



Conduct and Discipline Annual Report

1 January- 31 December 2024

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I. Introduction

1. Since 2020 UNEP has reported on conduct and discipline issues and provided information on the number of reports of unsatisfactory conduct involving UNEP personnel, its implementing partners, and vendors. UNEP has also reported on the results/outcome of these reports. The current report covers the period from 1 January to 31 December 2024.
2. The purpose of the annual Conduct and Discipline report is to provide:
 - a. information on the UN policy and legal framework on conduct and discipline;
 - b. an overview of the process which needs to be followed when reports of possible unsatisfactory conduct/prohibited conduct on possible unsatisfactory conduct are raised;
 - c. information on the actions taken by UNEP to prevent and address unsatisfactory conduct and to improve the work culture;
 - d. statistics on the completion of mandatory trainings and reports of unsatisfactory conduct against staff members and other personnel or entities, including implementing partners and vendors; and,
 - e. information on informal reports addressed by the Conduct and Discipline Focal Points.

II. Glossary of terms

Terms	Meaning
Unsatisfactory conduct	Any conduct that is in violation of the obligations of staff members of the United Nations.
Prohibited conduct	Four conducts covered by ST/AI/2019/8 i.e., harassment, including sexual harassment, discrimination, and abuse of authority.
Responsible official	In the case of UNEP, the Executive Director
Affected individual	Person in the workplace or in connection with work towards whom unsatisfactory conduct is directed.
Offender/alleged offender	Person who engages in unsatisfactory/prohibited conduct.
Preliminary assessment	The process of review and analysis by the responsible official or OIOS of information about unsatisfactory conduct to determine whether there are sufficient grounds to initiate an investigation.
Investigation	Process of gathering information to establish facts to allow for a determination as to whether a staff member engaged in suspected unsatisfactory conduct.
Disciplinary process	The process of review of the investigation report by the Assistant Secretary-General, Office of Human Resources (ASG/OHR) to determine whether a disciplinary process should be initiated.
Conduct and Discipline Focal Point	Staff member designated by the responsible official to provide advice and support on matters related to conduct and discipline.
Managerial action	Actions taken by management that are non-disciplinary in nature aimed at improving the work environment e.g., oral and written caution, warning or advisory communication, coaching, referral of staff member to the staff counsellor.
Administrative action	Actions taken by the responsible official that are non-disciplinary in nature e.g., oral or written reprimand, reassignment/or change of duties.

III. Policy and legal framework on Conduct and Discipline

3. The main UN and UNEP policies that are applicable to Conduct and Discipline are as follows:
 - a. UN Staff Regulations and UN Staff Rules (ST/SGB/2018/1/Rev.1)
 - b. Unsatisfactory conduct, investigation and the disciplinary process (ST/AI/2017/1)
 - c. Protection against retaliation for reporting misconduct and for cooperating with duly authorized audits or investigations (ST/SGB/2017/2/Rev.1)
 - d. Addressing discrimination, harassment, including sexual harassment, and abuse of authority (ST/SGB/2019/8)
 - e. Special measures for protection from sexual exploitation and sexual abuse (ST/SGB/2003/13)
 - f. Outside activities (ST/AI/2000/13)
 - g. Outside activities (ST/IC/2006/30)
 - h. Anti-Fraud and Anti-Corruption Framework of the United Nations Secretariat (ST/IC/2016/25)
 - i. UNEP Statement on Protection from Sexual Exploitation and Abuse and Response to Sexual Harassment for UNEP Personnel (2022)
 - j. UNEP Statement on Protection from Sexual Exploitation and Abuse for Implementing Partners (2022) UNEP Anti-Fraud and Anti-Corruption Guidelines (2020)

