

Ethics and Business Conduct

Annual Report 2018



Embedding Ethics throughout the World Bank Group



WORLD BANK GROUP
Ethics & Business Conduct



What We Do

The Staff of the Ethics and Business Conduct Department

The World Bank Group's (WBG) twin goals are to eliminate extreme poverty by 2030 and to boost shared prosperity for the bottom 40 percent of each developing country. For the diverse workforce of the Bank Group, integrity, ethical behavior, and adherence to corporate values are critical to the success of these goals.

The Ethics and Business Conduct Department (EBC) provides outreach and training, advisory services, and investigations to secure a safe, respectful, and

values- and ethics-driven workplace at the WBG. EBC's three business lines—Outreach, Training, and Values (OTV); Ethics Advisory Services (EAS); and Business Integrity Review (BIR)—are responsible for maintaining this environment. The *Ethics and Business Conduct Annual Report 2018* presents EBC's achievements for fiscal year 2018 and aspirations for the future.

EBC is headed by the Chief Ethics Officer, who is independent and reports directly to the President of the WBG. For administrative

matters, EBC reports to the Managing Director and Chief Administrative Officer of the WBG.

Every year, thousands of Bank Group staff interface with EBC. OTV provides staff with knowledge and understanding of our core values and the WBG's behavioral expectations, and multimedia trainings on conflict management, sexual harassment, and other timely topics. EAS offers advice and guidance to staff on navigating ethical dilemmas and avoiding conflicts

of interest as well as complying with the WBG Staff Rules and Principles of Staff Employment. BIR conducts primary inquiries into allegations of misconduct, and may open cases and oversee investigations to determine whether enough evidence exists to warrant further action.

EBC has 27 seasoned staff and consultants with specializations in business, compliance, communications, education and training, ethics, employment and labor law, international relations, fraud and anti-corruption as well as macro-economics. Our diverse staff, from 19 countries, have held positions at international finance institutions, multilateral development banks, and the United Nations and in nearly all WBG institutions.

The 2020 vision for EBC is to be a world-class ethics department, adhering to best practices in investigations, training, and advisory services, and setting standards in corporate ethics—in the promotion of ethical attitudes and behaviors in all the activities of the institution. These practices are embedded in decision making and in the evaluation of the relevance, impact, and efficiency of the department.

Contents

WHAT WE DO	inside front cover
The Staff of the Ethics and Business Conduct Department (EBC)	
WORDS FROM OUR LEADERSHIP.	2
President, the World Bank Group	2
Managing Director and Chief Administrative Officer, the World Bank Group	3
Chief Ethics Officer, Ethics and Business Conduct Department	4
OUR CORE VALUES.	7
Embedding Ethics throughout the World Bank Group	
EBC BUSINESS LINES.	8
Outreach, Training, and Values— <i>A New Strategy for Instilling Ethics and Values Understanding</i>	8
Ethics Advisory Services— <i>Helping to Mitigate Conflicts of Interest</i>	16
Business Integrity Review— <i>Improving Our Investigations of Misconduct</i>	24
SPECIAL REPORT.	33
Sexual Harassment— <i>Taking Every Measure Possible to Prevent Wrongdoing</i>	
ON CALL.	inside back cover
Contact EBC	

On the cover (left): A boy raises his hand in class in Burundi; Credit: UNICEF Burundi/Colfs. (Top right): EBC ensures that WBG staff are grounded in the institution’s core values, displayed here. They are the basis for our embedding ethics throughout the WBG. Photo World Bank / Stevan Jackson. (Bottom right) World Bank Group Headquarters. Photo: World Bank / Simone D. McCourtie



President's Message

Every staff member at the World Bank Group plays an important role in reaching our twin goals: to end extreme poverty by 2030 and to boost shared prosperity among the poorest 40 percent around the world. In 2018, we launched the World Bank Group's refreshed core values to guide our work and improve how we work with each other.

Our core values—impact, integrity, respect, teamwork, and innovation—articulate what we care about most. They inform our decisions and shape our relationships with our clients and our partners. In short, they help us become a better Bank Group, so we can improve how we serve the poorest and most vulnerable everywhere in the world.

When we infuse how we design, develop, and implement our programs with our core values, we can accelerate progress toward our goals. Our new Human Capital Index, for example, is rooted in the first core value, impact. The Index gives heads of state and ministers of finance a very clear picture of how much more productive their workers could be with full health, a complete education, and the skills needed for the future.

IFC's Creating Markets campaign is also making an impact, with solutions that multiply farm yields, boost job engagement, and power up solar energy. The Famine Action Mechanism (FAM), the first global partnership-driven technology to predict and help prevent famine, epitomizes the value innovation.



The remaining core values—integrity, teamwork, and

respect—are embedded in everything we do. Harassment of any kind is incompatible with our values and the way we aspire to work together. This is an area where we must maintain the highest ethical standards as an institution to help our people better serve our clients in every country.

The World Bank Group's department of Ethics and Business Conduct strengthens our core values and helps staff conduct operations the right way. We have a duty to avoid conflicts of interest; EBC supports World Bank Group colleagues in this effort. And we have a duty to use our resources as efficiently and effectively as possible; EBC promotes efficient operations and addresses any suspicion of misuse of resources.

Our mission is literally etched on the wall at the entrance to our headquarters: "Our dream is a world free of poverty." How we accomplish that mission is as important as the mission itself. I'm confident that together, we can bring our core values to life in meaningful ways and reflect those values in everything we do to deliver on our goals and end poverty on the face of the earth.

Jim Yong Kim
President
The World Bank Group



I am pleased to present this year's Annual Report for the World Bank Group Ethics and Business Conduct Department.

Our clients around the world and our shareholders are relying on us—now more so than ever—to deliver for the world's poorest. This is clearly laid out in the recent capital increase commitments and our compact with shareholders, the Forward Look. EBC's work fosters an ethical and values-based culture, which makes delivery on our commitments possible.

The World Bank Group aspires to maintain a safe, respectful, and healthy workplace. Our vision to embed ethics throughout the Bank Group will allow us to implement the highest standards of governance and accountability in our institution. One of EBC's achievements last year was the launch of our refreshed core values, helping to bring to life our commitment to truly live our values every day at work.

MDCAO's Message

For the first time, this year's report highlights how the WBG is improving our approach toward sexual harassment, a top priority of senior management. You may read more about this in the report as well as get an overview of the varied areas of EBC's work, including outreach and training, the conflicts of interest program, investigations, and advisory services.

I wish to welcome our new Chief Ethics Officer, Jorge Dajani, whose leadership is helping to bring about a cultural change to the WBG based on transparency, trust, and accountability. I would also like to thank former EBC head Ousmane Diagana for his dedication, innovation, and strategic leadership.

In closing, I want to reiterate my support to the work of EBC and to the overall goal of making the World Bank Group a leader in excellence, both in what we do and how we do it.



Shaolin Yang
Managing Director and Chief Administrative Officer
The World Bank Group

Chief Ethics Officer's Message

The WBG's Ethics and Business Conduct Department is increasingly focused on shifting the institution's culture by embedding ethical values in everything the WBG does. Transparency, trust, and accountability need to be at the center of everything we do. And this culture shift must start from within, beginning with EBC, to strengthen our role as a cohesive and proactive department. EBC is ensuring that ethics is present throughout the decision-making process of the Bank Group. Our first and best line of defense is to create a culture where staff, managers, and leaders are trained and empowered to make ethical decisions.

In this report on EBC's activities and performance in fiscal year 2018, we highlight some of our key priorities: prevention, fostering a respectful work environment, and addressing misconduct.

Prevention is a key priority. The Ethics Advisory Services Unit is essential to prevent potential conflicts of interest and reputational risk to the



Bank Group. The services are easily accessible and confidential, and the team is responsive: 93 percent of close to 1,000 queries received in fiscal year 2018 were addressed within two days. The Outreach, Training, and Values Unit has reached more than 4,600 staff in HQ and 33 country offices, while leading the work in refreshing the Bank Group's core values and the elaboration of the new Code of Ethics and Conduct. Furthermore, Ethics has been gradually increasing its presence and synergies with other areas of the Bank Group, including its involvement in key committees to mitigate risks in areas such as audit, enterprise risk, and procurement.

In fiscal year 2018, EBC actively worked to address and resolve misconduct. More than 250 allegations were received, with harassment being the primary source of misconduct. Moreover, in the wake of the #MeToo and #AidToo movements and increasing efforts by the WBG to address sexual harassment,

CONTINUES ON PAGE 6

Moving Forward

EBC made significant strides during fiscal year 2018. Still there is much more for us to do to grow from “good” to “excellent” and to create a fully safe workplace environment. Here is what we will need to do to attain these goals:



EBC will launch a new three-year holistic and people-centered strategy that will include benchmarking EBC’s policies and procedures against best practices. EBC aspires to become the Center of Excellence in Ethics, evaluating results based on detailed empirical evidence and further fostering our corporate culture based on values. Our ultimate goal is to embed ethics throughout the entire decision-making process in the World Bank, IFC, MIGA, and ICSID. EBC will continue to demonstrate leadership in fighting any kind of harassment in the workplace, walking the talk on our values of respect, integrity, and teamwork.



EBC will seek to improve WBG staff perception through more proactive outreach and communication. The goal will be to develop greater trust in the department as a promoter of ethics and provider of ethics services, not a policing department or overseer.



We will increase the speed of our investigations, especially sexual harassment cases, and improve the transparency, efficiency, and fairness of the investigatory process through a series of process and rule changes; the department will increase reporting outcomes on a periodic basis.



We will further develop and enhance our training, communications, and advisory activities to ensure that we can proactively provide value-added services to every staff member of the WBG.



We will persevere to add value to the Bank Group’s processes, beyond sorting out individual disputes. For instance, EBC will become an active member on WBG risk and procurement committees. In the future, EBC will also develop guidelines for operational conflicts of interest within the World Bank Group.



