

REPORT OF THE ETHICS OFFICE

Organizational oversight reports

Additional documents for this item:

Action required at this meeting—the Programme Coordinating Board is invited to:

- *Take note* of the report of the Ethics Office;

Cost implications for the implementation of the decisions: none

Table of contents

Executive summary	4
Introduction and background	6
Progress in establishing an independent Ethics Office	7
The core functions of the Ethics Office	8
Activities of the Ethics Office	8
Advice and guidance	8
Ensuring the highest standards of conduct	12
Protection against retaliation	12
Prevention of sexual misconduct	14
Declaration of interest programme	16
Ethics training, communication and outreach	16
Standard setting and policy coherence	18
Participation in the Ethics Multilateral Network	18
Implications of the restructuring of the ethics function in UNAIDS	19
Conclusion	20
Proposed decision points	20

Executive summary

1. This report is submitted in accordance with the decision taken during the 44th session of the Programme Coordinating Board, requesting the Executive Director of the Joint United Nations Programme on HIV/AIDS to ensure that the UNAIDS Secretariat ethics function adheres to the standards established by the Joint Inspection Unit.¹ The decision included establishing an independent Ethics Office and requiring the Ethics Office to submit an annual report, unchanged by management, to the Board. Additionally, it mandated the inclusion of a stand-alone agenda item covering ethics and other accountability functions.²
2. This is the fifth such report, covering the period of 2024, and it reviews:
 - background information,
 - progress in the establishment of an independent Ethics Office,
 - activities undertaken during the reporting period in the areas of confidential advisory services, addressing misconduct, protection from retaliation, prevention of sexual misconduct, the declaration of interest programme, training, outreach and communications, ensuring policy coherence, and participation in the Ethics Network of Multilateral Organizations, and
 - analysis of impact of ongoing restructuring on ethics in UNAIDS
3. In accordance with the Joint Inspection Unit recommendations, a new independent Ethics Office was established in 2020, and many of those recommendations have been implemented. However, further efforts are required to provide additional support to the ethics function and to issue contracts for the head of the Ethics Office that cover the full term.
4. The provision of advice and guidance decreased by 11%, from 227 in 2023 to 203 in 2024. Despite this decrease, the number of requests remained high compared to 2021 and 2022 (75 and 147 requests, respectively). It is noted that the Executive Director approved the recruitment of an Ethics Officer. However, contracting of the recommended candidate was frozen due to the financial crisis the organization is currently experiencing. The Ethics Office agrees with this decision and hopes the recruitment will be reauthorized, should the financial situation improve.
5. The Integrity Hotline received 83 reports, a significant increase from the 17 in 2023 and the 14 in 2022. However, 75 of those reports were spam. The number of legitimate reports remained relatively stable, with 8 in 2024, 7 in 2023, and 10 in 2022. The dramatic increase in spam reports is likely due to the addition of a QR code for accessing the hotline on the external UNAIDS website and the removal of a generic email address for fraud reporting.
6. No new requests for protection against retaliation were received during the reporting period. However, one outstanding case from the previous year was monitored as required by the policy on preventing and addressing retaliation. Lessons from recent years indicate that the small size of teams in the UNAIDS Secretariat coupled with

¹ Report of the 44th Programme Coordinating Board Meeting, (UNAIDS/PCB (44)/19.22), December 2019, pp. 41–42 ([05112019_UNAIDS_PCB45_Report-44thPCB_EN.pdf](#)).

² Report on the Working Group of the Programme Coordinating Board to strengthen the PCB's monitoring and evaluation role on zero tolerance against harassment, including sexual harassment, bullying and abuse of power at the UNAIDS Secretariat (hereinafter "2019 Working Group Report"), June 2019, (UNAIDS/PCB (44)/19.5), pp. 36 and 47.

financial constraints, makes implementing preventive and protective measures challenging.

7. Regarding the prevention of sexual misconduct, no new allegations were received by the Ethics Office during the reporting period. To reduce the risks of sexual exploitation and abuse, digital footprint and ClearCheck screenings were conducted for candidates considered for employment contracts with the UNAIDS Secretariat. Additionally, an implementing partner capacity assessment was executed to identify and mitigate sexual misconduct risks and a sexual exploitation, abuse and harassment country risk assessment tool was launched to assist countries in identifying and mitigating those risks.
8. An annual survey by the Office of the Special Coordinator on improving the United Nations response to Sexual Exploitation and Abuse in 2024 showed improvements in the proportion of correct responses from Secretariat staff but highlighted areas needing attention, such as prohibitions on sex with sex workers, sexual relations with children, the obligation to report and addressing fear of retaliation. An annual workplan on preventing and addressing sexual exploitation, abuse and harassment has been developed to address these issues.
9. The Ethics Office continued to administer the declaration of interest programme. During the reporting period, a total of 372 staff members were sent declaration of interest forms and potential conflicts of interest were identified and resolved. A new declaration of interest programme for consultants and experts was also implemented, ensuring transparency and integrity in their engagements with UNAIDS.³ The Ethics Office received and reviewed 58 declaration of interest forms from experts and consultants.
10. Regarding training and awareness creation, the requirement for all staff members and personnel to complete mandatory training courses on various ethics and conduct-related issues continued during the reporting period. The completion rate dipped slightly from 95–100% in 2023 to 88–100% in 2024. The Ethics Office will collaborate with the People Management Department to achieve higher completion rates for all mandatory training.
11. Additionally, the Ethics Office participated in new staff orientation programmes in July, September and November 2024, briefing 91 new staff on its mandate, UNAIDS's ethical principles and values, expected behaviours, and how to contact the Ethics Office. In October 2024, the Ethics Office conducted a virtual training session on “leadership by example” and ethical role models for the Latin America and Caribbean region during their Regional Cluster Meeting. This session was in response to the 2024 UNAIDS Global Pulse Survey, which showed a decline in positive perceptions of “leadership by example” in the region. The Ethics Office received positive feedback from some Country Directors after the training.
12. Furthermore, ethics-related trainings were held with staff members of the Namibia and Ghana Country Offices. Areas covered in the training included: (i) functioning of the Ethics Office; (ii) preventing and addressing abusive conduct and sexual misconduct; (iii) protection against retaliation; (iv) where and how to report misconduct; and (v) how and where to seek help. The Ethics Office received positive feedback from participants after the training.
13. During the reporting period, the Ethics Office promoted policy coherence by providing advice to staff and management to ensure that the organization's policies are applied

³ Hereafter, “UNAIDS” and “the organization” refer to the UNAIDS Secretariat.

properly and consistently. The Office served as a member of a steering committee that is leading the development of a Gender Equality, Diversity, Equity, Inclusion and Accessibility Framework which is aimed at promoting a safe and empowering environment for all staff, making substantive contributions to the selection and onboarding of the consultants. In addition, the Ethics Office also participated in meetings of the Ethics Multilateral Network to gather best practices in ethics from across the UN System for sharing and implementation at UNAIDS.

