

Ethics and Conduct Unit (ECO)

ANNUAL REPORT 2022

In line with the Charter of the Office of Ethics and Conduct¹, the present report provides an annual overview of the activities of the Ethics and Conduct Unit (ECO) during 2022. ECO noticed a substantial increase in all activities compared to the previous year, stemming from the increase in disclosure of conflicts of interest, requests for outside activities and resumption of ECO's face-to-face trainings. Retaliation-related inquiries also increased in 2022 as a result of IOM's new policy on protection of IOM personnel against retaliation.

For a second consecutive year, the increase in all areas of ECO's activities is proof that IOM personnel are more aware of the importance of upholding the IOM Standards of Conduct, including declaring outside activities, gifts and honours, relatives in the workplace, and other potential conflicts of interest. ECO continues to provide confidential advice, raise awareness, deliver online and in-person training in the three official languages, in addition to assessing allegations of retaliation and recommending protective measures.

ECO's annual 2022 highlights:

- New policy on IOM personnel's protection against retaliation ([IN/282](#)) was issued.
- Self-paced micro-module training on IOM's Framework on Addressing Retaliation was created.
- Face-to-face training to **755** IOM personnel in English and Spanish in five different IOM regions.
- **1387** IOM personnel and **357** third-party contractors received ECO's online training on the IOM Standards of Conduct in English, French and Spanish.
- ECO provided advice on **1,307** requests concerning the IOM Standards of Conduct.
- **90%** response rate within 48 hours to all requests received by ECO.
- Second year of the Yearly Declaration of Interest process was carried out successfully.

¹ IN/283 (attached)

SUMMARY OF ACTIVITIES DURING THE REPORTING PERIOD

Figure 1 summarizes the activities carried out by ECO from 1 January to 31 December 2022 (for more details on each activity, see the separate sections below).

Figure 1: Breakdown of 2022 Activities



MANDATE AND FUNCTIONS OF THE UNIT

ECO's mandate is to promote ethical awareness and compliance, and ensure that IOM's rules, policies, and procedures follow the standards of integrity called for in the IOM Standards of Conduct ([IN/15, Rev. 1](#)), including protection of staff against retaliation for reporting misconduct.

ECO carries out its functions under the principles of objectivity, impartiality, independence, confidentiality, and fairness. It conducts its activities with the highest levels of competence and integrity.

ECO's activities include:

- Assessing all allegations of retaliation and ensuring protection against retaliation, in accordance with [IN/282](#);
- Implementing an annual exercise on declaration of interests and providing recommendations to senior managers and other concerned staff on disclosures of conflicts of interest;
- Advising on outside activity requests, gifts and honors, relatives in the workplace and other potential conflicts of interest ([IN/15 Rev. 1](#) and [IN/161 Rev. 1](#));
- Raising ethics awareness through proactive online and in-person training and communication in the three official languages;

- Developing new policies and providing support, as necessary, on existing policies that pertain to ethical behavior and standards of conduct; and
- Providing guidance to all IOM personnel on enquiries related to the Standards of Conduct.

Unit structure and resources

The Ethics and Conduct Unit comprises of two positions: a Head of Ethics and an Ethics and Integrity Officer. In addition, a second Ethics and Integrity Officer and an intern support the Unit.

