

External Quality Assessment 2026 – World Intellectual Property Organization (WIPO) Investigation Function

September 2026

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1 Executive summary and conclusions

1.1 Overview

1. The Director of the Internal Oversight Division (IOD) at the World Intellectual Property Organization (WIPO) commissioned RSM UK Risk Assurance Services LLP (RSM) to conduct an External Quality Assessment ("EQA" or "the assessment") of IOD's investigation function. The assessment team consisted of Mark Sullivan, Matt Wilson and Faiza Guechi, referred to as "the assessors".
2. The principal objective of this assessment was to evaluate the investigation function's effectiveness in carrying out its mission by:
 - a) Assess the investigative function's conformity to the standards set forth in the Uniform Guidelines for Investigations endorsed by the Conference of International Investigators¹ (CII) in June 2009, the WIPO Internal Oversight Charter², Investigation Policy³, and the Investigation Manual⁴ (altogether, the standards); and
 - b) Identify opportunities to enhance the investigative function's resource management, work processes and overall value to WIPO.
3. The assessment was conducted in accordance with the General Principles for Reviews of CII Investigation Offices as conducted by External Experts and adopted by the CII in October 2014. It applied an evidence-based methodology, including but not limited to:
 - i Review of relevant policies, procedures, and guidance;
 - ii Examination of a representative sample of closed investigation case files;
 - iii Interviews with IOD staff and relevant stakeholders; and
 - iv Benchmarking, where appropriate, against comparable investigation offices.

The selection of a sample of case files was representative of the investigative caseload and considered factors such as the nature and complexity of allegations, time taken to complete investigations, and types of parties involved.
4. An assessment should be conducted every five years. The previous assessment was undertaken in 2020⁵.
5. This assignment covered IOD's investigative activities for the period from 1 January 2024 to 31 July 2026.

¹ [docs-en-oversight-iaod-investigations-uniform_guidelines.pdf](#)

² [Financial Regulations and Rules](#)

³ [Investigation Policy June 28 2013](#)

⁴ [Investigation procedure manual](#)

⁵ [docs-en-oversight-iaod-eqa-report-investigation-function.pdf](#)

1.2 Report rating

6. Our assessment concludes that the investigation function Generally Conforms with the standards set by the CII, and with the three WIPO Investigation framework documents i.e. the Internal Oversight Charter, the Investigation Policy and the Investigation Manual.
7. Overall, the assessment found that the investigation function is effective, independent, and operating to a high professional standard. The function demonstrated strong alignment with the Conference of International Investigators (CII) Uniform Guidelines for Investigations, achieving general conformance for the eight principles of the Guidelines, with 44 of the 47 standards assessed as generally conforming across the eight principles. The remaining standards identified opportunities for improvement rather than indicating significant or fundamental weaknesses. The review also found evidence of a strengthened intake and triage process that has enabled investigative resources to be focused on matters of greatest significance to the organisation.
8. A detailed list of conformity with individual standards is provided in Annex B. For those standards for which the investigation function does not fully achieve conformance, the assessors identified opportunities for further improvement, which are detailed in section 3.5 of this report.

#	Principle	Standard(s)	Conformance rating
1	General principles	1 to 10	General achievement
2	Definitions	11 to 12	General achievement
3	Rights and obligations	13 to 26	General achievement
4	Procedural guidelines	27 to 40	General achievement
5	Investigative findings	41 to 44	General achievement
6	Referrals to national authorities	45	General achievement
7	Review and amendment	46	General achievement
8	Publication	47	General achievement

1.3 Summary

9. The assessors found that the investigation function is effective and generally able to carry out its mandate independently. The function is well regarded by stakeholders, benefits from good support from key departments, and demonstrates a strong commitment to professionalism and continuous improvement.
10. Since the previous External Quality Assessment, the function has undergone significant change, including the appointment of a new Director and substantial staff changes. The revised intake and triage arrangements have strengthened the assessment of allegations and enabled investigators to focus resources on matters of greatest significance and risk to WIPO.
11. The assessment found a committed and capable team delivering investigations of a consistently high standard. Investigative work was generally thorough, evidence-based and conducted objectively, supported by a comprehensive governance framework, mature policies and secure information handling arrangements. Case file testing demonstrated that investigative conclusions were generally well supported and aligned with applicable professional standards.
12. Notwithstanding this positive position, the assessment identified a number of opportunities to further strengthen the function. These include the implementation of a dedicated case management system (already procured), strengthening investigation planning and documentation, improving the consistency of procedural compliance, formalising management information arrangements, and addressing capacity constraints including successfully completing the recruitment of the Head of Investigation Section position.
13. In summary, the investigation function provides an effective and valued service to WIPO and demonstrates a high level of conformity with applicable professional standards. The opportunities identified are focused on enhancing governance, consistency, performance management and organisational resilience rather than addressing fundamental weaknesses. Implementing these improvements will further strengthen the efficiency and long-term sustainability of the function.

2 Approach

14. The assessment was conducted in accordance with the General Principles for Reviews of CII Investigation Offices Conducted by External Experts (2014). The assessment applied a structured methodology and reporting approach to assess the investigation function against the agreed scope areas and relevant professional standards.
15. The assessment commenced in July 2026 and included a detailed review of the relevant standards, policies, procedures, and supporting documentation, complemented by interviews with key stakeholders to assess the effectiveness and operation of WIPO's investigative function.
16. It reviewed the investigation function's case information and evidential storage, case tracking spreadsheet, periodic reports (including quarterly reports to the Independent Advisory Oversight Committee (IAOC), and annual reports by the Director, IOD to the Program and Budget Committee and the General Assembly of WIPO), and case file security arrangements. The assessment also considered the processes for receiving, recording, screening, prioritising, and evaluating allegations, including decisions to open, close, or refer cases.
17. A sample of 19 of the 97 matters reported to IOD since January 2024 was selected for testing, representing approximately 20% of the total caseload. The sample comprised nine investigations and 10 preliminary evaluations undertaken by both IOD staff and consultants. Cases were selected through a combination of independent random selection and targeted selection to ensure coverage of different allegation types and levels of complexity. Following discussion with the Director, IOD, further cases were added to increase the breadth of the sample.
18. The assessors reviewed all three Management Implication Reports issued by IOD during the assignment period, representing 100% of MIRs produced. No MIR has been published during the period of this review in line with the provisions of the IOD publication policy.
19. Our case-file testing of the selected investigation cases considered the following testing attributes:
 - a) Scoping and investigation plans: Assessing the adequacy of investigation planning, including objectives, scope, risk assessments, investigative strategies, and resource allocation.
 - b) Evidence management documentation: Assessed whether evidence is collected, preserved, and managed in a manner that ensures integrity, security, and traceability.
 - c) Testimonial evidence/interview documentation: Assessed whether findings are supported by sufficient evidence, corroboration, and fair, reliable analysis.
 - d) Investigation reports: Assessed whether investigation reports are evidence-based, supported by documented findings, and include appropriate recommendations and closure records.
 - e) Examination of a representative sample of closed investigation case files: Reviewed a representative sample of fully investigated cases and cases closed following preliminary evaluation to assess compliance with investigative requirements.
20. The assessors conducted interviews with IOD staff and relevant stakeholders including management, oversight bodies, and other relevant parties. Interviews included:
 - Director General, WIPO.
 - Current IAOC Chair, WIPO.
 - IAOC Chair 2025, WIPO.
 - IAOC Chair 2024, WIPO.
 - Director, Human Resources Management Department, WIPO.
 - Chief Ethics Officer, WIPO.
 - Legal Counsel, WIPO.
 - Deputy Legal Counsel, WIPO.
 - Director, Internal Oversight Division, WIPO.
 - Senior Investigator, WIPO.
21. To maintain the confidentiality of interview proceedings and protect the information provided by interviewees, the corresponding interview notes and minutes have not been included in this report, and any information in our report is summarised and presented on an anonymised basis.
22. The assessment team also compared the investigative function against investigation functions at comparable UN and international organisations to consider key aspects of investigative practice, including interviewee rights, notification and conduct of interviews, the provision of allegations and supporting information in advance of interviews, investigator staffing models, staff rotation arrangements, training and competency frameworks, digital forensics capabilities, and continuing professional education requirements.

2.1 Assessors

23. The External Quality Assessment was conducted by the following team members:
- a) Matt Wilson, MSc, CFE, ACFS, the engagement lead, is an Associate Director at RSM UK. He has more than 22 years' experience in investigations. This includes 11.5 years as a police officer in a UK county force and a regional organised crime unit, where he served as a detective and accredited financial investigator. At RSM, he works with clients across the UK public and corporate sectors, as well as a number of UN organisations, undertaking investigations, fraud and crime prevention assignments, and reviews of control effectiveness. He holds a master's degree in Counter Fraud and Counter Corruption from the University of Portsmouth.
 - b) Faiza Guechi, CIA, CFE, is a Manager at RSM UK with over nine years' experience in assurance, quality assessment and the evaluation of professional functions against established governance frameworks. She has undertaken multiple External Quality Assessments and supported in the detailed assessment of WIPO's investigation function. Her role included reviewing the investigation governance framework, policies and procedures, assessing compliance with the CII Uniform Guidelines for Investigations, examining supporting evidence and case files, and contributing to the assessment of findings, areas for improvement and overall conformance. Faiza has worked in Europe and the Middle East and holds a master's degree in management research from the University of Lyon III, an MBA from the University of Lille II, and a master's degree in international trade from the University of Algiers.
 - c) Mark Sullivan, MSc, CIA, QIAL, was the contract lead and quality reviewer. Mark is Head of International Development Services at RSM UK, overseeing a range of assurance solutions for clients in the International Public Sector, including overseas multi-disciplinary audit and investigation assignments for donors, funding agents and INGOs. Mark is a qualified internal auditor with a particular interest in investigations, having led teams on over 30 major international audits and investigations on behalf of funders and donors including operating to Uniform Guidelines for Investigations. A long-standing volunteer to the profession, he is a former director of the Chartered Institute of Internal Auditors and Global Volunteer. He developed the IIA paper on fraud, and is an expert reviewer of the GIAS Topical Guidance.



3 Findings

3.1 Internal Oversight Division⁶

24. The Internal Oversight Division (IOD) provides WIPO Management with independent and objective assurance, analysis, advice, recommendations, and investigative insights to support effective governance, risk management, and accountability. The Division is organised into three dedicated functions: Internal Audit, Evaluation, and Investigation.
25. Its objectives include⁷:
 - a) Contributing to the Organization's successful achievement of its objectives, by enhancing its decision-making and oversight, its reputation and credibility with stakeholders, and its ability to serve the public interest;
 - b) Assessing the effectiveness and efficiency of governance, risk management, and control processes;
 - c) Identifying means for improving WIPO's relevance, effectiveness, efficiency, and economy of the internal procedures and use of resources;
 - d) Assessing whether cost-effective controls are in place and operate effectively; and
 - e) Assessing compliance with WIPO's Financial Regulations and Rules, Staff Regulations and Rules, relevant General Assembly decisions, the applicable accounting standards, the Standards of Conduct for the International Civil Service, and relevant policies and procedures.
26. The Internal Oversight Division is led by a director, who operates independently of WIPO Management in accordance with the Internal Oversight Charter. Although administratively accountable to the Director General, the Director, IOD has direct access to the Chairs of the General Assembly (GA), Coordination Committee (CoCo), the Program and Budget Committee (PBC) and the Independent Advisory Oversight Committee (IAOC), thereby reinforcing the operational independence of the oversight function.