14. Given UNAIDS's commitment to a victim-centered approach and zero-tolerance stance on misconduct, including retaliation, the Ethics Office relies on timely information from the Internal Oversight Services to protect individuals who report retaliation and those who are at risk of retaliation after having formally filed misconduct reports. Internal Oversight Services has committed to promptly provide the necessary information in line with the provisions of relevant policies to facilitate the Ethics Office's work towards protecting staff members and collaborators who require protection.
15. In 2024, the UNAIDS began restructuring due to reduced funding, which worsened in February 2025 when the United States Government terminated funding, cutting the Joint Programme's financial resources by approximately 60%. The ongoing restructuring will lead to significant downsizing, reducing staff from 671 in 2024 to 280, and retaining presence in 35 countries while supporting about 60 countries through multi-country offices, one-person offices, and senior officers embedded within UN Resident Coordinator offices. Some Global Centre staff will also be relocated to lower-cost locations to further reduce expenses.
16. The restructuring is expected to increase requests for advice and guidance as staff seek clarity on their roles and rights. The Ethics Office anticipates that the restructuring may result in higher ethical and operational risks, particularly in isolated and high-risk settings. To address the risks, the Office aims to collaborate with senior leadership and other departments to ensure a coordinated approach to implement a strategy focused on prevention, support and accountability.

Introduction and background

17. This report is submitted in accordance with the decision of the 44th session of the Programme Coordinating Board (PCB), which requested the Executive Director to ensure that the Secretariat ethics function conforms to standards set by the Joint Inspection Unit (JIU).⁴ This was in line with recommendations presented by the PCB Working Group on zero tolerance against harassment, including sexual harassment, bullying and abuse of power to the 44th PCB meeting. Specifically, the Working Group recommended that the PCB request the UNAIDS Executive Director to ensure that the Secretariat ethics function conforms to the standards set out by the JIU.⁵
18. In November 2019, the JIU released its "Review of the management and administration of UNAIDS," recommending further strengthening of the Ethics Office by establishing a fully independent Ethics Office and ensuring that it submits annual reports, unchanged by management, directly to the PCB. It was also recommended to include a stand-alone agenda item on ethics and other accountability function at PCB meetings.⁶ At the 45th PCB meeting in December 2019, the PCB affirmed its commitment to establish a

⁴ Report of the 44th Programme Coordinating Board Meeting, (UNAIDS/PCB (44)/19.22), December 2019, pp. 41-42 ([05112019_UNAIDS_PCB45_Report-44thPCB_EN.pdf](#)).

⁵ Note 2, above, 2019 Working Group Report at para. 73.

⁶ Review of the Management and Administration of the Joint United Nations Programme on HIV/AIDS, (JIU/REP/2019/7), at paras. 101–104 and 124 ([14112019_UNAIDS_PCB45_JIU_REP_2019_EN.pdf](#)).

regular stand-alone agenda item to cover ethics and other accountability-related topics.⁷ On 26 May 2020, the Executive Director issued an internal memorandum on the ethics function, which included several decisions to strengthen the independence of the Ethics Office.

19. The first report of the Ethics Office was presented to the PCB at its 48th session in June 2021.⁸ The Ethics Office has since submitted a report to the PCB each year.
20. In response to reduced funding in 2024, UNAIDS initiated a restructuring exercise. In February 2025, the United States (US) Government issued a notice of funding termination, resulting in an approximate 60% reduction in UNAIDS's financial resources for the year. Consequently, the ongoing restructuring focuses on downsizing staffing and changing the organizational structure to ensure viability.
21. This report includes information on progress towards establishing an independent Ethics Office and activities of the Ethics Office for the period from 1 January 2024 to 31 December 2024, and an analysis of the impact of the ongoing restructuring on ethics in the organization.

Progress in establishing an independent Ethics Office

22. The 2021 JIU report⁹ outlined standards for the independence of the United Nations's (UN) ethics function, including:
 - time-limited appointment for the head of the ethics function, with cooling-off periods or post-employment restrictions;
 - direct reporting of the head of the ethics function to the Executive Director;
 - submission of an annual report, unchanged by management, directly to the PCB, along with any comments from the Executive Director;
 - unrestricted access of the head of the Ethics Office to the governing body, formalized in writing;
 - the audit and oversight committees have a mandated responsibility for the ethics function; and
 - consultation with the audit and oversight committee on the selection, appointment, and dismissal of the head of the ethics function.
23. The contract for the current head of the Ethics Office specifies a term limit with no possibility of reemployment by UNAIDS, consistent with JIU standards. In addition, the head of the Office reports substantively to the Executive Director, with day-to-day management by the Chief of Staff.
24. Regarding the reporting requirement to the Board, the Ethics Office has submitted annual reports to the PCB since the Board's 48th session in 2021. These reports have remained unchanged by management, which has issued formal responses to the PCB, as required. Through its annual report, the Ethics Office has maintained access to the PCB, the PCB Bureau and the Independent External Oversight Advisory Committee (IEOAC). In addition, either party may request further engagements as needed.

⁷ Report of the 45th Meeting of the Programme Coordinating Board, (UNAIDS/PCB (45)/19.38), at pp. 46, 47 ([UNAIDS_PCB46_Report-of-the-45th-PCB_EN.pdf](#)).

⁸ Report of the Ethics Office – Organizational Oversight Reports, (UNAIDS/PCB (48)/21.6) ([PCB_48_Ethics_Office_Report_EN.pdf](#) ([unaid.org](#))).

⁹ Report of the Joint Inspection Unit on the Ethics Function in the United Nations System (hereinafter 2021 JIU Report) ([JIU//REP/2021/5](#)) at p. 24.

25. The IEOAC's terms of reference mandates it to oversee the ethics function.¹⁰ It reviews the Ethics Office reports and makes recommendations for strengthening the function. Regarding the recruitment of the head of the Ethics Office, the IEOAC was consulted in the selection process.
26. The JIU identified insecurity of tenure as a serious impediment to independence and recommended full-term contracts for newly appointed heads of the Ethics Office.¹¹ This recommendation remains outstanding.
27. To facilitate the work of the Ethics Office, the JIU recommended appropriate staffing and backup for the Ethics Office.¹² During the reporting period, a substantive head of the Ethics Office was recruited. In addition, the Executive Director approved the recruitment of a P3 Ethics Officer, but the “onboarding” of the selected candidate was frozen due to cost containment measures implemented by UNAIDS management. The Ethics Office agrees with this decision and hopes the recruitment will be reauthorized should the financial situation improve.