ACTIVITIES DURING THE REPORTING PERIOD

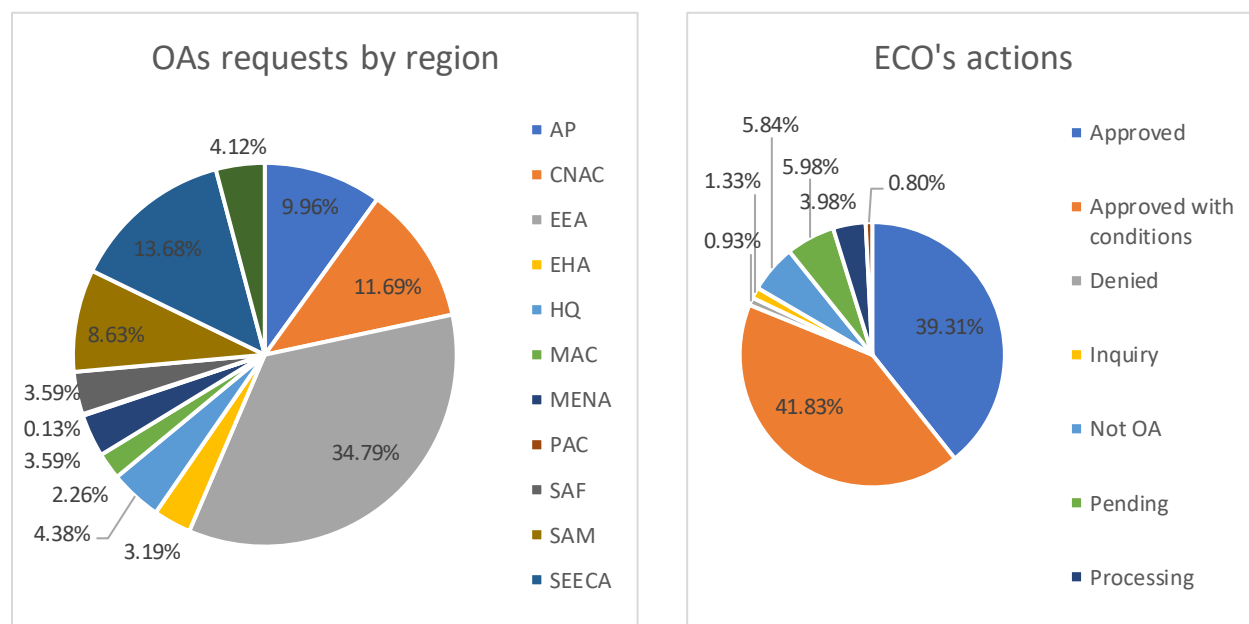
1. Conflicts of Interest

1.a Authorization of outside activities

Total Inquiries Processed

In 2022, ECO received **753** outside activities requests in accordance with the IOM Standards of Conduct, IN/15 Rev. 1, sections 5.45 and 5.46. ECO noted that similar to last year, IOM personnel from the EEA declared the highest number of outside activities, representing over one-third of the total number of requests, followed by CNAC and SEECA regions.

Figure 2: Details of Outside Activities (OAs)



Actions Taken by ECO

Of the 753 requests, ECO approved **610**, representing **81%** of all submissions. Of these 610 approvals, 314 required additional measures to ensure compliance with the provisions of the IOM Standards of Conduct or mitigate any potential conflicts of interest potentially arising during these outside activities.

ECO denied only 1% of the requests as these activities involved elements that were contrary to the IOM Standards of Conduct. Most of the activities requested involved academic requests, private business, counselling services or one-time activities, such as participation in events. Of the total number of requests, 10% were abandoned or withdrawn by the applicants.

ECO's goal is to respond normally within 48 hours to a request for outside activity. In 2022, ECO responded to **60%** of the requests **on the same day** while **90%** of the outside activity requests were responded **within 48 hours**.

Notable Trends

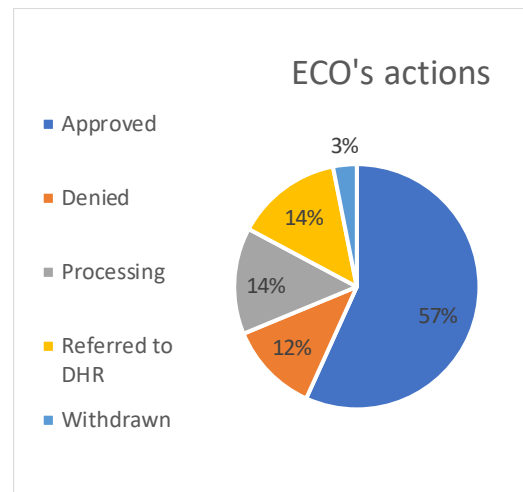
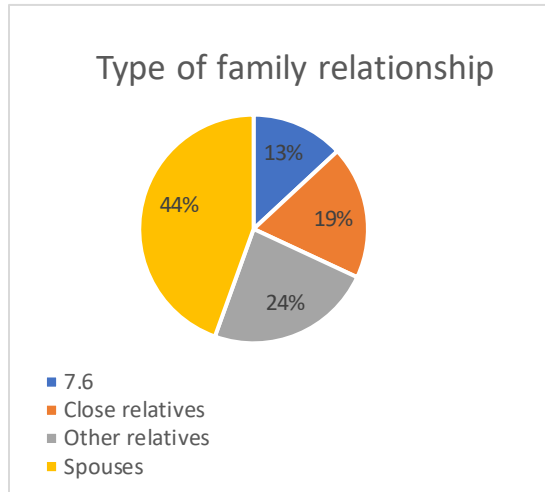
Similar to last year's trend, the total number of requests for outside activities has continued to increase. It is worth noting that outside activity requests increased by **84%** compared to 2020, representing a large part of ECO's daily activities. Furthermore, ECO notes that normally a high number of such requests is submitted after ECO's training sessions, where a better understanding of the IOM Standards of Conduct is achieved.

