



# Executive Board of the United Nations Entity for Gender Equality and the Empowerment of Women

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### Ethics

## Report on the Activities of the UN-Women Ethics Function for 1 January-31 December 2024

### *Summary*

Pursuant to decision 2022/5 of the Executive Board, the Ethics Advisor submits the present report covering the ethics function's activities for the period 1 January through 31 December 2024. Data related to UN-Women participation in the United Nations Financial Disclosure Programme administered by the United Nations Ethics Office is for the 2024 filing cycle.

As set forth in section 5.4 of the Secretary-General's bulletin on the United Nations system-wide application of ethics: separately administered organs and programmes (ST/SGB/2007/11), this report has been reviewed by members of the Ethics Panel of the United Nations at its 175th meeting on 13 February 2025.

This is the third report presented by the Ethics Advisor since the first incumbent in the role was appointed on 1 April 2023.

The Executive Board may wish to take note of the present report and the management response.



## I. Introduction

1. This report is submitted in accordance with Executive Board decision 2022/5. It details the work of UN-Women's ethics function in 2024 pursuant to its mandate to "cultivate and nurture a culture of ethics, integrity and accountability, and thereby enhance the trust in, and credibility of, the United Nations, both internally and externally."<sup>1</sup>

2. The activities of the ethics function are guided by the principles set forth in Articles 100 and 101 of the Charter of the United Nations, calling for the independence, efficiency, competence, and integrity of personnel. To support UN-Women's vision of achieving transformational results for gender equality and women's empowerment, the ethics function promotes ethical conduct throughout the organization enhancing trust and credibility with our partners and stakeholders.

3. By providing services to embed ethics in decision-making through awareness-raising and actionable advice, the ethics function assists in preventing, mitigating and managing ethical, operational and reputational risks.

4. Consistent with the principles of independence, impartiality and confidentiality and ST/SGB/2007/11, the mandate of the ethics function comprises the following: (a) providing confidential ethics advice and guidance to personnel and management, (b) ethics training, awareness-raising, and outreach, (c) standard-setting and policy support, (d) managing UN-Women's Financial Disclosure Programme, and (e) administering UN-Women's Protection Against Retaliation Policy. The report also includes the engagement of the Ethics Advisor with the Ethics Panel of the United Nations (EPUN) and the Ethics Network of Multilateral Organizations (ENMO).

5. For the majority of the reporting period, the ethics function continued to operate with one staff member, the Ethics Advisor at the P-5 level. On 1 October 2024, an Ethics Analyst at the P-2 level entered on duty on a temporary one-year contract. The ethics function serves UN-Women operations in its 83 locations, providing ethics services to approximately 4,200 UN-Women personnel, including approximately 1,480 staff members (35%).

6. During 2024, the Ethics Advisor continued to embed the ethics function within UN-Women by providing ethics-related services to support and promote an ethical organizational culture, in accordance with Executive Board decision 2023/10. These efforts included:

(a) *Policy support*: updating UN-Women's Protection Against Retaliation Policy to further strengthen UN-Women's protection framework consistent with Executive Board decision 2023/10; collaborating with the Human Resources Division on the creation of an Outside Activities Policy and substantial revisions to the existing Outside Activities Approval Procedure to proactively mitigate and manage conflict of interest risk; commencing a review of the Hospitality and Gifts Policy to clarify roles and responsibilities with respect to the receipt, disclosure and management of gifts.

(b) *Robust outreach efforts to further strengthen awareness*: creating and delivering scenario-based workshops in-person and virtually, with 670 UN-Women participations.

(c) *Becoming a trusted resource for timely and practical advice*: responded to 354 requests for advice, an increase of 121% from the 160 requests received for the nine-month period from 1 April-31 December 2023.

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<sup>1</sup> Secretary-General's bulletin on the United Nations system-wide application of ethics: separately administered organs and programmes (ST/SGB/2007/11).