We will implement an onboarding Declaration of Interests (DOI) program to ensure that all individuals hired from outside the Bank Group at the GH or GI levels, or who are promoted from within the Bank Group from GG to GH, complete a DOI within 30 days from the date of their onboarding. This will allow the EBC team to immediately identify and manage potential conflicts of interests.

the number of sexual misconduct allegations more than tripled to 35 in fiscal year 2018. Sexual harassment is antithetical to our core values of respect, integrity, and teamwork, and we are determined to tackle this issue head on. For that reason, the WBG's senior management tasked EBC with institutional coordination and implementation of a holistic and people-centered strategy to scale up prevention and improve the current system for addressing cases of sexual misconduct. EBC is collaborating with Internal Justice Services (IJS) in this endeavor. Our objective is to manage a fair, transparent, and effective process, based on accountability and aimed at building the trust necessary to create a culture where those who bring allegations are listened to, where their concerns are remedied, and where they do not have to fear for their career or their wellbeing in coming forward. In such an environment, staff must be equipped with the tools to address any type of ethical concern or instance of misconduct. EBC will continue to raise awareness through targeted training, communications, events, and other outreach efforts.

Finally, EBC will adopt a three-year strategy to catalyze a change in the WBG's culture and to ensure that staff are able to continue to work in an environment grounded in ethics. This is not just about "ticking boxes" to guarantee compliance with the Bank Group's Code of Ethics and Conduct and the Staff Rules. The work of my department must be geared toward empowering staff across the Bank Group to make ethical decisions that prevent misconduct from occurring. This will require a joint effort by the entire institution, including WBG management, staff, and key stakeholders.

I hope you find interesting reading about EBC's progress in 2018 and our common vision for our shared future.

A handwritten signature in blue ink, appearing to read 'Jorge Dajani', with a stylized flourish at the end.

Jorge Dajani
Chief Ethics Officer
The World Bank Group



Our Core Values

What We Care about Most

impact

We help our clients solve their greatest development challenges

- We use our convening power, commitment to excellence, and deep professional expertise to facilitate outcomes that improve people's lives
- We make decisions that prioritize impact over politics or process
- We stay at the cutting edge in our fields of expertise
- We leverage the best knowledge and expertise available, from within and outside the WBG
- We partner with our clients with flexibility and agility

respect

We care for our people, our clients, our partners and our planet

- We treat everyone with dignity and compassion
- We embrace diversity and pursue inclusion of backgrounds, identities, cultures, work styles and perspectives
- We remain humble in carrying out our mission
- We support work-life balance of our colleagues across the globe
- We apply policy and standards with fairness and consistency
- We promote sustainable solutions in our operations and in our work environment

teamwork

We work together to achieve our goals

- We seek diverse views, perspectives and experiences
- We encourage challenging ideas and constructive disagreements
- We collaborate across boundaries and borders
- We collectively own team deliverables, decisions and accountabilities
- We celebrate and reward team successes

integrity

We do what is right

- We hold ourselves, our clients and our partners to the highest ethical standards
- We put the interests of the WBG and our clients first
- We ensure our words are consistent with our actions
- We take ownership of our actions and decisions
- We communicate with honesty and transparency
- We question actions that are inconsistent with our values

innovation

We learn and adapt to find better ways of doing things

- We challenge assumptions and take informed risks
- We approach our work with curiosity and passion
- We reflect on, and learn from, mistakes and failures
- We capture, apply and share knowledge consistently
- We ask for and learn from feedback

Outreach, Training, and Values



A New Strategy for Instilling Ethics and Values

The Outreach, Training, and Values (OTV) team is responsible for managing the EBC outreach, training, and values activities for WBG staff. In the past fiscal year, we focused on becoming more proactive and deliberate in what we do and how we do it by prioritizing. This strategy guided us as we decided where to focus our outreach, and developed such products as the well-received, timely e-learning module “Preventing and Addressing Sexual Harassment at the WBG,” created at a critical time.

OTV’s goals in outreach and training are to help WBG staff acquire: (1) knowledge and understanding of our core values, common ethical issues, and ethical and behavioral expectations; (2) the right skills and tools for navigating ethical dilemmas and situations; and (3) a strong ethical and values-based mindset over time.



OTV team (left to right): Leonard Newmark, Olesya Gafurova, **OTV Manager Trang Nguyen**, Junko Saito, Deepa Mahesh, and Mary Anne Magpoc. Not pictured: Stella-Monica Mpande.



Xiaolei Zeng, audit supervisor and VP of DARE (left) talks about invisible identities, including unseen disabilities. From left to right: Monica Oldham (Senior HR Specialist) and April 10, 2018, Ethics at Work learning session, with keynote speaker Souleymane Bachir Diagne (Columbia University Professor of French and Philosophy) and OTV Manager, Trang Nguyen.

Impact

OTV stays at the cutting edge of training and learning expertise to deliver original, engaging products that are driven by ethics and the core values, delivered institution wide both face to face and online.

- In fiscal year 2018, OTV connected with 4,615 staff (see Table 1.1) through outreach and training activities, both directly and by videoconference. We reached staff in Washington, DC, and the following 33 country offices: Accra, Addis-Ababa, Amman, Antananarivo, Bangkok, Brasilia, Buenos Aires, Bujumbura, Cairo, Chennai, Dar es Salaam, Dili, Djibouti, Islamabad, Istanbul, Johannesburg, Kabul, Khartoum, Kigali, Kyiv, Luanda, Manila, Maputo, Monrovia, Mumbai, Nairobi, New Delhi, Ouagadougou, Pretoria, Pristina, Skopje, Tegucigalpa, and Yaoundé.

Table 1.1 Outreach to WBG Staff Worldwide, FY18

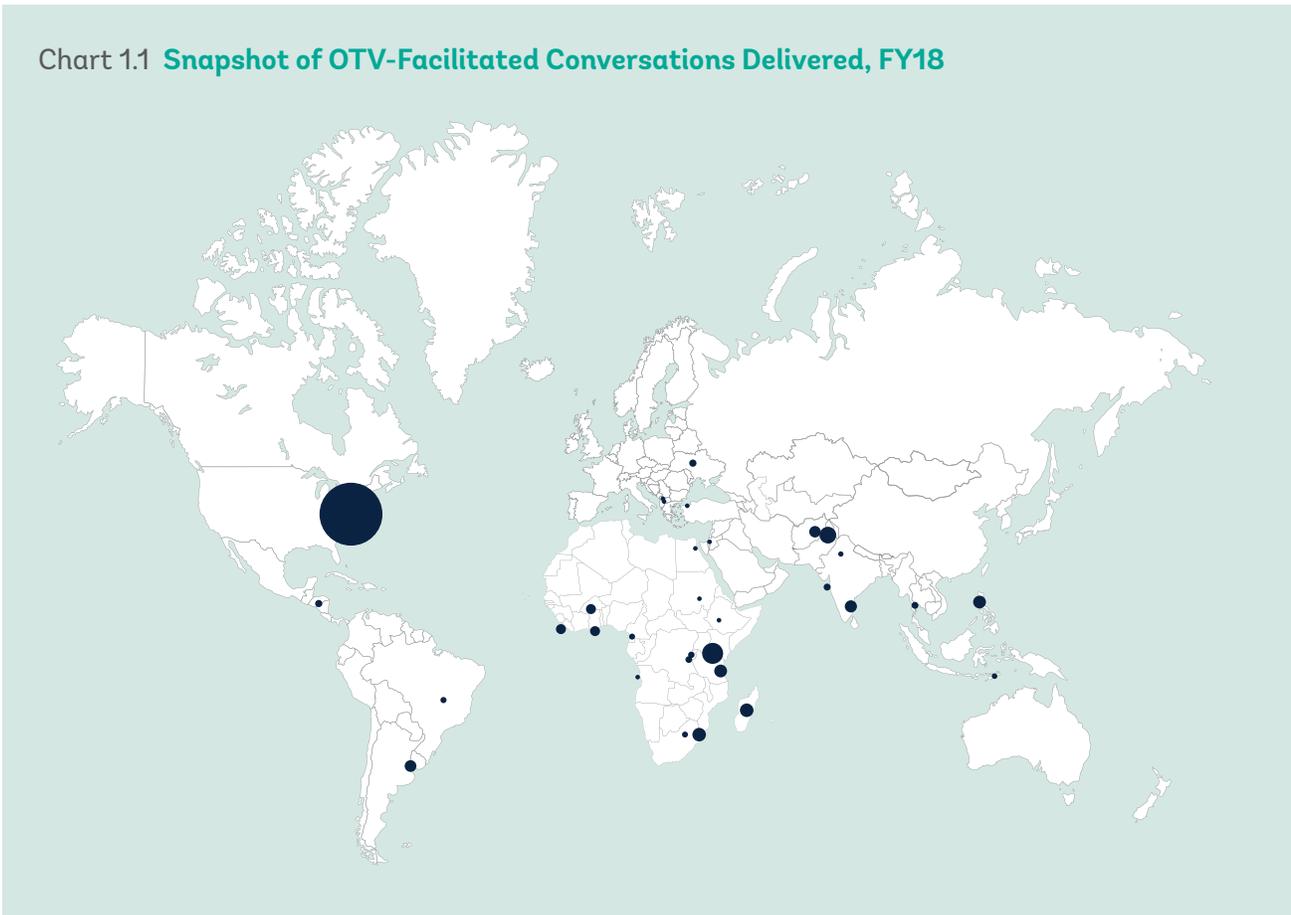
Ethics at Work lectures	416
Ethics Awareness seminars	2,098
“Creating a Respectful and Harassment-Free Workplace” conversations	2,101
Total outreach	4,615

- Through our flagship product—“Creating a Respectful and Harassment-Free Workplace”—OTV has helped leaders and their teams across the WBG to engage in impactful, meaningful conversations about how each member, and the team collectively, can contribute to strengthening the work environment. Feedback from participants has been

very positive, and OTV will significantly increase this activity in response to increased demand next fiscal year.

- EBC will continue to strengthen partnerships with the Human Resources Development Vice Presidency (HRDVP) and the Staff Association to regularly engage staff and communicate the WBG core values. We are in the process of developing a guide to help leaders converse with their teams about how to put the values into action. We worked with leaders to pilot these conversations in fiscal year 2018 and anticipate making the guide available to all leaders in early 2019.