1.b Advising on Relatives in the Workplace

On 20 January 2020, [IN/161, Rev. 1 - Relatives in the Workplace](#) was issued, describing the applicable rules on recruitment and placement of relatives in IOM in order to avoid any risk of perception of favoritism, nepotism, actual or perceived family influence or conflict of interest. The instruction applies to all IOM personnel worldwide.

Total Inquiries Processed

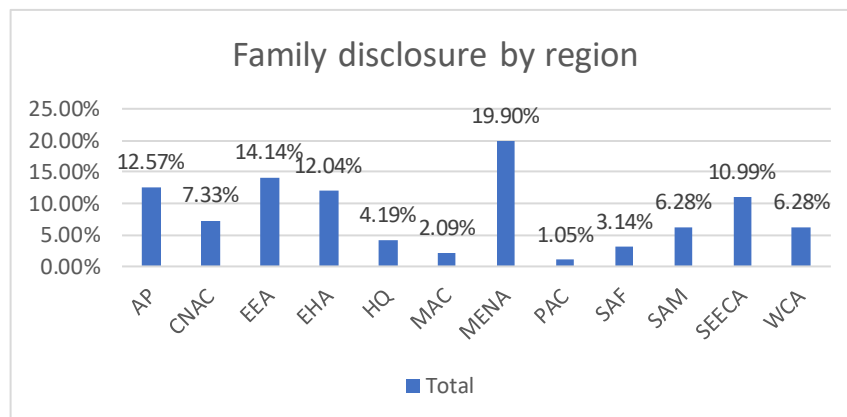
During the reporting period, ECO reviewed **191** new cases involving recruitments and placement of existing IOM personnel worldwide to whom IN/161 Rev. 1. applies. Of these 191 cases, 57% were approved, 14% were referred to DHR and HR-PAC for final determination and 12% were determined by ECO as contrary to the policy and therefore ECO advised against them. The remaining cases were pending for further information, or the Missions withdrew their initial requests.



ECO also worked on **140** selection processes requested by REC-MAC – double the amount compared to last year for candidates with declared family relationships within the Organization and completed **36** pending evaluations of cases declared in 2020 and 2021.

Notable Trends

In 2022 most of the cases were about **spousal** relationships, while personal relationships established in section 7.6 of IN/161 Rev.1² continued to increase this year. ECO believes that the ongoing communication and trust provided during the ECO trainings is key to IOM personnel continuing to disclose their relationships, as required by IN/161 Rev. 1.



² IN/161 rev.1, 7.6: IOM personnel must also disclose close personal relationships that may give rise to a conflict of interest, such as a former spouse, or a close relative, other relative or spouse working for a donor, vendor, government, third party contractor or any other organization associated with IOM, if that person is engaged with IOM in any capacity. Advice must be sought from ECO as to whether a disclosure is required in such cases.

Most of the cases reviewed were from five different regions, while the Panama and Manila Centres along with the SAF region continue to be the regions/departments with the least number of disclosures. ECO urges all missions to declare this type of conflict in the early stages of any recruitment.

ECO provides prompt advice on cases of family relationships. In 2022, ECO responded within 24 hours to **87%** of the requests received and in 48 hours to **94%** of requests related to IN/161 rev.1.

1.c Advising on Gifts and Honours

Every year ECO reminds colleagues that, according to the IOM Standards of Conduct, [IN/15 Rev. 1](#), receiving a gift in connection with work can create or appear to create an obligation to the staff member receiving the gift. To avoid such situations, staff members are normally not allowed to receive gifts within the context of their work at IOM.