IV. Summary of the process for addressing unsatisfactory conduct

4. All reports of unsatisfactory conduct/prohibited conduct are submitted to the Investigation Division of the Office of Internal Oversight Services (“OIOS/ID”) or to the Executive Director, UNEP (“UNEP ED”), with a copy to OIOS. Reports may also be submitted to the line manager or the Conduct and Discipline Focal Point (“CDFP”)¹, which are in turn transmitted to the UNEP-ED as the Responsible Official by the CDFP and/or to OIOS.²
5. OIOS/ID retains the ultimate authority to review all reports of possible unsatisfactory conduct/prohibited conduct. Accordingly, OIOS/ID will review and determine whether to investigate the report or refer it to UNEP to take appropriate action.
6. On receipt of a referral from OIOS, UNEP conducts a preliminary assessment. Upon conclusion of the preliminary assessment, UNEP may take the following appropriate action(s):
 - a. Initiate an investigation of all or part of the matters raised in the information about unsatisfactory conduct;
 - b. Decide that an informal resolution process would be more appropriate in the circumstances;
 - c. If UNEP decides not to initiate an investigation, it will either close the matter without further action or take:
 - i. interim administrative action;
 - ii. managerial action;
 - iii. any other appropriate action.

a. Preliminary assessments and investigations by OIOS/ID

¹ The CDFPs were designated by the Executive Director in 2019 pursuant to Section 1.16 of ST/SGB/2019/8 to provide advice and support on matters relating to conduct and discipline. The CDFPs advise the ED regarding the ED’s obligations under the Secretary-General Bulletin (Section 3.4).

² The CDFP in UNEP is the Head of Legal Unit, Corporate Services Division.

7. Upon receipt of a report of unsatisfactory conduct, OIOS/ID logs the report and assigns it an OIOS/ID number. An initial assessment is conducted to determine whether the complaint should be investigated by OIOS/ID, or refer the matter to the UNEP ED.
8. If OIOS decides to investigate the report of possible unsatisfactory conduct, the investigation is conducted in accordance with the OIOS Investigations Manual. Upon conclusion of the investigation, should the facts establish that the staff member engaged in unsatisfactory conduct, OIOS/ID will transmit an investigation report, accompanied with supporting documentation, to the ASG/OHR. Should OIOS/ID conclude that there is no factual basis that the staff member engaged in unsatisfactory conduct, a closure notice shall be provided to the UNEP ED, and the staff member will be informed that the investigation has been closed.
9. Should OIOS/ID determine that the matter is better handled by UNEP-ED, OIOS/ID will refer the matter to the UNEP ED, who will conduct a preliminary assessment to determine whether an investigation should be initiated.

b. Preliminary assessments and investigations by UNEP

10. Upon receipt of a referral from OIOS/ID, UNEP conducts a preliminary assessment to determine whether an investigation should be initiated.³ This assessment is not a formal investigation process and normally, the UNEP ED will request staff members, from the Legal Unit, Corporate Services Division to conduct it. Following the preliminary assessment, one of three recommendations will be made: (a) close the case; (b) take administrative or managerial action(s); or (c) initiate an investigation. The UNEP ED makes the final decision on the next course of action.
11. If the UNEP ED decides to initiate an investigation, he/she will appoint a fact-finding panel. The fact-finding panel is composed of at least two individuals who have been trained and rostered by UN-OHR in conducting workplace investigations.
12. The Department of Management Strategy, Policy and Compliance (DMSPC) keeps the roster of the trained individuals. These individuals, consisting of both current and former staff members, may serve as fact-finding panel members for any UN entity in the UN Secretariat. There are currently nine trained and rostered fact-finding panel members in UNEP.
13. Upon conclusion of the fact-finding investigation, the panel will prepare a report for the UNEP ED that captures the findings and attaches all supporting documentation.
14. After reviewing the report, the UNEP ED will determine whether there is a factual basis that the staff member engaged in unsatisfactory conduct, and if so, if it amounts to misconduct. If there is insufficient evidence that a staff member engaged in unsatisfactory conduct, the UNEP ED takes no further action and informs the staff member accordingly. If there is sufficient evidence that a staff member engaged in unsatisfactory conduct, the UNEP ED has two options:
 - If the unsatisfactory conduct does not amount to misconduct, the UNEP ED may choose to either take no action and close the case, or institute managerial and/or administrative action(s); or,
 - If the unsatisfactory conduct could amount to misconduct, the UNEP ED will refer the matter to the ASG/OHR, copying OIOS/ID.

c. The disciplinary process

15. Should the UNEP ED or OIOS/ID refer the matter to the ASG/OHR, the ASG/OHR reviews the investigation report, and if the facts indicate that the staff member's conduct may rise to a misconduct, a disciplinary process will be initiated. The staff member will be provided with the formal allegations of misconduct, accompanied with the investigation report and supporting documentation. The staff member is entitled to seek legal advice and provide comments.

