

Management Response

Evaluation Title	Initial Evaluation of the Framework of Engagement with Non-State Actors (FENSA)
Commissioning Unit	DGO/EVL
Link to the evaluation	https://www.who.int/docs/default-source/documents/about-us/evaluation/fensa-report-final.pdf?sfvrsn=c62a32c5_8
Evaluation Plan	Organization-wide Evaluation Workplan for 2018-2019
Unit Responsible for providing the management response	DGO with CRE/DAN as facilitator
<p>Overall Management Response: WHO welcomes and accepts the recommendations of the evaluation.</p> <p>As requested by Member States when adopting the Framework of Engagement with non-State actors (FENSA) in 2016, an initial evaluation of its implementation was conducted in 2019, following the two-year timeframe set for full operationalization. The recommendations presented in the initial evaluation were accepted by Member States at PBAC31 (EB146/3) and EB146 (146/38 Add.2).</p> <p>When introducing the report on the evaluation and report on FENSA implementation to Governing Bodies, the Secretariat informed PBAC/EB that a full management response would be made available following consultation across the three levels of the Organization. While many ambitious goals have been achieved since its adoption in 2016, enabling actions highlighted by the evaluation are critical to ensure full implementation of FENSA in an aligned, coordinated, and systematic manner to maximize the value added from non-State actor engagement across the Organization.</p> <p>To facilitate implementation of the recommendations, the Office of Compliance, Risk Management and Ethics, Due Diligence and Non-State Actors Unit (CRE/DAN) developed four overarching action areas that underpin a more detailed set of actions that respond to the six recommendations contained in the evaluation and are contained in this management response: a) Ensure recommendations are implemented across the Organization in an aligned, integrated, coordinated, and systematic manner; b) Re-establish the FENSA Proposal Review Committee; c) Improve and increase communication; and d) Strengthen capacity and establish better learning mechanisms. The External Relations Division is developing an engagement strategy with non-State actors that responds to Recommendation 6.</p> <p>Particular attention is given to ensuring communication for and capacity strengthening of Country Offices, Regional Offices and HQ units to enhance understanding and implementation of FENSA. Organization-wide planning will need to assess required financial and human resources across the Organization, as well as means to forge stronger links of FENSA with technical teams to make it an integral part of implementation, delivering and partnering.</p>	
First Management Response Status:	In progress
First Management Response Date: December 2020	Updated Management Response Date: 10 May 2022
Overall update on the actions taken since December 2020	

Recommendations and Action Plan

<p>Recommendation 1: There is a clear, expressed and urgent need to substantially increase communication both internally and externally. Communication should be coordinated and multi-channel to ensure coverage with consistent messaging in order to demystify the FENSA and reduce or remove persistent “myths”, supported by effective signposting to existing materials and sources of further information. In order to raise awareness of the FENSA and sensitize staff to the practicalities of its implementation, with the aim of improving buy-in and preparing the groundwork for consistent application, WHO should:</p> <ul style="list-style-type: none"> • develop a light-touch plan to enhance communication of the FENSA; • ensure that communication is tailored and adopted to key audiences, for example, technical officers; <p>conduct a coordinated series of outreach activities, such as roadshows; townhall meetings; brown bag lunches or lunch-and-learn sessions; and familiarization with the FENSA as part of the new-staff induction process.</p>					
Management response	Accepted				
Status	<i>Implemented</i>				
Key actions	Responsible	Timeline	Status	Comments	Overall update on the actions taken since December 2020
Plan for communicating about the Framework of engagement with non-State actors internally in WHO, differentially targeted to key WHO staff audiences	CRE/DAN	October 2020	<i>Implemented</i>	A communication and strategy plan has been developed with the specific objectives to: demystify FENSA and promote it as an enabler for better, transparent and successful engagement between WHO and non-State actors; create awareness on FENSA within audiences internal and external to WHO; familiarize, sensitize and strengthen understanding of WHO staff on FENSA at <u>the three levels of the Organization</u> ; create new practical tools that are user-friendly to drive behavioral change in implementing FENSA; initiate learning exchange, facilitated by the FENSA Focal Points network, by capturing innovative practices and applications of FENSA; and maintain coherent information sharing, harvest feedback and disseminate success stories on FENSA’s implementation.	No update required
Communication material development tailored to audience and targeting different aspects of the Framework	CRE/DAN FENSA Focal Points Regional Offices DGO/CSS DCO	December 2021	<i>implemented</i>	With the aim of improving buy-in and preparing the groundwork for consistent application, the communication and strategy plan present audience-tailored messages, tools, and products required to increase uptake and institutionalize FENSA. These would be tailored and adapted to key audiences across the Organization and coordinated through multiple channels.	In line with the well-defined communications plan, a series of products, tools and tailored communication outcomes and messages have been developed and disseminated on a range of subjects including: secondment, official relations, emergencies, joint publications, human resources,