The core functions of the Ethics Office

28. The Ethics Office promotes ethical principles and standards throughout the organization, ensuring that all staff members maintain the highest integrity in their professional duties and personal conduct, as expected of international civil servants.
29. The functions of the Ethics Office include:
 - providing confidential ethics advice and guidance;
 - undertaking the responsibilities assigned to the Ethics Office under the policy on protection against retaliation;
 - preventing sexual misconduct;
 - administering the organization's declaration of interest programme;
 - developing standards, training and education on ethics issues, in coordination with the People Management Department and other offices, and conducting ethics-related outreach;
 - supporting ethics standard-setting and promoting policy coherence within the organization; and
 - participating in the Ethics Network of Multilateral Organizations.

Activities of the Ethics Office

Advice and guidance

30. As an independent, impartial, and confidential resource, the Ethics Office offers advice and guidance to staff and management on various matters. It helps resolve ethical dilemmas, manages conflicts of interest and clarifies expected behaviours according to the Staff Regulations and Rules and international civil service standards. This advisory

¹⁰ Proposed revised terms of reference of the Independent External Oversight Advisory Committee of UNAIDS (UNAIDS/PCB (52)/23.19 at pp. 10–11.

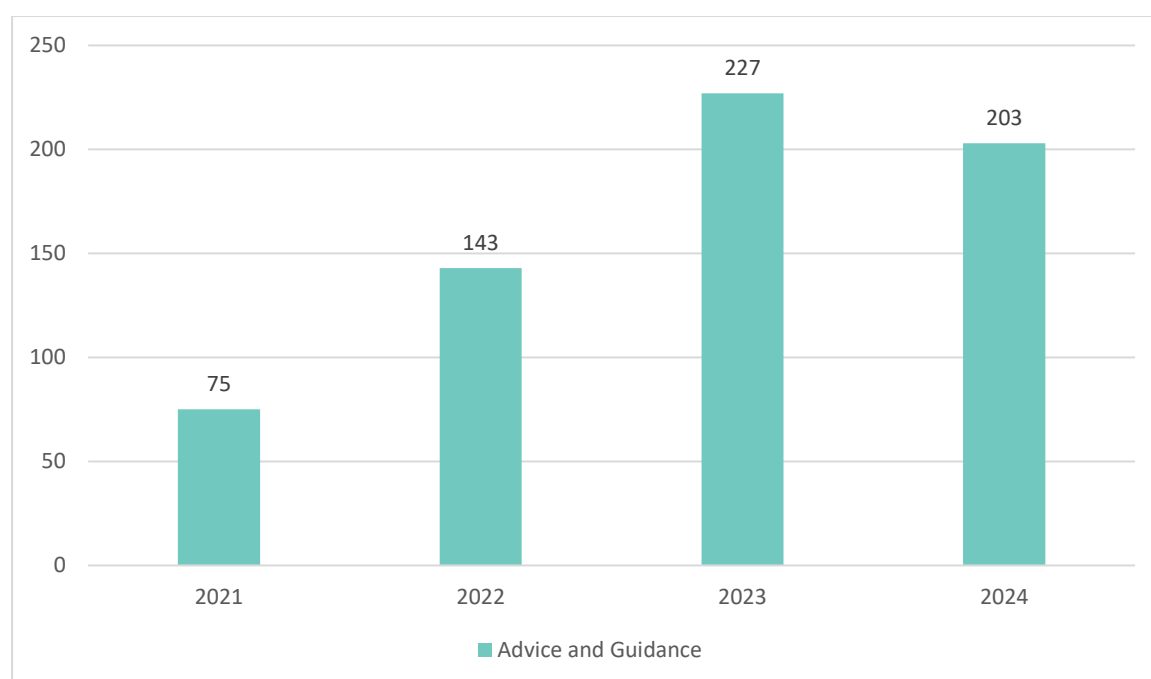
¹¹ Note 7 above, at p. 29.

¹² Note 5, above, at p. 24. In 2022 the newly established Independent External Audit and Oversight Committee of UNAIDS (IEAOC) also recommended “that the PCB and the UNAIDS Executive Director ensure that the Ethics Office has adequate resources to carry out its functions”.

role is vital for preventing and managing conflict-of-interest risks and safeguarding the organization's reputation and image.

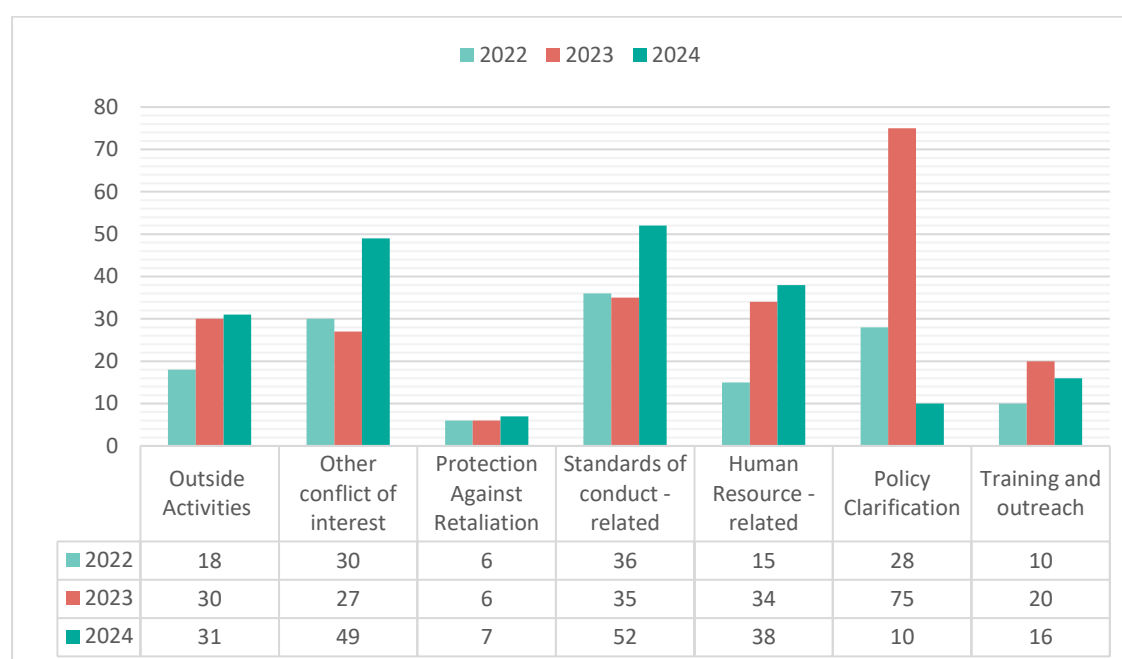
31. The Ethics Office responded to 203 requests for advice and guidance in 2024, an 11% reduction from 227 requests in 2023. Despite this decrease, as shown in Figure 1 below, the number of requests remained high in both 2023 and 2024. This follows a steady increase from 75 requests in 2021 to 143 in 2022 and 227 in 2023. The relatively high number of requests in the past two years may be attributed to the stability in the staffing of the Ethics Office, improvements in the office's autonomy and increased awareness through training. On the other hand, the slight decrease in the number of requests in 2024 is attributed mainly to a significant drop in requests for policy clarification, from 75 in 2023 to 10 in 2024.¹³