Chart 1.1 **Snapshot of OTV-Facilitated Conversations Delivered, FY18**





EBC Counsel Yasmeen Nasser Al Tabbag, Investigator, presents to WBG staff at EBC's "Creating a Respectful and Harassment-Free Workplace" facilitated conversation.

Integrity

Of institution-wide significance, EBC led the drafting of a new Code of Ethics and Conduct, oriented closely with the core values, in fiscal year 2018.

- The refreshed WBG core values were presented to the Bank Group on May 2, 2018. EBC coordinated this initiative on behalf of the WBG under the direction of the Values Steering Committee, with selected vice presidents from across the WBG. The working group, with representatives from the Staff Association, HRDVP, IFC, and MIGA, played a critical role in translating staff inputs into the new core values. They are a direct result of the candid views and inputs that over 1,000 staff shared through more than 40 face-to-face focus group discussions in Washington, DC, and country offices. These talks were followed by an online engagement targeted to all staff at all levels, and designed to ensure the new core values embraced the diversity of the WBG family.
- EBC drafted a new Code of Conduct to replace the 2009 code. Distributed to staff for input in early fiscal year 2019, the revised code is aligned to our core values and is meant to be positive and aspirational, focusing on expected behaviors rather than replicating the Staff Rules in a strict manner, as in the past code. The final draft will be submitted to senior management by the end

of calendar year 2018, and the new Code of Ethics and Conduct will go into effect in early January 2019. The document espouses the highest ethical standards and emphasizes that our actions reflect our words.

- OTV continued to provide “Ethics Awareness” training throughout the fiscal year, both by responding to requests coming from business units and as part of organizational priorities such as staff orientation for 354 new employees at IBRD and IFC. OTV delivered training to employees at staff meetings and during retreats for units including the Integrity Vice Presidency and the Corporate Secretariat; Brown Bag Lunches for the WBG Domestic Abuse Prevention Program and Global Partnership for Education; and regular sessions for the WBG Internal Justice Services’ Respectful Workplace Advisors, and Country Directors and Country Managers.



Above: Ethics Officer Stella-Monica Mpande engages with WBG staff at EBC sponsored “Creating a Respectful and Harassment-free Workplace” workshop.

Right: OTV Manager Trang Nguyen presents a case study at a “Creating a Respectful and Harassment-Free Workplace” facilitated conversation at IFC.



Respect

In fiscal year 2018, respect was evident in our efforts to include as many different views and inputs, and reach as many staff, as possible, as well as expose staff to new perspectives.

- OTV continued to raise awareness of ethical issues through the Ethics at Work lecture series by inviting outside speakers to engage with staff. Attendance was typically standing room only, with total attendees at 416. We held three Ethics at Work lectures in fiscal year 2018, all highlighting themes related to respect:

“Curiosity: A Missing Link in Human Potential”

Explored both intellectual and social curiosity as a key to boosting human potential.

“Bullies Be Gone: A Guide to Understanding and Beating Them”

Addressed the issue of workplace bullying.

“Our Identity—It’s Complicated”

Examined how identity can affect how we behave at work.

Box 1.1 OTV Focus on Country Offices

Over the fiscal year, OTV expanded our outreach to country offices. We focused on the Latin America and Caribbean, South Asia, and Middle East and North Africa regions, particularly in areas where we had not recently been present or where there were special needs from the country offices.

In addition to deploying our DC-based team, we leveraged our senior-level Chief Counsel based in Nairobi (see Box 1.2) and hired a Senior Ethics Officer based in Chennai to respond to ethics-related inquiries more efficiently and effectively. They will lead the development of products geared specifically to country office needs.

In Nairobi, EBC delivered sessions on general ethics issues and political activities. In Chennai we also delivered multiple sessions of “Creating a Respectful and Harassment-Free Workplace” and supported the Chennai leadership to begin a conversation on how the WBG’s core values are relevant to the Chennai office.

Teamwork

While EBC's outreach and training is managed by the OTV team, we ask colleagues from both the Ethics Advisory Services (EAS) and Business Integrity Review (BIR) units to deliver training and facilitate conversations, presenting "one EBC" to our clients across the WBG. This approach helps our clients put a face to EBC staff who may be providing them advice on how to manage a potential conflict of interest or carrying out an investigation on their behalf. We also team up with staff from other units such as Human Resources and the Ombuds Office to deliver our outreach and training activities.

In addition, OTV partners with many departments across the World Bank Group to deliver training to staff.

- We partnered with Human Resources to deliver "Giving and Receiving Feedback" in Nairobi, New Staff Orientation on a monthly basis, and a special orientation program for staff going to fragile, conflict, and violence affected countries.
- OTV delivered targeted training to IJS Respectful Workplace Advisors to support them in their role as first-line support to staff.
- EBC participated in events organized by partners such as Internal Justice Services Week and Diversity & Inclusion Day.
- OTV's manager is a member of the staff-led Working Group on Sexual Harassment, and a member of the HR-led Performance Management Steering Committee, which was tasked with recommending a new approach to performance management for the WBG.



On February 28, 2018, WBG staff attend the curiosity and learnability Ethics at Work learning session hosted by the Ethics and Business Conduct Department (EBC).

Innovation

Innovation has been at the heart of OTV's activities this past year in terms of developing new products and approaches, including e-learning, videos, facilitation activities, and others. The results of OTV's efforts, such as the highly praised "Creating a Respectful and Harassment-Free Workplace" and new e-learning courses show the passion and curiosity with which each training product is developed.

In fiscal year 2018, OTV launched two e-learning modules:

- "Conflict of Interest Risk Management for Your Project" was launched in fall 2017. It targets World Bank Group staff, clients, and partners, and provides participants with the skills to identify, assess, and manage conflict of interest risks by using a variety of scenarios commonly seen in development projects. In fiscal year 2018, this course was completed by 48 staff and 77 external partici-

pants, such as donors, members of civil society, government counterparts, and private sector representatives. Considering the participation numbers, EBC will promote “Risk Management” more widely in fiscal year 2019.

- “Preventing and Addressing Sexual Harassment at the WBG” was developed in house and launched in June 2018 (see the Special Report on Sexual Harassment, page 33).

Box 1.2 EBC Outreach to Africa

In addition to delivering on EBC’s mandate, Nairobi-based EBC staff have supported a number of regional and international organizations to adopt or revise their own policies on sexual harassment, sexual exploitation, and abuse.

In keeping with the values of teamwork and innovation, during fiscal year 2018, EBC Nairobi provided technical support to:

- the African Economic Research Consortium by sharing best practices as well as pertinent policies, rules, and procedures to assist the regional organization in setting up its own ethics unit;
- the African Union by assisting the African Union High-Level Committee as it grappled with effectively and pragmatically addressing staff concerns related to ethics, workplace conflict, and oversight; and
- the implementation support mission for the Kenyan Judicial Performance Improvement Project, which is based on increasing access to courts and timeliness of judicial services, quality decision making, and fiduciary compliance.

In addition, the Nairobi-based Chief Counsel was invited by the World Intellectual Property Organization, a United Nations agency based in Geneva, to deliver a presentation on the WBG ethics framework and recurring ethics themes in international organizations, particularly international financial institutions.

EBC Nairobi was also invited by USAID to a knowledge-sharing event attended by 100 representatives from international and local USAID implementing partners. The Chief Counsel shared about the WBG policies and processes in place to build staff confidence in the IJS at the World Bank Group, to handle misconduct, prevent retaliation, and establish a respectful workplace culture in the Bank Group.

Ethics Advisory Services



Helping to Mitigate Conflicts of Interest

Every business day, the Ethics Advisory Services (EAS) team responds to an average of four requests for advice and guidance on following the WBG values and complying with the Staff Rules and Principles of Staff Employment. In addition to providing a high volume of compliance expertise, the EAS team manages the two Declaration of Interests (DOI) programs of the WBG, the ethics helpline, and in partnership with the Global Environment Facility (GEF), during fiscal year 2018 acted as Ethics Officer of its Ethics Committee and implemented the first DOI program for its Council.

In fiscal year 2018, EAS received 925 requests for advice, an increase of 9 percent over the previous year's 846 queries. Thirty-four percent of all queries received related to questions about outside activities and outside employment. This includes questions



EAS team (left to right) Gabriela Beal, Suzhe Jia, **EAS Manager Sylvie Dossou**, Dawn Mpati, Stan Simpson, and Selina Talengie Katenga-Kaunda.



EAS Senior Counsel Dawn Mpati (center) presents to WBG staff at an EBC “Creating a Respectful and Harassment-Free Workplace” facilitated conversation.

about holding board positions in outside entities, teaching, and publishing. About 14 percent of the queries received related to relationships, which encompasses questions about the recruitment of relatives of staff by the WBG, and the assignment

of spouses or domestic partners also at the WBG, or intimate relationships between staff members. The remainder of our advisory work involved answering a mix of queries mainly related to gifts, political activities, and financial conflicts of interests (see Table 2.1).

Table 2.1 EAS Advice by Category, FY16–FY18

Subcategory	FY16	FY17	FY18
Outside Activities & Employment	284	311	317
Future or Former Employment	112	103	94
Close Relatives/Relationships	112	112	129
Vendor Procurement	50	60	95
External Services	48	48	42
Gifts, Medals, & Honors	42	47	61
Personal Financial Interests	20	17	21
Public Statements & Disclosures	32	40	63
Operational	29	20	6
Other	48	88	97
Total	777	846	925

 **Impact**

EAS experts are trained to be agile to address client needs swiftly and effectively. The high number of EAS cases, especially in ethical areas concerning close relatives and spouses, outside activities (other), outside employment, and procurement, made this a challenge. EAS staff were able to respond to 93 percent of queries within 48 hours in fiscal year 2018, an increase of 3 percent over fiscal year 2017, and 68 percent of queries in one day.

To support the WBG's policy of simplification and agile processes, EBC plans to abolish the Outside Interests Committee (OIC) and replace it with decisions by the Chief Ethics Officer. The Staff Rules referring to the OIC will be changed in fiscal year 2019, in close consultation with the Staff Association, IJS, Legal Vice Presidency, and HRDVP.