3.2 Investigation function⁸

27. The investigation function is responsible for receiving allegations from across the organisation, referred to as matters, and then conducting independent fact-finding

inquiries into allegations of misconduct and other wrongdoing involving WIPO personnel. Its purpose is to establish the relevant facts, determine whether wrongdoing has occurred, and identify any individuals or entities responsible. The function may also investigate allegations involving external parties where the matters are considered detrimental to WIPO's interests.

28. The investigation function is currently led by Julie Nyang'aya, Director (D-1), Internal Oversight Division (IOD), who has been in post since October 2023. The establishment comprises one P-5, one P-4 and one P-3 role.
29. The P-5 Head of Investigations role has been vacant since March 2024. The position was subject to a recruitment process in 2025 which did not result in the position being filled. The department is currently staffed by a Senior Investigator (P-4), who joined in April 2026. An Investigator position (P-3) was recently vacated at the end of a one-year contract, with support being provided by consultants as required.

3.3 Legal framework for investigations

30. The IOD investigation function operates within a regulatory framework consisting of four key framework documents, which are accessible through both the WIPO external website and the WIPO intranet. As part of this assessment, the assessors conducted a detailed review of these documents and engaged with the investigation team to obtain feedback and identify any necessary updates.

Internal Oversight Charter⁹

31. The WIPO Internal Oversight Charter establishes the mandate, authority, independence, and responsibilities of the Internal Oversight Division (IOD). The Charter was last amended with effect from 1 January 2025.

Uniform Guidelines for Investigations¹⁰

32. The CII Uniform Principles and Guidelines for Investigations (2nd Edition), endorsed by the 10th Conference of International Investigators in June 2009, provides the principal international framework for the governance and management of the investigation function within international organisations. They establish minimum standards and good practices for conducting investigations, serving as

⁶ [Internal Oversight Division](#)

⁷ [docs-en-oversight-iaod-audit-e-testing-of-key-organization-controls.pdf](#)

⁸ [Investigation](#)

⁹ [Financial Regulations and Rules](#)

¹⁰ [docs-en-oversight-iaod-investigations-uniform_guidelines.pdf](#)

the foundation upon which organisations develop their own investigative regulations, policies, and procedures.

Investigation Policy

33. The WIPO Investigation Policy establishes the framework and governing principles for the Organisation's investigation function, setting out the roles, responsibilities, and procedures for receiving, assessing, and investigating allegations of misconduct and wrongdoing. The Policy was last updated and entered into force on 28 January 2025.

Investigation Manual

34. The WIPO Investigation Manual provides detailed procedures and guidance for conducting investigations within WIPO, translating the requirements of the Internal Oversight Charter and Investigation Policy into operational practices. It supports the consistent, fair, and effective management of investigations, from intake and preliminary evaluation through to evidence gathering, reporting, and case closure. The Manual was updated in the 2025 Edition and entered into force on 29 January 2025.

Other relevant documents

35. In addition to the core investigation framework documents, the investigation function is supported by a number of WIPO-wide documents that set out related governance, procedural, and operational requirements.
 - a) WIPO Code of Ethics;
 - b) Guide to Ethics at WIPO;
 - c) Policy to Protect Against Retaliation for Reporting Misconduct and for Cooperating with Duly Authorised Audits or Investigations;
 - d) Policy on Preventing and Detecting Fraud and Other Prohibited Acts;
 - e) Guide to a respectful and harmonious workplace;
 - f) Workplace-related Conflicts and Grievances;
 - g) WIPO Policy on Preventing and Addressing Sexual Exploitation and Sexual Abuse;
 - h) Anti-Retaliation Policy;
 - i) WIPO Financial Regulations and Rules, including Annex II - Terms of Reference of the IAOC.

3.4 Internal policies review

36. The assessors reviewed the policies, procedures, and guidance that underpin the investigation function to determine whether they provide a robust framework for the conduct of investigations and are aligned with applicable professional standards and recognised good practice. The review concluded that the framework is comprehensive and provides an appropriate basis for the management and delivery of investigative activities.
37. While no significant deficiencies were identified, several opportunities were noted to enhance clarity and consistency within the documentation. These related primarily to drafting refinements intended to minimise the risk of differing interpretations and improve procedural consistency. The observations were shared with management during the assessment and agreement was reached to update the relevant documentation in the following areas:

WIPO Financial Regulations and Rules

- Clarify with the Ethics office whether the document should refer to reprisal or retaliation.

Investigation Manual

- Clarify the difference between misconduct and wrongdoing as the descriptions overlap.
- Consider additional internal safeguards to ensure investigators' access to data is proportionate to the matter being reviewed, and approved by the Director, IOD.
- Extend the likely outcomes following investigation to cover action outside of disciplinary action that may be recommended.
- Amend terminology regarding evidential searches to clarify the timeline, and staff required to be present.
- Clarify wording around Preliminary Evaluation Forms and Reports.
- Amend the flow chart to include reference to matters being passed to other units.

Investigation Policy

- Extend the scope of the policy further by referencing anyone acting for, representing or providing services on behalf of, or to, WIPO.
- Align the policies more closely to CII by referring to misconduct rather than wrongdoing.
- Clarify wording relating to reprisals and retaliation across policies and standardise.

3.5 CII standards compliance assessment

38. The assessors evaluated the investigation function's conformance with the CII Uniform Guidelines for Investigations through a review of policies, procedures, investigation files, and stakeholder interviews. Of the 47 CII standards assessed, the investigation function was found to be generally conforming with 44 standards (see Annex B), and partially conforming with three standards.

Standards assessed as partially conforming

Overall, the assessment demonstrates a high level of conformance with the CII standards, with the areas assessed as partially conforming representing opportunities for continuous improvement rather than material weaknesses in the investigation function's operating framework.

Standard #	Observations	Evidence	Recommendation
Rights and obligations			
Standard 16	The General Conditions for the Provision of Individual Contractor Services do not include an equivalent provision requiring contractors to cooperate fully with the investigation function. Para. 2 of the General Conditions for the Provision of Individual Contractor Services (ICS) states that: "Contractors working on WIPO premises are expected to adhere to the same standards of conduct that apply to international civil servants". However, the provision should not be limited to WIPO premises only as contractors can work remotely and away from WIPO premises.	Staff Regulations and rules Investigation Policy Investigation Manual Standard contract templates (vendor, consultant, SSA, expert and contractor agreements). General Conditions of Contract for the provision of individual contractor services General Conditions of Contract for the provision of goods and services. Interview with the Director IOD	Management should update the General Conditions for the Provision of Individual Contractor Services to explicitly require contractors to fully cooperate with duly authorised investigations and oversight activities, regardless of whether services are performed on or off WIPO premises. This would ensure the requirement is consistently applied to all contractors and aligned with the expectations set out in WIPO's investigative framework.
Standard 18	Key performance indicators to monitor compliance with investigation timelines have not been formally documented, limiting management's ability to systematically assess and demonstrate whether investigations are consistently completed within expected timeframes.	Investigation Policy Investigation Manual Case management records and annual reports for investigation timeliness metrics, Interview with the Director IOD Testing of a sample to identify timelines,	The investigation function should formally document key performance indicators (KPIs) in a Standard Operating Procedure and track through the CMS, to ensure that investigations are undertaken expeditiously within the constraints of available resources. This should include monitoring compliance with internal investigation timelines, including the timeliness of preliminary evaluations, investigations, reporting, and stakeholder notifications. Management should periodically monitor and report against these indicators to support effective oversight, identify delays, and promote the expeditious completion of investigations.
Procedural guidelines			
Standard 32	The preliminary evaluation defines the resources needed, investigation scope and investigative activities that are proportionate to the gravity and potential impact of allegations. However, our case-file testing did not identify a documented investigation plan for any of the internally conducted investigations sampled.	Investigation Policy Investigation Manual Internal Oversight Charter Case file sample	Management should formalise the requirement for investigation planning by ensuring that a documented investigation plan is prepared at the outset of each investigation, setting out the scope, objectives, resource requirements, and planned investigative activities in a manner proportionate to the nature and complexity of the allegations.

3.6 Case file results

39. Based on the requirements set out in the Uniform Guidelines for Investigations, the Investigation Policy, and the Investigation Manual, the assessors assessed the sampled case files against the following key attributes:
- Case intake, assessment, and preliminary evaluation activities were adequately documented and supported by a complete and auditable record of decisions and actions.
 - Case-related communications were appropriately managed and evidenced compliance with confidentiality requirements and established protocols.
 - Findings, conclusions, and recommendations were clearly documented, logically supported, and based on sufficient, relevant, and reliable evidence.
 - Evidence gathering, handling, preservation, and witness interviews were conducted and documented in accordance with applicable investigative and evidential standards.
 - Investigations were performed objectively, independently, and in accordance with the principles of due process, fairness, and confidentiality.
 - Case progression and timeliness were effectively managed, with key decisions, significant developments, and any delays appropriately documented and justified within the case record.
40. We selected 19 matters reported between 2024 and 2026, comprising nine investigations and ten preliminary evaluations. Our sample included the following categories:

Preliminary Evaluation Form (PEF) cases: These are cases where, following an initial review, the IOD determined that the allegations did not warrant a full investigation and should therefore be referred to the appropriate team for further review and handling¹¹.

Preliminary Evaluation Report (PER) cases: These are cases where, following an initial assessment, the IOD determined that the allegations fell within its mandate and undertook a preliminary review of the available evidence to assess whether a full investigation was warranted.

Investigation cases: These are cases where, following a preliminary evaluation, the IOD determined that a full investigation was warranted and conducted a formal investigation to establish the relevant facts and assess the allegations.

Highly confidential investigation cases: These cases relate to allegations involving IOD personnel, Assistant Director General, Deputy Director General and Director General, and, given their sensitivity, are subject to restricted access.

Access is limited to the Director, IOD to maintain confidentiality and ensure the appropriate handling of such matters. Consequently, the assessors interviewed the Director, IOD regarding these cases and were given an online walkthrough to confirm paragraphs 23 to 28 of the Internal Oversight Charter were adhered to.

41. IOD recorded 137 new matters between January 2022 and December 2025¹², which are distributed as follows:

Figure 1: Case intake by year

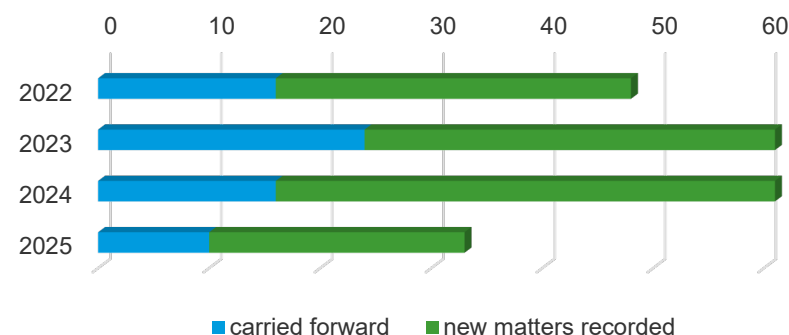
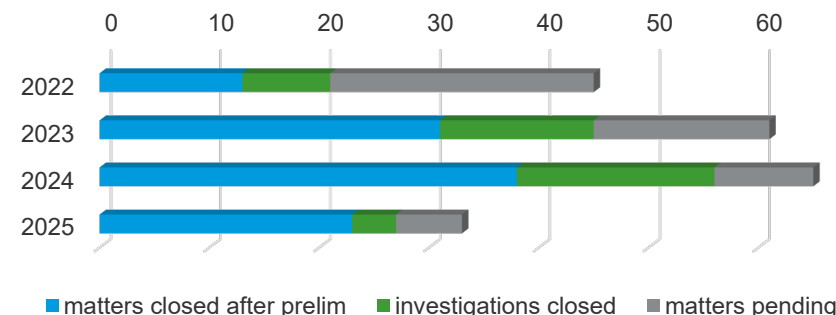


Figure 2: Case outcomes by year



¹¹ [Investigation procedure manual](#) – para 80(e)

¹² [Internal Oversight Division](#) – IOD Annual Reports 2022-2025

¹³ One case in 2024 was split into several different cases resulting in a difference between the number of cases received and progressed in year.