Figure 1. Overall requests for advice and guidance in the past four years



32. As shown in Figure 2, the 203 requests received in 2024 pertained to outside activities (31), other conflicts of interest (49), human resources-related (38), training and outreach (16), standards of conduct-related (52), policy clarification (10) and protection against retaliation concerns (7).

¹³ The reasons for this reduction are further discussed in para 35 below.

Figure 2. Ethics Office advisory services 2022–2024

Outside activities

33. Of the 203 requests for ethics advice, 31 pertained to outside activities, similar to the 30 requests in 2023. Staff members primarily consulted the Ethics Office on external engagements in a personal or private capacity, including teaching, board positions, advisory panels or groups, social and charitable activities. In assessing these requests, the Ethics Office ensured that the outside activity: (a) does not conflict with the staff member's official function or status as an international civil servant; (b) does not conflict with the interests of UNAIDS; and (c) is permitted by local law at the duty station or location of the outside activity.

Other conflicts of interest

34. The Ethics Office assists staff members in addressing various conflicts of interest. These typically include issues related to family relationships within the organization, the engagement of family and friends in official UNAIDS business, and the acceptance of gifts and benefits. The Ethics Office ensures that conflicts of interest are addressed in a manner that upholds staff impartiality, ensures fairness, complies with relevant staff rules and regulations, and does not compromise the organization's reputation.
35. During the reporting period, there were 49 requests categorized under other conflicts of interest, a significant increase from 27 in 2023. This increase may be attributed to a better understanding of the importance of seeking advice from the Ethics Office to mitigate conflicts of interest. This enhanced knowledge is likely to result from the ethics-related training that the staff members have received over time.

Human resource-related

36. The human resource-related category showed a slight increase over the three years, with 45 requests in 2022, 46 in 2023 and 50 in 2024. This category addresses issues such as ethical dilemmas related to interpersonal and supervisory relations, career-related concerns, performance appraisals, contract management and recruitment-

related issues. The Ethics Office provided advice and referred the staff members concerned to the People Management Department or other appropriate offices.

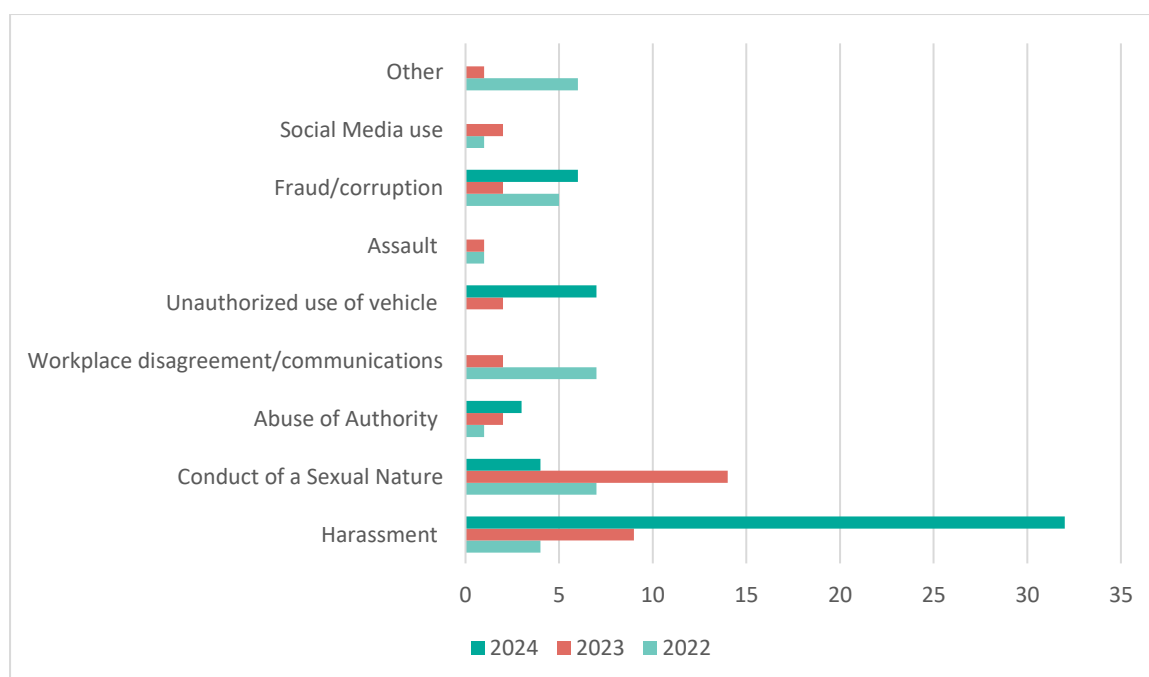
Policy clarification

37. The policy clarification category has fluctuated significantly since 2022. Requests rose from 28 in 2022 to 75 in 2023, then dropped to 10 in 2024. The Ethics Office report to the PCB in 2024 noted a high interest in 2023 in policies on preventing and addressing abusive conduct, sexual misconduct and retaliation, likely due to new policy launches during the reporting period.¹⁴ The sharp decline in 2024 suggests that these policies became clearer through training and staff engagement. In 2024, staff interest shifted to procurement, data protection, diversity and inclusion.