 **Integrity**

As the value of integrity states: the interests of the WBG and our clients come first. Corruption and poor governance are major challenges to the institution's twin goals. One of the best ways to mitigate potential conflicts of interest and corrupt practices is to require transparency and disclosure.

- EAS oversees two Bank Group DOI programs, which are designed to mitigate real or perceived conflict of interest risks.

The Senior Management Team and Vice Presidents DOI Program required the 42 most senior individuals in the organization in fiscal year 2018, including the Bank Group President, to complete a declaration that is summarized and publicly posted on the Internet. At the start of their appointment, all new vice presidents receive individual briefings on compliance with the conflict of interest requirements of the Bank Group, and senior management regularly consult EAS for guidance on conflicts of interest concerns. There were no unresolved issues in fiscal year 2018.

The Staff DOI Program required 2,466 manager-level staff members, as well as designated staff in other sensitive roles, in fiscal year 2018 to complete a confidential DOI that was reviewed by EAS and internal consultants. Eighty-seven percent were closed at initial review, and the balance will be finalized in due course. At the close of fiscal year 2018, EAS was finalizing the Staff DOI Program for the year, with 95 percent of the cases closed.

- The Staff Rules address staff members' ability to participate in employment outside the WBG. While some activities do not require approval, others do. For employees in certain staff grade levels, requests to engage in particular activities are considered by the Outside Interests Committee. The OIC comprises representatives from throughout the Bank Group and considers staff members'

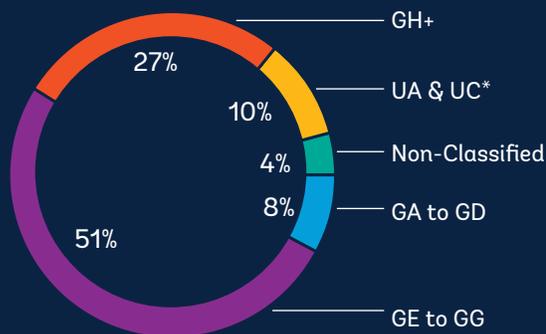


Ethics Awareness session held at HQ.

requests to provide services to a for-profit entity or initiative, paid services to a nonprofit entity, unpaid services to a nonprofit entity that has a business relationship with the Bank Group, or services to a government.

In fiscal year 2018, the OIC considered 15 requests to engage in outside employment and activities from staff members employed at grade levels GF and above. Ten of the requests were approved.

Chart 2.1 EAS Consultations by Grade Level, FY18



*UA/UC grades are designated for JPAs, the Chair of the Staff Association, staff on Special Assignments, as well as staff hired through the partnership programs (i.e., Donor Funded JPOs, Saudi Recruitment, Global or Voice Secondment). Source: HR's Quarterly Business Reports.

Outside employment and activities is a subject area where EAS sees most misunderstanding from staff about Staff Rules. Many staff accept board positions in outside private entities without realizing that they require approval because such concurrent external employment is restricted by the WBG. Private sector employment is not permitted.

- In Chart 2.1, higher levels of consultation at the senior level show the high ethical commitment of the managers in the institution. Low use of service by STCs is, in part, because some conflict-of-interest rules do not apply to the consultants.

Respect

The members of the Ethics Advisory Services team help staff avoid potential conflicts of interest. Particularly in fiscal year 2018, this action flourished into a deeper and more widespread trust in and respect for the EAS's ability to advise accurately, confidentially, and promptly.

- The increase in EAS queries from 846 to 925 in fiscal year 2018—a jump of 9 percent—can be attributed to a combination of factors. There is broad and growing awareness among staff of EAS's availability and a greater satisfaction with EAS's answers to bring about positive outcomes in terms of interactions with staff. This gradually leads to an increase in favorable word-of-mouth recommendations among colleagues on the unit's advisory services. There is also a rise in trust that staff and consultants across the Bank Group can confidentially discuss difficult situations with EAS with a clear expectation that questions will be answered swiftly and accurately. In fiscal year 2018, staff expressed satisfaction and trust related to services and advice provided by EAS. This year staff expressed increased satisfaction in EAS's services. Staff found EAS's guidance on WBG Staff Rules particularly helpful.

Teamwork

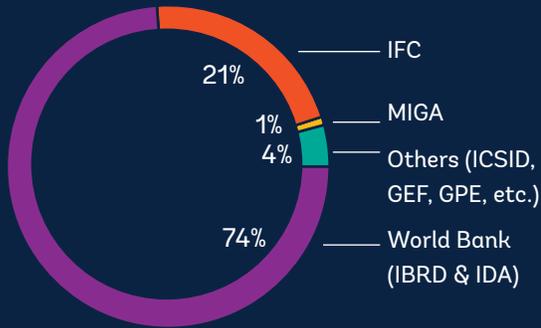
EAS guides staff to align their professional conduct and private interests with ethical standards. The team members also reinforce the special responsibility of staff to avoid situations and activities that might reflect adversely on the organization, compromise its operations, or lead to real or apparent conflicts of interest.

- In fiscal year 2018, Ethics Advisory Services worked closely with the BIR and OTV teams on Ethics and Business Conduct Department initiatives. For example, EAS staff are an active part of the intake team to determine if or when an

Professor of Business Psychology at University College London, Tomas Chamorro-Premuzic, shares his findings on curiosity and learnability at the Ethics at Work learning session.



Chart 2.2 EAS Case Percentage by WBG Institution, FY18: Advice Given by WBG Institution



allegation should be channeled to investigations or if it could be handled as a conflict of interest. EAS staff also regularly participate in delivering “Creating a Respectful and Harassment-Free Workplace” seminars, among other activities.

- EAS partnered with the Global Environment Facility (GEF) in fiscal year 2018 to serve the role of Ethics Officer for the Ethics Committee of the GEF Council. While EAS has provided support in designing ethics policies for partnerships in the past, this is the first time that we were

acting as an Ethics Officer for the governing body of a partnership. In this capacity, EAS provided substantial input, reviewed, and proposed amendments to the Policy on Ethics and Conflicts of Interests applicable for all GEF Council members, alternates, and advisors. EAS also designed and implemented the first DOI program for the GEF Council, achieving 100 percent compliance with the corresponding reporting obligations.

- EAS directed onboarding of all new WBG staff and the IFC induction program regularly.

Innovation

EAS asks for and learns from feedback about service quality. The direct, person-to-person feedback captures the experiences and input of complainants, witnesses, and subjects involved in reviews of allegations of suspected misconduct. Ratings are consistently good.

- Going forward, EAS will implement a systematic survey to our clients in order to collect anonymous feedback on the quality and timeliness of the service provided.
- The EAS team will soon set up an onboarding DOI program. In line with international best practices, all individuals hired from outside the Bank Group at the GH or GI level, or who are promoted from within the Bank Group from GG to GH, will complete a DOI within 30 days from the date of their onboarding. This will allow EAS to immediately identify and manage potential Conflicts of Interests (COI) instead of waiting for the next DOI cycle and identifying potential COI months after the onboarding.

Preventing and Addressing COIs

The EAS team handles each conflict of interest case by applying knowledge gained over years of finding better ways of doing things while abiding by the rules set by the EBC in concert with the Bank Group. Here we share some of that knowledge through sample cases and policy feedback.



Financial conflict of interest

CASE: A firm in which a short-term consultant (STC) had an ownership interest competed in a procurement process to provide services under a Bank-financed project. The STC in question was working for the Bank on the same project at the same time. The Task Team Leader (TTL) of the project requested EAS's guidance to resolve the potential conflict of interest. EAS advised the TTL and Project Implementation Unit (PIU) to consider and manage the conflict of interest risk, and consequently, the PIU decided not to award the contract to the STC's company. Additionally, EBC recommended that the TTL inform management of the implemented mitigating measure.

REMARKS: *Bank policy requires that staff members cannot have interests in firms participating in procurement processes under a Bank-financed project. A conflict of interest may arise when a staff member has competing professional and personal interests that can make it difficult to fulfill duties impartially. We are required to perform our duties in a manner that preserves integrity—one of the WBG's five core values.*



Family relationship conflict of interest

CASE: A close relative of a WBG staff member was appointed advisor to a high-level government official. In the new role, the relative became the focal point at the government agency for all WBG matters in the specific country office. This meant that potentially, the staff member, who is located in the same country office, could be working directly with the close relative on official WBG matters. EAS worked with the management team to put in place a risk management strategy to ensure that the ongoing work program of the staff member did not include tasks that would overlap with the official duties of the close relative. Management established a country office focal point (who is not the relative) to be responsible for communications between the WBG and the government agency. Additionally, management sent a general correspondence to all staff in the country office to remind them of their obligation to keep nonpublic WBG information confidential, and to be cautious with regard to information shared in public forums and other social media.

REMARKS: *A perception of favoritism and nepotism likely arises when close relatives work together, whether they both work within the WBG or if one of the relatives works in a WBG counterpart. To avoid such perception, the WBG policy is that close relatives and spouses should avoid working on the same matters (even when in counterpart entities), because working together brings them into routine professional contact, which creates conflict of interest risks.*



Outside employment— public office

CASE: In the past year, the Outside Interests Committee granted approval for a staff member to accept nomination and appointment to a position in a commission on housing at a country or municipal level. The commission advises the Country Executive and Country Council on ways to handle issues associated with common ownership of property in communities and adjudicates housing disputes between residents. The OIC approved the request provided that (1) the position is unpaid; (2) the staff participation in committee and council matters takes place on the staff's own personal time and without using WBG resources; (3) the position is held in a personal capacity; (4) the staff's WBG affiliation is not referenced (the staff is not representing the WBG) in connection with the position; and (5) the country does not have any business relationship with the WBG while the staff member is involved in country administration matters.

REMARKS: *EAS receives many queries about whether WBG staff may hold public office. The WBG makes a distinction between national public office and other public office positions. A staff member who evidences intent or undertakes by conduct or stated decision to become a candidate for or accept an appointment to national public office is required to resign from WBG employment. For any other public office, staff are required to seek approval from the OIC. EAS performs the Secretariat function for the OIC and provides advice and guidance to staff about outside activities in which they may engage.*



Outside employment— teaching versus private consulting

CASE: A full-time staff member requested permission to perform mission-readiness training activities at an outside private entity.