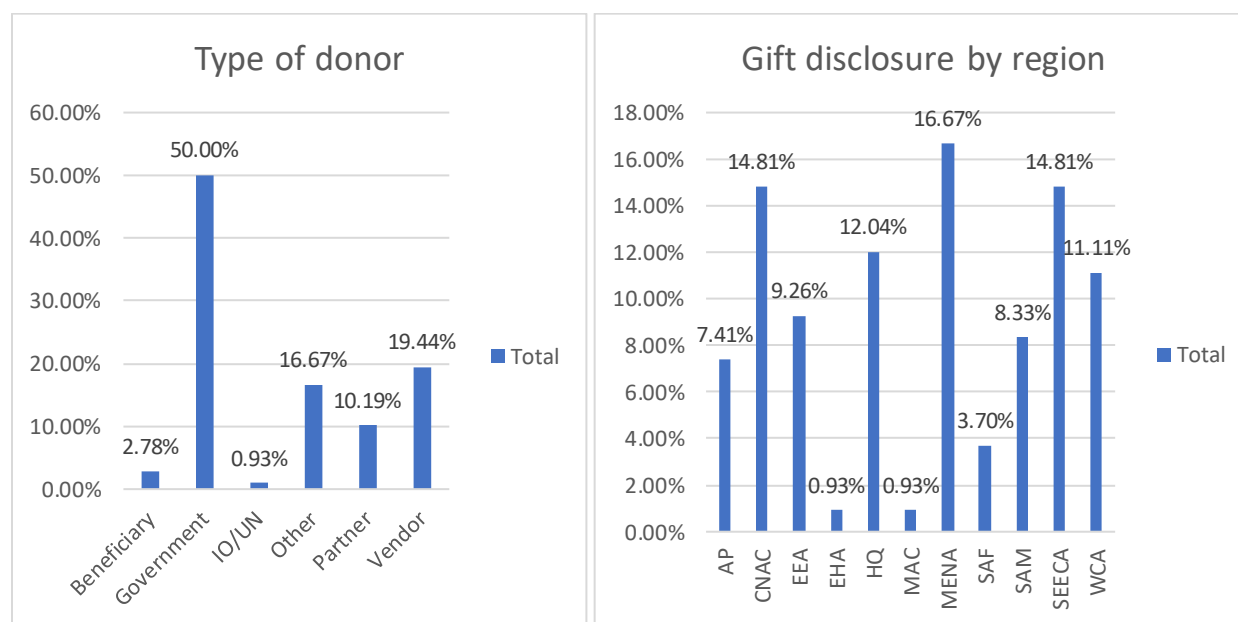
Any gifts received on behalf of IOM should be promptly declared to ECO. Guidance about gifts may be found in IOM's Standards of Conduct (IN/15, Rev. 1) and the Unified Staff Regulations and Rules (Reg. 1.6).

Total Inquiries Processed

During the reporting period, ECO handled **108** declarations of gifts and honors, representing a substantial increase of **25.58%** compared to last year.

For the second year in a row, the region submitting the most disclosures of gifts was the MENA region, followed by CNAC and SEECA regions. It should be noted that the EHA region and the Manila Centre submitted only one gift declaration during the reporting period.

Figure 3: Details of Gifts and Honors Declarations



Actions Taken by ECO

Most gifts disclosed were of nominal value (up to 50 USD) and approved by ECO at a rate of **96%**. ECO denied or provided advice on the remaining 4%. Similar to the trend in past years, most of the gifts were offered by governmental institutions. The gifts rejected were due to the fact that they were provided by vendors, or their value far exceeded the nominal value stated, such as invitations from vendors to attend events unrelated to IOM functions or offer of luxury products. Noting the substantive increase in gift declarations, ECO has prepared a guidance document in the form of guidelines on receipt of gifts and honours to raise IOM personnel's awareness on the applicable rules that will be released in early 2023.

ECO provided advice on gifts within 24 hours to **94 %** of the requests received and within 48 hours to **97%** of the requests.

2. Assessing allegations of retaliation

In 2022, IOM issued a new policy on the protection of IOM personnel against retaliation for reporting suspected misconduct or cooperating with audits and investigations ([IN/282](#)). The policy explains the framework of personnel protection against retaliation and describes the process of filing a complaint of retaliation and seeking protection. ECO considers that the new policy on protection of IOM personnel against retaliation is a positive step in encouraging personnel to report misconduct. The policy has been circulated in all three official languages and periodic training to raise awareness on the applicable protection framework is provided by ECO. ECO has also developed, in coordination with SDL, an online self-paced micromodule on IOM's framework on addressing retaliation. The training will be launched in 2023 and will be available to all IOM personnel.

According to the policy, ECO is mandated to receive allegations of retaliation while all other allegations of misconduct are handled by OIG ([IN/275](#)). IOM personnel may submit a complaint of retaliation by contacting ECO in writing, or by using the online platform www.weareallin.iom.int. Upon receipt of a retaliation complaint, ECO conducts a preliminary assessment. If ECO finds *prima facie* evidence of retaliation, it sends the complaint to OIG for investigation.

During the reporting period, ECO received **36** complaints of retaliation, that is, 12 complaints more than in 2021. 2 complaints were from HQ, while the rest came from IOM Missions or Regional Offices. The region with the highest number of complaints was MENA representing one-third of the complaints received (12 cases), followed by WCA (6 cases), EHA and CNAC (4 cases each).