Standard of conduct related

38. The Ethics Office responded to 52 requests for advice and guidance on standards of conduct-related issues, which is higher than the 36 and 35 requests received in 2022 and 2023, respectively.¹⁵ As shown in Figure 3, this increase is attributable to significantly more requests relating to harassment in 2024. All requests regarding matters of a sexual nature were prioritized and, as appropriate, referred to the WHO Internal Oversight Services (IOS). Matters requiring informal resolution were referred to the Office of the Ombudsperson.

Figure 2. Standards of conduct advisory service provided by the Ethics Office, 2022 and 2023.^{16 17}



¹⁴ Report of the Ethics Office to the PCB, June 2024 (UNAIDS/PCB (54)/24.16) at page 8.

¹⁵ Note *xii* at page 8.

¹⁶ Please note that matters with multiple issues were counted multiple times. Retaliation is excluded, since it is addressed separately in paras 40-51.

¹⁷ Note that the category "other" includes unauthorized absence, substance abuse, discrimination, assault and theft.

Ensuring the highest standards of conduct

39. Staff members, collaborators and the public can seek advice on alleged misconduct and related matters by contacting the Ethics Office directly or through the Integrity Hotline. Managed by the Ethics Office and provided by a third party, the Integrity Hotline is a confidential channel for reporting concerns related to UNAIDS. It is accessible 24/7 through a link or telephone from any location, at no cost to callers. Administered in all six UN languages, the Integrity Hotline accepts anonymous reports and the service provider is contractually bound not to disclose any identifying information about users unless express permission is granted by the user.
40. The Ethics Office deals with reports confidentially and refers them to relevant departments, such as the IOS or the People Management Department. Individuals lodging reports, including those who remain anonymous, may be contacted via the platform for further information or next steps, while ensuring that their anonymity is preserved.
41. Access to the Integrity Hotline continued to be available through the external UNAIDS website, the UN Preventing Sexual Exploitation and Abuse website,¹⁸ and the UNAIDS Intranet. Both UNAIDS personnel and external parties and partners can use these channels to report misconduct or raise any other concerns. To facilitate easier access to the Integrity Hotline through the external UNAIDS website and ensure it is used for all reporting, a QR code was added to the website, and the dedicated email address for reporting fraud was removed from the website.
42. During the reporting period, 83¹⁹ reports were received through the Integrity Hotline, up from 17 in 2023²⁰ and 14²¹ in 2022. The number of legitimate reports remained almost the same at 8 in 2024, 7 in 2023 and 10 in 2022. However, the number of spam reports has risen steeply from 4 out of 14 in 2022 and 10 out of 17 in 2023 to 75 out of 83 reports in 2024. The increase in 2024 could be a direct result of the placement of the QR code for accessing the Integrity Hotline on the external UNAIDS website and the removal of a generic email address for fraud reporting.
43. Data from the Global Staff Survey conducted in 2022 indicate that 85% of staff were aware of the misconduct reporting procedure, surpassing the average benchmark by about 15 percentage points. This suggests that UNAIDS is performing better than other UN entities and similar international organizations included in the study. However, in the same study, only 57% of respondents indicated that they would feel safe reporting a case of misconduct.²² Additional progress is needed to ensure compliance with the obligation to report misconduct as outlined in the regulatory frameworks of UNAIDS.

Protection against retaliation

44. The Ethics Office has the mandate to undertake the functions assigned to it under the policy on protection against retaliation. This is a critical element for building an organizational culture of integrity, transparency and accountability.

¹⁸ The Integrity Hotline available at the UN PSEA website at [How to Report | Preventing Sexual Exploitation and Abuse \(un.org\)](#).

¹⁹ This includes 75 spam reports received.

²⁰ This included 10 spam reports

²¹ This included 4 spam reports.

²² UNAIDS Global Staff Survey 2022, overall narrative report, February 2023, at p. 5.

45. Pursuant to the WHO policy on Preventing and Addressing Retaliation,²³ which is applicable to UNAIDS and which came into force in 2023, the Ethics Office develops and recommends measures to protect staff members and collaborators from retaliation and to ensure their well-being. Additionally, the Office coordinates and monitors implementation of these measures, working closely with IOS, the People Management Department and other relevant offices.
46. When IOS receives allegations of retaliation or identifies risks of retaliation during misconduct investigations, it informs the Ethics Office, which then collaborates with the affected individual(s) to implement appropriate preventive and/or protective measures. Recommendations by the Ethics Office are provisionally implemented by the People Management Department pending decisions on the outcome of the investigation, with ongoing monitoring and updates provided to the affected individuals. The Ethics Office also reports on all cases involving protection against retaliation, maintaining confidentiality and the integrity of investigations.²⁴
47. Ensuring timely information from the IOS is crucial for protecting staff and collaborators who report allegations of retaliation or are at risk of retaliation because they have reported misconduct allegations. To facilitate this, the Ethics Office held two meetings with the IOS to establish processes for information sharing. The IOS agreed to promptly provide necessary information after preliminary reviews of retaliation cases and where risks of retaliation are identified during misconduct investigations. The Ethics Office will monitor this commitment of the IOS and ensure that any requirements are addressed after the restructuring process, as well as during the renegotiation of the memorandum of understanding between UNAIDS and IOS.
48. Preventive and protective measures under the policy may include physically separating the alleged offender and the affected individual, issuing no-contact directives, reassigning or transferring either party, considering special leave, temporarily changing reporting lines, placing the alleged offender on administrative leave, or implementing other appropriate measures, including security measures.
49. In the past few years, the Ethics Office has observed challenges in implementing preventive and protective measures due to small team sizes and limited financial resources. Small teams make it difficult to separate the alleged offender and affected individuals, who are often in the same teams. Moving individuals usually requires financial resources and creates gaps that strain the remaining team members. This challenge is exacerbated by the length of time it takes to conclude investigations. The Ethics Office, the People Management Department and other structures will need to continue working creatively to find suitable measures to protect staff members.
50. During the reporting period, no requests for protection against retaliation were received by the Ethics Office. Despite that, it is important to enhance sensitization about the kinds of behaviours that constitute retaliation, the fact that retaliation is prohibited conduct and is subject to disciplinary action, and how staff members can practically seek help and guidance when they feel they are experiencing retaliation. The enforcement and enhancement of measures to protect staff from retaliation are critical for facilitating reporting of misconduct and ensuring that UNAIDS is a safe, equal and empowering workplace.
51. As part of efforts to monitor measures taken to protect and ensure the well-being of a staff member who filed a case of retaliation in 2023, for which investigation was

²³ WHO policy on preventing and addressing retaliation, 2023.

