

What is the Financial Disclosure Programme?

The Financial Disclosure Programme was launched by the UN in 2006 in response to requests from Member States. The programme seeks to identify and constructively manage and resolve any conflicts arising between the private interests of a staff member, such as financial holdings or outside activities, and those of the United Nations. This ensures accountable management of the assets and interests of the United Nations thereby safeguarding the public trust and enabling the UN to achieve its objectives on behalf of those it serves. By identifying and managing any possible conflicts of interest, the Financial Disclosure Programme helps to ensure that all staff members observe and perform their functions consistent with the highest standards of integrity required by the UN Charter, staff regulations and rules, and relevant guidelines and policies.

How often does disclosure take place, and who is covered?

The Financial Disclosure Programme takes place on an annual basis, covering the previous year, and is managed by the Ethics Office. Based on guidelines issued by the Ethics Office, the following categories of persons are covered by this programme:

- All staff members with a personal grade of D-1 or L-6 and above.
- All staff members who are procurement officers, or whose principal occupational duties are the procurement of goods and services for the United Nations.
- All staff members whose principal occupational duties relate to the investment of the assets of the United Nations Joint Staff Pension Fund or of any accounts for which the United Nations has a fiduciary or custodial responsibility.
- Other staff members whose direct access to confidential procurement or investment information warrants the filing of a financial disclosure statement (including for example staff members serving on Headquarters or Local Contracts Committees).
- Staff of the Ethics Office.

* All managers concerned are requested to report to the Ethics Office with the list of eligible staff under their supervision by end January.

Why do only certain staff disclose?

Staff managing UNHCR's resources and funds are required to participate in the programme. However, the values and principles underlying the programme are relevant to *all* staff. Any staff member with concerns or questions can contact the Ethics Office in confidence for advice.

The Financial Disclosure Programme asks certain questions about spouses and dependent children so as to ensure no actual or perceived conflict of interest occurs. The objective is to ensure the credibility of the UN through avoidance of any favouritism, perception of personal gain, or inadvertent conflict which could undermine the ability of the UN or of UNHCR to effectively deliver its mandate.

When and How Should I File?

You will receive a message from the Ethics Office in March of each year if you are required to file. If you fit one of the categories listed above and have not received a message, you should contact the Ethics Office. The deadline for filing is March 31 (in respect of the previous year). If you are appointed to a level or position that requires filing, you must submit a statement in respect of the immediately preceding 12-month period. An integrated on-line filing system is used for staff to complete their disclosure forms.

What information should I report?

In addition to declaring financial holdings and supplements exceeding certain thresholds, you are also required to report your personal leadership and policymaking roles in non-UN entities as well as any relatives employed in the UN system.

What happens after I submit?

After you submit your statement:

- ✓ Forms are confidentially reviewed and assessed under program objectives
- ✓ The review is conducted by external financial experts to safeguard privacy
- ✓ You may be contacted by the financial experts for further information
- ✓ Should a conflict be identified proposals will be made to resolve it (e.g., divest of holdings, places assets in a blind or diversified qualified trust, recusal from specific matters, etc.)
- ✓ Your annual statement will be closed if no further action is required.

NOTE: *Always* contact the UNHCR Ethics Office if you have any concerns about the process, the advice provided, or action proposed.

How is my confidentiality ensured?

- Forms are confidential. They are used for the purposes of the financial disclosure programme as prescribed, to identify, resolve and give advice on conflicts of interest.
- Financial expert teams undergo security background checks and sign non-disclosure agreement.
- Forms may also be used in authorized investigations when questions of misconduct or corruption arise.

What issues can you advise on?

The Ethics Office can assist you with questions concerning:

- Gifts and Hospitality
- Personal investments and assets
- Outside positions and activities
- Use of UN assets
- Post employment activities
- Business dealings with an agency where a relative or personal contact works
- Standards of Conduct, CoC, and guiding values and principles.

Key References

- UNHCR IOM/FOM 40/42, June 2008, Ethics Office – Terms of Reference
- UNHCR IOM/FOM 43/43 2006.
- ST/SGB/2006/6 Financial Disclosure and Declaration of Interest Statements

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THE UNHCR ETHICS OFFICE

A Guide to UNHCR's
Financial Disclosure Programme



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UNHCR Ethics Office

CONFIDENTIALITY

*The Ethics Office maintains
Confidentiality as set forth in its
Terms of Reference.*