Figure 3: Types of misconduct investigated by IOD (January 2022 – December 2025¹⁴)

No.	Category of complaint	2022	2023	2024	2025
1	Abuse of position or status	2	2	3	2
2	Abuse of work time	2	4	1	0
3	Benefits and entitlements fraud or abuse	3	1	0	1
4	Breach of confidentiality	3	1	2	1
5	Conflict of interest	0	2	0	0
6	Corruption	0	1	0	1
7	Harassment (non-sexual), discrimination	6	12	14	2
8	Insubordination and other inappropriate behaviour	1	0	1	0
9	Misuse of WIPO funds or assets	0	1	0	1
10	Negligence at work, obstruction to WIPO operations	1	1	1	0
11	Other failures to meet the standards of conduct for international civil servants	2	2	4	6
12	Procurement irregularities	5	1	1	0
13	Recruitment irregularities	3	3	4	6
14	Retaliation	1	1	0	0
15	Sexual harassment	3	4	2	0
16	Unauthorised outside activities	0	1	0	0
17	External users of business systems	0	0	12	3
	Total	32	37	45	23

42. Interviews with WIPO personnel indicated that some departments perceived variations in the quality of investigation reports, particularly in relation to understanding of the organisational context, interpretation of the investigative function's remit, and the depth of review undertaken.
43. The assessors reviewed a sample of investigation case files and noted differences in report style, structure and presentation. The review identified that internally prepared reports generally demonstrated a clear understanding of the organisational context and were presented in a format that was straightforward to follow. For outsourced investigations, evidence was available that the investigation function had established terms of reference and undertaken a review of draft reports before finalisation. However, the file review did not provide sufficient evidence to independently assess whether the quality of investigative analysis or conclusions differed between internally delivered and outsourced investigations.

¹⁴ Data related to 2026 cases will be available at year-end

4 Additional observations

4.1 Case management system

44. The IOD does not currently use a CMS. The team previously used an in-house system, but this was withdrawn because it is no longer supported as a result of technology and software upgrades. Although the team has procured Case IQ, existing cases have not yet been migrated to the system and new cases are not currently being recorded in it.
45. Cases are currently managed through the use of a Microsoft Excel spreadsheet, which is saved on a secure network drive, along with a separate folder and subfolders for each recorded matter.
46. We tested access to the secure drives and found that it was restricted to IOD investigation staff. Access is strictly monitored through the use of both restricted access and additional security keys. Sensitive cases are stored on a separate drive with access only available to the Director or an assigned Investigator, on a needs basis.
47. The current spreadsheet and folder-based arrangements provide a secure interim method for recording and storing case information, with access restricted through established security controls. As these arrangements do not offer all of the integrated functionality available within a dedicated case management system, implementation of the procured system would further strengthen the consistency, accessibility and auditability of case records.
48. The introduction of the dedicated case management system would provide additional assurance through a consolidated chronological record of investigators' notes, key decisions, management approvals and relevant case documentation. This would enhance the existing arrangements by making it easier to demonstrate the completeness and progression of enquiries, including where lines of enquiry have been considered but have not produced material relevant to the investigation.
49. The Investigation Manual¹⁵ at section 90 details that if and as necessary the designated investigator will prepare an investigation plan. Through our sample review we did not identify any cases, investigated internally, where an investigation plan had been created. Where large or complex investigations are undertaken the investigation plan is a useful document to set the parameters of the investigation, and also ensure that all viable lines of enquiry are pursued. We did note that

outsourced investigations had detailed investigation plans through the ToR and the investigators' proposals.

4.2 Standard of proof

50. Our review noted that investigation reports have not always used consistent terminology for the standard of proof required. This distinction did not affect the outcome of the case reviewed, as the allegations were not substantiated under either formulation. For consistency and clarity, WIPO should confirm the terminology to be used in investigation reports and update its guidance and templates accordingly.

4.3 Receipt of matters

51. The IOD is charged with receipt of all allegations within the organisation, save for retaliation which is reported to the Ethics Office. Such a wide remit may result in the investigations team being overwhelmed with trivial matters that are not within its remit for investigation. It is evident from our initial research^{16,17}, that historically the investigations team has pursued matters outside of the normal remit of such activity, such as management issues relating to staff, discrepancies in technical outputs and technical errors with data sharing.
52. While these are all issues for the organisation, they did not warrant investigations to be undertaken by IOD. We noted from interviews with staff, and the numbers of matters and their themes recorded, that much work has been undertaken since the arrival of the current Director to address this area through a more stringent triage process. A new form has been introduced to allow the transfer of matters to more suitable teams where a fact-finding is not required, but some internal action is. The benefit of this work is clearly realised with the investigations team now able to focus on higher-risk or higher-priority matters.

4.4 Case closure timelines

53. Through interviews with staff and research of previous annual reports, we identified the duration of investigations was an issue. Analysis of the current active caseload

¹⁵ [Investigation procedure manual](#)

¹⁶ [Internal Oversight Division](#) – IOD annual report 2021-25

¹⁷ [Investigation](#) – MIR reports (MIR on personal data and privacy issues concerning WIPO e-mails to external users, and MIR on Information contained in Patentscope Website)

found that of the 20 pending cases, 18 had been opened since March 2026, indicating prompt active investigation of matters received.

54. Previously the ageing of cases was reported to the IAOC, but we found that this had lapsed. While the age of a case is identifiable by its reference number and the IAOC members will be aware of historic cases from their previous updates it was agreed with the investigators that metrics on case ageing will be re-added to the quarterly IAOC updates to provide greater transparency.

4.5 Staffing

55. The approved establishment provides for three investigative posts; however, current vacancies mean that the function is not fully staffed in practice. This has increased reliance on the Director for day-to-day oversight and for a short period¹⁸ on a single investigator for case intake and investigative delivery. Although the current team has reduced investigation timelines and strengthened case management, capacity constraints limit its ability to further improve timeliness, manage caseload fluctuations, support implementation of the new CMS, and undertake more proactive and preventative activities. Filling the vacant P-5 position would strengthen resilience within the function, reduce key person dependencies, alleviate caseload pressure, and provide additional capacity to support both operational and strategic objectives.

4.6 Treatment of multiple allegations

56. The review of one of the investigation files identified multiple allegations investigated and reported in a single investigation report. While the report contained a logical assessment of the allegations, the referencing of allegations was not applied consistently throughout the document. Allegations were initially identified using Roman numerals and subsequently referred to using letters (a-k). As certain allegations were determined to be unsubstantiated, the list of references reduced (from a-k, then a-j, and subsequently a-h), making it difficult for the reader to identify which specific allegations had been removed from consideration at each stage of the investigation. This reduced the traceability of findings and conclusions within the report and increased the effort required to follow the progression of each allegation through to its final outcome. The use of a unique identifier for each allegation, applied consistently throughout the report, would improve clarity, auditability, and the reader's ability to track individual allegations from receipt through to conclusion.

¹⁸ For one month.

¹⁹ The remainder utilise the Office of UN Secretariat Internal Oversight Services (OIOS) to provide services.

4.7 Case checklist

57. In one case reviewed, the investigator had completed a detailed case checklist that documented key investigation activities and included sign-off confirming completion of each stage of the investigation. The checklist also recorded mandatory notifications to complainants and subjects. We found this to be an effective mechanism for evidencing compliance with established procedures, monitoring progress against required timelines, and documenting any justified deviations from standard requirements. The consistent use of a standardised checklist across all investigations would promote a more uniform approach to case management, strengthen quality assurance, and provide greater assurance that mandatory procedural steps, notification requirements, and key milestones are completed and appropriately evidenced.

4.8 Publication of Management Implication Reports and EQA Results

58. We found that the investigations team publish more information publicly than other comparable organisations. Within the 15 specialised agencies, 11 publish information relating to their internal oversight/investigation functions¹⁹. WIPO previously was the only organisation that published MIRs and EQAs, noting one organisation does publish redacted investigation reports²⁰. While publishing this information does aid transparency it may also identify weaknesses in the organisational policies that could be exploited, and/or may be used by journalists to create media stories that could perpetuate negative publicity against the organisation. This process was updated in 2023 under the IOD publication policy, and these details are no longer routinely shared.

4.9 External consultants

59. As required by case complexity and/or capacity, the investigation function may outsource cases to external consultants for progression. In addition, for matters relating to the Director, IOD, Director General, Deputy Director General and Assistant Director General levels there are escalation routes through Chairs of the IAOC, the General Assembly and Coordination Committee, who may choose to employ external consultants to undertake an impartial investigation. We were informed that a list of consultants and companies exists, but that the list has not been updated in some years. IOD has recently been provided with access to the International Labour Organization's (ILO) Long-Term Agreement (LTA) to utilise approved suppliers.

²⁰ [Documents & Reports](#)

5 Status of recommendations of 2020 EQA report

60. As part of this assessment, we reviewed progress against the 18²¹ recommendations issued in the 2020 External Quality Assessment Report. This report also carried forward outstanding recommendations from the 2015 report.
61. Based on the evidence available, we concluded that two recommendations have not been implemented²², three were partially implemented, and five were no longer applicable or superseded. This demonstrates the investigation function's commitment to continuous improvement and alignment with recognised professional standards.

Number	Recommendation number from 2020 EQA	Observation	Implementation status
1	Recommendation 1a	2015 recommendation 1: The Internal Oversight Charter (para. 7) and the General Conditions of Contract for Goods and Services require contractors to cooperate with investigations. However, the General Conditions for Individual Contractor Services do not contain an equivalent requirement, limiting conduct standards to contractors working on WIPO premises. The Director, IOD confirmed that cooperation clauses are included in some third-party contracts, but not consistently across all contractual arrangements.	Partially implemented
	Recommendation 1b	2015 recommendation 6: A chain of custody form was introduced and a new process for collecting, securing and retaining electronic evidence has been agreed in writing with SIAD.	Implemented
	Recommendation 1c	2015 recommendation 7: The Director, IOD confirmed that the proposed P-3 Investigator position was not formalised in the 2024-25 Biennium Budget despite earlier approval. The Director also confirmed that external investigators may be engaged when additional investigative capacity is required.	Not applicable
	Recommendation 1d	2015 recommendation 13: The Director, IOD confirmed that regular meetings are held with HRMD and OLC to discuss ongoing and closed cases, management actions, and lessons learned. This practice is formalised in paragraph 195 of the Investigations Manual, which has been updated in 2025 to reflect these arrangements.	Implemented
2	Recommendation 2	The Investigation Manual (2025) requires staff to report suspected wrongdoing to the Director, IOD, or a supervisor who must inform the Director, IOD (para. 64). Interviews with the IOD team confirmed that allegations may also be reported directly to any IOD staff member.	Implemented (with improvement)
3	Recommendation 3	Paragraph 98 of the Investigation Manual provides that complaints arising during an ongoing investigation may be assessed and, where appropriate, deferred until the underlying investigation is concluded. The Director, IOD confirmed that such complaints are evaluated on a case-by-case basis to determine whether they should be incorporated into the existing investigation, treated as new evidence, or addressed through a separate investigation.	Implemented
4	Recommendation 4	During interview, the Director, IOD explained that, given the volume and nature of matters handled by the investigative team, a dedicated full-time Intake Officer is not required. Instead, investigators assume intake responsibilities for their assigned cases, including recording and processing allegations in accordance with the Investigation Policy and Investigations Manual.	Not applicable

²¹ The 2020 report lists 15 recommendations, but the first was to address four outstanding recommendations from the 2015 EQA (1, 6, 7 and 13)

²² Two recommendations (five and 11) had previously been implemented but were not in place at the time of our review.