²⁴ Note 14 above, at para 3.11–3.15

ongoing, the Ethics Office participated in seven meetings with the People Management Department, Staff Counselor, supervisors of the staff member, and Staff Health and Wellness to address matters related to implementation of the interim protective measures.

Prevention of sexual misconduct

52. During the reporting period, the WHO policy on preventing and addressing sexual misconduct, applicable to UNAIDS, was in force. This policy acknowledges that the drivers and causes of sexual exploitation, abuse and harassment are similar, and it uses the umbrella term "sexual misconduct" to encompass all forms of prohibited sexual behaviour by UNAIDS personnel. It adopts a victim-centered approach, prohibiting all forms of sexual misconduct, including exploitation, abuse and harassment. The policy outlines reporting options, clarifies responsibilities of individuals, team leaders and the organization, and it emphasizes the rights of victims/survivors, subjects of allegations, and bystanders. Sexual misconduct by a staff member or collaborator is considered a serious offense, warranting disciplinary measures such as summary dismissal, contract termination, inclusion in screening databases and other appropriate actions.
53. Pursuant to the policy and in line with the UNAIDS recruitment policy,²⁵ the People Management Department hired a third-party company to conduct professional digital footprint checks for all external candidates. These checks assess risk categories such as sexually explicit content, violent/graphic content, potential substance abuse, illegal activities, hate and discriminatory behaviour, and extreme views. Flagged digital content is sent to the Ethics Office for advice. During this period, the Ethics Office advised on flagged content for five candidates.
54. Additionally, the People Development Department continued to implement the use of ClearCheck²⁶ to screen all candidates UNAIDS intended to offer a staff position. This background check ensures that UNAIDS does not hire individuals with a history of sexual misconduct.
55. UNAIDS continued to execute the implementing partner capacity assessment for preventing sexual exploitation, abuse and harassment at country level. This assessment is a prerequisite for entering into agreements with implementing partners. It ensures that they meet the minimum standards set out in the UN Harmonized Implementation Tool.²⁷ The Finance and Accountability team is developing an enhanced online implementing partner capacity assessment platform to replace the current paper-based tool. This new platform will strengthen oversight and management of sexual exploitation and abuse, and other risks associated with implementing partner engagement. It is expected to be rolled out in 2025.
56. The WHO policy on preventing and addressing sexual misconduct is part of the standard contractual provisions for all individuals and third parties who have any form of contractual relationship with UNAIDS. All commercial contracts contain terms and conditions on the prevention of sexual exploitation and abuse, which all vendors are required to abide by.

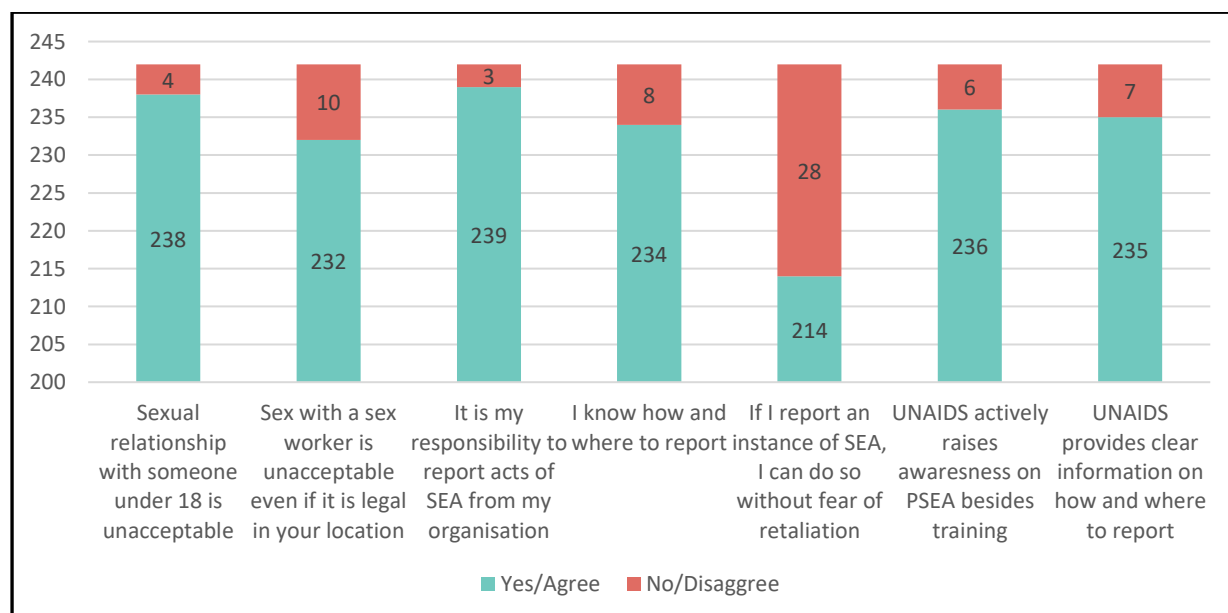
²⁵ UNAIDS recruitment policy and procedures, HRM/IN 2022-1 rev.1, 2022, at para 22.

²⁶ ClearCheck is a platform for screening candidates for past sexual exploitation and abuse or sexual misconduct before hiring them.

²⁷ United Nations implementing partner PSEA capacity assessment tool, 2020 ([UN Harmonized Implementing Tool](#)).

57. As noted in the 2024 Ethics Office report to the PCB,²⁸ a sexual exploitation, abuse and harassment country risk assessment tool was launched in early 2024 to help countries identify those risk factors and implement measures to mitigate them. The tool assesses risks in the local context and internal operating environments. Offices were provided with sample mitigation measures to help them identify appropriate actions to mitigate identified risks. Countries then included selected risk mitigation measures in their plans.
58. A UNAIDS Code of Conduct to Prevent Abusive Conduct and Sexual Misconduct at Events and Gatherings was launched during the reporting period. It is to be shared with participants at UNAIDS events and gatherings to help them to prevent misconduct, identify it if it occurs and to report it. The code defines abusive conduct and sexual misconduct, outlines the responsibilities of event organizers, and provides guidance on how to address incidents. It also highlights the Integrity Hotline as a confidential channel for reporting cases.
59. The UN Office of the Special Coordinator on Improving the UN Response to Sexual Exploitation and Abuse conducts an annual UN System-wide survey. This survey evaluates awareness of prohibitions against sexual exploitation and abuse, individuals' roles in prevention and response, the impact of training, knowledge of reporting procedures, and consequences of such behaviour, among other aspects.
60. Overall, UNAIDS staff responses in 2024 showed improvement compared to previous years, with a higher proportion of correct answers. However, as shown in Figure 3, specific areas require attention, including prohibitions on sex with sex workers and sexual relations with children (under 18 years), the obligation to report, and the need to address fears of retaliation. The Ethics Office, in collaboration with management, has developed an annual work plan to tackle these issues.