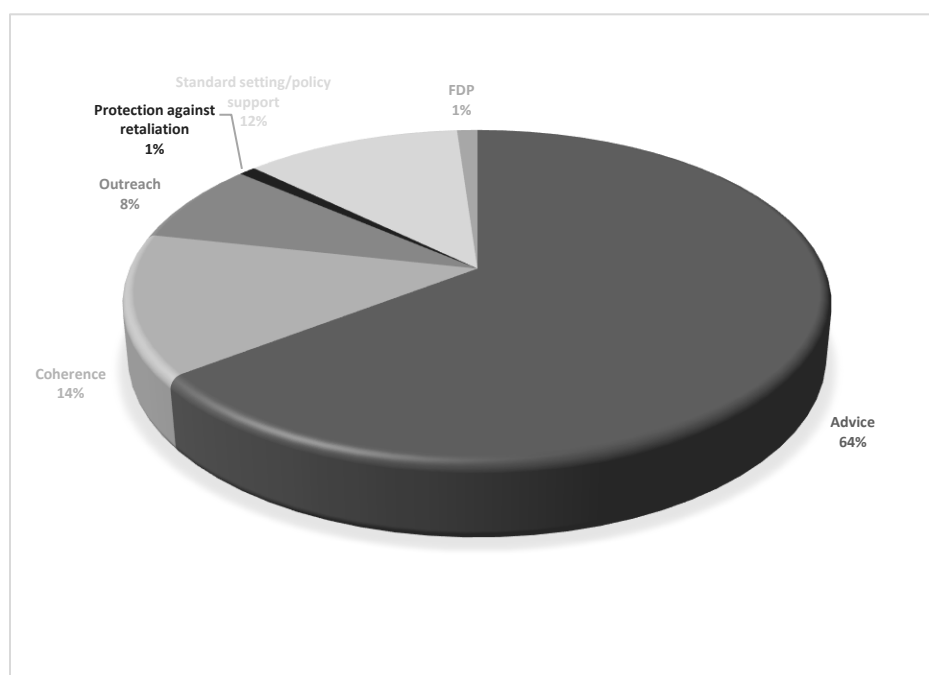
(d) *Promoting harmonization, effectiveness and efficiency, by strengthening collaboration with EPUN:* as reflected by the first ever joint Ethics Awareness Month with UNDP.

7. The independence of the ethics function is fundamental to the effective delivery of its mandate. Taking note of the standards and recommendations of the United Nations Joint Inspection Unit (JIU),<sup>2</sup> the Ethics Advisor confirms that the function conducted its activities free from external interference. In Executive Board decision 2024/6, the Executive Board urged UN-Women to ensure sufficient long-term resources to the ethics function to enable the sustainable and independent implementation of the ethics function's mandate and in Executive Board decision 2023/10, the Executive Board requested UN-Women management to provide sufficient resources to the ethics function to enable the sustainable and independent implementation of the ethics function's mandate. However, the ethics function continues to operate without such resources.

8. While maintaining its independence and safeguarding confidentiality, the ethics function's mandate to cultivate and nurture a culture of ethics, integrity and accountability requires partnerships with other functions within UN-Women and support from leadership. The Ethics Advisor is encouraged that UN-Women has embraced ethics as an essential element of its operations. Leadership at all levels of the organization continues to fully support an emphasis on integrating ethics into UN-Women's work, seeking training sessions and advice on proactively managing conflicts of interest and interactions with stakeholders. Policy support was routinely requested, and partnerships between the ethics function and other offices on issues of mutual concern were supported. Personnel regularly sought ethics guidance to ensure that their personal and professional conduct adheres to the highest standards of ethics and integrity. The participation of the Executive Director and the Deputy Executive Director in outreach initiatives demonstrated support for and increased the visibility of the function.

9. During the reporting period, the Ethics Advisor responded to 548 requests for services, an increase of 85% from the 295 requests received from 1 April-31 December 2023. As shown in Figure 1, requests for services fell into the following categories: ethics advice (354, 64%), protection against retaliation (5, 1%), outreach, training, and awareness raising (43, 8%), standard-setting and policy support (64, 12%), coherence (76, 14%) and financial disclosure programme (6, 1%).