					financial resources, participation in meetings, and WHO's visual identity. The aim is to improve organizational awareness, buy-in, and capacity to ensure the consistent application of the Framework. This work is shared through different channels including the Secretariat's updated Intranet page and, more widely, through Intranet articles aimed at staff at all three levels of the Organization.
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Recommendation 2: There is a clear, expressed and urgent need to support capacity-building to strengthen the consistent application of the FENSA rules and procedures. Actioning the following points will help further mainstream and “stabilize” the application of the FENSA:

- A fully-costed training plan and delivery schedule should be developed, with human and financial resources made available to support preparation and delivery. Training should be informed by analysis of training needs and the identification of a hierarchy of priority recipients, in order to ensure that sufficient numbers of staff across the Organization have a shared understanding and common interpretation (critical mass). Training should be coordinated, with effective mechanisms for monitoring quality. In this vein, it will be necessary to ensure that training evolves iteratively, based on feedback and experience from participants. A training-of-trainers approach should also be considered and workshops for heads of WHO country offices and training materials for e-learning should be included.
- Updates of guides, guidances and handbooks should be undertaken to ensure that meaningful and up-to-date guidance is provided. Periodic reviews and updates should then be established and undertaken to ensure ongoing relevance and applicability. Guides and handbooks should be available in all the official languages of WHO. Feedback on guides and handbooks should periodically be sought to ensure that assets remain fit-for-purpose and are improved based on user experience (for example, enhancing the clarity of criteria to route engagements through the simplified or standardized procedural track).
- Clarity on simplified procedures should be made more widely available to ensure a common understanding of what may be classified as simplified and what may not.
- Electronic workflows and the full establishment of the Register of non-State actors, in line with paragraph 38 of the FENSA, should be expedited to allow effective documentation and coordination of engagements with all non-State actors and facilitate knowledge management by supporting the retrieval of reference material for staff. Mechanisms for maintaining the Register of non-State actors need to be established. Electronic workflows are needed to support effective implementation of the FENSA, aligning the FENSA and its systems with the transformation agenda. Data provided by non-State actors on the Register should be routinely reviewed and updated.¹ Procedures for granting accreditation should be universally established.

¹ Ensuring that paragraphs 39–41 of the FENSA are enacted and that self-reported data is monitored.

Management response	<p>Accepted</p> <p>In order to proceed promptly with implementing recommendations including the current, CRE/DAN has developed a project plan guided by WHO's Project Management Centre of Excellence (PMCoE) that includes costing and financial elements required for the implementation of recommendations. The roadmap/implementation plan delineates two major pillars: Improving and increasing communication and strengthening capacity and establishing better learning mechanisms.</p>				
Status	<i>In progress</i>				
Key actions	Responsible	Timeline	Status	Comments	Overall update on the actions taken since December 2020
Costed capacity reinforcement and training plan targeted to key WHO staff audiences on FENSA	CRE/DAN	October 2020	<i>Implemented</i>	A costed training plan has been also elaborated and proposes audience-tailored training modules to build capacity on FENSA implementation and its relevant procedures <u>at the three levels of the Organization</u> and recommends concrete actions on how to use FENSA as an enabler policy guiding the Organization's engagement with non-State actors. The specific objectives of the training plan are to: familiarize, sensitize and strengthen the understanding of WHO staff on FENSA; build capacity and needed technical skills of WHO staff to fully and coherently implement FENSA procedures across the three levels of the Organization; create awareness on FENSA workflows, implementation tools and key mechanisms; and establish WHO staff specific and shared roles and responsibilities in placing FENSA as an overarching WHO policy for engagements with non-State actors. The plan incorporates lessons and needs articulation from the three levels of the Organisation.	No update required
Development of learning modules, including decision trees, checklists and best practices.	CRE/DAN FENSA Focal Points Regional Offices	December 2021	<i>Implemented</i>	New training modules on different aspects of the Framework and procedures are currently under development, including use of decision-trees and checklists. The modules take into consideration the needs and interest of different technical units across the three levels of the Organization, with the goal of developing a common understanding of the Framework as an enabling policy and sharing best practices and practical information on its use.	To strengthen common understanding of the Framework and facilitate learning across the Organization, the initiative "Demystifying FENSA" was launched together with several activities that included capacity-building, development and dissemination of communication