Number	Recommendation number from 2020 EQA	Observation	Implementation status
5	Recommendation 5	The self-assessment report issued on 19 March 2025 states that: "The IAOC quarterly reports were subsequent[ly] amended accordingly and provide this information." However, our review of the following quarterly minutes sample session 78, 79, 80 and 81 and the interview with the Director, IOD show that while this recommendation was previously implemented it lapsed during a period where active investigation numbers fell, and has not subsequently been reinstated when numbers rose again.	Not implemented
6	Recommendation 6	The Director, IOD confirmed that preliminary evaluations should not be subject to fixed time limits, as their duration depends on the complexity of the case and available resources. The reference to completing preliminary evaluations within 30 calendar days has been removed from the Investigation Manual. While the updated FAQs provide additional information on the investigation process, they do not specify an expected timeframe for preliminary evaluations.	Not applicable (With improvements)
7	Recommendation 7	The Investigation Manual was updated in January 2025 to include a policy related to an oath of confidentiality to be included in every investigation. The para.123 of the Manual states that "All investigation participants shall be required to sign an oath of confidentiality prior to their participation in an interview authorised by IOD". File reviews identified instances where confidentiality oaths had not been signed by all participants involved in an investigation, including investigators, subjects, complainant and witnesses.	Partially implemented
8	Recommendation 8	The Investigation Manual was updated in 2025 to include a policy related to seeking legal advice from outside IOD. The para.196 of the Manual states that "IOD may seek legal advice from OLC, as necessary, either in writing or orally. For oral communications, IOD will prepare a note to file and document such interactions in the relevant case file".	Implemented
9	Recommendation 9	The Investigation Manual was updated in 2025 to include a policy related forensic[] analysis of corporate WIPO mobile phones. The para.59 of the Manual states that "IAD will grant IOD access to a WIPO User's email account and/or journal, network and/or local file storage, and/or WIPO-issued IT devices (including but not limited to a desktop and/or laptop computer or mobile phone) in support of duly authorised investigations". The frequency in which WIPO corporate mobile phones would require forensic examination is too low to consider building an in-house capability. If this is required, the IOD has access to third parties to which the task can be outsourced.	Implemented
10	Recommendation 10	An informal and continuous self-assessment was conducted between 2023 and 2024. A formal self-assessment was subsequently completed in 2025, resulting in the issuance of a self-assessment report. During interview, the Director, IOD stated that the Internal Audit Function performs self-assessments on a biennial basis and that the investigation function intends to adopt the same approach, moving from an annual to a two-year self-assessment cycle. A formal policy should be documented regarding the frequency of the investigation function's self-assessment activity.	Partially implemented (with improvement)
11	Recommendation 11	The Director, IOD confirmed during interview that this had previously been completed, but that the in-house Case Management System (CMS) was no longer accessible as it is not supported. Procurement of a new CMS is complete; however, the migration of historic cases has not yet been undertaken due to capacity issues. It is accepted that this is now a priority and resource has been assigned to commence case migration.	Not implemented

Number	Recommendation number from 2020 EQA	Observation	Implementation status
12	Recommendation 12	This provision no longer exists in the revised WIPO Office Instruction No. 33/2017 Rev. 1 (“Policy to Protect Against Retaliation for Reporting Misconduct and for Cooperating with Duly Authorised Audits or Investigations”, which entered into force in 2023. In line with general provision under Paras. 171 and 173 of the Investigation Manual, the investigation report originating from a prima facie determination from the Chief Ethics Officer is submitted to the Director General, and, in case of allegations concerning the DG or personnel at the DDG and ADG level, it is submitted to the IAOC, and the Coordination Committee and General Assembly Chairs.	Not applicable
13	Recommendation 13	The Director, IOD confirmed that this recommendation will not be implemented, as it is not aligned with the Investigation Manual and IOC. Under paragraphs 54-55 of the Investigation Manual, the Director, IOD independently determines whether allegations should be investigated. For allegations involving IOD staff, the DG, DDGs or ADGs, the IAOC provides recommendations to the Chairs of the General Assembly and Coordination Committee (IOC paras. 25-28). In addition, paragraphs 156 and 158 of the Investigation Manual require preliminary evaluation reports relating to discrimination or harassment to be submitted to the Director General, with a copy to HRMD.	Not applicable
14	Recommendation 14	We found that although an independent platform, SpeakUp, had been implemented, the platform only displays English as a language option, despite advertising support for 75+ languages. Interviews with the IOD team confirmed that complaints may be submitted in any language and translated securely. IOD should engage with the platform provider to clarify the discrepancy and improve language accessibility.	Implemented
15	Recommendation 15	The Investigation Manual (2025) includes specific provisions on sexual misconduct investigations (paras. 186-190), requiring a victim-centred approach. Paragraph 187 states that investigations must be conducted in a non-discriminatory, gender- and culture-sensitive manner, prioritising the dignity, safety and wellbeing of alleged victims.	Implemented

6 Proposed management actions

We propose the following management actions are completed to strengthen the investigation function:

Ref.	Management action	Suggested owner	Priority
1	Implement the procured Case IQ case management system, including migration of existing cases, recording of new cases, role-based access, audit trails and integrity controls.	Director, IOD / Senior Investigator	High
2	Require a proportionate, documented investigation plan at the start of every investigation, covering scope, objectives, risks, resources, lines of enquiry and planned activities.	Head of Investigations / Director, IOD	Medium
3	Establish and formally document KPIs for preliminary evaluations, investigations, reporting, stakeholder notifications, case ageing and overall timeliness. Report these periodically to management and the IAOC.	Director, IOD	Medium
4	Reinstate case-ageing metrics in quarterly IAOC reporting and establish escalation arrangements for overdue cases.	Director, IOD	High
5	Introduce a standard case checklist for all investigations, with evidence of completion, review and sign-off for mandatory procedural steps, notifications and milestones.	Head of Investigations	Medium
6	Ensure all required investigation participants sign confidentiality undertakings before participation, with compliance recorded on the case checklist and retained on file.	Investigators / Head of Investigations	High
7	Update the General Conditions for Individual Contractor Services and relevant contract templates to require full cooperation with authorised investigations and oversight activities, irrespective of where services are performed.	Procurement / Legal	Medium
8	Review and approve the correct evidential standard to be applied in WIPO investigations; update guidance and report templates and brief investigators and consultants accordingly.	Director, IOD	High
9	Seek to fill the vacant P-5 Head of Investigations role.	Director General / HR / Director, IOD	Medium
10	Update the Investigation Policy to cover persons acting for, representing or providing services to WIPO, and align the scope and terminology with the CII standards.	Director IOD	Medium
11	Introduce unique identifiers for each allegation and require their consistent use throughout investigation plans, evidence schedules, reports and conclusions.	Head of Investigations	Medium

12	Review the benefits and risks of publishing Management Implication Reports, EQAs and other investigation information, and establish documented publication and redaction criteria.	Director, IOD	Medium
13	Review the outstanding policy refinements agreed during the assessment and complete a controlled update of all affected documents, including version control, approval and staff communication.	Director, IOD / Policy owners	Medium



Annexes

Annex A – External Quality Assessment evaluation matrix

In the absence of a formal assessment framework issued by the Conference of International Investigators (CII), we developed a bespoke three-tier rating model to assess conformance with the CII Uniform Guidelines for Investigations. The framework was informed by recognised quality assessment methodologies, including the Institute of Internal Auditors' (IIA) External Quality Assessment methodology, and comprises the ratings General Achievement/Conformance, Partial Achievement/Conformance, and Non-achievement/Non-conformance.

Quality rating	For conclusions on achieving overall conformance	For conclusion on achieving each principle	For conclusion on achieving each standard
General achievement (or General conformance)	The investigation function conforms with the majority (or all) of the applicable Principles of the CII Uniform Guidelines for Investigations and is achieving the overall purpose and intent of the function. Any deficiencies identified are minor in nature and do not materially affect the effectiveness, independence, quality, or reliability of the investigation function.	The investigation function conforms with the majority (or all) of the standards related to the principle and is achieving the intent of the principle. While minor deficiencies or opportunities for improvement may exist, these do not materially affect achievement of the principle's intent.	The investigation function is conforming with the requirements of the standard and is achieving its intent. Minor deficiencies or opportunities for improvement may exist but do not materially affect the achievement of the standard's intent.
Partial achievement (or Partial conformance)	The investigation function is not fully achieving one or more Principles of the CII Uniform Guidelines for Investigations. The deficiencies identified are significant enough to affect aspects of the function's effectiveness, quality, or reliability, but not so pervasive as to prevent achievement of its overall purpose and intent.	One or more standards supporting the principle is not being achieved, and the resulting deficiencies are significant enough to affect achievement of the principle's intent.	The investigation function is not achieving one or more key elements of the Standard, and the resulting deficiencies are significant enough to affect the achievement of the standard's intent.
Non-achievement (or Non-conformance)	The investigation function is not fully achieving at least one principle of the CII Uniform Guidelines for Investigations, and the impact is significant enough to rate the function's overall achievement as not achieving.	The investigation function is not fully achieving at least one Standard, and the impact is significant enough to rate the function as not achieving the principle's intent.	The investigation function is not fully achieving at least one standard, and the impact is significant enough to rate conformance with the Standard as not achieving the Standard's intent.