REMARKS: *The OIC denied the request because it considered the activity to be a paid consulting service provided to a for-profit entity, rather than a permissible teaching activity within the meaning of the Staff Rules. Part-time teaching is allowed under the Staff Rules provided that the immigration laws permit the activity in the country where the staff member is stationed. The Staff Rules lean toward interpreting teaching in an academic context, that is, lecturing, delivering talks at conferences, writing, and contributing to academic research or to the design of academic courses. Although each request is considered based on its own facts, the Staff Rules state that the OIC will generally not approve a request from a staff member holding an appointment at grade GF or above, or under an ungraded position, or Extended Term Consultants at level EC2 or above, who is providing full-time service to the WBG, to engage in self-employment for profit or to perform any paid services for any outside private entity, whether as employee, director, partner, or otherwise.*

Business Integrity Review



WBG Chief Ethics Officer Jorge Dajani speaks at the October 18, 2018, UK Department for International Development event in London on "Putting People First: Tackling sexual exploitation and abuse, and sexual harassment, in the aid sector."

Improving Our Investigations of Misconduct

The vast majority of WBG personnel uphold the highest ethical standards in the work environment and communicate and act with honesty and transparency. A few, regrettably, do not. Their behavior hurts the integrity and reputation of the WBG and the functioning of its individual offices and sometimes the lives of their coworkers.

As part of our mandate, BIR diagnoses and manages incidents when staff bring forward concerns about potential misconduct. BIR's core objective is twofold: (1) to serve as impartial and independent fact finders; and (2) to provide a fair opportunity and process by which staff can clear up any uncertainty if or when their activities or behavior is called into question. BIR's intent is to stop misconduct in all its forms whenever or wherever it occurs.



BIR team (left to right): Yagid Al-Eryani, Kosta Nesterov, Jose Luis Martinez, Ashok Rau, Simisola Adejumo, Lemlem Workalemahu, **BIR Manager Jodi Glasow**, Doreen Kapakasa, Sylvia Winborne, Adebisi Oyelade, Suzan Sgaier, Jules Baughns, and Philip Caine. Not pictured: Yasmeen Nasser Al Tabbaa, and Eliane Kabwa.

When an investigation is completed, BIR provides a report to the Vice President, Human Resources (HRDVP), a basis from which the HRDVP can decide whether the staff member’s behavior constitutes misconduct, and what sanction, if any, to impose. BIR also helps to ensure that the Bank Group’s Staff Rules, policies, and procedures are consistently followed.

Disposition of Cases



Not every allegation received by BIR results in an investigation. The process of reviewing an allegation of misconduct involves four stages: (1) intake; (2) preliminary inquiry; (3) investigation; and (4) report (see Table 3.1). Here is a breakdown of how BIR disposed of the 250 allegations in fiscal year 2018:

<p>1. Intake</p> 	<p>Upon receipt of an allegation, EBC assesses the information gathered to determine whether the complaint, if proven, would constitute misconduct under Staff Rule 3.00. If it does not, EBC may refer the complaint to another appropriate area of the WBG, such as the Internal Justice Services or line management, to address the matter. EBC also may offer guidance, consultation, and advice if the complaint is not suitable for review through an investigation.</p>	<p>115 IN FISCAL YEAR 2018, 115 ALLEGATIONS OF MISCONDUCT WERE CLOSED AT THE INTAKE STAGE.</p>
<p>2. Preliminary Inquiry</p> 	<p>If an allegation is within EBC’s mandate and a less formal intervention is not appropriate, EBC conducts a preliminary inquiry to determine whether there is a sufficient basis for a formal investigation of the allegation. At this stage, EBC seeks to discover the facts of the case by collecting evidence, including interviewing witnesses and reviewing documents. During this stage, EBC assesses the allegation to determine if the evidence is credible and verifiable.</p>	<p>97 IN FISCAL YEAR 2018, 97 ALLEGATIONS OF MISCONDUCT WERE CLOSED AT THE PRELIMINARY INQUIRY STAGE.</p>

<p>3. Investigations</p> 	<p>When EBC finds a sufficient credible basis for investigating the allegation, the department begins a formal process. A written Notice of Alleged Misconduct is issued to the subject staff member to inform him or her of the allegations and seek a response. An investigation enables EBC to establish whether there is strong enough evidence of misconduct or whether the case should be closed.</p>	<p>19</p> <p>IN FISCAL YEAR 2018, 19 ALLEGATIONS OF MISCONDUCT WERE CLOSED AT THE INVESTIGATORY STAGE.</p>
<p>4. Report</p> 	<p>After the formal investigation stage, if EBC determines that there is sufficient evidence to support an allegation of misconduct, it prepares a report of its findings for the HRDVP to review. The HRDVP determines whether the evidence supports a finding of misconduct, and if so, decides on the appropriate disciplinary sanction.</p> <p>A breakdown of EBC’s findings in the 19 allegations and the resulting disciplinary decisions can be found in Table 3.4.</p>	<p>19</p> <p>IN FISCAL YEAR 2018, 19 ALLEGATIONS OF MISCONDUCT RESULTED IN INVESTIGATION REPORTS THAT WERE SENT TO THE HRDVP FOR REVIEW AND DECISION.</p>



Table 3.1 **How BIR Managed Cases, FY18**

TOTAL NUMBER OF ALLEGATIONS PROCESSED IN FY18	283
Brought forward from previous year (FY17)	31
Reported in FY18	252
Total number of allegations closed in FY18	250
Closed at Intake	115
Closed during Preliminary Inquiry	97
Closed during Investigation	19
Reports to HRDVP	19
Total number of allegations carried over to FY19	33

Impact

BIR makes decisions about allegations that prioritize impact. The unit addresses each allegation during a preliminary inquiry to determine whether an investigation is required, keeping in mind the concerns of the reporter and moving forward with sensitivity to all parties involved. In doing so, the investigators adhere to the principles of due process and fairness, holding ourselves to the highest standards.



- BIR measures its impact not by the number of allegations that result in investigative reports sent to the HRDVP, but by the number of allegations that the team has mitigated and addressed. As reflected in the numbers, the majority of allegations are closed at the intake, preliminary inquiry, and investigation stage. What is the basis for closing at these stages? The decision to close an allegation is due to a variety of factors. For example, staff often approach BIR seeking advice. Our investigators provide counsel and guidance to staff in assisting how and where to best resolve their concerns. Of the 250 allegations closed in fiscal year 2018, BIR provided complainants with advice and consultation in 60 allegations (24 percent). For those matters that were not suitable for investigations, BIR referred the parties to different services in the IJS for resolution in 22 allegations (8 percent).
- In other instances, some complainants simply wanted to come forward to create a record but did not want BIR to move forward with a review. This happened in approximately 29 allegations (12 percent). In 15 allegations (6 percent), BIR did not have jurisdiction to review the matter as the issue raised was not alleged misconduct. In six allegations (2 percent), BIR could not reach the reporters, as the allegations were filed anonymously, and therefore the matters were closed. Finally, in only one allegation (0.4 percent), BIR closed the matter as the parties reached a mediated settlement.
- In the remainder of the 98 allegations (40 percent), BIR determined that the concerns alleged involved inappropriate behavior, but did not rise to the level of misconduct and/or there was insufficient evidence to support misconduct. In the majority of these cases, BIR contacted management and encouraged management to address the subject's inappropriate behavior through performance management, counseling, and monitoring. In those cases where BIR served the subject with a notice of alleged misconduct, BIR informed the subject of his or her inappropriate behavior and explained how it was inconsistent with the WBG's Staff Rules and Code of Ethics and Conduct. Many times, after interviewing the subject, the subject was not aware of the impact that the alleged behavior had on the complainant. Alternative remedies were identified to resolve the matter, such as management intervention and monitoring of behavior.

- This year, BIR efficiently closed 115 cases at intake and a further 97 cases during the preliminary inquiry. Nineteen cases were referred to the Bank Group’s Vice President of Human Resources Development (see Table 3.2).
- It is noteworthy that BIR closed 14 more cases in fiscal year 2018 (248) than in fiscal year 2017 (234) despite receiving 24 more cases this year than in fiscal

year 2017 (228 cases in fiscal year 2017 and 252 in fiscal year 2018). This is due in part to the heightened focus on prioritizing sexual harassment allegations and bringing resolution to these matters in a more timely and efficient manner. In fiscal year 2018, the time to complete the 19 investigations that resulted in sending a report to the HRDVP varied between 115 days and 322 days, with an average time of 181 days.

Table 3.2 Types of Allegations Reviewed that Resulted in Reports to HRDVP, FY16—FY18

Cases	FY16	FY17	FY18
Abuse of Authority	1	0	2
Discrimination	1	0	0
G-5 Domestic	1	1	2
Harassment	1	1	7
Misuse of Bank Resources	12	6	1
Non-Compliance with Staff Rules	7	8	3
Personal Legal Obligation	2	0	0
Sexual Harassment	2	2	4*
Total	27	18	19

*See Special Report on Sexual Harassment, page 33.

Integrity

We do what is right. EBC is focused on the average time required to investigate a sexual harassment case. We are currently fast-tracking these cases to shorten the length of investigation.

Respect

EBC and the Bank Group pride ourselves on embracing diversity and pursuing inclusion. When alleged discrimination is reported to BIR, it is taken extremely seriously. We will investigate the issue in greater depth to ensure action is taken when necessary.

- In fiscal year 2018, BIR reviewed seven allegations of discrimination. These included alleged instances of discrimination based on race, nationality, religious/creed, and gender. None of these allegations resulted in a report of

investigation or finding of misconduct, on par with 2017. EBC recognizes that discrimination can be hard to prove because of its nature, which is often covert and subtle. EBC, therefore, is reviewing the process by which the World Bank Group addresses alleged discrimination to make it easier for staff members to successfully bring forward a claim of alleged discrimination, increase the effectiveness of EBC reviews, and provide more support to potential victims.

