



## **ANNUAL REPORT ON ACTIONS TAKEN IN RESPONSE TO COMPLAINTS OF MISCONDUCT AND RETALIATION – 2025**

(Presented by the Secretary General)

1.1 Under paragraph 90 i) of the ICAO Framework on Ethics (Annex I to *The ICAO Service Code*), the Secretary General is required to submit to the Council an annual report on actions taken in response to: a) matters referred and investigation reports provided by the United Nations Office for Internal Oversight Services (OIOS) on complaints of misconduct; and b) recommendations made by the Ethics Advisor and the UN Ethics Office on complaints of retaliation or threats of retaliation. The annual report of the Secretary General, which shall contain anonymized information on disciplinary and administrative measures taken in response to substantiated cases of misconduct and retaliation, shall be publicly available on the ICAO website.

1.2 According to Article 1 of the ICAO Service Code, “All staff members are subject to the authority of the Secretary General and are accountable to the Secretary General for the proper discharge of their functions and “[s]taff members shall abide at all times during their service with the Organization by the principles and values of integrity, loyalty, independence, impartiality, tolerance and understanding, non-discrimination, gender equality, accountability and respect for human rights”.

1.3 Furthermore, the Council approved ICAO Accountability Framework highlights the accountability of all staff and personnel to act in compliance with the Ethics Framework and the Standards of Conduct for the International Civil Service of the International Civil Service Commission (ICSC).

1.4 This document, therefore, presents the Secretary General’s annual report on disciplinary actions, administrative measures, and managerial actions taken in response to matters referred and investigation reports provided by OIOS during the period under review. The document also presents information pertaining to actions taken by the Secretary General in response to recommendations made by the Ethics Advisor and the UN Ethics Office on complaints of retaliation or threats of retaliation.

## **2. MATTERS REFERRED BY OIOS TO ICAO FOR ACTION IN 2025**

2.1 OIOS referred 13<sup>1</sup> matters to ICAO for action in 2025. Following receipt and initial assessment of the associated complaints, OIOS determined that ICAO should handle these 13 matters with

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<sup>1</sup> Action was taken on one matter which OIOS referred back to ICAO only after it had started an investigation. Therefore, OIOS categorizes the matter as an investigation, not a matter referred back. Additionally, two matters referred back in 2025 stemmed from complaints filed in a previous year and as such OIOS did not count them for 2025.

appropriate action, including consideration of conducting managerial interventions in the work units concerned. No matters referred back were carried over from 2024.

2.2 During the reporting period, actions to conclude eight matters were taken by the Secretariat. Of the five remaining matters, four remained under review and one is in suspense pending completion of a related investigation.

2.3 Anonymized information in respect of the eight matters referred back is provided below:

- OIOS received an anonymous complaint regarding the staff of a particular section, alleging inappropriate comments around external stakeholders. OIOS declined to investigate the matter and referred it back to ICAO for appropriate action. The complaint did not identify any specific personnel, nor a date on which the conduct would have occurred. The matter was closed, but the section head was advised to send a general reminder of good comportment to the section.
- OIOS received a complaint about inappropriate internal comments made over ICAO official email. OIOS declined to investigate the matter and referred it back to ICAO for appropriate action. One staff member made at least two escalatory comments in an email to a colleague and an email to a supervisor. Pursuant to Personnel Instruction (P/I) 1.6, section 1.6.1, the staff member was sent a preliminary report containing the facts of the allegations and given an opportunity to comment. No response was received by the agreed deadline. The Secretary General decided to take managerial action in the form of a letter of caution, which will remain on the staff member's personnel file for a period of two years.
- OIOS received a complaint from one staff member alleging that another staff member did not possess the requisite education credentials upon initial recruitment. OIOS declined to investigate the matter and referred it back to ICAO for appropriate action. The matter was referred to Human Resources to verify the education credentials, which were confirmed as valid and properly checked before recruitment. The matter was closed.
- OIOS received a complaint from one staff member alleging that another staff member abused their authority and engaged in arbitrary decision making in the performance of their duties. OIOS declined to investigate the matter and referred it back to ICAO for appropriate action. The staff member had also filed a Form 177 Staff Member Request for Administrative Review of the same decision. Given that the matter was already under administrative appeal, the matter referred back was closed.
- OIOS received a complaint from one staff member against the staff member's supervisor, for bullying, harassment and poor management. OIOS declined to investigate, but provided ICAO with a Note to File, including information obtained through a preliminary interview with the complainant. OIOS concluded the behaviour complained of pointed to interpersonal matters and possible abrasive and poor management, and was unlikely to amount to misconduct. It referred the matter back to ICAO for appropriate action. Given that the parties would no longer be working together in the near future, managerial action in the form of a verbal warning was considered appropriate.
- OIOS received a complaint regarding a staff member violating the office no-smoking policy and engaging in unprofessional communication. OIOS declined to investigate and referred the matter back to ICAO. HR and the relevant manager were consulted, and HR advised the manager on how

to address the issues through performance management, including through use of a Performance Improvement Plan. The matter was closed.

- OIOS received a complaint which alleged delays and mishandling of administrative matters relating to certain entitlements. It declined to investigate and referred the matter back to ICAO. The staff member had also filed a Form 177 Staff Member Request for Administrative Review relating to the same issues. Given that the matter was already under administrative appeal, the matter referred back was closed.
- OIOS received an anonymous complaint alleging fraud and misrepresentation by a former consultant. OIOS declined to investigate and referred the matter back to ICAO. Without further information, ICAO was unable to take action and closed the matter.

### 3. INVESTIGATION REPORTS PROVIDED TO ICAO AND ACTIONS TAKEN THEREON

3.1 In 2025, OIOS provided three new investigation reports to ICAO. Two cases remained under process by the end of the year. Action taken in one case was as follows:

3.2 OIOS investigated allegations of sexual harassment against a consultant. The substantiated misconduct consisted of repeated instances of inappropriate comments, including references to the victim's appearance, as well as sexual innuendos and remarks. The consultant was notified of the allegations against him and provided a response. The Secretary General found that there was a factual basis to conclude that the consultant had engaged in sexual harassment and conduct unbecoming of an international civil servant and decided to terminate the consultant's contract without notice.

### 4. OVERVIEW OF CASES

4.1 The table below provides a snapshot of the status of investigation reports and referrals for appropriate action received in 2025 and those carried over from 2024.

	New reports received in 2025	Pending reports carried over from 2024	Total
Investigation reports	3	0	3
Referral for appropriate action	13	0	13
In process as of 31 December 2025	7	0	7

4.2 As of 31 December 2025, there were seven pending matters to process; five matters referred back and two investigation reports.

5. **ACTIONS TAKEN IN RESPONSE TO RETALIATION**

5.1 In 2025, the Secretary General did not receive any recommendations from the ICAO Ethics Advisor in connection with complaints of retaliation or threats of retaliation. At the same time, towards the end of the year, the United Nations Ethics Office (UNEO) informed the Secretary General that it had established retaliation in a case brought to its attention in accordance with the existing Agreement between the United Nations and the ICAO on the provision of services to the ICAO by the UNEO, and remedial measures were recommended. Actions on this matter were taken in early 2026 and will be detailed in next year's report.

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