					products, as well as tools such as templates and checklists.
Update, translation and wide dissemination of guidance documents, eManual sections, and handbooks	CRE/DAN FENSA Focal Points Regional Offices	December 2021	<i>In progress</i>	In order to expand access to different guidance documents including but not limited to Guide for Staff, Handbook for non-States actors and eManual Sections, CRE/DAN has initiated the update of the documents and would pursue relevant consultations on this matter , after which translations as appropriate will be pursued and dissemination facilitated through different channels.	
Develop electronic workflows using in-house mechanisms, and enhance functionality of the Register of non-State actors	CRE/DAN EXT FENSA Focal Points Regional Offices	December 2022	<i>implemented</i>	Features of WHO Register of non-State actors are regularly assessed and refined including enhancing its usability. This process requires major efforts and sufficient financial resources. An electronic workflow system would facilitate the process and ensure swift communication between non-State actors in official relations and relevant department involved. Alignment with the new system set for resource mobilization has been considered to ensure a sustained and corporate approach at the three levels of the Organization.	To strengthen the data environment by establishing a systematic monitoring and tracking mechanism, the features of the WHO Register of non-State actors have been enhanced and a new mechanism to report and track donations to WHO has been established.

Recommendation 3: There are several existing mechanisms that need further strengthening or revitalizing, including:

- Active and routine engagement with FENSA focal points in regions and technical units is needed. The management, coordination and support of this important network and community of practice will ensure that a critical mass of FENSA focal points is maintained, mitigating turnover and rotation challenges. Developing this network will provide enhanced understanding of FENSA's application to be accessed closer to the point of need (region, country or technical unit) and allow the dissemination and sharing of good practices and innovative approaches to FENSA's application across the three levels of the Organization.
 - Reactivation is warranted of the FENSA Steering Committee, including overall senior management sponsorship for continued implementation as an oversight body to continue to monitor progress, as well as reactivation of the FENSA Proposal Review Committee. These bodies have been underutilized to date and offer a useful support mechanism to the specialized unit.
 - A redefinition and clarification of the role and responsibilities of the specialized unit responsible for performing standard due diligence and risk assessment is needed to protect it from routine due diligence and risk assessment, which lead to systemic overload. The focus should be redirected, inter alia, to:
 - the conduct of in-depth due diligence and risk assessment on high-risk and complicated engagements that may give rise to conflict of interest or acceptance of significant resources from non-State actors;
 - the provision of increasingly specialized knowledge for exceptional cases ("navigating the grey areas"), based on extensive institutional memory;
- the proactive support and maintenance of guides, handbooks, guidances, training, the FENSA focal point network and the Register of non-State actors.