In one-third of the cases the alleged retaliation was harassment or other abusive conduct representing the most frequently alleged retaliatory action. While in the previous year almost half of the complaints were related to the abolition of post and/or non-extension of contract, in 2022, this category of retaliatory act was second with 10 complainants alleging the termination or non-extension of their contract as retaliation. 20% of the alleged retaliation concerned non-selection, performance evaluation

or other actions affecting employment conditions. In another 20% of cases, the retaliatory action was not identified.

If ECO determines that *prima facie* evidence of retaliation exists, it refers the matter to OIG for investigation and notifies the complainant accordingly. ECO found *prima facie* evidence in 2 cases and referred them to OIG. 23 cases were closed following ECO's preliminary assessment, and in 7 cases the complainants abandoned or withdrew their claims.

The introduction of IN/282 sets a deadline for ECO to conclude a preliminary assessment within 30 calendar days, unless justified by exceptional circumstances. In 2022, ECO met the 30-day deadline in all but one case and concluded its preliminary assessments within an average time of **11 days**.

ECO's role is to recommend temporary measures to protect complainants from retaliation. ECO recommended temporary protective measures in 3 cases where it determined that there was a high risk of retaliation. Some protective measures were coordinated with the respective Chiefs of Mission.

ECO offers confidential and impartial advice about the definition of retaliation and available mechanisms for personnel to address their concerns. IOM personnel raising concerns other than retaliation are referred, as appropriate, to the OOM, LEG, DHR and OIG. If ECO becomes aware of an immediate risk to the safety and security of the complainant, ECO either notifies the IOM Office of Staff Security (OSS) or advises the complainant to do so directly. ECO also refers staff to the Staff Welfare Officer (SWO) in cases of stress or other mental health issues. During the reporting period, ECO handled 7 general enquiries regarding retaliation and coordinated with the above-mentioned units as necessary.

3. Awareness Raising and Training Activities

One of ECO's main activities is raising awareness of IOM's policies on ethical conduct. With three training modalities, ECO continues to increase its coverage among IOM staff globally, including third-party contractors (TPCs).

Online self-paced Training

The ECO e-learning training, Ethics and Conduct at IOM: *The Values We Share*, has been ongoing since 2017. The course, available in English, French, Spanish, and Arabic, is based on the Standards of Conduct (IN/15 Rev. 1) and seeks to build understanding on why integrity and ethical conduct are important for IOM and its staff. It also promotes awareness of our responsibility to uphold IOM standards in our day-to-day work with beneficiaries, partners and colleagues. After completing this course, learners can better recognize, prevent, and address misconduct. The training is **mandatory** for all IOM staff and non-staff personnel.

In the first quarter of 2022, ECO launched the Arabic version of the mandatory course, making this training accessible to a large number of colleagues, particularly in the MENA region.

According to the latest report provided by the Staff Development and Learning Unit (SDL) and a Staff Advisory communication, by the last quarter of 2022, compliance of staff with the ethics mandatory training was **81%**. ECO will continue its efforts of raising awareness about the training and expects to set the aim higher for next year (over 90%).

Face-to-face Training

The lifting of travel restrictions due to COVID-19 allowed the resumption of ECO's face-to-face trainings. Despite the limited resources and increased workload, the two ECO ethics and integrity officers were able to conduct 31 face-to-face sessions of the updated 3-hour *"Let's Talk Ethics"* training in five different regions, reaching **755** IOM personnel. The sessions were provided in English and Spanish. ECO considers that the in-person trainings are valuable in increasing awareness on ethical behaviour and IOM's framework and appreciates the colleagues' engagement and strong participation in these sessions. ECO is able to conduct the face-to-face training in the three official IOM languages.

Remote online training

In 2022, ECO adapted its *"Let's Talk Ethics"* webinar to a two-hour session in order to reach a wider audience and have more accessibility within the IOM Missions worldwide. The webinars offered in English, Spanish and French were attended by **1387** personnel.

Furthermore, for the first time, ECO provided two sessions to third party contractors (TPCs) of IOM Afghanistan, IOM Iraq, IOM Bangladesh and IOM Pakistan on the IOM Standards of Conduct, IN/15 Rev. 1. reaching **357** participants.

Other Awareness Raising Activities

At the beginning of 2022, ECO in collaboration with IOM El Salvador released a video on the IOM Standards of Conduct, which was focused on raising awareness about ethical issues among IOM personnel. The video is now available on ECO's intranet as well as on the [We Are All In platform](#) resources.