<sup>2</sup> Review of the ethics function in the United Nations system (JIU/REP/2021/5), section III.A and para. 98, quoting from JIU/REP/2018/4, para. 127, which states "Independence is most commonly defined as the freedom from conditions that threaten the ability of a person to carry out his or her responsibilities in an unbiased manner, with sufficient autonomy and in the absence of external influence."

**Figure 1: Requests for services by category**

10. In 2025, the ethics function will focus on: (a) positively influencing organizational culture, through the provision of awareness raising and training on ethical standards; (b) continuing to deliver ethics advice in a timely manner in response to growing demand to proactively mitigate and manage conflict of interest risk, (c) engaging with personnel at the onboarding stage to increase awareness of ethical behaviour expected of all UN-Women personnel, and (d) continuing the review of the Hospitality and Gifts Policy.

## II. Activities

### A. Standard-setting and policy support

#### *Policies that are critical to the ethics function*

11. In its decision 2023/10, the Executive Board requested the ethics function “to continue to strengthen UN-Women’s procedures and policies on protection from retaliation and to continue to provide an annual update to the Board, within the existing reporting mechanism;” In this regard, the Ethics Advisor reviewed and revised the Protection Against Retaliation for Reporting Misconduct and for Cooperating with Duly Authorized Audits or Investigations Policy to ensure that UN-Women has a robust and effective protection framework, consistent with best practices from other United Nations organizations, and reflective of UN-Women’s operational environment.

12. Following consultations with stakeholders, in February 2024, UN-Women issued a revised Protection Against Retaliation Policy. Key revisions include: (a) replacing the United Nations Ethics Office with the Ethics Advisor to reflect the role of the ethics function at UN-Women; (b) shortening the review time of the policy from the standard four years to every two years to be consistent with other United Nations entities and to ensure continuous monitoring of trends in whistle-blower protection; (c) including the Executive Director on recommendations for interim

protection measures to ensure awareness at the highest level of UN-Women of protection against retaliation matters that have been referred for investigation; (d) using more inclusive language to encourage affiliate personnel to report misconduct and wrongdoing; and (e) ensuring consistency with other UN-Women policies that had been updated since the last revision to the policy. In the interest of transparency and highlighting the organizational importance of protection against retaliation, the revised policy is publicly available on UN-Women's "Accountability" tab of its website.

13. The Ethics Advisor collaborated with the Human Resources Division in the development of an Outside Activities Policy and substantial revisions to the existing Outside Activities Approval Procedure, which were issued in March 2024. This Policy and Procedure are critical in ensuring that UN-Women personnel are aware of when and how they must seek prior approval for engagement in outside activities, which assists in the proactive management and mitigation of conflict-of-interest risk. As a result of the introduction of this framework, as well as growing trust in the ethics function, the number of requests for advice related to outside activities increased by 151% from 98 in the nine-month period from 1 April-31 December 2023, to 246 in the current reporting period.

14. During the reporting period and in collaboration with the Management and Administration Division, the Ethics Advisor started a review of the Hospitality and Gifts Policy.

#### *Policy support to other divisions*

15. The ethics function is responsible for providing advice and support to other divisions to ensure that organizational policies are consistent with ethics and integrity standards.

16. During the reporting period, the Ethics Advisor commented on several policy matters, including: the Legal Policy for Addressing Non-Compliance with United Nations Standards of Conduct (now the Investigation and Disciplinary Process Policy), the Recruitment and Selection Policy and Procedure, the Consultant Contract Policy, the Partner Personnel Services Agreement, the Child Safeguarding Policy, the Charter of the Independent Evaluation, Audit and Investigation Services, and the investigation guidelines for UN-Women's new internal investigation function.

## **B. Training, outreach and awareness-raising**

17. Training, outreach and awareness-raising activities are essential to ensure that all personnel observe the highest standards of ethical conduct in performing their functions. Personnel must follow coherent ethical standards to protect UN-Women's reputation and ensure programme implementation is delivered consistent with the highest levels of integrity and independence.