Management response	Accepted (with exception of the Steering Committee). Senior management sponsorship for continued implementation would be exercised through the FENSA Proposal Review Committee and as per the terms of the Framework the Secretariat will continue to update the Independent Expert Oversight Advisory Committee on the implementation phases of the recommendations.				
Status	<i>Implemented</i>				
Key actions	Responsible	Timeline	Status	Comments	Overall update on the actions taken since December 2020
Reconfirmation and reactivation of FENSA Focal points network across all levels of the Organization; update ToRs; reconfirm/appoint new Focal Points	CRE/DAN FENSA Focal Points Assistant Director-General (ADG- Head of a Division) Regional Offices	July 2021	<i>Implemented</i>	In response to the recommendation and in view of enhancing access to specialized knowledge and apply expert technical advice, the network of FENSA Focal Points has been reconfirmed. The configuration is that each Regional Director and Assistant Director-General (ADG-Head of a Division) reconfirms or appoints two staff members that would coordinate and define the internal approval stages in accordance with the delegation of authority. The Terms of Reference for FENSA Focal Points have been approved and the new provisions align with WHO's transformation agenda and the evaluation recommendations. The FENSA Focal Points' role is, inter alia, to support the management of the region/cluster in the strategic promotion of engagement with non-State actors; support their respective departments and units with the elaboration of clear engagement proposals facilitating an efficient due diligence and risk assessment; to conduct due diligence and risk assessment and decide if an engagement referred by the technical unit qualifies for the standard due diligence and risk assessment. The Focal Point represents also the Regional Office/Division in the FENSA focal point network.	With a view to enhancing access to specialized knowledge and applying expert technical advice, the Secretariat has reconfirmed the network of FENSA Focal Points appointed by each Regional Director and Assistant Director-General.
Alignment of roles and responsibilities for implementing core components of FENSA due diligence	CRE/DAN FENSA Focal Points Assistant Director-General	July 2021	<i>Implemented</i>	The reactivation of FENSA Focal point would ensure a corporate and streamlined approach for the mitigation of potential risks, facilitate learning exchange, dissemination of good practices, and innovative approaches across three levels to break silos. It will also enable communities of practice to enhance	As per the Framework and the terms of reference, FENSA Focal Points conduct simplified due diligence and risk assessments to facilitate engagement with non-State actors and coordinate the internal approval stages in accordance with their delegation of

	(ADG- Head of a Division) Regional Offices			<p>understanding of FENSA's application closer to the point of need (region, country, technical unit).</p> <p>The reactivation of FENSA Focal Points would also facilitate the response to the recommendations calling for a redefinition and clarification of the role and responsibilities of the specialized unit responsible for performing standard due diligence and risk assessment. While the focus of the Unit would be redirected, FENSA focal points would be enabled and have the necessary guidance and support to process engagements with non-State actors in a proactive and accountable manner.</p>	<p>authority. The reactivation of the FENSA Focal Point network ensures a corporate, streamlined approach to mitigate potential risks and facilitate learning across the Organization. Dedicated platforms have been established and rolled out for FENSA Focal Points to share knowledge, best practices, innovative approaches and background documents on non-State actors to support focal points in conducting simplified due diligence and risk assessments. The platform aims to foster the development of communities of practice to enhance understanding of the Framework's application.</p>
Reactivate FENSA Proposal Review Committee (FPRC), including revision of TORs and its operationalization	DDG ODG EXT BOS LEG Regional offices CRE/DAN	December 2020	<i>Implemented</i>	<p>The FENSA Proposal Review Committee has been reestablished as a body to resolve disagreements or incongruences with recommendations on proposed engagements. The Committee identifies also innovative applications of FENSA to enhance learning and support the FENSA Focal Points network.</p> <p>The reactivation of the FENSA Proposal Review Committee is of key importance. The Committee serves as an arbitration body and enable high-level functions confirming the strong steer from senior leadership. The FENSA Proposal Review Committee (FPRC) was originally established in response to FENSA paragraph 35 that called for "a dedicated secretariat mechanism reviews proposal of engagement referred to it and recommends engagement, continuation of engagement, engagement with measures to mitigate risks, non-engagement or disengagement from an existing or planned engagement with non-State actors".</p> <p>In line with the WHO's transformation agenda, the original terms of references of the Committee have been revised. These include as per the initial version :</p>	No update required

				reviewing proposals for engagement considered to have a potentially significant associated risk or require specific, senior level consideration; review proposals for engagement that illustrate specific aspects of engagement and require a consistent interpretation of existing policies; reviewing proposals for engagement requiring arbitration or where there is a difference of opinion between the proposing unit and the assessing unit; addressing questions on the interpretation and application of FENSA provisions; and making recommendations to the Director-General on the way forward concerning the above-mentioned proposals of engagement.	
Periodic reporting to IEOAC and Executive Board	CRE/DAN DGO	Ongoing	<i>Implemented</i>	The Secretariat continues to update the Independent Expert Oversight Advisory Committee on the implementation phases of the recommendations as well as the Executive Board through annual reports. The FENSA Proposal Review Committee, per its terms of reference, ensures senior management sponsorship for and internal oversight of continued implementation.	No update required