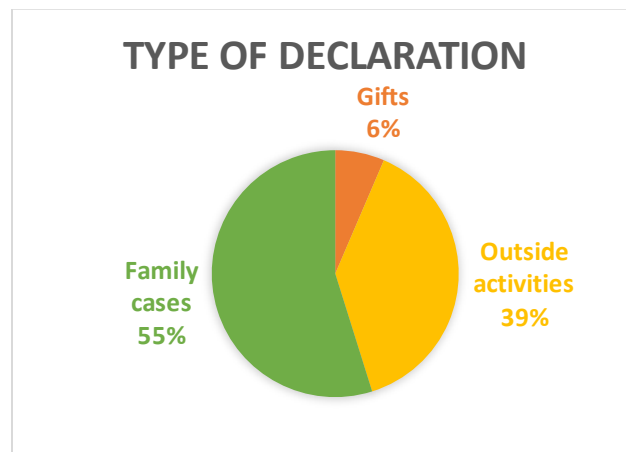
4. Yearly Declaration of Interest (YDI) process

The Yearly Declaration of Interest process, implemented for the first time in 2021, serves as a reminder to certain categories of staff members that possible conflicts of interest should be disclosed and appropriately addressed. ECO circulated the YDI form to staff members at D1 level and above, Heads of Department, Heads of Division, Chiefs of Mission/Heads of Office and SRMOs/RMOs.

By completing the Declaration of Interest form, concerned staff were given the opportunity to affirm their compliance with the Unified Staff Regulations and Rules and the Standards of Conduct (IN/15, Rev.1) in respect of outside employment and activities; financial holdings; gifts, honours and remuneration from outside sources; and relatives in the workplace.

In the second year of its implementation, the YDI form for calendar year 2021 was circulated to **387** concerned staff in February 2022. ECO received **381** declarations. Out of the 6 staff members who did not respond, 5 staff members were no longer with IOM and 1 was on extended sick leave.

Of the 381 staff members who filed their Yearly Declaration of Interest form, **102** staff members declared possible and/or actual conflicts of interests. Of these 102 conflicts, 71 had been evaluated by ECO prior to the 2021 YDI exercise, and **31** were considered as new potential conflicts of interest. ECO classified the 31 new conflicts of interest as follows: 17 declarations about relatives, 12 declarations about outside activities and 2 declarations about gifts and honours.



ECO assessed the declarations in a confidential manner, advising on ways to mitigate any real or perceived conflict of interest. ECO completed the YDI process, including all assessments in the first half of the year. In implementing this annual exercise for a second year, ECO considers it a successful step in affirming compliance with the standards of conduct and monitor any potential conflict of interest in a systematic manner. Moving forward, ECO is looking into ways of streamlining the disclosure process, including by establishing an automated online process.

5. General Inquiries

ECO is contacted daily by IOM personnel and persons external to IOM with queries or concerns of a general nature. In 2022, ECO dealt with **209** general queries, representing a considerable increase of **22%** in the number of persons seeking ECO's advice or support. Of those, the matters pertaining to IN/15 Rev. 1 - IOM's Standards of Conduct were over two times higher compared to last year, amounting to 79 queries. The topics of concern included queries on impartiality, public expression on controversial matters, participation in demonstrations, use of social media, disclosure of confidential data and recruitment of persons working for implementing partners or state actors. Moreover, ECO handled cases involving engagement of IOM personnel in political activities, which were referred to ECO by OIG. Additionally, 20 were matters relating to a respectful working environment, where ECO advised IOM

personnel of the available channels to address their concerns. It is noteworthy that the number of queries on a respectful working environment was reduced by half compared to 2021, showing an increased awareness of IOM personnel following the revision of IN/90. The remaining general queries were responded to by ECO or referred to the appropriate office, accordingly.

ECO responded within 24 hours to **74%** of the requests and within 48 hours to **80%** of these requests. Having noted the increase in requests pertaining to outside activities, participation in demonstrations and similar matters, ECO is planning to develop guidelines on these topics to enhance IOM personnel's awareness.

DEVELOPMENT OF NEW POLICIES

In 2022, IOM's new policy on [Protection of IOM personnel against retaliation for reporting misconduct and co-operating with investigations and audits](#) was finalized (IN/282). In line with the approach of other UN Organizations, the policy focuses on protection against retaliation for IOM personnel who either i) report suspected misconduct or ii) cooperate with audits or investigations. ECO considers the introduction of IN/282 an innovation in the IOM policy framework, as for the first time, a formal regulatory framework on protection against retaliation is implemented. The policy not only strengthens IOM's protection framework but also enhances personnel's trust in the Organization. The policy was circulated in the 3 official IOM languages (English, French and Spanish). Accompanying training material and a dedicated online self-paced training (micro-module) on explaining IOM's framework on addressing retaliation were produced by ECO in coordination with SDL as part of its implementation. ECO will launch the online self-paced training in early 2023.