³ [Section 5.3 ST/AI/2017/1](#).

16. At the end of the disciplinary process, the ASG/OHR may decide to:
 - a. close the case;
 - b. refer the case to the UNEP ED for managerial and/or administrative action(s); and/or,
 - c. recommend to the Under-Secretary-General for DMSPC to:
 - i. decide that the facts are established to the requisite standard of proof;
 - ii. impose disciplinary measures⁴ if the facts have been established and the behaviour amounts to misconduct;
 - iii. take administrative or managerial action where necessary; and/or,
 - iv. decide on recovery of financial loss to the Organization in full or part.
17. The final decision is communicated to the staff member by the ASG/OHR, copied to UNEP ED.⁵

V. Actions taken to prevent and address unsatisfactory conduct in UNEP and to improve the work culture

a. UNEP prevention and response to Sexual Harassment

18. In 2024, UNEP has undertaken the following measures to prevent and respond to sexual harassment:
 - a. On 9 May 2024, the UNEP ED reported on actions taken by UNEP in relation to sexual harassment to the UNEP governing body and the UN Secretary-General, respectively;
 - b. UNEP consistently reminded staff members to complete the mandatory training on sexual harassment and regularly reinforces their obligation to report any incidents of sexual harassment.
 - c. UNEP Deputy Executive Director is a member of the UN Executive Group to Prevent and Respond to Sexual Harassment and participates and contributes to the quarterly meetings chaired by UNICEF.
 - d. UNEP collaborated with the aforementioned UN Executive Group and provided its response to the questionnaire in relation to the annual survey on reporting of sexual harassment.
 - e. UNEP contributed to the enhancement of UN system-wide sexual harassment policy by providing information on relevant UNEP policies to the UN System-wide Knowledge Hub on Addressing Sexual Harassment. This publicly accessible Hub serves as a long-term solution to enhancing knowledge sharing on the UN's efforts to eliminate sexual harassment and enhancing transparency and accountability.

b. UNEP prevention and response to Sexual Exploitation and Abuse:

19. The following actions were taken in relation to sexual exploitation and abuse (SEA):
 - a. On 9 May 2024, the UNDP ED reported on actions taken by UNEP in relation to SEA to the UNEP governing body and the UN Secretary-General, respectively.
 - b. UNEP Country Offices actively participated in the Protection from SEA (PSEA) Networks and continued in their engagement with the Resident Coordinators on SEA-related issues. The UNEP Country Offices participated in the development of the joint PSEA Action plan, which identifies priority areas at the country level, and some have subsequently signed commitments to prevent and respond to SEA.

⁴ Staff rule 10.2 (a) of [ST/SGB/2023/1, Staff Regulations and Rules of the United Nations](#) provides that disciplinary measures may take one or more of the following forms (i.e., more than one measure may be imposed in each case): a) Written censure; b) Loss of one or more steps in grade; c) Deferment, for a specified period, of eligibility for salary increment; d) Suspension without pay for a specified period; e) Fine; f) Deferment, for a specified period, of eligibility for consideration for promotion; g) Demotion, with deferment, for a specified period, of eligibility for consideration for promotion; h) Separation from service, with notice or compensation in lieu of notice, and with or without termination indemnity; i) Dismissal.

⁵ **Annex 2** presents a detailed overview of the formal report of possible unsatisfactory conduct process.

- c. UNEP Legal Unit participated in the in-person training convened by the Inter-Agency Standing Committee ([IASC](#)) on “Prevention and Protection from SEA”, including on emerging issues related to PSEA and strategies to enhance coordination.
- d. UNEP also participated in the IASC meeting of investigatory bodies on the “Protection from SEA and sexual harassment”, held on 11–12 June 2024 in Geneva.
- e. UNEP circulated the annual survey on the SEA-related challenges that continue to hinder progress in our collective efforts to eliminate SEA (PSEA Survey). The results were shared with the [Office of the Special Coordinator on Improving the UN Response to SEA](#) (OSCSEA) as part of the efforts to improve the UN response to SEA.
- f. UNEP has continued to actively participate in the UN SEA Working Group organized by OSCSEA. The SEA Working Group encourages coordination between UN entities to respond and address SEA throughout the UN system.
- g. UNEP consistently reminded staff members to complete the mandatory training on SEA. Regular updates were sent to all staff, reinforcing the importance of completing the training. Additionally, staff are frequently reminded of their individual obligation to report any incidents of SEA.
- h. UNEP provided statistical data to the [Joint Inspection Unit](#) on matters concerning SEA. UNEP has responded to two questionnaires on the review of policies and practices to prevent and respond to SEA in the Organization.