Recommendation 4: There is a need to establish an effective monitoring mechanism, at different levels of implementation, in order to ensure both accountability and ongoing learning and improvement. This includes the following:

- Systematic documentation and tracking of all engagements with non-State actors across the three levels of the Organization, where the Register of non-State actors or electronic workflows do not presently allow this. This would include consistent tracking of the due diligence and risk assessments undertaken.
- Routine spot checks to ensure consistency of application (quality assurance).
- Establishment of a monitoring and evaluation mechanism to capture lesson-learning and ascertain whether intended benefits and results are achieved.

Continued annual reporting to the Executive Board on engagement with non-State actors, including tracking of secondees. Routine reporting to Regional Committees is also advised.

Management response	Accepted				
Status	<i>Implemented</i>				
Key actions	Responsible	Timeline	Status	Comments	Overall update on the actions taken since December 2020
Develop internal mechanism for FENSA Focal Points facilitating monitoring and learning across the Organization.	CRE/DAN FENSA Focal Points	November 2020	<i>Implemented</i>	In order to maintain both accountability and ongoing learning and improvement on FENSA, a SharePoint site has been established for FENSA focal points. This would serve as an effective monitoring mechanism, facilitate the systematic documentation and tracking of engagements with non-State actors across the three levels of the Organization, where the Register of non-State actors or electronic workflows do not presently allow this.	No update required
Continued annual reporting to the Executive Board on engagement with non-State actors	CRE/DAN	November 2020	<i>Implemented</i>	In May 2016, the Sixty-ninth World Health Assembly adopted resolution WHA69.10 on the Framework of Engagement with Non-State Actors, in which the Director-General was requested, inter alia, to report on the implementation of the Framework to the Executive Board at each of its January sessions under a standing agenda item, through the Programme, Budget and Administration Committee.	No update required
Recording of secondments from non-State actors	CRE/DAN BOS	November 2020	<i>Implemented</i>	In line with resolution WHA69.10 and the report on the initial evaluation of the Framework, enhancements to the WHO Register of non-State actors continue to be introduced in a phased manner to facilitate the efficiency and transparency of engagements with non-State actors in official relations. Enhancements made in the year 2020 include the establishment of a new section in the Register displaying “secondments from non-State actors”. The section will serve as recording mechanism of secondments from non-State actors and is publicly accessible https://publicspace.who.int/sites/GEM/default.aspx#	No update required

Recommendation 5: The lack of lesson-learning and knowledge exchange was identified through the evaluation. Based on an improved data environment and linked to enhanced communication activity, enhancing learning could include:

- Learning exchange, facilitated by the FENSA focal points network to support the replication of good practice and exploit opportunities for learning by harvesting pockets of good practices and innovation to break silos. Currently learning exchange is based on institutional memory rather than systematic capture and dissemination, which leaves learning processes vulnerable to the impact of turnover and rotation. A learning mechanism/platform is needed to share exemplars.
- Identification, capture and dissemination of unique/innovative applications of the FENSA, on a precedent/case study basis (using the FENSA Proposal Review Committee).

Annual synthesis circulated to all staff (as part of communication strategy) to show the learning from, and benefits of, the FENSA: sharing successes of engagement while protecting WHO and supporting global public health.

Management response	Accepted				
Status	<i>Implemented</i>				
Key actions	Responsible	Timeline	Status	Comments	Overall update on the actions taken since December 2020
Improving and increasing communication	CRE/DAN FENSA Focal Points Regional Offices DCO	December 2021	<i>Implemented</i>	In order to raise awareness on the Framework and sensitize staff including FENSA focal points on the benefits and practicalities of its processes, with the aim of improving buy-in and preparing the groundwork for consistent application, it is proposed to develop a light-touch communication plan. The plan has been grounded in change management and present audience-tailored messages, tools, and products required to increase uptake and institutionalize FENSA. These are tailored and adapted to key audiences across the Organization and coordinated through multiple channels to ensure coverage and consistency in order to demystify FENSA. A series of outreach activities, such as policy briefs, virtual meetings, workshops and familiarization with the FENSA as part of the new-staff induction process would be also considered.	Series of products, tools and tailored communication outcomes and messages have been developed and disseminated across the Organisation on a range of subjects including: when to apply FENSA, secondment, official relations, emergencies, joint publications, human resources, financial resources, participation in meetings, co-sponsorship and co-organization of meetings; FENSA and other policies, FENSA and WHO collaborating centers, and WHO's visual identity. The aim is to improve organizational awareness, buy-in, and capacity to ensure the consistent application of the Framework. This work is shared through the Secretariat's updated Intranet pages and other channels aimed at staff at all three levels of the Organization.