Annex B – Assessment against CII standards – General achievement

Standard Number	Principle description	Assessment	Evidence
General Principles			
Standard 1	Each organisation shall have an Investigative Office responsible for conducting investigations.	Governance: An investigation function is in place within the Internal Oversight Division. The team has dedicated, qualified investigation staff Job descriptions are documented for the current staff, and an Investigation Policy is in place. The Internal Oversight Charter establishes the Internal Oversight Division (IOD) and provides that it carries out investigations through its investigation function and is responsible for investigating allegations of misconduct and other wrongdoing (paragraphs 14 and 32). The Investigation Policy and Investigation Manual further confirm that the Director, IOD, has overall authority and responsibility for conducting investigations on behalf of the organisation. Supporting evidence review: Refer to the governance conclusion above.	Internal Oversight Charter Investigation Manual Investigation team members job descriptions
Standard 2	The purpose of an investigation by the Investigative Office is to examine and determine the veracity of allegations of corrupt or fraudulent practices as defined by each institution including with respect to, but not limited to, projects financed by the organisation, and allegations of misconduct on the part of the organisation's staff members.	Governance: The Internal Oversight Charter defines an investigation as the examination of allegations of misconduct and other wrongdoing and authorises the Director, IOD, to investigate allegations of suspected wrongdoing, including fraud and corruption (paragraphs 9, 20 and 32). The Investigation Policy defines an investigation as a formal fact-finding inquiry to examine and determine the veracity of allegations of corrupt or fraudulent practices and misconduct by WIPO personnel (Section 2). The Investigation Manual similarly states that investigations are conducted to determine the veracity of allegations of corrupt or fraudulent practices, misconduct by WIPO personnel, and other wrongdoing detrimental to WIPO, and that investigations aim to gather and review both inculpatory and exculpatory evidence to establish the facts (Sections 2 and 4). Supporting evidence review: Refer to the governance conclusion above.	Internal Oversight Charter Investigation Policy Investigation Manual
Standard 3	The Investigative Office shall maintain objectivity, impartiality, and fairness throughout the investigative process and conduct its activities competently and with the highest levels of integrity. In particular, the Investigative Office shall perform its duties independently from those responsible for or involved	Governance: The Internal Oversight Charter requires IOD to operate independently from management and to act professionally, impartially and free from conflicts of interest (paragraphs 4, 5, 6 and 22). The Investigation Policy requires investigations to be conducted through an objective, impartial and independent process and with due regard to fairness and the presumption of innocence (paragraphs 20, 21 and 28). The Investigation Manual explicitly requires investigators to maintain objectivity, impartiality, fairness and integrity, remain free from improper influence and fear of retaliation, and avoid actual or perceived conflicts of interest.	Internal Oversight Charter Investigation Manual Investigation Policy Interview with Director IOD Conflict of interest declaration

Standard Number	Principle description	Assessment	Evidence
	in operational activities and from staff members liable to be Subject of investigations and shall also be free from improper influence and fear of retaliation.	Conflict of interest clause is included within the investigator's employment contract and is required to declare any exception before or during an investigation. Supporting evidence review: Refer to the governance conclusion above.	
Standard 4	The staff of the Investigative Office shall disclose to a supervisor in a timely fashion any actual or potential conflicts of interest he or she may have in an investigation in which he or she is participating, and the supervisor shall take appropriate action to remedy the conflict.	Governance: The Internal Oversight Charter requires IOD staff to avoid actual or perceived conflicts of interest and provides mechanisms for addressing impairments to independence and objectivity, including conflicts of interest (paragraph 22). The Investigation Manual further requires investigators to maintain objectivity, impartiality and fairness and to avoid actual or perceived conflicts of interest when conducting investigations. Supporting evidence review: The IOD team are required to make an annual declaration which is retained on file.	Internal Oversight Charter Investigation Manual Investigation Policy Interview with Director IOD Annual declarations of IOD staff
Standard 5	Appropriate procedures shall be put in place to investigate allegations of misconduct on the part of any staff member of an Investigative Office.	Governance: The WIPO Internal Oversight Charter and the Investigation Policy establish a clear framework for addressing allegations of misconduct and other wrongdoing within the Organization. The Charter defines the mandate, authority and independence of the Internal Oversight Division (IOD) and empowers the Director, IOD, to receive, assess and investigate allegations of misconduct and other wrongdoing (Charter paras. 10, 11, 15, 31). It also requires WIPO personnel to report suspected wrongdoing and provides for confidential and anonymous reporting mechanisms (Charter paras. 15 and 17). The framework allows investigations to be initiated in response to complaints or proactively based on identified risks (Charter para. 31), and establishes procedures to ensure allegations are assessed, investigated and reported in a structured, fair, objective and independent manner (Charter paras. 12, 32 and 43). The Investigation Policy further supports these requirements by setting out the processes for receipt, assessment, investigation and reporting of allegations. Supporting evidence review: A SpeakUp portal is available for all staff to report any misconduct, including those related to the Investigative office members. Cases can also be reported directly to any IOD team member by telephone, email or in person.	Internal Oversight Charter Investigation Policy WIPO intranet
Standard 6	Each organisation shall publish the mandate and/or terms of reference of its Investigative Office as well as an annual report highlighting the integrity and anti-fraud and corruption activities of its Investigative Office in accordance with its policies on the disclosure of information.	Governance: The organisation publicly discloses the mandate, authority, responsibilities and governance framework of its investigation function through the WIPO Internal Oversight Charter, the Internal Oversight Division (IOD) website, the Investigation webpage, and related investigation policies and manuals. The Charter publicly sets out the mission and mandate of IOD, including the investigation function, its authority, independence, responsibilities and reporting arrangements (Charter paras. 1, 2, 9, 10, 27, 31 and 32). The Charter also requires the Director, IOD, to establish and maintain investigation policies and manuals (Charter para. 28(2)-(3)). In addition, WIPO publishes annual reports of the Internal Oversight Division that provide information on investigative activities, integrity-related matters, substantiated misconduct cases and other oversight work (Charter paras. 47 and 48). The reports could be further strengthened by detailing proactive anti-fraud and corruption activities undertaken, such as training or compliance rates with internal training.	Internal Oversight Charter Investigation Policy Investigation Manual Annual reports by the Director IOD to the General Assembly/Program and Budget Committee report,

Standard Number	Principle description	Assessment	Evidence
		Supporting evidence review: IOD annual reports for 2006-2025 are available on the WIPO website.	
Standard 7	The Investigative Office shall take reasonable measures to protect as confidential any non-public information associated with an investigation, including the identity of parties that are the Subject of the investigation and of parties providing testimony or evidence. The manner in which all information is held and made available to parties within each organisation or parties outside of the organisation, including national authorities, is subject to the organisation's rules, policies and procedures.	Governance: The Internal Oversight Charter requires reports of wrongdoing to be received on a confidential basis (paragraph 9), guarantees confidential communication with IOD (paragraph 11), requires protection of information obtained during investigations (paragraph 12), and states that investigation reports, materials, findings and recommendations are fully confidential unless disclosure is authorised (paragraph 47). The Investigation Policy requires allegations to be received confidentially and permits anonymous reporting (paragraph 13). It further requires investigative activities to preserve confidentiality, protects the identity of complainants and sources on a need-to-know basis only, and prohibits the disclosure of investigation plans, strategies and terms of reference outside IOD (paragraph 28). Investigation reports and related materials are also designated as confidential (paragraph 37). The Investigation Manual reinforces these requirements through specific provisions on Confidentiality (paragraphs 45-53), Confidentiality of Reports and Identity of Complainants (paragraphs 68-72), secure handling and storage of evidence (paragraphs 110-117), confidentiality obligations for interview participants, and confidentiality of investigation reports (paragraph 156). Supporting evidence review: Investigation files are stored in a restricted investigation repository, with access limited to authorised investigation personnel. Highly confidential investigation case files are subject to enhanced access restrictions and are not accessible to all investigation team members.	Investigation Policy Internal Oversight Charter Investigation Manual WIPO intranet: Data privacy notice
Standard 8	Investigative findings shall be based on facts and related analysis, which may include reasonable inferences.	Governance: The Internal Oversight Charter requires IOD reports to include findings, conclusions and recommendations, and allows the issuance of Management Implication Reports (MIRs) to address control weaknesses or systemic issues identified during investigations (paragraphs 35 and 41(d)). The Investigation Policy and Investigation Manual further provide that investigation reports may include recommendations and that MIRs may be issued to communicate lessons learned and recommend improvements to controls, policies and procedures. Supporting evidence review: Our file sample review indicates that Investigative findings are based on facts and related analysis, based on available relevant and complete evidence in addition to witness and subject interviews.	Internal Oversight Charter Investigation Manual Investigation Policy Investigation cases - sample review Sample of quarterly IOD Activity Report to IAOC
Standard 9	The Investigative Office shall make recommendations, as appropriate, to the organisation's management that are derived from its investigative findings.	Governance: The Internal Oversight Charter requires IOD reports to include findings, conclusions and recommendations and allows the issuance of Management Implication Reports (MIRs) where investigations identify control weaknesses or systemic issues (paragraphs 35 and 41(d)). The Investigation Policy and Investigation Manual further provide that investigation reports may include recommendations and that MIRs may be issued to recommend improvements to policies, procedures and internal controls. Supporting evidence review: Based on the sample of investigation files reviewed, investigation reports consistently included recommendations to management where warranted by the investigative findings, demonstrating that corrective actions, control improvements, or other appropriate measures were identified and communicated to	Internal Oversight Charter Investigation Manual Investigation Policy Investigation cases - sample review Sample of quarterly IOD Activity Report to IAOC

Standard Number	Principle description	Assessment	Evidence
		address the issues substantiated during the investigation.	
Standard 10	All investigations conducted by the Investigative Office are administrative in nature	Governance: The Investigation Policy explicitly states that investigations are administrative in nature and are conducted as fact-finding exercises rather than punitive proceedings (paragraph 11). It further clarifies that the investigation function forms part of WIPO's internal justice system and is separate from disciplinary actions (paragraph 11). The Investigation Manual reiterates that investigations are administrative in nature rather than criminal investigations and are conducted to establish facts and collect evidence to substantiate or refute allegations (paragraphs 57 and 95). Supporting evidence review: Interviews with the Director, IOD, and the Legal Counsel confirmed that investigations conducted by the Investigative Office are administrative in nature, serving as internal fact-finding processes governed by the organisation's rules and procedures rather than criminal or judicial proceedings.	Investigation Policy Investigation Manual Interview with Director, IOD and Legal Counsel
Definitions			
Standard 11	Misconduct is a failure by a staff member to observe the rules of conduct or the standards of behaviour prescribed by the organisation	Governance: The Investigation Policy defines misconduct as a staff member's failure to observe the Staff Regulations and Rules, the standards of conduct required of an international civil servant, or any other obligation applicable to WIPO staff members (paragraph 12). The Investigation Manual contains the same definition of misconduct (Section 2 - Definitions: Misconduct). In addition, the Retaliation Policy defines misconduct to include fraud, corruption, abuse of authority, breaches of WIPO regulations and rules, and other wrongdoing (paragraph 4(g)). Supporting evidence review: Refer to the governance conclusion above.	Investigation Policy Investigation Manual Retaliation Policy
Standard 12	The Standard of Proof that shall be used to determine whether a complaint is substantiated is defined for the purposes of an investigation as information that, as a whole, shows that something is more probable than not	Governance: The Investigation Policy and Investigation Manual require investigations to examine the veracity of allegations through an objective assessment of available evidence and to gather and assess both inculpatory and exculpatory evidence before reaching findings. Investigative conclusions are therefore evidence-based and supported by a structured fact-finding process. However, WIPO is subject to the ILO Administrative Tribunal's (ILOAT) jurisdiction, which applies an even stricter standard of proof (beyond a reasonable doubt). Supporting evidence review: Refer to the governance review above.	Investigation Policy Investigation Manual Staff Regulations and Rules Interview with Legal Counsel Interview with IOD team Investigation reports sample
Rights and obligations			
Standard 13	A staff member who qualifies as a "whistleblower" under the rules, policies and procedures of the organisation shall not be subjected to retaliation by the organisation. The organisation will treat retaliation as a separate act of Misconduct.	Governance: The Policy to Protect Against Retaliation for Reporting Misconduct and for Cooperating with Duly authorised Audits or Investigations establishes a dedicated framework to protect personnel who report misconduct in good faith or cooperate with oversight activities. The policy explicitly provides that such individuals are entitled to protection against retaliation (paragraphs 6 and 10) and states that retaliation constitutes misconduct in itself (paragraph 7). In addition, any finding of retaliation may result in administrative or disciplinary action against the responsible individual (paragraph 38). The Internal Oversight Charter further guarantees the right	Retaliation Policy Internal Oversight Charter Interview with Legal Counsel