Figure 3. Selected data from the UN Office of the Special Coordinator on Improving the UN Response to Sexual Exploitation and Abuse 2024 global survey on sexual exploitation and abuse



²⁸ Note above, at para 46.

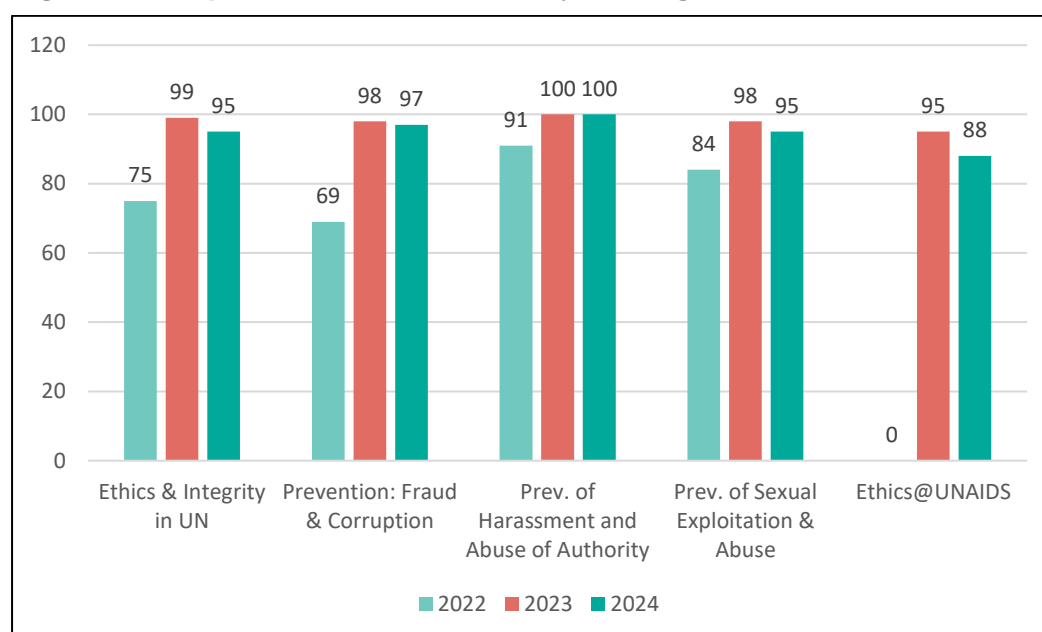
61. Subsequent to the progress so far and following the imminent downsizing, management needs to clarify and strengthen the primary responsibilities of all personnel, including managers, leaders and relevant offices, in implementing the policy on preventing and addressing sexual misconduct. This clarification should aim to ensure proactive prevention of sexual misconduct, provision of fair and timely support to victims, ensuring due process for alleged perpetrators, and protection of witnesses.

Declaration of interest programme

62. The Ethics Office administers the annual declaration of interest programme in accordance with Staff Rule 110.7.2 and WHO eManual III.1.2, as outlined in UNAIDS Information Note 3 – 2020 (PFA-FRM-IN-2020-3). The programme aims to identify and mitigate conflicts of interest arising from the outside activities and other interests of eligible staff members, their spouses and dependent children. In 2024, the declaration of interest form was sent to 372 eligible staff members and any identified potential conflicts of interest were addressed with the individuals concerned.
63. In addition, the Ethics Office, in collaboration with the Finance and Accountability team, developed a declaration of interest programme for consultants and experts. This programme ensures that consultants and experts disclose any potential conflicts of interest related to their assignments for UNAIDS. All consultants and experts engaged after the programme was rolled out completed a declaration form, which the Ethics Office reviewed prior to their recruitment being finalized. During the reporting period, the Ethics Office received and reviewed fifty-eight completed declaration forms.

Ethics training, communication and outreach

64. One of the key roles of the Ethics Office is to promote an ethical culture within the organization through ethics training, communication and outreach. These efforts aim to raise awareness of ethics-related issues among staff and personnel, familiarize them with relevant policies and procedures, and improve adherence to the organization's regulatory framework.
65. The requirement for all staff and personnel to complete mandatory training courses continued during the reporting period to ensure everyone has basic knowledge of ethics and conduct issues. The specific mandatory courses include "Ethics and integrity in the United Nations", "Prevention of fraud and corruption", "Prevention of harassment and abuse of authority", "Ethics@UNAIDS" and UN-wide prevention of sexual exploitation and abuse. Figure 4 shows that the completion rates of these mandatory training courses improved significantly from 2022 to 2023 but dipped slightly in 2024. Efforts will be made to ensure that all personnel who have not completed the courses do so.

Figure 4. Completion rates of mandatory training courses, 2022–2024

66. The Ethics Office participated in new staff orientation programmes in July, September and November 2024. The sessions briefed all staff who had joined the organization since November 2023. The programme covered UNAIDS priorities for 2023–2024, linking them to the Global AIDS Strategy and the Sustainable Development Goals, UNAIDS's value proposition and culture, and ongoing culture change initiatives. In addition, briefs from the Ethics Office and the Staff Counselor were included. The ethics component focused on the mandate of the Ethics Office, UNAIDS's ethical principles and values, expected ethical behaviours, and how to contact the Ethics Office. A flyer highlighted the oath of office and provided URL links to the Ethics Office Intranet page. Key policies were also shared with each participant after the sessions. A total of 91 new staff participated in the orientation.
67. In October 2024, the Ethics Office conducted a virtual training session during the regional cluster meeting for the Latin America and Caribbean region. The session focused on leadership by example and highlighted the qualities of ethical role models. The topic was chosen in response to the 2024 UNAIDS Global Pulse Survey, which had showed that the proportion of respondents who believed leaders in the region led by example had declined from 93% in 2022 to 67% in 2024.²⁹ The Ethics Office received positive feedback from some Country Directors after the training.
68. In May and August 2024, the Ethics Office held training sessions with the Namibia and Ghana Country Offices, respectively. Each session covered the functioning of the Ethics Office and preventing and addressing abusive conduct and sexual misconduct. Other topics included protection against retaliation, where and how to report misconduct, and where to seek help. The Ethics Office received positive feedback from the Country Directors after the training.
69. The Ethics Office will prioritize more interactive staff training to ensure that participants have better opportunities for in-depth and nuanced discussion and understanding of the application and implications of the standards of conduct and relevant policies.