18. In 2024, the Ethics Advisor delivered training sessions on ethical standards, conflicts of interest and protection against retaliation, with 670 UN-Women virtual and in-person participations.

19. In July 2024, the Ethics Advisor conducted in-person sessions with personnel in the UN-Women Liaison Office in Geneva, the Egypt Country Office, the Regional Office in the Arab States, and the Europe and Central Asia Regional Office. Seven total sessions were conducted, including workshops on conflicts of interest and protection against retaliation. In-person sessions were also held in New York for operations managers on ethical organizational culture as part of the fraud risk management training of the trainer's session, a joint induction session with UNDP for

new UNDP and UN-Women junior professional officers, and a session for all New York based personnel on upholding ethical standards. Virtual engagements on ethical standards were also conducted with the Pakistan and Jordan Country Offices and the UN-Women Multi-Country Office for Southern Africa.

20. Given the small size of the ethics function at UN-Women, collaboration with the ethics functions of other United Nations system organizations on training and outreach activities is vital for enhancing the effectiveness and efficiency of initiatives to raise ethics awareness among UN-Women personnel. During the month of May 2024, the Ethics Advisor collaborated with the UNDP Ethics Office to launch an ethics awareness month on the topic “Navigating Impartiality in a Polarized World.” The month included two panel discussions with senior leaders in both organizations (including the Deputy Executive Director for Normative Support, UN System Coordination and Programme Results), recorded statements on the importance of upholding impartiality as United Nations personnel from UN-Women’s Executive Director and the UNDP Administrator followed by a declaration of office ceremony, two ethics open houses, and a case scenario distributed to country and regional offices for discussion in English, Spanish and French.

21. To ensure that UN-Women is not engaging consultants with other employment that would conflict with the independence and integrity required of them as UN-Women personnel, the Ethics Advisor, in cooperation with the Human Resources Division, led two sessions on the Consultant Contract Policy and the Outside Activities Policy. A total of 125 operations managers and Human Resources personnel participated in the sessions.

22. Sessions were also delivered to the Internal Audit Service to discuss enhancing the consideration of ethics-related elements in audits, and to the Independent Evaluation, Audit and Investigation Service on conflicts of interest.

23. A “Holiday Gifts Advisory” and a “Guidance Note on Political Activities” were issued, which reminded personnel of the restrictions on the acceptance of gifts and engagement in political activities that could compromise the independence and impartiality required of them as UN-Women personnel.

24. The Ethics Advisor provided ethics briefings to the two Deputy Executive Directors during their induction programme to positively influence the “tone at the top”. A session on ethical considerations for senior leaders was also delivered to the Regional Director and Country Representatives in the Eastern and Southern Africa Region.

25. The United Nations Leadership Dialogue is an initiative of the United Nations Secretariat, where managers are asked to host a yearly conversation with their direct reports related to ethical challenges personnel face in their day-to-day work. The topic for the 2024 Dialogue was “Navigating Outside Activities”, where participants examine common outside activities such as personal academic pursuits and publications, serving on external boards or committees and engaging in outside business ventures. The 2024 Dialogue gave participants the opportunity to discuss how personnel can ensure that their outside activities do not lead to conflicts of interest or reputational risks to UN-Women and how they can seek advice and approval.

26. The UN-Women ethics team conducted significant editing of the English, French and Spanish materials provided by the Secretariat to ensure consistency with the UN-Women outside activities framework and to reflect its applicability to all personnel. All materials were made available on the Ethics intranet page for accessibility.

27. The Ethics Advisor assisted the Executive Director in launching the 2024 Leadership Dialogue, including moderating her session with the Global Management Team. As of 31 March 2025, 1,746 UN-Women personnel had participated, which is the highest level of participation of UN-Women personnel in a Leadership Dialogue.

28. When joining UN-Women, all personnel are required to complete an online training course on ethics and integrity. The course was designed by UNICEF and is hosted on UNICEF's Agora learning platform and UNDP's Quantum platform. As of the end of 2024, approximately 82% of UN-Women staff members had completed the mandatory course, which is an increase of 4% over the 78% of UN-Women staff members who had completed the mandatory course at the end of 2023. In an effort to raise the completion rate, personnel are required to certify that they have taken the online ethics and integrity training course as part of the revised Outside Activities Approval Procedure.

