical behaviour and prevent misconduct; best practices and innovation in prevention and training in a hybrid environment; data analytics (harnessing data to measure impact, proactively identify red flags and focus on prevention efforts); and latest trends in encouraging internal whistle-blowing and providing protection.

Geneva, 27 February 2023

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