c. Other actions taken in relation to conduct and discipline

- 20. In 2024, UNEP appointed Focal Points on Diversity, Gender, Disability Inclusion and Anti-Racism. The Focal Points are responsible for raising awareness on cross-cutting issues which pertain to conduct and discipline.
- 21. UNEP consistently updated its Conduct and Discipline management tools, including the Misconduct Risk Register.
- 22. On 4 April 2024, a presentation on the Victim-Centred Approach was given during the UNEP Corporate Services Division Town Hall.
- 23. On 29 September 2024, UNEP rolled out its updated Partnership Policy, which ensures that robust and policy frameworks are in place to prevent and respond to SEA and SH.
- 24. UNEP actively followed up on reports of possible unsatisfactory conduct/prohibited conduct with OIOS/ID and ASG/OHR to ensure that reports of possible unsatisfactory and/or prohibited conduct are addressed in a timely and efficient manner to prevent further issues in the workplace. UNEP continued to coordinate with OIOS/ID regarding pending cases, to identify administrative and/or other actions that UNEP could take to enable timely population of the Case Management Tracking System (CMTS), managed by the Conduct and Discipline Service/DMSPC, which is responsible for maintaining oversight over reports of possible unsatisfactory conduct/prohibited conduct received across the UN Secretariat.
- 25. UNEP continued to update its WeCollaborate intranet page and its public website pages on “Integrity and Fraud and Corruption” and “Prevention and Response to Sexual Misconduct” with information on conduct and discipline issues.
- 26. In 2024, UNEP received eleven cases of possible unsatisfactory/prohibited conduct and took the following actions:
 - a. Established a fact-finding panel in one case;
 - b. Took managerial action in three cases;
 - c. Preliminary assessment concluded in three cases; and,
 - d. Closed one case.
- 27. There are currently three cases in the finalization stage of the preliminary assessment.
- 28. There are five cases of unsatisfactory/prohibited conduct carried over into 2024. In these cases, UNEP took the following actions:
 - a. Two cases were closed;

- b. Two cases are under investigation with OIOS; and,
- c. One case is still under-going preliminary assessment.

VI. Statistics of reports of possible unsatisfactory conduct

a. Reports of unsatisfactory conduct from 1 January to 31 December 2024

29. UNEP maintains a record of allegations of unsatisfactory conduct in the CMTS database.
30. The chart below provides information on the types of reports of unsatisfactory conduct/prohibited conduct received during the period 1 January to 31 December 2024. A detailed list of all unsatisfactory reports is attached to this report as **Annex 1**. The detailed list does not reflect reports of fraud and corruption, which can be found in the Annual Fraud and Corruption Report.

Abuse of authority	9
Harassment	7
Sexual harassment	1
Discrimination	1
Total Reports	11

Table 1: UNEP reports of unsatisfactory conduct in 2024

31. In 2024, 11 new reports of unsatisfactory conduct were received, and 5 reports were carried over from the previous reporting cycle making a total of 15 reports handled in 2024.⁶ It is to be noted that different offices in the UN system play different roles in reviewing and processing reports of unsatisfactory conduct. Annex 2 provides the role of OIOS/ID, UNEP, and the ASG/OHR in processing these reports.
32. All 11 reports received by UNEP in 2024 were initially transmitted to OIOS/ID as OIOS/ID retains overall oversight of all reports submitted to UNEP. 6 reports were submitted directly to OIOS/ID. Of the 11 UNEP-related reports received in 2024, 5 reports were closed, and 6 reports remain open.

b. Reports of unsatisfactory conduct carried over from 1 October 2021 to 31 December 2023

33. Of the 5 reports carried over from the previous reporting cycle into 2024, 2 reports have been closed, and 3 reports remain open. 1 of these reports is currently under investigation with OIOS/ID and 1 is pending conclusion of the UNEP preliminary assessment. In addition, 1 of these cases has been transmitted to ASG/OHR for review.
34. The statistics in this report should be read together with those in the annual Fraud and Corruption Report.