### **C. Confidential advice and guidance**

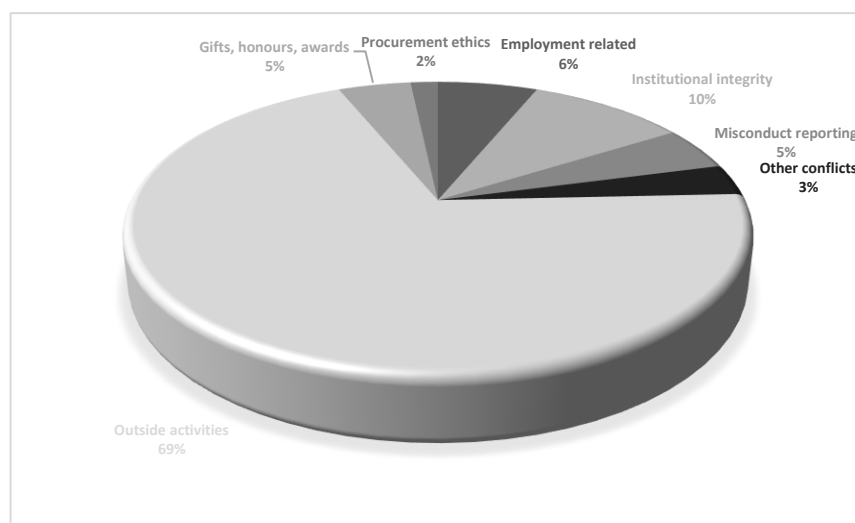
29. Providing confidential, accurate and timely advice to UN-Women personnel is an essential component in the Ethics Advisor's mandate to foster a culture of ethics, accountability, and transparency. The advisory role is primarily preventive and proactive, assisting personnel in making informed decisions in accordance with applicable ethical standards. In providing well-reasoned, timely, actionable, and impartial guidance to personnel and management on how to resolve possible conflicts of interest, the ethics function supports appropriate decision-making that contributes to accountable mandate delivery. The function also assists in risk management, by advising against engagement or proposing mitigation measures to guard against conflict-of-interest risk.

30. The Ethics Advisor is committed to providing prompt and quality advice to support appropriate decision-making. During the reporting period, the Ethics Advisor typically provided a response within two business days of receiving all requested information.

31. During the reporting period, 354 of all requests for ethics services (64%) were requests for advice, which is a 121% increase from the 160 advisory requests received during the nine-month period from 1 April-31 December 2023. This increase is attributable to the comparison period (nine months in 2023 and a full year in 2024), the growing level of visibility of the ethics function and confidence in the support provided, as well as the issuance of the Outside Activities Policy in 2024. While continued increases in advisory requests will be a positive indicator of continued awareness and trust in the ethics function, future increases are likely to be more gradual.

32. As shown in Figure 2 below, advice was provided on a range of topics including: outside activities (246, 69%), internal procedures for reporting misconduct (17, 5%), other conflicts of interest (12, 3%), ethics-related employment concerns (22, 6%), institutional integrity (35, 10%), gifts, honours and awards (16, 5%), and procurement ethics (6, 2%).

33. For matters raised that did not fall within the mandate of the ethics function, personnel were directed to the appropriate offices including UN-Women's Workplace Relations Advisor, the United Nations Secretariat's Office of Internal Oversight Services (OIOS), the Human Resources Division, the Office of the Ombudsman for the United Nations Funds and Programmes, the Office of Staff Legal Assistance and the joint UNDP/UNFPA/UN-Women/UNOPS Staff Council.

**Figure 2: Requests for ethics advice by category**

34. In terms of geographic spread, of the 348 requests for ethics advice received from UN-Women personnel during the reporting period,<sup>3</sup> 173 (49.7%) came from regional, country and liaison offices. This is a slight increase from the last reporting period, where 48% of the requests came from regional, country and liaison offices.