- BIR tries to address allegations of inappropriate behavior that may not amount to misconduct through consultation, advice, and performance management—empowering managers and staff to make decisions within an ethical framework that translates into accountability and ownership.

Teamwork

EBC helps WBG staff make the right choices rather than taking a punitive approach. We provide training and guidance on ethical issues to create a secure workplace and an efficient, effective environment in which to work toward the WBG mission.

- EBC is engaging with the WBG Working Group on Sexual Harassment to promote conversation. In May 2018, we invited a speaker from Georgetown University to share its activities related to preventing and addressing sexual harassment.
- In fiscal year 2018, BIR substantiated 19 cases, and the HRDVP reviewed BIR's reports and gave appropriate sanctions. Eleven cases substantiated were from HQ and the remaining cases were from country offices. In terms of disciplinary action by grade level, one staff member was at GK, four were GH, seven were GG, one was level GE, two cases were at levels GA–GD and the balance were STCs and STTs. In descending order by category of misconduct, the largest shares (1) were related to harassment (six)—one was linked to sexual harassment (see page 30 for details about the outcomes of all the sexual harassment allegations)—and (2) were in connection with non-compliance of Staff Rules (six), two were associated with misuse of WBG resources, two were related to G-5 issues, and one was connected with abuse of authority (see Table 3.3).
- BIR works in close collaboration with the entire IJS system. Investigators consult with and refer cases to the Ombuds, Peer Evaluation Review, and Mediation teams as well as the Staff Association.
- BIR's manager is a member of the staff-led Working Group on Sexual Harassment.
- Outreach and training activities were often followed by one-on-one consultations with staff members either in person or by phone or email. As a result, EBC Nairobi regularly receives requests for guidance on ethical matters or reports of



workplace complaints. The office personnel work with Washington, DC-based colleagues in the BIR and EAS units. EBC Nairobi supports country staff in addressing and resolving workplace concerns and disputes early on by providing timely coaching and intervention.

- In addition, EBC Nairobi staff supported the DC BIR team with investigations in the Madagascar and Kenya country offices by carrying out interviews with parties and other support.

Table 3.3 Allegations Substantiated by EBC and HRDVP Disciplinary Decisions, FY18

* notes cases originally reported as sexual harassment

Location	Categories of Allegations as Substantiated by EBC	HRDVP Decision	Subject's Grade Level
CO	Abuse of Authority	1. Barred from rehire beyond current contract	GE
CO	*AMS 6.20 (Breach of Information Security Policy)	1. Written censure indefinitely; 2. barred from rehire beyond current contract	GG
HQ	Failure to Comply with G-5 Code of Conduct	1. Written censure for three years; 2. removal of the privilege to employ a G-5 indefinitely	GD
HQ	Failure to Comply with G-5 Code of Conduct	1. Written censure for three years; 2. removal of the privilege to employ a G-5 indefinitely	GG
HQ	Harassment	1. Ineligibility for future WBG employment; 2. written censure to remain in personnel file indefinitely; 3. permanent restriction from access to WBG premises	Consultant
HQ	Harassment (Hostile Work Environment)	1. Written apology; 2. enrollment in anger management classes within 30 days; 3. restitution for losses attributable to misconduct; 4. demotion from GH to GG; 5. ineligibility for promotion for a period of three years	GH
HQ	Harassment (Hostile Work Environment)	1. Written apology to Contractor to be presented in person; 2. attend unconscious bias training; 3. demotion from GC to GB; 4. ineligibility for promotion for three years	GC

Table 3.3 continued

Location	Categories of Allegations as Substantiated by EBC	HRDVP Decision	Subject's Grade Level
HQ	Harassment (Hostile Work Environment)	1. Written censure indefinitely; 2. ineligibility for promotion for two years	GG
HQ	Harassment (Hostile Work Environment)	1. Decision pending	GG
CO	Harassment (Failure to Observe Norms of Prudent Professional Conduct)	1. Oral censure, which is delivered to the Subject by way of HR letter; and 2. a written and oral apology to be provided by the Subject to the complainant	GG
CO	Misuse of Resources (Misuse of Bank Assets)	1. Hiring restriction on future WBG employment; 2. access restriction to all WBG premises; 3. full restitution to the WBG; and 4. written censure to remain in personnel file indefinitely	Temporary (UC)
HQ	Misuse of Resources (Theft)	1. No misconduct	GH
HQ	Non-Compliance with Staff Rules (Conflict of Interest)	1. Demotion from GH to GG; 2. no promotion for three years; 3. written censure for three years	GH
HQ	Non-Compliance with Staff Rules (Conflict of Interest)	1. Permanently barred from rehire; 2. admittance to WBG is restricted	GH
CO	*Non-Compliance with Staff Rules (Conflict of Interest)	1. Permanently barred from rehire; 2. admittance to WBG is restricted	GG
CO	*Non-Compliance with Staff Rules (Conflict of Interest)	1. Termination of employment from the WBG	GG
HQ	Non-Compliance with Staff Rules (Disclosure of Confidential Information)	1. Oral censure	GK
CO	Non-Compliance with Staff Rules (Intentional Misrepresentation of Facts to Be Relied Upon)	1. Demotion from GE to GD; 2. ineligibility for promotion for two years; 3. written censure indefinitely	GE
CO	Sexual Harassment (Hostile Work Environment)	1. Ineligibility for future employment at the WBG	Consultant

Innovation

- In fiscal year 2018, BIR reacted to the WBG’s changing landscape caused by the #MeToo and #AidToo movements with new ideas. For instance, in response to the increased allegations of sexual harassment, EBC, ITS, and members of an informal working group designed and implemented a new easy tech tool for reporting allegations, thus streamlining the overall process.
- The types of allegations of misconduct that BIR receives vary (see Chart 3.1 and Table 3.4). In fiscal year 2018, of the 252 allegations received, 79 allegations involved issues associated with harassment (31 percent). This category

includes behavior such as bullying and inappropriate verbal and written communications. Harassment is the main source of complaints received, so EBC rapidly stepped up efforts to address this issue. For example, as part of a comprehensive and holistic strategy to address these types of behaviors, BIR investigators actively participated in delivering the “Creating a Respectful and Harassment-Free Workplace” training with staff across the WBG.

Chart 3.1 Allegations Received by BIR by Category, FY18

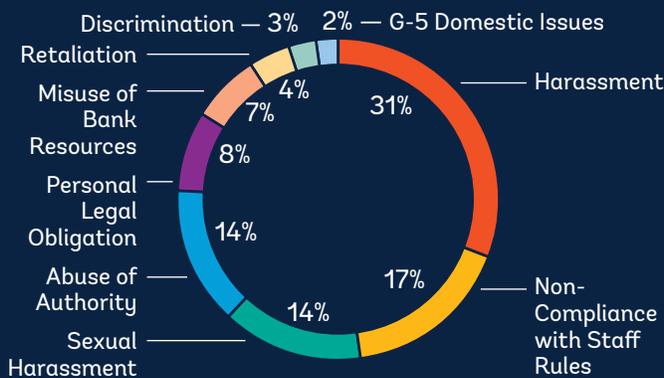


Table 3.4 Allegations Received by BIR by Category, FY15–FY18

Allegation received	Number of cases			
	FY15	FY16	FY17	FY18
Harassment	88	49	60	79
Non-Compliance with Staff Rules	64	74	60	44
Sexual Harassment	7	10	11	35
Abuse of Authority	48	26	31	34
Personal Legal Obligation	14	17	18	20
Misuse of Bank Resources	36	19	21	18
Retaliation	15	11	11	11
Discrimination	10	8	7	7
G-5 Domestic	15	15	9	4
Total	297	229	228	252



Moderator WB Senior Vice President and World Bank Group General Counsel Sandie Okoro, with discussants Co-Chair of staff-led Working Group on Sexual Harassment, Marianne Fay, WB CEO Kristalina Georgieva (speaking), and Managing Director and WBG Chief Administrative Officer Shaolin Yang. Photo credit: Joseph Grant Ellis/PhotoLab.

Special Report: Sexual Harassment

Taking Every Measure Possible to Prevent and Address Wrongdoing

Summary

EBC is listening, taking action, and making changes. We will hold offenders accountable, and create an environment of trust. EBC will employ the best international practices and lessons learned so that all staff and those impacted by our work are always safe, and we all are empowered to report allegations without fear of retaliation. This is a collective WBG strategy that will determine our ability to uphold our core values. Sexual harassment is antithetical to the World Bank Group's core values of respect, integrity, and teamwork. The WBG prohibits any type of sexual harassment.

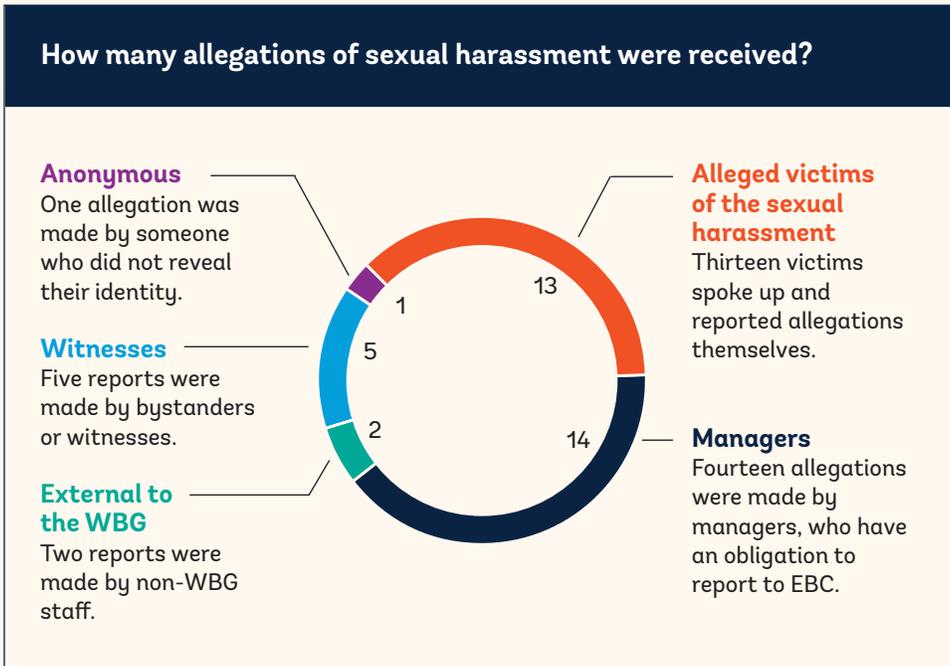
There is increased awareness of sexual harassment in the WBG, in part because of the #MeToo and #AidToo movements, but also because of the WBG senior leadership’s commitment and unambiguous communication on the issue. In addition, the Ethics and Business Conduct Department has followed up with increasing training and raising awareness. Other WBG units have contributed significantly. In particular, the staff-led Working Group on Sexual Harassment has surveyed all staff members on sexual harassment. The outcome of the survey and recommendations from the Working Group is that we need to do more to address sexual harassment effectively.