VII. Informal reports of unsatisfactory conduct

35. The role of the CDFP was strengthened during the reporting period. The CDFP provided guidance on the process of addressing unsatisfactory conduct both informally and formally.
36. The CDFP has continued to provide advice to the ED on addressing informal reports of unsatisfactory conduct. This is the category of inappropriate behaviour where informal resolution may address the concerns raised. Such reports do not constitute a complaint but may evolve into a complaint should the informal measures not be successful in resolving the grievances.

⁶ This number includes all reports including those on fraud and corruption. The previous reporting cycle for the Annual Conduct and Discipline Report was 1 October 2021 to 31 December 2023. That previous reporting period for the fraud and corruption report was 1 January to 31 December 2023.

VIII. Completion of mandatory training on Conduct and Discipline

37. All staff members are required to take the following mandatory trainings on conduct and discipline:

- Ethics and Integrity at the United Nations;
- Preventing fraud and Corruption at the United Nations;
- Prevention of Sexual Exploitation and Abuse 2.0; and,
- United to Respect: Preventing Sexual Harassment and Other Prohibited conduct.

38. As of 31 December 2024, the completion rate for these mandatory training are as follows:

Mandatory training	Completion rate
Ethics and Integrity at the United Nations	96 %
Preventing Fraud and Corruption at the United Nations	97 %
Prevention of Sexual Exploitation and Abuse 2.0 (New) ⁷	97 %
United to Respect: Preventing Sexual Harassment and Other Prohibited conduct (NEW)	97 %

39. UNEP continues to aim for 100% completion of these trainings. In this context, broadcast emails have been sent to all staff, reminding them of their duty to complete their mandatory trainings, including on fraud and corruption. Managers have also been reminded that completion of mandatory trainings is part of the performance evaluation of staff members.

40. Other non-mandatory trainings that UNEP personnel are encouraged to take include the Ethics Office annual Leadership Dialogue, and Dialogues on Improving the work culture in UNEP.

⁷ A new mandatory course entitled "Prevention of Sexual Exploitation and Abuse by UN Personnel, Version 2.0" was introduced for all UN staff in the UN Secretariat effective 1 February 2023. The programme represents an update of the "Prevention of Sexual Exploitation and Abuse by UN Personnel" course, thereby replacing it and requiring all staff to complete the 2.0 update regardless of the completion status of the previous version. The programme contents inculcate the UN policies on standards of conduct concerning sexual exploitation and abuse, including what qualifies as prohibited behaviour and the consequences and impact of sexual misconduct on personnel, field operations, and host populations.

Conclusion

41. As captured in this report, UNEP has under taken several initiatives to improve its work culture and build the trust of UNEP personnel in the conduct and discipline mechanisms that are in place. Moreover, UNEP is encouraged by the statistics indicating that the majority of UNEP personnel understand their obligations, responsibilities, and the various reporting mechanisms and procedures. UNEP is, however, assessing the most effective means of publicly sharing the outcome of reported allegations to illustrate that accountability remains a key priority for UNEP management, while maintaining the confidential nature of the process.