35. The largest number of advisory requests related to engagement in outside activities in a personal capacity, which includes leadership roles in non-profit organizations such as board membership, part-time outside employment such as teaching courses at a university or working for a non-profit organization, social and charitable activities, the difference between official and personal capacity, publications such as articles and blogs, and speaking engagements on topics related to UN-Women.

36. As a proactive risk prevention measure, the Ethics Advisor reviews requests for engagement in outside activities to ensure that the proposed outside activity is not against the interests of UN-Women, does not conflict with the individual's UN-Women function, or with the core obligations of all personnel to uphold independence, impartiality and loyalty to UN-Women. Where it is recommended that the individual seek approval from the Human Resources Division through their supervisor, the Ethics Advisor includes a list of conditions that the individual requesting advice must adhere to in order to mitigate and manage any possible conflict-of-interest risk during engagement in the outside activity.

## **D. Financial Disclosure Programme**

37. The purpose of the United Nations Financial Disclosure Programme (UNFDP) is to identify, mitigate, and manage conflict of interest risks arising from the financial holdings, personal affiliations or outside activities of United Nations personnel and their immediate family members. UN-Women's designated personnel participate in the UNFDP, which is administered by the United Nations Ethics Office in accordance with the Secretary-General's bulletin on Financial disclosure and declaration of interest statements (ST/SGB/2006/6). UN-Women staff members at the D-1 level and above, those whose principal duties involve procurement and investment or who have

<sup>3</sup> Of the total 354 requests for advice, six came from external sources and are accordingly not counted in this statistic.



access to confidential procurement or investment information, and the ethics team are required to file an annual financial disclosure statement.

38. Participation in the UNFDP assists UN-Women in the identification, mitigation and management of possible or actual conflicts of interests with the goal of ensuring that UN-Women staff members observe and perform their functions consistent with the highest standards of integrity required by the Charter of the United Nations, the Staff Regulations and Rules, and relevant UN-Women guidelines and policies. The benefits of participating in the UNFDP include (a) ensuring a coherent and consistent application of United Nations ethical standards, (b) incorporating best practice from both the United Nations and the private sector, in terms of experience and technical expertise, and (c) benefiting from economies of scale, combining service quality with cost efficiency.

39. During the 2024 annual filing cycle, conducted from 1 March 2024 until 31 December 2024, 153 UN-Women staff members were designated to participate in the UNFDP. All UN-Women filers submitted their statements as required.

40. Following a review of the submitted financial disclosure statements, the UNFDP identified three filers with one possible conflict of interest each. The conflicts are in the following categories: financial activities, family relationships, and outside activities. The UNFDP made recommendations to each of the three UN-Women filers on measures to mitigate and manage the identified possible conflicts of interest, which were accepted and implemented before the end of the filing cycle.

41. In 2024, a verification process of the disclosure statements submitted was also conducted as part of the UNFDP, as in previous years. Eight UN-Women filers were selected for the verification process. Of these, seven UN-Women filers provided the required verification documents, and their files were closed. One filer did not provide the required verification documents, resulting in an incomplete review of their disclosure statement. In line with established procedures under the UNFDP, filers with an incomplete status are referred to their Head of Entity for consideration of accountability measures. Furthermore, filers with an incomplete status regarding the verification process will be re-selected for the verification process and priority review in the following cycle.

## **E. Protection against retaliation**

42. The Ethics Advisor administers UN-Women's Protection Against Retaliation Policy. The policy encourages all UN-Women personnel to report misconduct and wrongdoing and fully cooperate with audits and investigations, referred to as protected activities. The ability of personnel to report and cooperate without fear of retaliation is an essential element in building an organizational culture of integrity, transparency, and accountability.

43. Pursuant to the policy, the Ethics Advisor conducts a preliminary review of a request for protection to determine whether the complainant engaged in a protected activity and whether the protected activity was a contributing factor in causing the alleged retaliation. If the Ethics Advisor determines that the complainant has not raised a *prima facie* case of retaliation, the complainant may request further review by the Chair of EPUN.