Standard Number	Principle description	Assessment	Evidence
		of personnel to communicate confidentially with and provide information to IOD without fear of reprisal (paragraph 11). Supporting evidence review: The Legal Counsel confirmed compliance with this principle, noting that retaliation allegations are managed and investigated separately from misconduct cases.	
Standard 14	The organisation may require staff to report suspected acts of fraud, corruption, and other forms of Misconduct.	Governance: The requirement for personnel to report suspected fraud, corruption, misconduct and other wrongdoing is explicitly established in several internal policies. The Internal Oversight Charter states that “WIPO staff members and other personnel have a duty to report suspected or potential wrongdoing in WIPO” and requires IOD to maintain mechanisms for receiving reports of misconduct, including fraud and corruption (para 9). The Investigation Policy further provides that WIPO staff members, contractors and other personnel have a duty to report potential wrongdoing where there is reasonable cause to suspect that wrongdoing has occurred or is about to occur (para 13). It specifically identifies fraud, corruption, abuse of authority and other violations of WIPO regulations and rules as reportable matters. Similarly, the Investigation Manual states that WIPO personnel have a duty to report potential wrongdoing and sets out mechanisms for reporting allegations of fraud, corruption, harassment and other misconduct directly to IOD (paras 62-65). The requirement is reinforced by the Policy to Protect Against Retaliation for Reporting Misconduct and for Cooperating with Duly authorised Audits or Investigations, which states that “it is the duty of all personnel to report that misconduct may have occurred, or any reasonable belief that such misconduct may have occurred” (para 5). Supporting evidence review: Refer to the governance conclusion above.	Internal Oversight Charter Investigation Policy Policy to Protect Against Retaliation for Reporting Misconduct
Standard 15	The organisation shall require staff to cooperate with an investigation and to answer questions and comply with requests for information.	Governance: The Staff Regulations and Rules explicitly require staff members to report suspected wrongdoing and cooperate with any duly authorised investigation (Regulation 1.7(b)). They further require staff members to report wrongdoing to the Director, IOD, or through supervisory channels (Regulation 1.7(c)). The Investigation Policy and Investigation Manual require personnel to cooperate with investigations, provide requested information and records, and participate in interviews, consistent with the Internal Oversight Charter, which establishes staff’s duty to cooperate with investigations and grants IOD unrestricted access to records and personnel (Charter para. 13). Supporting evidence review: Based on feedback from the Director, IOD, and a review of a sample of escalations made, staff are expected to fully cooperate with investigations by responding to requests for information, participating in interviews, and providing relevant records and evidence when requested by investigators. Where a witness does not fully cooperate with the investigation process the matter is escalated through the relevant Director.	Investigation Policy Investigation Manual Staff Regulations and Rules Interview with the Director, IOD Escalation of failure to comply with investigation
Standard 17	As part of the investigative process, the Subject of an investigation shall be given an opportunity to explain his or her conduct and present information on his or her behalf. The	Governance: The Investigation Policy provides that subjects of investigations must be informed of the allegations against them and be given an opportunity to respond before conclusions are finalised. It also requires investigations to be conducted fairly and with due regard to the rights of the subject. The Investigation Manual further requires investigators to obtain and consider both inculpatory and exculpatory evidence and provides subjects with an opportunity to explain their conduct, respond to	Investigation Policy Investigation Manual Staff Regulations and Rules Investigation cases -

Standard Number	Principle description	Assessment	Evidence
	determination of when such opportunity is provided to the Subject is regulated by the rules, policies and procedures of the organisation	allegations, and provide information or evidence on their behalf during the investigative process. In addition, the Staff Regulations and Rules require that no disciplinary measure may be imposed without giving the staff member an opportunity to present their defence (Regulation 10.1(c) and Rule 10.1.2(a)) Supporting evidence review: Based on interviews with the Director, IOD, and a sample review of investigation files, Subjects of investigations were consistently afforded an opportunity to respond to allegations, explain their conduct, and provide information on their behalf before investigative conclusions were finalised, in accordance with established investigation procedures.	sample review Interview with IOD team
Standard 19	The Investigative Office should examine both inculpatory and exculpatory information.	Governance: The Investigation Manual and Investigation Policy require investigations to be conducted objectively and impartially, including the consideration of both inculpatory and exculpatory evidence. These requirements align with the Internal Oversight Charter, which requires investigations to be conducted impartially (para. 12) and reported fairly and objectively (para. 32). Sample file testing confirmed that investigators collected and assessed both inculpatory and exculpatory evidence before reaching conclusions. Supporting evidence review: Our review of investigation files evidenced that the investigation team collect and analyse inculpatory and exculpatory evidence.	Investigation Manual Investigation Policy Investigation files case-file testing
Standard 20	The Investigative Office shall maintain and keep secure an adequate record of the investigation and the information collected.	Governance: Based on review of the Investigation Policy (sections 35-37), Investigation Manual provisions on information security and records management, the WIPO Data Privacy Notice, and investigation files, the investigation function maintains adequate investigation records and applies appropriate measures to securely retain and protect investigation information. These requirements are reinforced by the Internal Oversight Charter, which requires the protection of information from unauthorised disclosure (para. 18) and the confidentiality of investigation materials and records (para. 43). Supporting evidence review: Based on feedback from the Director, IOD, and review of investigation files and records maintained in the IOD caseload repository, investigation information and evidence are appropriately secured, access is restricted to authorised personnel, and confidentiality is maintained throughout the investigation process.	Internal Oversight Charter Investigation Policy Investigation Manual WIPO Data Privacy Notice Investigation files sample review
Standard 21	The staff of the Investigative Office shall take appropriate measures to prevent unauthorised disclosure of investigative information.	Governance: The Internal Oversight Charter requires the Director, IOD, to protect information obtained during investigations from unauthorised disclosure (paragraph 12) and designates investigation reports and related materials as confidential (paragraph 47). The Investigation Policy requires all investigative activities to preserve confidentiality and restricts disclosure of investigation information to a need-to-know basis (paragraph 28). The Investigation Manual further requires investigators to protect investigation information from unauthorised disclosure, maintain the confidentiality of case files and evidence, and treat breaches of confidentiality as potential misconduct (paragraphs 45-53). Confidentiality clause is acknowledged by every investigator involved in an investigation. Written evidence is maintained within the case file.	Internal Oversight Charter Investigation Policy Investigation Manual Investigation files sample review Interview with IOD team

Standard Number	Principle description	Assessment	Evidence
		Supporting evidence review: Investigation files are maintained in a secure shared repository accessible only to authorised members of the IOD Investigation team. Additional access restrictions are applied to highly confidential cases, allow access to only permitted investigation team members, .	
Standard 22	The Investigative Office shall document its investigative findings and conclusions.	Governance: The Internal Oversight Charter requires the Director, IOD, to issue written reports containing findings, conclusions and, where appropriate, recommendations arising from investigations (paragraphs 35 and 41(d)). The Investigation Policy provides for the preparation of formal investigation reports and requires investigative findings and conclusions to be documented and communicated through the reporting process (paragraphs 34-40). The Investigation Manual (sections 27-30) requires investigators to maintain investigation files documenting the evidence, analysis, findings and conclusions supporting their determinations. Supporting evidence review: Sample file testing confirmed that the investigative Office consistently documents its investigative findings and conclusions, with case files evidencing clear records of the outcomes reached and the rationale supporting investigative determinations.	Internal Oversight Charter Investigation Policy Investigation Manual Investigation cases - sample review
Standard 23	For purposes of conducting an investigation, the Investigative Office shall have full and complete access to all relevant information, records, personnel, and property of the organisation, in accordance with the rules, policies and procedures of the organisation.	Governance: The Internal Oversight Charter grants the Director, IOD, full, free, direct and prompt access to all WIPO records, personnel, premises and other information necessary to perform oversight activities, including investigations (paragraph 7). It also requires all WIPO personnel to cooperate with oversight activities. The Staff Regulations and Rules require staff members to cooperate with any duly authorised investigation (Regulation 1.7(b)). The Investigation Policy (sections 15-16) and Investigation Manual (sections 17-19) provide investigators with authority to obtain access to relevant documents, records, systems, personnel and other evidence necessary to conduct investigations. Supporting evidence review: Case-file testing confirmed that investigators were able to obtain the information, records, personnel access, and other evidence required to conduct investigations in accordance with organisational policies and procedures.	Internal Oversight Charter Investigation Policy Investigation Manual Staff Regulations and Rules Interview with IOD team Investigation cases - sample review
Standard 24	To the extent provided by the organisation's rules, policies and procedures and relevant contracts, the Investigative Office shall have the authority to examine and copy the relevant books and records of projects, executing agencies, individuals, or firms participating or seeking	Governance: The Internal Oversight Charter grants the Director, IOD, full, free, direct and prompt access to WIPO records, personnel, premises and information necessary to conduct investigations (paragraph 7). The Investigation Policy and Investigation Manual further provide investigators with authority to obtain and examine documents, records and other evidence relevant to an investigation. Supporting evidence review: In addition, WIPO procurement-related documentation requires suppliers to comply with the UN Supplier Code of Conduct, and WIPO procurement processes provide for audit, inspection and oversight mechanisms in the context of procurement activities	Internal Oversight Charter Investigation Policy Investigation Manual WIPO Financial Regulations and Rules (procurement)

Standard Number	Principle description	Assessment	Evidence
	to participate in organisation-financed activities or any other entities participating in the disbursement of organisation funds.		
Standard 25	The Investigative Office may consult and collaborate with other organisations, international institutions, and other relevant parties to exchange ideas, practical experience, and insight on how best to address issues of mutual concern.	Governance: The Internal Oversight Charter permits IOD to cooperate and coordinate with external oversight bodies and other relevant organisations in carrying out its mandate (paragraphs 10 and 44). The Investigation Policy further allows cooperation, referrals and information sharing with external organisations and competent authorities, subject to applicable confidentiality requirements (paragraphs 18, 39 and 41). The Investigation Manual also provides for collaboration with other organisations, law enforcement authorities and oversight functions where appropriate to support investigative activities (paragraphs 81, 82 and 223). Supporting evidence review: Evidence from case file testing and interviews indicates that the Investigative Office collaborates with relevant internal and external stakeholders to obtain expertise and insight where appropriate. This includes consulting Legal, Ethics, and Human Resources functions on matters within their respective areas of expertise, supporting informed and effective handling of investigative issues. The investigation team also outsources investigations to specialist, experienced, private organisations to assist where additional capacity, seniority or capability is required.	Internal Oversight Charter Investigation Policy Investigation Manual Interview with IOD team Investigation cases - sample review Director General interview Legal Counsel interview
Standard 26	The Investigative Office may provide assistance to and share information with other Investigative Offices.	Governance: The Internal Oversight Charter allows IOD to cooperate and exchange information with external oversight bodies and competent authorities in support of its mandate (para 10 and 44). The Investigation Policy further provides for the sharing of information and cooperation with other organizations, investigative bodies and relevant authorities, subject to confidentiality and legal requirements (para 18, 39 and 41). The Investigation Manual also contemplates coordination, referrals and information exchange with other investigative offices, international organizations and law enforcement authorities where appropriate (para 81, 82 and 223). Supporting evidence review: An interview with the Director, IOD confirmed that information can be shared with other investigative offices when needed.	Internal Oversight Charter Investigation Policy Investigation Manual Director, IOD Interview
Procedural guidelines			
Standard 27	The Investigative Office shall accept all complaints irrespective of their source, including complaints from anonymous or confidential sources.	Governance: The Internal Oversight Charter provides that reports of suspected wrongdoing may be submitted confidentially and anonymously to the Director, IOD (para 9). The Charter also requires the Director, IOD, to maintain facilities for receiving such reports from staff members and other personnel. The Investigation Policy provides that the Director, IOD, shall be available to receive allegations of misconduct and other wrongdoing from any source, and that allegations may be submitted on a confidential or anonymous basis (para 13).	Internal Oversight Charter Investigation Policy Investigation Manual Allegations tracker