²⁹ UNAIDS Global Pulse Survey 2024: Regional report – Latin America and Caribbean (RSP) key findings, p. 3.

Standard setting and policy coherence

70. The standard setting and policy coherence mandate of the Ethics Office requires that it contribute ethical considerations to standards setting in the organization so that the policies, rules and practices reflect and promote the values of the organization and are applied appropriately and consistently.
71. During the reporting period, the Ethics Office was involved in promoting policy coherence by providing advice and guidance to staff and management to ensure that the organization's policies and procedures are applied fairly and consistently. As discussed, several requests for advice on policy clarifications were received by the Ethics Office, including for the areas of procurement, publication, intellectual property and data protection.
72. UNAIDS initiated a process to develop a Gender Equality, Diversity, Equity, Inclusion and Accessibility Framework. The Framework aims to expand diversity, promote gender equality and address social, economic, racial and gender inequalities to help foster a safe and empowering environment for all staff. The Ethics Office is a member of the steering committee which drives this process under the leadership of the Director of Management. The Office made substantive contributions to the analysis of the bids, selection and briefing of the consultants working on this project. It will continue to contribute to the process by providing relevant data and reviewing and commenting on drafts submitted by the consultants.

Participation in the Ethics Multilateral Network

73. The Ethics Office engages with other agencies through the Ethics Network of Multilateral Organizations, which includes ethics offices from UN System organizations, international finance institutions and other multilateral entities. This network serves as a platform for members to share information and experiences, and to collaborate on issues of common interest and relevance to their roles. It aims to strengthen the professional capacity of ethics functions and to promote standards of practice and responsibilities among member organizations. The network hosts annual conferences and other meetings to discuss topics of mutual interest.
74. The Ethics Office participated in the 16th annual conference of the network, held at the WHO headquarters in July 2024. Key areas covered included the responsible use of Artificial Intelligence (AI), whistleblower protection and ethics in AI and other innovative technologies. Discussions also considered the importance of jurisprudence for ethics practitioners, leveraging interactive and innovative forms of training, and strategies for bringing about culture change through ethics programmes. One of the products from the conference was a draft standards of practice document, which is currently being finalized.
75. In addition to the annual conference, the Ethics Office also participated in separate quarterly meetings of the ethics offices of Geneva-based and other UN entities to discuss matters of mutual interest. The Ethics Office will continue to participate in ethics network meetings to gather insights and best practices that can be implemented in the UNAIDS context.

Implications of the restructuring of the ethics function in UNAIDS

76. UNAIDS initiated a restructuring process in 2024 in response to reduced funding. The financial situation worsened when the US Government, in February 2025, issued a notice of funding termination, resulting in an approximate 60% reduction in UNAIDS's financial resources for the year. The resulting restructuring will lead to significant downsizing, with staff numbers to be reduced from 671 in 2024 to 280. The organization's presence will be retained in 35 countries, while approximately 60 countries will be supported through a model of multi-country offices, one-person offices, and senior officers embedded within UN Resident Coordinator Offices. Additionally, some Global Centre staff will be relocated to lower-cost locations.
77. During the restructuring process, the UNAIDS is likely to experience an increase in requests for advice and guidance as staff seek clarity on their roles, rights and the overall transition. The shifting workplace dynamics may also lead to a rise in conduct-related complaints, as uncertainty and stress affect collaboration and trust among personnel. The Ethics Office will remind staff of the standards of conduct and will seek to respond promptly to any requests received during this period.
78. Based on information shared by management thus far, the Ethics Office has been preserved in the restructuring. After restructuring, UNAIDS is likely to face heightened ethical and operational risks due to its significantly reduced footprint and reworked organizational structure. In countries where only one staff member is present, oversight and peer accountability may be limited, increasing the potential for ethical lapses or misconduct. Isolated offices, particularly in high-risk settings, may also be more vulnerable to sexual exploitation and abuse. The risk of misconduct, including retaliation, going unreported may be elevated in environments where staff may feel isolated or fear consequences for speaking out. Implementing protective measures will be more challenging in smaller teams where separation of roles and responsibilities is less feasible. Additionally, financial and logistical constraints will make it harder to deliver in-person training, an essential tool for addressing nuanced ethical issues and fostering a culture of accountability and integrity.
79. In response to the anticipated increase in ethical and operational risks from the restructuring, the Ethics Office will implement a strategy focused on prevention, support, and accountability. High-risk locations will be targeted with tailored training and support, especially in the areas of prevention of sexual exploitation and abuse, abusive conduct and retaliation. Special initiatives will be aimed at reducing fear of retaliation and ensuring a culture of safe, confidential reporting. To further strengthen this approach, the use of digital tools to regularly monitor staff perceptions and identify emerging risks will be explored. The Ethics Office will collaborate closely with senior leadership, the People Management Department, the Culture Transformation and Information Technologies teams, the Staff Counsellor, the Ombudsperson and the IOS to ensure a coordinated and comprehensive approach is adopted.
80. Furthermore, the Ethics Office will contribute to a management-led process of developing and implementing an accountability framework that strengthens the primary responsibilities of all personnel, including managers, leaders and relevant offices, in implementing preventing and addressing sexual misconduct, including sexual exploitation and abuse. This process will ensure proactive prevention of sexual misconduct and the provision of fair and timely support to victims, thus ensuring due process for alleged perpetrators and protection of witnesses.

Conclusion

81. The Ethics Office has continued to foster an environment where staff members observe and perform their functions consistently with the highest standards of integrity. The Office's efforts in providing confidential advice, protecting against retaliation, preventing sexual misconduct and ensuring policy coherence have been instrumental in fostering this culture of integrity. The 2024 global PSEA survey conducted by the UN Office of the Special Coordinator on Improving the UN Response to Sexual Exploitation and Abuse showed improvements in key areas. However, additional work is needed to ensure zero tolerance for all forms of misconduct. The financial constraints and the ongoing downsizing of UNAIDS present risks that require adaptation and collaboration with other stakeholders to address.
82. Looking ahead, the Ethics Office will work closely with senior leadership and other key stakeholders to mitigate the ethical risks associated with a reduced footprint and new structure by focusing on prevention, support and accountability. The development of an accountability framework and the promotion of a safe, confidential reporting culture will be critical for ensuring that all personnel uphold the highest standards of conduct.

Proposed decision points

83. The PCB is invited to *take note* of the report of the Ethics Office.

[End of document]