44. If the Ethics Advisor determines that there is a *prima facie* case of retaliation, the matter is referred to OIOS for investigation. Protective measures may be recommended by the Ethics Advisor to safeguard the complainant during the investigation. Following an independent review of the OIOS investigation report and supporting documents, the Ethics Advisor will determine whether the report and

supporting documents show, by clear and convincing evidence, that UN-Women management would have taken the alleged retaliatory action absent the protected activity and will make appropriate recommendations to the Director, Division for Management and Administration.

45. During the reporting period, the Ethics Advisor received five inquiries under the policy. Four were requests for advice rather than requests for protection. Personnel who raised concerns not covered by the policy were referred, as appropriate, to the Office of the Ombudsman for the United Nations Funds and Programmes or the Human Resources Division or were advised to report possible misconduct to OIOS.

46. In the one request for protection, the Ethics Advisor began conducting the review, which was suspended at the complainant's request.

47. In a matter referred for investigation to OIOS by the United Nations Ethics Office in 2022, the Ethics Advisor made a final determination in 2024 that retaliation had not occurred and made recommendations to the Director, Department of Management and Administration in accordance with the policy. Although the Ethics Advisor concluded that retaliation had not occurred, recommendations were made to ensure that the staff member concerned was appropriately reintegrated into their work division following the end of the interim protection measures that had been put in place during the investigation, and that no action was taken against them because of the staff member's engagement in a protected activity and request for protection.

### **III. The Ethics Panel of the United Nations and the Ethics Network of Multilateral Organizations**

48. Collaboration with other ethics functions including sharing best practices and promoting coherent standards is crucial to enhancing ethical conduct, transparency and accountability at UN-Women. In its decision 2023/10, the Executive Board requested "UN-Women to stay in continuous dialogue with the United Nations Ethics Panel and the Ethics Network of Multilateral Organizations in order to share best practices and promote coherent standards for ethical conduct, transparency and accountability at UN-Women;"

49. During the reporting period, the Ethics Advisor continued to actively participate in monthly meetings of EPUN. As set forth in the Secretary-General's bulletin ST/SGB/2007/11, EPUN is mandated to create a unified set of ethical standards and policies and to consult on complex ethics matters that have system-wide implications. EPUN is composed of the heads of the ethics offices of the Secretariat and the separately administered organs and programmes.

50. The two working groups established by EPUN in 2023 on outside activities and on gifts and honours, respectively, completed their work in developing common guidance, in the form of Guidance Notes on Outside Activities and on Gifts and Honours. The notes contain principles and interpretative guidance to promote coherence of practices among members of the Panel.

51. The Panel is chaired by the Director of the United Nations Ethics Office. The Chair is additionally mandated to review upon complainant request, and in consultation with other EPUN members, no prima facie retaliation determinations issued by other member ethics offices, including UN-Women.

52. In 2024, the Ethics Advisor led a session with nine colleagues from EPUN agencies on practical tips for conducting preliminary reviews of requests for protection against retaliation.

53. In addition to engaging with the ethics functions through EPUN, the Ethics Advisor is an active member of ENMO. ENMO was established in 2010 and brings together senior professionals responsible for the ethics functions in about 50 multilateral inter-governmental institutions, including United Nations system organizations, as well as international and regional financial institutions. This includes the organizations belonging to the United Nations System Chief Executives Board for Coordination (CEB), who have established a dedicated group within ENMO.

54. The Ethics Advisor attended the 2024 annual meeting of ENMO hosted by the World Health Organization in Geneva and served on a panel to discuss leveraging interactive and innovative forms of training.

## **IV. Conclusion**

55. During 2024, the ethics function responded timely to an 85% increase in requests for its services. This demonstrates a deepening trust in the support and expertise provided by the ethics function. Policies critical to the ethics function were issued, providing a clarified framework for ethical standards and a strong basis for advice. The policy frameworks were complemented with a significant investment in awareness raising, outreach and capacity building, which will continue in 2025.

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