

Thank you for sharing the WHO's draft conflicts of interest in nutrition programmes materials. While we presume that WHO's Office of Compliance, Risk Management and Ethics has reviewed the documents, the UNDP Ethics Office nonetheless has a few comments to the following sections of the "Proposed Decision-Making Process and Tool":

1. (a) Preventive Measures: Disclosure of interests that may affect the capacity of public officials to serve independently (page 1)

The 'disclosure of interests' within the UN and many other public service entities often involves two distinct yet complementing elements. Specifically, and by way of example, under the UN's Staff Regulations and Rules all UN staff members have a proactive obligation to disclose any potential conflict of interest situation in which they find themselves so that the conflict may be mitigated by, and resolved in favour of, the Organization (UN Staff Regulation 1.2(m)). In addition to this, senior UN officials and individuals with significant financial and/or procurement responsibilities are required to file annual financial disclosure statements (specifying financial holdings, interests and external affiliations) in respect of themselves, their spouses and their dependent children. You may accordingly wish to expand your 'disclosure of interests' measure so as to specify that it can include both ongoing proactive disclosure obligations on the part of all officials, as well as more structured and periodic financial disclosure programmes applicable to specific categories of personnel.




Task 1: Perform a background check and assess the external actor's profile against the exclusionary criteria (page 6)

It may be worth noting - without naming specific on-line services - that is also possible to access third party due diligence databases when conducting internet-based background reviews of prospective vendors/partners (some of these services are at no cost, such as Ethixbase).

Annex: Example of "Questionnaire for non-State Institutions and individuals for disclosure of information" For non-State individuals (page 32)

While the questionnaire for non-State Institutions seeks information on 'engagement with the national authority', the non-State individuals questionnaire only requires information pertaining to 'remuneration from a non-State institution or individual.' For the purpose of full disclosure and to facilitate background checks with relevant government authorities in the event of prior government interaction, the non-State individuals questionnaire should also require information on 'engagement with the national authority'. To enable comprehensive conflict of interest vetting, the non-State individuals questionnaire should additionally ask if the individual has any immediate family member or relative who is employed by the 'national authority' as a staff member or is an elected or appointed government official (other questions in the questionnaire such as that dealing with 'Investments' could additionally be extended to "or any immediate family member or relative" to ensure more comprehensive Col vetting).

Best regards,

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