EBC has already implemented a number of changes in fiscal year 2018. We facilitated conversations on “Creating a Respectful and Harassment-Free Workplace” for over 2,000 staff members in 17 locations. We developed an e-learning course on sexual harassment that every staff member must complete. We made more explicit in the WBG Staff Rules that taking part in sexual exploitation and abuse is defined as misconduct. In cooperation with ITS, we posted a form online to enable anyone to report an allegation of sexual misconduct against a WBG staff member. As a result of increased awareness, we view the fact that there is triple the number of allegations over past fiscal year as positive, and expect them

to increase even more in 2019.

WBG is convinced of the need to do more. At the request of the WBG President, EBC commissioned an external review by independent experts to assess the WBG policies, procedures, and practices relating to sexual harassment and identify possible improvements. On the basis of all the information accumulated in the past year,

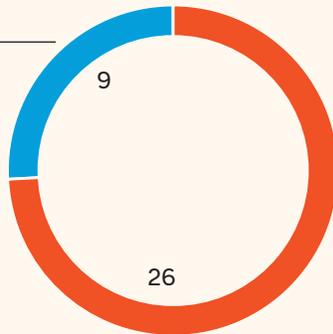
including the external review, EBC has led a new three-year action plan to address sexual harassment, which is expected to be adopted at the end of calendar year 2018 (see below).



Classification of the allegations received

Quid pro quo

sexual harassment occurs when submission to sexual advances or requests for sexual favors are made a condition of employment or used as the basis for employment decisions.



Hostile work environment

sexual harassment occurs when sexual conduct or other actions interfere with a staff member's work or create an intimidating or offensive work environment.

- 1 Sexual assault
- 9 Touching
- 11 Comments/gestures
- 4 Requests
- 1 Sharing/displaying offensive material

Sexual Harassment at the WBG: The Facts in Fiscal Year 2018

Growing from 11 in fiscal year 2017 to 35 in 2018, allegations of sexual harassment were reported by staff at various levels, including managers, victims, witnesses or bystanders, non-WBG staff, and one anonymous complainant.

ALLEGATIONS OF SEXUAL HARASSMENT REPORTED TO EBC

Typically, the types of allegations of sexual harassment that are reported to EBC fall into two categories: quid pro quo sexual harassment and hostile work environment sexual harassment.

Quid pro quo sexual harassment occurs when submission to sexual advances or requests for sexual favors are made a condition of employment or used as the basis for employment decisions. For example, a manager gives a staff member a poor performance review because the employee will not have a sexual relationship.

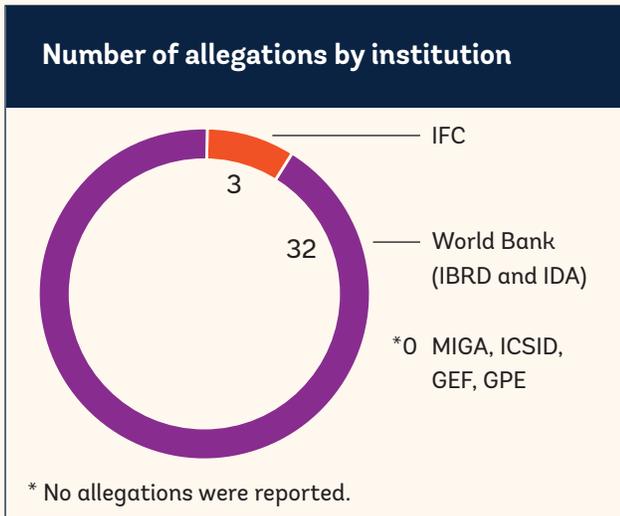
Sexual harassment in the realm of hostile work environment occurs when sexual conduct or other actions interfere with a staff member's work or create an intimidating or offensive work environment.

For example, a colleague continues to make unwelcome sexual innuendoes even though the recipient has indicated that the behavior is unwelcome. It is important to note that with respect to both types of sexual harassment, the impact on the victim—not the intent of the perpetrator—is the key factor. In the category of hostile work environment, in fiscal year 2018, there was one sexual assault, nine instances of touching, 11 comments or lewd gestures, four requests of a sexual nature, and one instance of sharing offensive material.

The allegations came predominantly from the World Bank, with a proportionately smaller number emanating from IFC. This is still a significant increase for IFC because no case of sexual harassment was reported in the past few years, indicating a pattern of underreporting.

HOW EBC RESPONDED TO THE 35 CASES

During its review of allegations in fiscal year 2018, EBC found sufficient evidence to investigate and to support findings of misconduct in four cases. In two of these four cases, allegations involved a number of citations of alleged misconduct, including quid pro quo sexual harassment. Upon review of these concerns, EBC



established that the parties had engaged in a consensual sexual relationship and that the supervisor had failed to disclose the relationship and resolve any inherent conflicts of interest arising from the relationship pursuant to Staff Rule 3.01. In these cases, EBC sent a report of its findings to the HRDVP for review and possible sanctions. In both of these matters, the HRDVP determined that the subjects had engaged in misconduct. The resulting disciplinary sanctions were termination of employment and permanent bar from rehire.

In the third of the four cases, EBC substantiated sexual harassment and the HRDVP found misconduct, resulting in the disciplinary sanction of ineligibility for future employment. In the fourth case, EBC did not find sufficient evidence to establish sexual harassment. However, EBC determined that the subject had violated WBG rules because the subject had downloaded and viewed sexually explicit material on the subject's WBG phone. The HRDVP found misconduct and barred the subject from future WBG employment.

EBC decided not to proceed with an investigation in 28 allegations (four of the 28 allegations closed were carried over from fiscal year 2017). EBC often addressed the concerns raised by reporters by speaking with the relevant parties and management. Of the 28 allegations closed, eight were closed at intake either because there was insufficient evidence or because reporters wanted to inform EBC without triggering an investigation. Ten were closed at preliminary inquiry and six cases were closed at investigation, most often because there was insufficient evidence or because the actions under scrutiny did not amount to misconduct. In these cases, the impact of the discussions with EBC should not be underestimated. The discussions assisted the alleged subjects to reflect on their alleged inappropriate behavior and to adjust their behavior going forward.

In some cases, EBC addressed the inappropriate behavior directly with the manager of the staff member. In this way, emphasis is placed on resolving the concerns through performance management rather than disciplinary measures.

In focus: How EBC handled sexual harassment allegations in FY18



Allegations Received

Brought forward from previous year FY17	04
Reported in FY18	35



EBC Review

Total number of allegations closed in FY18	28
Closed at intake	8
Closed during preliminary inquiry	10
Closed during investigation	6
Reports to the HRDVP	4
Total number of allegations carried over to FY19	11

The result is that the inappropriate behavior is addressed, but by means other than a report to the HRDVP.

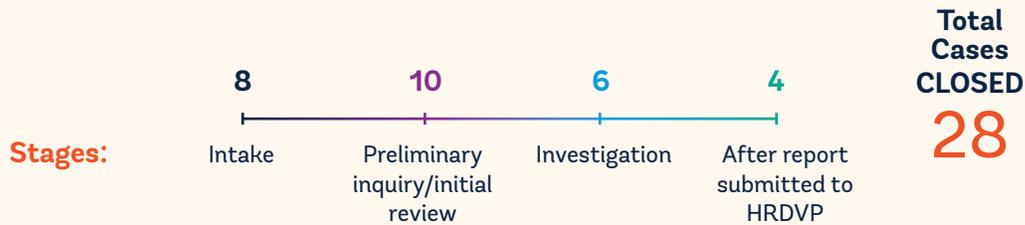
Eleven allegations of sexual harassment were carried over for further review in fiscal year 2019. Since the end of fiscal year 2018, five of these cases had already led to reports to the HRDVP.

It is noteworthy that of the 35 allegations of sexual harassment reported in fiscal year 2018, 15 of the reports were made by the alleged victims themselves. Thirteen were reported by managers, four were by bystanders/witnesses, two were by non-staff members, and one remained anonymous.

The time required for sexual harassment cases to be fully investigated, with a report to the HRDVP, varied between 176 and 322 days, and was 227 days on average. EBC anticipates that the time required to complete investigations regarding sexual harassment claims to decline in the future. EBC has made a commitment to fast-track the review and preparation of the report with quality, rigor, and speed.

The EBC Complaint Process In Focus

Investigations closed at each stage of the process



Once a complaint is brought to EBC, an intake is conducted to assess the nature of the complaint. This is to understand the allegation and decide if it falls under EBC’s mandate or should be referred to another office.

If the allegation is within EBC’s mandate to investigate as set forth in Staff Rule 3.00, EBC conducts a preliminary inquiry, during which investigators gather information and evidence. Investigators may also speak to witnesses. If investigators find that the allegation is credible and that there is sufficient information and evidence, EBC will initiate an investigation, notify the subject, and inform the reporter.

Once the investigation is concluded, and if the investigators find that there is sufficient information to support the allegation, a report is prepared. It includes all the transcripts of interviews and any other evidence that was gathered during the investigation. The subject then reviews the report and all exhibits and may provide comments. EBC sends the report and all exhibits to the HRDVP for review and action, if warranted. EBC closes the case, and the reporter is informed that the case has been forwarded to the HRDVP. It is important to note that the investigators are impartial and independent fact finders and do not decide if misconduct occurred or what, if any, sanctions to impose. The investigators are advocates for the truth.