In addition, ECO continued its participation in the working group for the revision of IOM's policy on respectful workplace, IN/90, which was released with its accompanying guidelines in the last quarter of 2022. ECO, together with DHR and OOM held introductory webinars for the new [IN/90 Rev. 1 Policy for a Respectful Working Environment](#), as well as participated in the IOM Headquarters Task Force on the Prevention of Sexual Exploitation and Abuse working group.

INTERAGENCY COOPERATION

The Head of ECO and one ethics and integrity officer participated in-person in the 14th Network of Multilateral Organizations (ENMO) annual meeting held from July 5 to 8, 2022 in Paris, at UNESCO headquarters.

The Head of ECO took part in the third panel of the ENMO meeting titled *“Best Practices and Innovation in Prevention and Training in a Hybrid Environment”*, in which she shared the best practices that were incorporated at IOM, such as the adaptability of the face to face training to online (via Teams) in *the three official languages* of the organization, the use of *anonymous applications* such as SLIDO, and the inclusion of *an anonymous evaluation* after each training. The Head of ECO also emphasized that despite the limited

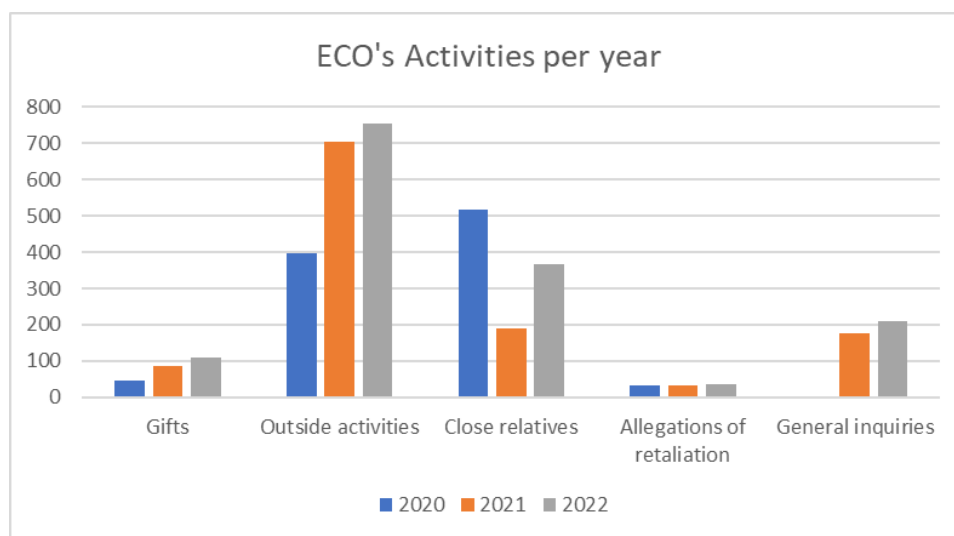
number of staff that the IOM Ethics Unit currently has, it has been able to train more than 4,000 (four thousand) staff through the different training modalities (online and face-to-face) and has been able to adapt each training to the needs of the staff. Finally, she shared the efficiency of the training given the high demand for requests for more sessions and the questions after each session provided.

At the end of the session, the panelists were complimented by colleagues from WFP, WHO, FAO and the ITU/WMO colleague.

CONCLUSION

ECO's activities continue to increase steadily. Since the change in its mandate in 2019, ECO has undertaken a number of activities, including the adoption of an ECO Charter, the drafting and implementation of IOM's policy on protection against retaliation and the introduction of the yearly process of declaration of interests. ECO has further expanded its training activities to the three IOM official languages and translated its mandatory training on ethics to Arabic. Moreover, ECO has produced videos and training materials on the IOM Standards of Conduct and is constantly updating its both online and in-person training methods.

The table below indicates the *significant* increase in almost all of ECO's activities, including the increase in IOM personnel reaching out to ECO on concerns of a general nature.



ECO operates efficiently and responds normally within 48 hours to requests. While in 2022, ECO responded within 48 hours to 90% of all requests received, showing the Unit's efficiency, the mandate of the Unit would be better served with additional resources, so that further undertakings of a larger scale could be pursued.