Standard Number	Principle description	Assessment	Evidence
		The Investigation Manual further confirms that allegations may be received from a wide range of sources, including staff members, external parties, victims, witnesses, referrals and anonymous complainants, and that such allegations are accepted and recorded confidentially (para 63, 66 and 68). Supporting evidence review: We reviewed the WIPO internet pages which provides clear links to the Oversight pages from the main web page. The investigation page gives guidance on how to report wrongdoing and has a link to the SpeakUp platform. We reviewed the complaints tracker covering the period from January 2024 to July 2026. Based on our review and interviews with members of the investigation function, all allegations received are recorded in the tracker, including matters classified as spam due to their nature, which are documented but not subject to investigation. The tracker captures key case management information, including the date allegations were received, source, complainant, allegation type, subject, assigned investigator, investigation status, and case ageing.	
Standard 28	Where practicable, the Investigative Office will acknowledge receipt of all complaints.	Governance: The Investigation Policy provides that allegations of misconduct and other wrongdoing may be submitted to the Director, IOD through established reporting channels and are formally received and assessed by IOD (paragraphs 13-15). The Investigation Manual establishes procedures for the receipt, registration and preliminary evaluation of allegations and provides that complainants may be informed of the status of their complaint, where appropriate and practicable (paragraphs 68-75). In addition, the Staff Regulations and Rules provide that where the Director, IOD, has not notified a complainant in writing of the status of a matter within six months, the complainant may escalate the matter to the Director General or the Chair of the Coordination Committee (Regulation 1.7(c)). This implies that complainants are ordinarily expected to receive acknowledgement or status updates regarding their complaint. Supporting evidence review: Our review of a sample of investigation files showed that the Investigative Office acknowledged receipt of complaints either by email or through the SpeakUp portal. This was corroborated through interviews with IOD staff, who confirmed that complainants are routinely notified of the receipt of their complaints in accordance with established case intake procedures.	Investigation Policy Investigation Manual Staff Regulations and Rules Complaint intake records Interview IOD staff
Standard 29	All complaints shall be registered and reviewed to determine whether they fall within the jurisdiction or authority of the Investigative Office.	Governance: The Investigation Policy requires all allegations of misconduct and other wrongdoing received by IOD to be assessed through an intake and preliminary review process to determine whether they fall within the mandate and authority of the investigation function (paragraphs 13-15). The Investigation Manual further requires allegations to be formally received, recorded and registered, followed by a preliminary evaluation to determine jurisdiction, credibility and whether further action is warranted (paragraphs 68-75). It also provides for the referral of matters that fall outside IOD's jurisdiction to the appropriate function or authority. The Internal Oversight Charter assigns responsibility to the Director, IOD, for receiving and assessing reports of suspected wrongdoing submitted through established reporting channels (paragraph 9). Supporting evidence review: All allegations received are subject to a preliminary evaluation to determine whether they fall within the	Investigation Policy Investigation Manual Internal Oversight Charter Complaints tracker Investigation team interview

Standard Number	Principle description	Assessment	Evidence
		jurisdiction and mandate of the investigation function. Where a matter is determined to fall outside the investigation function 's authority, the tracker records the authority or function to which the case was referred. In such instances, the case is closed by the investigation function and responsibility for any further review or investigation is transferred to the relevant authority through the Preliminary Evaluation Form (PEF). The investigation team holds meetings at least weekly to discuss the receipt and triage of new matters. This meeting is attended by the Director, who oversees the next steps of all complaints received.	
Standard 30	Once a complaint has been registered, it will be evaluated by the Investigative Office to determine its credibility, materiality, and verifiability. To this end, the complaint will be examined to determine whether there is a legitimate basis to warrant an investigation.	Governance: The Investigation Policy requires allegations of misconduct and other wrongdoing received by IOD to undergo a preliminary evaluation to determine whether there is a sufficient basis for further action and whether the matter falls within IOD's mandate (paragraphs 13-15). The Investigation Manual further provides that all complaints are registered and subjected to an initial review to assess factors such as credibility, reliability, sufficiency of information, jurisdiction, and the availability of evidence before a decision is made on whether to open an investigation (paragraphs 68-75). The Internal Oversight Charter assigns responsibility to the Director, IOD, for receiving and assessing reports of suspected wrongdoing submitted through established reporting channels (paragraph 9). Supporting evidence review: We reviewed the complaints tracker covering the period from January 2024 to July 2026 and, based on our review and interviews with members of the investigation function, noted that all allegations received are recorded in the tracker, including matters classified as spam, which are documented but not subject to investigation. The tracker captures key case management information, including the date allegations were received, source, complainant, allegation type, subject, assigned investigator, investigation status, and case ageing. All allegations are subject to a preliminary evaluation to determine whether they fall within the jurisdiction and mandate of the investigation function. Where a matter falls outside the investigation function 's authority, the tracker records the authority or function to which the case was referred, and the matter is subsequently closed by the investigation function and handled by the appropriate authority.	Investigation Policy Investigation Manual Internal Oversight Charter Complaints tracker Investigation team interview
Standard 31	Decisions on which investigations should be pursued are made in accordance with the rules, policies and procedures of the organisation; decisions on which Investigative Activities are to be utilized in a particular case rest with the Investigative Office.	Governance: The Investigation Policy provides that allegations received by IOD are subject to a preliminary evaluation and that decisions on whether to open an investigation are made in accordance with established investigation procedures and the mandate of the investigation function (paragraphs 13-15). The Investigation Manual further establishes a formal intake and assessment process under which complaints are reviewed for jurisdiction, credibility, available evidence and investigative merit before a decision is made on whether to proceed. It also provides investigators with discretion to determine the appropriate investigative activities, methodologies and evidence-gathering techniques to be applied in each case (paragraphs 68-75, 95-108). The Internal Oversight Charter assigns responsibility to the Director, IOD, for receiving, assessing and investigating allegations of wrongdoing within the authority of the investigation function (paragraphs 9 and 32). Supporting evidence review: Based on interviews with the Director, IOD, and review of a sample of investigation files, decisions on whether allegations should be pursued are made following a documented preliminary evaluation , a preliminary evaluation, the results of which determine whether a formal investigation is warranted. File review confirmed that decisions to open or decline investigations were supported by the assessment process, while	Investigation Policy Investigation Manual Internal Oversight Charter Complaints tracker Interview with IOD team Investigation cases - sample review

Standard Number	Principle description	Assessment	Evidence
		investigative activities and evidence-gathering procedures were determined by the investigation function based on the specific facts and circumstances of each case.	
Standard 33	The Investigative Office shall, wherever possible, seek corroboration of the information in its possession.	Governance: The Investigation Policy requires investigative findings to be based on substantiated facts and evidence and requires allegations to be assessed through an objective evaluation of the information collected (paragraphs 21-22). The Investigation Manual further requires investigators to collect, verify and analyse evidence, assess both inculpatory and exculpatory information, and support findings through documented evidence and analysis (paragraphs 56, 95, 107 and 108). These requirements demonstrate that investigators are expected to corroborate information wherever possible before reaching conclusions. The Internal Oversight Charter also requires investigations to be conducted professionally, objectively and in accordance with established investigative standards (paragraphs 6 and 32). Supporting evidence review: Review of a sample of investigation files confirmed that witness statements, documentary evidence, and key allegations were corroborated when needed, with the evidentiary basis for investigative findings clearly documented. However, some instances may not include or require subject/witness interviews, based on the available evidence and the investigation conclusions of the IOD team.	Investigation Policy Investigation Manual Internal Oversight Charter Investigation cases - sample review
Standard 34	For purposes of these guidelines, investigative Activity includes the collection and analysis of documentary, video, audio, photographic, and electronic information or other material, interviews of witnesses, observations of investigators, and such other investigative techniques as are required to conduct the investigation.	Governance: The Investigation Manual recognises a broad range of investigative activities, including the collection and analysis of documentary, electronic and other forms of evidence, witness interviews, review of records, evidence verification, and other investigative techniques necessary to establish facts and assess allegations (paragraphs 95-108). The Investigation Policy provides that investigations are fact-finding exercises aimed at gathering, analysing and assessing relevant information and evidence to determine the veracity of allegations (paragraphs 21-22). The Internal Oversight Charter grants IOD access to records, personnel, premises and information necessary to conduct investigations and fulfil its mandate (paragraph 7). Supporting evidence review: Cases case-file testing confirmed that investigators utilised appropriate evidence-gathering and analysis techniques, including document review, witness and subject interviews, and examination of relevant electronic evidence where applicable. The files demonstrated that investigative conclusions were supported by sufficient evidence and analysis, consistent with established investigation procedures.	Investigation Policy Investigation Manual Internal Oversight Charter Investigation cases - sample review
Standard 35	Investigative Activity and critical decisions should be documented in writing and reviewed with managers of the Investigative Office.	Governance: The Investigation Manual requires investigators to maintain investigation files and document key investigative activities, evidence obtained, analyses performed, decisions taken and the rationale supporting investigative findings and conclusions (paragraphs 95-108). It also provides for supervisory oversight and review of investigations throughout the investigation process. The Investigation Policy requires investigations to be conducted in a structured and documented manner, with findings and conclusions supported by evidence and recorded in formal investigation reports (paragraphs 34-40). The Internal Oversight Charter assigns responsibility to the Director, IOD, for the management and	Investigation Policy Investigation Manual Internal Oversight Charter Investigation cases - sample review