In fiscal year 2018, EBC investigated 10 cases of sexual harassment, of which six were closed during the investigation and four were referred to the HRDVP for action based on the charge of sexual harassment. EBC is conscious of the need to increase the speed of such investigations and is now fast-tracking them.

Fiscal Year 2018 Reforms

In fiscal year 2018, as directed by the President of the WBG, EBC rapidly stepped up actions to combat sexual harassment in all of its forms.

As part of our evolving strategy, EBC developed a mandatory e-learning course, “Preventing and Addressing Sexual Harassment at the WBG,” that explains how the Bank Group defines sexual harassment, discusses how we all can work together to prevent and address sexual harassment, and describes the many resources available to support our staff.

EBC’s OTV unit significantly increased offerings of face-to-face conversations on the “Creating a Respectful and Harassment-Free Workplace” seminar, placing a greater emphasis on preventing and addressing sexual harassment at the WBG. These sessions were presented to 2,101 staff, including 1,130 based in Washington, DC, and 971 based in the following 16 country offices: Accra, Amman, Antananarivo, Brasilia, Buenos Aires, Cairo, Chennai, Dar es Salaam, Islamabad, Johannesburg, Kabul, Liberia, Maputo, Nairobi, Ouagadougou, and Pretoria.

EASIER ONLINE REPORTING AND RESOURCES

A form was made available on the Internet so that anyone in the world who wanted to report an allegation of sexual harassment against a WBG staff member could do so. Complaints can be made anonymously.



EBC made information on sexual harassment more readily available for staff by launching a new internal website in fiscal year 2018. The site includes blogs, Q&As, links to other resources, and online reporting. Here staff can help prevent, report, and reduce sexual harassment in the workplace. Staff can type “antiSH” into the intranet browser.

EBC understands that for the victim, reliving the experience of sexual harassment by retelling it will be difficult; similarly, it will be difficult to investigate alleged misconduct if the victim is not available. EBC encourages staff to come forward and report.

Access the Internet form at <http://www.worldbank.org/reportsexualmisconduct>

Visit the intranet page at <http://antish>

Send an account of your experience to ethics_helpline@worldbank.org

Call 24/7, to report cases: **1-800-261-7497** or, outside the US, **1-877-576-2569**



WBG Staff Association Chair Daniel Sellen talks about system shortcomings and offers a proposal for dealing with it.

STAFF RULE 3.00 NOW BETTER DEFINES “SEXUAL EXPLOITATION AND ABUSE.”

On April 13, 2018, the WBG revised Staff Rule 3.00 (Ethics and Business Conduct Department), paragraph 6.01 (Allegations of Misconduct Addressed by EBC) to clarify and explicitly state that sexual exploitation and abuse is a sanctionable form of misconduct and is prohibited. Clarifying definitions of *sexual exploitation* and *abuse* were also adopted.

THE WBG COMMISSIONED A REVIEW OF ITS POLICIES AND PROCEDURE BY EXTERNAL INDEPENDENT EXPERTS.

To ensure that we are following best practices on addressing and preventing sexual harassment, the WBG enlisted a group of independent external experts to review the WBG policies, processes, and procedures related to sexual harassment, abuse, and exploitation. The review was carried out by Fatima Shaheed, a London barrister (QC) who is an expert in human rights; Merrick Rossein, a law professor from New York with years of experience in sexual harassment litigation and investigations; and Vicky Magley, a professor of psychology at the University of Connecticut who has specialized in studying sexual harassment in corporations. The experts will identify how the WBG can strengthen, modernize, and simplify reporting and reviewing allegations, and will give input on how to shape the institutional strategy and action plan on sexual harassment. The focus of the external review will be on increasing training, outreach, and communicating, and improving the manner in which allegations of sexual harassment are handled, and actions are taken when allegations are substantiated.

CONTINUES ON PAGE 42

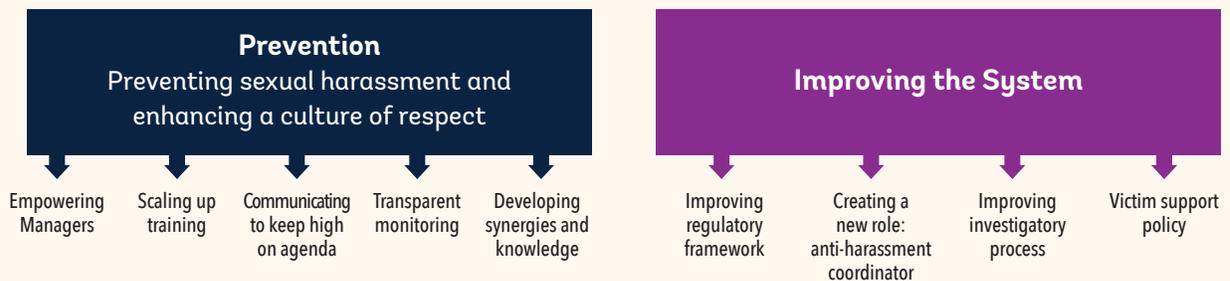
Increasing Awareness, Improving the System

The Ethics and Business Conduct Department has the responsibility to implement most initiatives under the sexual harassment action plan throughout the World Bank, IFC, and MIGA. Many initiatives require the collaboration of other services, especially Legal, Human Resources, the Health Services Department, and the Ombuds Office and other Internal Justice Services. EBC will be reporting to senior management frequently on its progress.

The sexual harassment action plan will shore up prevention in order to:

- increase awareness of what constitutes harassment and avenues for reporting and support;
- guarantee that such situations involving sexual harassment are addressed as early as possible, before they become misconduct;
- develop peer pressure so that behaviors incompatible with the WBG culture are rapidly signaled as such to their subjects and that those who feel uncomfortable with the behaviors of others do not hesitate to say so; and
- make sure that managers are attentive to developing an environment free of inappropriate sexual conduct.

The Strategy: People-Centered Approach



The plan also intends to improve the system for reporting and addressing sexual misconduct, and increase trust in the system by introducing greater transparency, fairness, and efficiency:

- improve and modify existing rules and procedures;
- make certain that cases where there is insufficient evidence are addressed, not by an investigation, but through other remediation approaches that are more effective in such cases;
- better support those who report sexual harassment or who feel sexually harassed, ensure that their career or personal wellbeing does not suffer; and
- carry out root cause analysis to identify how inappropriate conducts developed.

International Cooperation on Good Practices

The WBG has increased its role in international initiatives focused on preventing sexual harassment, including the United Nations (UN). EBC represents the WBG on the Chief Executives Board (CEB) UN Task Force on Addressing Sexual Harassment. The task force's goal is to review policies to address and prevent sexual harassment; capacities to investigate allegations; and support and protection offered to victims. It aims to formulate a common and consistent approach to sexual harassment across the UN. The Chair of the CEB Task Force presented a progress report on the work of the task force to the CEB at the Board's meeting in May 2018.

The work of the task force was in its final stages at the end of fiscal year 2018 and is expected to conclude in November 2018. The WBG will be able to draw upon its work with the task force to ensure that its approach to reviewing and preventing sexual harassment is aligned with the global international community.

Throughout fiscal year 2018, EBC also met with the ethics officers of other international financial organizations and of the UN system to exchange information and good practices.

WE ARE IMPLEMENTING A BOLD, HOLISTIC ACTION PLAN TO PREVENT AND ADDRESS SEXUAL HARASSMENT IN THE WBG WORKPLACE.

During fiscal year 2018, EBC began planning a new three-year people-centered strategy to address and prevent sexual harassment in the workplace. We based the strategy on two pillars: prevention and trust.

It is a strategy that moves the WBG, and specifically EBC, into a proactive mode rather than a reactive stance of waiting to receive allegations. EBC's sexual harassment strategy includes:

- disseminating information and training to make certain everyone is aware of what sexual harassment is and how to handle the unwelcome behavior in the workplace from the perspective of a victim, witness or bystander, and manager;
- reviewing WBG policies and practices to determine whether together they support the safe, ethics-based work environment EBC encourages; and
- fostering a culture where harassment can be talked about openly and therefore confronted.



President Kim gives opening remarks at an all staff town hall on sexual harassment on March 12, 2018.



Dr. Lynne Curry, the author of *Beating the Workplace Bully: A Tactical Guide to Taking Charge*, shares her expertise on office bullying with facts, humor, and insight at the November 14, 2017, Ethics at Work event.

Contact EBC

EBC enables staff members (both past and present) to seek ethics-related advice or report suspected misconduct and other ethical issues. The department informs employees, business partners, and other stakeholders of EBC's services through a range of communications and training programs. Most services are provided in English, which is the working language of the organization.

Employees can seek advice directly from EBC staff during office hours or arrange to speak with team members at another convenient time. EBC maintains an email service account (ethics_helpline@worldbank.org) accessible to staff that is advertised on the external website. Staff members can also contact the multilingual Ethics Helpline by phone ([202-473-0279](tel:202-473-0279), [1-800-261-7497](tel:1-800-261-7497) 24/7).

Advisory requests are treated with the highest possible level of confidentiality given the requirements of the case. Requests for advice can be made anonymously. For reports of suspected misconduct, all information is confidential and subject to disclosure on a strict need-to-know basis. Anonymous complaints are accepted.



Our Core Values



impact



integrity



respect



teamwork



innovation

Ethics and Business Conduct Department

Embedding Ethics throughout the World Bank Group

TEL: 202-473-0279, 1-877-576-2569 from the United States.

FAX: 202-522-3093

EMAIL: ethics_helpline@worldbank.org

ETHICS HELPLINE: 1-800-261-7497

(24 hours, 7 days a week; multiple languages)

INTRANET: <http://ethics.worldbank.org>

INTERNET: <http://www.worldbank.org/ethics>

For general queries, or public speaking or media requests, contact EBC's Communications Officer Stevan Jackson at +1 (202) 458-5054 or by email: Sjackson@worldbank.org



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