



OFFICE OF ETHICS &
BUSINESS CONDUCT

FY11-FY12
REPORT

Ethics & Business Conduct

A firm commitment to Core Values and high ethical standards is critical to the success of the World Bank Group. The World Bank Group's ethical framework flows directly from the five Core Values:

- Personal honesty, integrity, commitment
- Working together in teams—with openness and trust
- Empowering others and respecting differences
- Encouraging risk taking and responsibility
- Enjoying our work and our families

The Office of Ethics and Business Conduct (EBC) promotes the development and application of high standards of conduct by staff in the performance of their duties and reviews allegations of staff misconduct under Staff Rule 3.00. Headed by the Vice President and Chief Ethics Officer, EBC reports directly to the President of the World Bank Group.

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ABBREVIATIONS

ACS	administrative and client support
ACBF	Africa Capacity Building Foundation
COI	conflicts of interest
CY	calendar year
DOI	declaration of interests
EBC	Office of Ethics and Business Conduct
ETC/ETT	extended term consultant/temporary
FY	fiscal year
HR	Human Resources
HRSVP	Office of the Vice President of Human Resources
IBRD	International Bank for Reconstruction and Development
IDA	International Development Association
IFC	International Finance Corporation
IJS	Internal Justice System
INT	Integrity Vice Presidency
OIC	Outside Interests Committee
SMT	senior management team
STC/STT	short term consultant/temporary
TRE	World Bank Treasury
UNIDO	United Nations Industrial Development Organization
VP	vice president
WBAT	World Bank Administrative Tribunal
WBG	World Bank Group

LETTER FROM THE VICE PRESIDENT AND CHIEF ETHICS OFFICER



The World Bank Group’s operational effectiveness—the ability to meet the expectations of key stakeholders—depends in large part on our upholding high standards of conduct. I’ve seen this from my past work in World Bank Group (WBG) operations as well as my tenure as a client representative, including working as an Executive Director on the Board. Fundamentally, high standards of conduct are important to achieving the Bank Group’s mission.

As this report was being prepared, I was completing my first months as the WBG’s first Vice President and Chief Ethics Officer. The elevation of the Office of Ethics and Business Conduct (EBC) to a vice presidency is first and foremost a statement from senior management of the importance of ethics in our work. I am greatly honored to lead EBC as it embarks on a strengthened mandate to raise awareness of these issues through outreach and communication, as it advises staff and managers on conflicts of interest, and as it handles allegations of staff misconduct.

I look forward to working to further integrate ethics into WBG operations by engaging in increased outreach and dialogue at all levels of the organization; by working with operations teams to ensure that our guidance and support are highly relevant to the situations staff face; and by helping create an enabling policy environment that encourages staff to make the best decisions.

In EBC, we are fortunate to work with many people who help staff uphold high standards of conduct. While it is difficult to mention all, I would like to recognize in particular our partners within the Bank Group’s Internal Justice System: the offices of the Conflict Resolution System, the Staff Association, Human Resources, the Legal Department, and the Integrity Vice Presidency. The International Finance Corporation as well as the World Bank Procurement, Treasury, and Trust Fund communities are also valued partners in promoting ethics awareness among staff. We at EBC are excited about collaborating even more closely with these groups—and all staff—in the months ahead.

The accomplishments of EBC over the past two years highlighted in this report reflect the professionalism, commitment, and expertise of EBC staff. I would like to express my appreciation to Nichola Dyer, who served as Acting Chief Ethics Officer for more than a year prior to my joining EBC. To all EBC staff, I express my deepest appreciation for their dedication to furthering high standards of conduct in the World Bank Group.

A handwritten signature in black ink, appearing to read 'Xian Zhu'.

Xian Zhu
Vice President and Chief Ethics Officer

Executive Summary

This report highlights activities and achievements over the two fiscal years since the last report on the activities of the Office of Ethics and Business Conduct was released. EBC has three teams with dedicated staff: conflicts of interest; investigations; and outreach, communications, and training. All EBC teams contribute to knowledge management aimed at the identification of emerging trends, business conduct risks, and effective solutions.

ADDRESSING CONFLICTS OF INTEREST RISK

EBC is a resource for the entire WBG for identifying and managing conflicts of interest (COI) risk. EBC provides advice on hundreds of queries each year from staff with questions on personal and Bank operational COIs. In FY11, EBC responded to 894 queries, almost 20 percent more than the preceding year; FY12 saw a slight drop. Nearly one-third of the requests received in FY11–FY12 related to outside activities that staff members wanted to

undertake in their personal capacity, and about 15 percent concerned future or former employment. Average EBC response time to queries was five to seven days for COI consultations, with approximately half the queries being addressed within two business days.

In addition to providing guidance, EBC chairs the Outside Interests Committee (OIC), which reviews petitions from staff to engage in outside activities in their private capacity or accept awards or honors unrelated to their WBG service. The OIC handled 26 petitions in FY11 and 15 in FY12. OIC members consider rules and policies, as well as business risks and benefits, in their deliberations.

The WBG Declaration of Interests (DOI) Programs, formerly called the Financial Disclosure Programs, are important tools for identifying and managing possible COIs for specific categories of staff whose roles and responsibilities may give rise to greater COI risks. There were 2,045 participants in the 2011

Staff DOI Program, and 44 in the Senior Management Team and Vice Presidents (SMT/VP) Program. As in prior years, summaries of disclosures from the SMT/VP Program were made publicly available.