In 2023 ECO will continue to promote ethical awareness and compliance across the organization to ensure levels of integrity are followed, in line with the IOM Standards of Conduct.

In addition to its daily activities, the strong emphasis on addressing concerns of retaliation will continue, with an effort to raise awareness among colleagues on what retaliation is, and what measures must be taken against it. In this regard, in early 2023 ECO is planning to launch a self-paced micro-learning modules on describing the protection framework against retaliation.

ECO will also continue providing trainings and promoting awareness regarding ethical behaviour organization wide.

ECO will continue its successful Teams training sessions that it initiated in 2020, with a view to reaching colleagues in all three official languages of the Organizations. Also, ECO will continue with targeted face-to-face training sessions.

Finally, in 2023 ECO intends to produce a number of guidance documents (guidelines) on different topics relevant to the IOM Standards of Conduct, while it will be following closely the process of updating the UN Standards of Conduct by the International Civil Service Commission (ICSC).

ANNEX I

Charter of the Office of Ethics and Conduct (ECO)

I. Introduction

1.1 This Charter provides the framework for the function of the IOM Office of Ethics and Conduct (ECO). ECO was established in 2014 in line with the Director General's commitment towards professionalism, accountability and transparency, and with a view to uphold IOM's fundamental principle of "integrity", as enshrined in the IOM Constitution (Article 15).

1.2 ECO is an integral part of the Office of the Director General (ODG) and reports to the Director General.

II. Mandate and functions

2.1 ECO's mandate is to promote ethical awareness and compliance, and ensure that the IOM rules, policies and procedures follow the standards of integrity called for in the IOM Standards of Conduct (IN/15 Rev.1), including protection of staff against retaliation for reporting misconduct.

2.2 ECO's activities include:

- Assessing all allegations of retaliation and ensuring protection against retaliation in accordance with the applicable procedures (IN/90, IN/275 and IN/282);
- Advising on outside activities, gifts and honours, relatives in the workplace and other potential conflicts of interest (IN/15 Rev.1 and IN/161 Rev.1);
- Raising ethics awareness through proactive training and communication;
- Providing recommendations on submissions from senior managers and other relevant staff on conflict of interest disclosure obligations;
- Developing new policies and providing support as necessary on existing policies that pertain to ethical behaviour and standards of conduct; and
- Providing guidance on enquiries related to the standards of conduct.

2.3 ECO makes recommendations to the Director General, Deputy Director General, and senior management on all matters related to ethics or those derived from its activities.

III. Enabling Environment

3.1 IOM is committed to fostering an organizational culture of ethics and an inclusive and harmonious work environment. The IOM senior management adheres to ethical principles,

recognizes, and supports ECO as a key institutional function for achieving results and accountability. The IOM senior management ensures that rules, policies, and procedures are adopted that provide for the independent and efficient functioning of ECO.

IV. Principles

4.1 ECO carries out its functions under the principles of objectivity, impartiality, independence, confidentiality, and fairness. ECO conducts its activities with the highest levels of competence and integrity.

Independence

4.2 ECO is functionally independent, exercises its judgement independently and operates without interference from parties internal or external to the Organization, without improper influence or external control and risk of retaliation.

4.3 Ethics Officers conduct their work impartially, without the risk of adverse effects on their contracts or career development and are able to express freely their opinion. The independence of ECO requires access to information. In order to effectively carry out its functions, ECO may request this information from the appropriate units.

4.4 ECO has full access to senior management in the Organization and is available to the Organization's governing body, if required.

Conflict of Interest

4.5 Ethics Officers must not engage in any situation which could create a potential conflict of interest. Ethics Officers should not have a personal stake in the resolution of any issue brought to the office, either in view of a previous involvement in the matter or a personal interest.

4.6 Ethics Officers shall disclose to the Head of ECO in a timely fashion any actual or potential conflict of interest they may have in an activity in which they are participating or situation where they are asked for advice. In such cases, the Head of ECO will recommend appropriate action to address the conflict as necessary.

4.7 The Head of ECO shall disclose any actual or perceived conflict of interest that may arise in the performance of their function to the Director General.

Confidentiality

4.8 ECO respects the rights of individuals to provide information and seek guidance in confidence, while making them aware of the scope and limits of confidentiality. ECO should obtain consent from the individuals prior to sharing any confidential information.

4.9 ECO ensures that sensitive data is protected and safeguards any non-public information associated with its functions, in compliance with the Organization's rules, policies and procedures.

V. Reporting

5.1 An annual report highlighting the activities of the ECO is available to all staff of the Organization.