Standard Number	Principle description	Assessment	Evidence
		supervision of investigative activities and for ensuring the quality and consistency of investigation work products (paragraphs 14, 32 and 35). Supporting evidence review: Review of a sample of investigation files confirmed that key investigative activities, evidence-gathering steps, and significant case decisions were documented in writing and retained within the case file. The file review further indicated that investigations were subject to supervisory oversight and review by management throughout the investigative process during weekly team meetings, and through management reviews of investigation reports.	
Standard 36	Subject to the organisation's rules, policies and procedures, if, at any time during the Investigation, the Investigative Office considers that it would be prudent, as a precautionary measure or to safeguard information, to temporarily exclude a staff member that is the subject of an investigation from access to his or her files or office or to recommend that he or she be suspended from duty, with or without pay and benefits, or to recommend placement of such other limits on his or her official activities, the Investigative Office shall refer the matter to the relevant authorities within the organisation for appropriate action.	Governance: The Investigation Policy provides that where circumstances require protective or precautionary measures during an investigation, the matter may be referred to the appropriate authority for consideration and action in accordance with WIPO's administrative framework (paragraphs 26 and 29). The Investigation Manual further recognises that investigators may identify risks to evidence, witnesses, the investigation process or the organisation, and may recommend appropriate interim measures to the competent authority while remaining separate from the final management decision (paragraphs 84, 118 and 121). The Staff Regulations and Rules provide that the Director of HRMD may temporarily suspend a staff member from duty pending the results of an investigation and/or disciplinary process if the staff member's continued presence may be prejudicial to the interests of the organisation (Rule 10.1.3(a)). Suspension may be with full pay, partial pay or without pay (Rule 10.1.3(c)). Supporting evidence review: Based on interviews with the Director, IOD and review of a sample of investigation files, where investigative circumstances warrant precautionary measures, the investigation function refers the matter to the appropriate management authorities for consideration and action in accordance with established procedures. File testing confirmed that potential risks to evidence, information, or the integrity of the investigation were assessed and appropriately escalated when required, while decisions regarding administrative measures remained with the relevant organisational authorities.	Investigation Policy Investigation Manual Internal Oversight Charter Staff regulations and rules Investigation cases - sample review Interview with IOD team, Director OLC, and Chief Ethics Officer.
Standard 37	To the extent possible, interviews conducted by the Investigative Office should be conducted by two persons	Governance: The Investigation Manual (para. 138) provides that interview participants may include one or two interviewers, together with the interviewee and, where relevant, an observer and/or interpreter. This allows subject interviews to be conducted by two investigators where appropriate. Supporting evidence review: Based on review of a sample of investigation files and interviews with the IOD team, subject interviews were consistently conducted by two investigators, providing appropriate corroboration and oversight. Witness interviews were generally conducted by a single investigator, with interview records documented and retained in the case file. Overall, the review confirmed that interview arrangements were applied in a manner proportionate to the role of the interviewee and the circumstances of the investigation.	Investigation Manual Investigation cases - sample review
Standard 38	Subject to the discretion of the Investigative Office, interviews	Governance: The Internal Oversight Charter provides the Director, IOD, with authority to obtain access to personnel and	Investigation Policy Investigation Manual

Standard Number	Principle description	Assessment	Evidence
	may be conducted in the language of the person being interviewed, where appropriate using interpreters.	information necessary for investigations and requires cooperation with investigative activities (para. 7). The Investigation Policy further requires investigations to be conducted with due regard for fairness and the rights of individuals involved (Section 5). The Investigation Manual operationalises these principles by permitting the use of interpreters during interviews where necessary to facilitate effective communication (para. 146). Supporting evidence review: Interview with IOD team and review of investigation files and interviews with IOD staff confirmed that interviews are conducted in a language understood by interviewees and that interpreters are used where required, demonstrating effective implementation of these requirements in practice.	Internal Oversight Charter Interview records IOD team review
Standard 39	The Investigative Office will not pay a witness or a subject for information. Subject to the organisation's rules, policies and procedures, the Investigative Office may assume responsibility for reasonable expenses incurred by witnesses or other sources of information to meet with the Investigative Office.	Governance: The Investigation Manual provides that the Investigative Office will not pay witnesses or subjects for information, although it may assume responsibility for reasonable expenses incurred by witnesses or other sources of information to meet with the Investigative Office, subject to applicable rules and procedures (para. 163). The Internal Oversight Charter and Investigation Policy support the conduct of investigations in a fair, independent and accountable manner and provide the framework within which investigative activities and related expenditures are managed (Internal Oversight Charter paras. 5, 7 and 21; Investigation Policy Section 5). Supporting evidence review: Interview with IOD team and review of investigation files and interviews with IOD staff confirmed that witnesses and subjects are not compensated for information provided and that any costs associated with participation in investigative activities are managed in accordance with established procedures.	Investigation Policy Investigation Manual Internal Oversight Charter Interview records IOD team review
Standard 40	The Investigative Office may engage external parties to assist in its investigations.	Governance: The Internal Oversight Charter authorises the Director, IOD, to obtain expertise and resources necessary for the discharge of its oversight responsibilities and to cooperate with external parties where required (paragraphs 10 and 14). The Investigation Policy and Investigation Manual further provide flexibility in the conduct of investigations and allow the use of specialised expertise, external support and cooperation with external parties where necessary to support investigative activities, including in matters requiring technical, forensic or other specialist knowledge (paragraphs 18, 39, 81 and 223). Supporting evidence review: Records show that external investigators are appointed when internal resources are insufficient. During the period under review, contracts with external investigators, either individuals or private firms were appointed to support the investigation team. This was confirmed during interview with Director, IOD.	Investigation Policy Investigation Manual Internal Oversight Charter Investigation cases - sample review Director, IOD interview
Investigative findings			
Standard 41	If the Investigative Office does not find sufficient information during the investigation to substantiate the complaint, it will document such findings, close	Governance: The Investigation Policy provides that, following an assessment of the evidence gathered, allegations may be closed where there is insufficient information to substantiate the complaint and that the outcome of the matter is communicated as appropriate (paragraphs 34-40). The Investigation Manual further requires investigators to document the evidence, analysis, findings and	Investigation policy Investigation Manual Internal Oversight Charter Investigation cases -

Standard Number	Principle description	Assessment	Evidence
	the investigation, and notify the relevant parties, as appropriate.	conclusions of an investigation, including cases where allegations are unsubstantiated. It also provides for the closure of cases and appropriate notification of relevant parties following completion of the investigative process (paragraphs 95-108 and 210-223). The Internal Oversight Charter requires the Director, IOD, to issue reports setting out investigative findings and conclusions, thereby ensuring that the outcome of investigations is formally documented (paragraphs 35 and 41(d)). Supporting evidence review: Investigation file reviews confirmed that where allegations could not be substantiated due to insufficient evidence, the investigation findings were appropriately documented, the cases were closed, and relevant parties were notified, as appropriate, in accordance with established investigation procedures.	sample review Interview with IOD team
Standard 42	If the Investigative Office finds sufficient information to substantiate the complaint, it will document its investigative findings and refer the findings to the relevant authorities within the organisation, consistent with the organisation's rules, policies and procedures.	Governance: The Investigation Policy provides that, where an investigation substantiates allegations of misconduct or other wrongdoing, the findings are documented in a formal investigation report and communicated to the appropriate authority for further action in accordance with WIPO's rules and procedures (paragraphs 34-40). The Investigation Manual requires investigators to document the evidence, analysis, findings and conclusions of the investigation and provides for the referral of substantiated matters to the competent authority for consideration of administrative, disciplinary or other appropriate action (paragraphs 95-108 and 210-223). The Internal Oversight Charter requires the Director, IOD, to issue investigation reports containing findings, conclusions and, where appropriate, recommendations, and to communicate the results of investigations to the relevant authority within WIPO (paragraphs 35, 41(d) and 48). Supporting evidence review: The Director, IOD, confirmed during interview, and the review of investigation files demonstrated, that substantiated allegations are appropriately documented and referred to the relevant authorities in accordance with applicable rules, policies, and procedures.	Investigation Policy Investigation Manual Internal Oversight Charter Investigation cases - sample review Interview with IOD team
Standard 43	Where the Investigative Office's investigative findings indicate that a complaint was knowingly false, the Investigative Office shall, where appropriate, refer the matter to the relevant authorities in the organisation for further action consistent with the organisation's rules, policies and procedures.	Governance: The Staff Regulations and Rules provide that reports, statements or claims that are intentionally and knowingly false or misleading, or made with reckless disregard for accuracy, shall be regarded as serious misconduct (Regulation 1.7(e)). The Investigation Policy and Investigation Manual provide that investigation findings are documented and reported to the appropriate authority and that cases involving misconduct may be referred for further administrative or disciplinary action in accordance with WIPO's established procedures (paragraphs 34-40 and 210-223). In addition, the Staff Regulations and Rules establish disciplinary procedures for misconduct, including serious misconduct, and provide for referral of substantiated misconduct matters to the competent authority for consideration of disciplinary action (Regulation 10.1 and Rule 10.1.2). Supporting evidence review: During interviews it was confirmed that false complaints would be documented and reported to the relevant authority where applicable.	Investigation Policy Investigation Manual Internal Oversight Charter Staff Regulations and Rules

Standard Number	Principle description	Assessment	Evidence
Standard 44	Where the Investigative Office's investigative findings indicate that there was a failure to comply with an obligation existing under the investigative process by a witness or subject, the Investigative Office may refer the matter to the relevant authorities in the organisation.	Governance: The Staff Regulations and Rules require staff members to report suspected wrongdoing and cooperate with duly authorised investigations (Regulation 1.7(b)). Failure to comply with staff obligations may constitute misconduct and may result in disciplinary action (Regulation 10.1(a)). The Investigation Policy and Investigation Manual provide that investigative findings are documented and reported to the appropriate authority and that misconduct identified during an investigation may be referred for further administrative or disciplinary action in accordance with WIPO procedures (paragraphs 34-40 and 210-223). Supporting evidence review: The Director, IOD, confirmed during the interview, and the review of investigation files demonstrated, that where investigative findings identify a failure by a witness or subject to comply with obligations under the investigative process, the matter is escalated to the appropriate Director within the organisation.	Investigation policy Investigation Manual Internal Oversight Charter Staff Regulations and Rules Sample of Investigation file review Interview with IOD team Escalation of failure to comply with investigation
Referrals to national authorities			
Standard 45	The Investigative Office may consider whether it is appropriate to refer information relating to the complaint to the appropriate national authorities, and the Investigative Office will seek the necessary internal authorization to do so in cases where it finds a referral is warranted	Governance: The Investigation Policy permits cooperation and information sharing with external authorities where appropriate and in accordance with applicable legal, confidentiality and procedural requirements (paragraphs 18, 39 and 41). The Policy also provides for the referral of matters arising from investigations where such action is warranted. The Investigation Manual further provides for coordination with external authorities, referrals and information sharing with law enforcement and other competent bodies, subject to relevant approvals and confidentiality requirements (paragraphs 81, 82 and 223). The Internal Oversight Charter authorises IOD to cooperate with external authorities and oversight bodies in the discharge of its mandate and requires such cooperation to occur in accordance with WIPO's governance framework (paragraphs 10 and 44). Supporting evidence review: The Director, IOD, confirmed during interview, and the review of investigation files demonstrated, that where appropriate, information relating to a complaint may be referred to the relevant national authorities following the necessary internal authorization process.	Investigation Policy Investigation Manual Internal Oversight Charter Sample of Investigation file review Interview with IOD team
Review and amendment			
Standard 46	Any amendments to the Guidelines will be adopted by the organisations by consensus.	Governance: Guidelines were reviewed by the IOD function to document the Internal Oversight Charter, manual and policy. Supporting evidence review: Interviews with the IOD team confirmed that relevant internal policies and procedures governing the investigation function take the Guidelines into consideration during periodic reviews and updates. The review of the Investigation Manual, Investigation Policy, and Charter further demonstrated alignment with the Guidelines.	Investigation Policy Investigation Manual Internal Oversight Charter Interview with IOD team
Publication			

Standard Number	Principle description	Assessment	Evidence
Standard 47	Any organisation may publish these Principles and Guidelines in accordance with its policies on the disclosure of information.	Governance: Guidelines were reviewed by the IOD function to document the Internal Oversight Charter, manual and policy. Supporting evidence review: We observed that the CII guidelines are linked on the WIP investigation team internet page Interviews with the IOD team confirmed that relevant internal policies and procedures governing the investigation function take the Guidelines into consideration during periodic reviews and updates. The review of the Investigation Manual, Investigation Policy, and Charter further demonstrated alignment with the Guidelines.	Investigation Policy Investigation Manual Internal Oversight Charter Interview with IOD team

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