Develop a learning exchange approach to document best practices, and to monitor and synthesize lessons and learning for FENSA across the three levels of the Organization.	CRE/DAN FENSA Focal Points Regional Offices	December 2021	<i>Implemented</i>	<p>The Evaluation report highlighted the need to capture and dissemination of unique/innovative applications of the FENSA, and support capacity-building to strengthen the consistent application of FENSA rules and procedures. Actioning those recommendations are completed through well-defined learning and training plans. Trainings are informed by needs analysis and the identification of priority recipients, before reaching out to a wider audience and ensuring that all staff across the Organization have a shared understanding and common interpretation on implementing FENSA (critical mass). A training-of-trainers approach is considered and workshops for heads of WHO country offices and training materials for e-learning are to be developed and included.</p> <p>Updates of guides, WHO eManual sections, and handbooks are carried out to ensure that meaningful and up-to-date guidance is provided at the three levels of the Organization and made available through relevant internal channels, as appropriate.</p>	Through its internal initiative “Demystifying FENSA”, the Secretariat conducted series of briefings and training sessions at the three levels of the Organisation to strengthen common understanding of the Framework as an enabling policy, enhance use of mechanisms to implement the Framework and facilitated the sharing of best practices and practical information across the Organization.
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Recommendation 6: Recognizing the increasing prominence of partnerships, which is explicit in the Thirteenth General Programme of Work, 2019–2023, and the Sustainable Development Goals, there is a need to clearly articulate an overall engagement strategy that sets out the objectives for WHO’s engagement with non-State actors and specific, concrete actions and associated resourcing and communication plans to be undertaken in a phased way. This would ensure that the FENSA is appropriately situated and calibrated as a framework within the wider approach of the Organization to engagement. Furthermore, the strategy should:

- allow senior management to amplify the Organization’s maturing position on engagements between WHO and non-State actors;
- sharpen congruence between what is espoused and what is enacted; and ensure that staff have an equally constructive yet risk-aware approach towards engagement by encouraging them to seek engagements with non-State actors while preserving WHO’s reputation and mandate;
- be relevant and applicable across the three levels of the Organization, with such relevance and applicability being defined through participation and consultation;
- include the designation of a senior-level steward to oversee implementation of the FENSA, who will ensure the application of rigorous project management principles and practices.

Management response	Accepted				
Status	<i>In progress</i>				
Key actions	Responsible	Timeline	Status	Comments	Overall update on the actions taken since December 2020
Develop a corporate WHO engagement strategy with non-State actors, including specific strategies for nongovernmental organizations and for private sector entities.	EXT/HMP Regional offices	End Q2 2022	<i>In progress</i>	<p>The strategy would also serve as an instrument to encourage engagements with non-State actors in advancing global health and WHO's priorities as articulated in the WHO's General Programme of Work and its Programme Budget.</p> <p>The engagement strategy aims to establish clear organizational objectives of engagement with non-State actors, define indicators to measure progress towards these objectives, promote organizational coherence in working with non-State actors, and embed regional and cluster-specific strategies.</p> <p>Consultations with technical units and with the three levels of the Organisation on the draft strategy will allow sensitization of staff to a more proactive engagement approach in line with both WHO's General Programme of Work and FENSA.</p>	<p>A draft overarching engagement strategy has been consulted with regions and technical units and a survey with all budget centers gathered information on current pattern of engagement and needs strategically improve engagement. Based on this feedback an overarching strategy and specific engagement strategies for NGOs, for private sector and for parliament engagement are being finalized.</p>