Annex 1

Reports of unsatisfactory conduct from 1 January to 31 December 2024

Personnel Status	Conduct	Report received	Details of reported allegation?	Reporting Process	Status	Conclusion/Action taken/Sanction
Participant - UNEP meeting	Harassment	30-Apr-24	Meeting participant acted in an aggressive manner towards staff members during a conversation with the staff member.	Reported to UNEP. Transmitted to OIOS/ID. Referred to UNEP.	Closed	Preliminary assessment concluded that the conduct did amount to unsatisfactory conduct. Subject reminded of the UN Code of Conduct on Meetings. Future engagement has been suspended.
Staff Member	Harassment / Discrimination/ Abuse of authority	8-Apr-24	Complaint of prohibited conduct.	Reported to UNEP. Transmitted to OIOS/ID. Referred to UNEP.	Closed	Managerial action taken.
Staff Member	Sexual Harassment	16 Apr -24	Sexual harassment by a meeting participant	Reported to OIOS	Closed	Access to UN System meetings suspended; Collaboration with UNEP ceased
Staff Member	Harassment / Abuse of authority	04-Jun-24	Staff member allegedly engaged in abuse of authority and harassment.	Reported to OIOS/ID. Referred to UNEP.	Pending	Fact-Finding panel has been established.
Staff Member	Harassment / Abuse of authority	08-Jun-24	Supervisor acted in a hostile, offensive, and intimidating manner.	Reported to OIOS/ID. Referred to UNEP.	Closed	Managerial action taken.
Staff Member	Harassment / Abuse of authority / Discrimination	12-Jul-24	Inappropriate comments, creation of hostile working environment.	Reported to UNEP. Transmitted to OIOS/ID. Referred to UNEP.	Pending	Preliminary assessment completed.
Staff Member	Harassment / Abuse of authority	22-Jul-24	Supervisor engaged in abuse of authority, misused performance evaluation, verbal abuse, and removal of duties.	Reported to UNEP. Transmitted to OIOS/ID. Referred to UNEP.	Closed	Managerial action taken.
Staff Member	Abuse of authority, corruption, fraud	23-Aug-24	Fraudulent certificates and selection to JO due to intimate relationship with former staff member.	Reported to OIOS/ID. Referred to UNEP.	Pending	Preliminary assessment ongoing

Personnel Status	Conduct	Report received	Details of reported allegation?	Reporting Process	Status	Conclusion/Action taken/Sanction
Staff Member	Abuse of authority	17-Sep-24	Staff member influenced a selection process	Reported to OIOS/ID. Referred to UNEP.	Pending	Preliminary assessment ongoing
Staff Member	Abuse of authority	18-Dec-24	Staff members engaged in abuse of authority, favouritism, lack of impartiality, and misuse of funds.	Reported to OIOS/ID. Referred to UNEP.	Pending	Preliminary assessment ongoing
Staff Member	Harassment / Abuse of authority	18-Dec-24	Staff member engaged in harassment, intimidation and bullying.	Reported to UNEP. Transmitted to OIOS/ID. Referred to UNEP.	Pending	Preliminary assessment completed.

Report of unsatisfactory conduct carried over from the previous reporting cycle 1 July 2022 to 31 December 2023

Personnel Status	Conduct	Report received	Details of report	Reporting Process	Status	Conclusion/Action taken/Sanction
Staff member	Sexual Harassment	04-Jul-22	Staff member made inappropriate sexual comments and jokes about another staff member during a team retreat, which humiliated the colleague.	Reported to UNEP. Transmitted to OIOS/ID.	Pending	Ongoing OIOS/OID Investigation.
Staff members	Sexual Harassment / abuse of authority	11-Nov-22	Anonymous comments from an annual survey indicating that security officers abused their authority. The survey also indicated that sex is used as a reward tool.	Reported to OIOS/ID. Referred to UNEP.	Pending	(a) Preliminary assessment on-going. (b) Broadcast sent by UNON to all UNON personnel. (c) Increased sensitization by UNEP on sexual harassment in UNON campus, via videos and banners.
Intern	Sexual Harassment	11-Jan-23	Private sexual content uploaded online	Reported to OIOS/ID.	Pending	OIOS Investigation report transmitted to ASG/OHR for review.
Staff member/ Consultant	Harassment / discrimination	16-Feb-23	Staff members harassed and discriminated against staff member, creating an intimidating and unsafe work environment.	Reported to UNEP. Transmitted to OIOS/ID. Referred to UNEP.	Closed	Preliminary assessment concluded the report was inconclusive as to whether the allegations constituted prohibited/ unsatisfactory conduct.
Staff member	Private obligations	07-Oct-23	Harassment by staff member of non-UN partner.	Reported to OIOS/ID. Referred to UNEP.	Closed	Preliminary assessment concluded that the conduct did not pertain to unsatisfactory conduct.

Annex 2

The formal report of possible unsatisfactory conduct process