EBC has been engaged in various efforts to improve policies relating to COI, to increase awareness of COI risks among staff, and to strengthen business practices. Ensuring that all staff, regardless of seniority or appointment type, are made aware of COI issues before commencing employment is a high EBC priority. For example, as part of the SMT/VP Program, EBC has worked with senior management to develop and implement on-boarding and pre-departure consultations to identify and manage COI concerns more proactively.

In addition, in FY12 EBC began leading a COI Working Group, in close partnership with several other WBG offices and groups. The working group, which has made good progress in proposing solutions, will focus in the coming fiscal year on

specific policy revisions and on raising staff awareness of risky business practices.

INVESTIGATIONS

At the close of FY12, EBC completed its third year of investigating allegations of staff misconduct. Over this time frame, the efficiency of EBC's investigative process has significantly improved. Average case closure time for nontax cases fell from 110 days in FY11 to 91 days in FY12, well within the six months recommended in the 2007 Volcker report. Time to process tax-related cases, which take much longer to resolve than other types of cases, also dropped from 419 days in FY11 to 281 days in FY12.

In FY11 and FY12, EBC closed 288 and 276 cases, respectively, involving allegations of misconduct. The largest categories of cases EBC handled in both years were personal legal obligations and harassment:

- *Personal legal obligations, 23 percent of all cases in FY11 and 28 percent in FY12.* These types of cases include tax obligations, G4/G5 employment issues, and court orders for alimony, child support, or unpaid debt.
- *Harassment, 17 percent of all cases in FY11 and 18 percent in FY12.* Harassment includes sexual harassment, discrimination, and other behaviors that create a hostile work environment.

FY12 also saw increases in allegations of unprofessional conduct, which increased from 9 cases in FY11 to 33 cases in FY12. Abuse of authority allegations increased from 22 cases in FY11 to 32 cases in FY12.

The number of substantiated cases submitted to the Office of the Vice President of Human Resources (HRSVP) for a determination of whether misconduct occurred and the imposition of disciplinary action, if recommended, decreased from 32 cases in FY11 to 26 cases in FY12.

In addition to conducting investigations, EBC also focused on increasing staff members' understanding of the investigative process, releasing two publications in FY12: *Staff Misconduct: What Staff and Managers Need to Know* and *the Guide to EBC's Investigative Process*. These documents also describe staff members' obligations and rights should they become involved in an investigation.

OUTREACH, COMMUNICATIONS, AND TRAINING

Educating staff on the WBG's expectations of appropriate business conduct and on the resources available to assist them in resolving ethical dilemmas is essential to preventing misconduct and effectively addressing issues before they escalate. EBC's face-to-face outreach and training programs collectively reached more than 4,000 staff in FY11 and 3,000 in FY12.

EBC engaged in partnerships with WBG units to help increase the relevance of the content at the unit level and more efficiently leverage EBC's resources. EBC offered a new program called "Preventing Harassment" in partnership with the Conflict Resolution System offices. EBC also customized face-to-face "Living Our Values" workshops

for Bank and IFC staff in Africa, the Middle East, South Asia, and East Asia. A training partnership with Bank and IFC offices in Africa concluded, and EBC entered into discussions to establish similar training partnerships with the Middle East and North Africa and Latin America and Caribbean Regions.

The deployment of EBC's ethics e-learning course "Living Our Values" represented the first time that ethics training was made mandatory for every staff member of the WBG. As a result of focused outreach and a push for compliance, by the end of FY12 nearly 24,000 individuals had completed the course. In FY12, EBC developed a second e-learning course, "Ethics 102: Supporting a Positive Work Environment," in partnership with Ombuds Services. This course, to be released in FY13, addresses sexual harassment, discrimination, abuse of authority, and bullying.

WBG ETHICS SURVEY

In September 2008, EBC conducted the World Bank Group's first ethics survey. The objective was to establish a baseline of staff knowledge and perceptions of business conduct before finalizing a revised Code of Conduct and a related training initiative for all staff. The survey was sent to 2,446 randomly selected WBG staff worldwide, representative of staff demographics, and the 44.6 percent response rate demonstrated strong staff interest in this subject. Findings showed significant gaps in staff knowledge of resources and a concern among staff about accountability. In addition, responses indicated that confidentiality

concerns and fear of retaliation may prevent many staff from reporting business conduct issues. The report of survey findings can be found on the EBC website.

In March 2012, EBC re-administered that survey to over 3,000 randomly selected staff, with a response rate similar to the earlier survey. The 2012 survey was intended to assess changes and to deepen the WBG's understanding of business conduct concerns. Additional questions were included to assess the impact of EBC's training workshops and the knowledge of the offices of the Internal Justice System (IJS) and to further understand staff fears of retaliation. A report on the findings will be completed in FY13.

LOOKING AHEAD

EBC will be moving forward in FY13 to address issues identified in the ethics survey, as well as business conduct risks that are evident through EBC's advisory and investigative functions. The upcoming year will include several areas of focus:

- ***Fostering an institution-wide conversation on Core Values, ethics, and reputational risk in the WBG.*** A senior management forum on Core Values, ethics, and reputational risks has been scheduled in FY13, to be followed by additional WBG-wide communications.
- ***Managing ethics-related risks.*** Strengthening policies, raising awareness, and building skills to change business practices can help address topics such as conflicts of interest that may arise from post-WBG employment and from staff noncompliance with personal legal obligations.

- ***Developing tools to educate and to prevent and address misconduct concerns.*** These tools include a user-friendly website, brochures, webinars, and other outreach. A high priority for FY13 will be partnering with Ombuds Services to deploy the "Positive Workplace" e-learning course.
- ***Leading institutional conversations on key issues.*** These will address conflicts of interest, retaliation, and sexual harassment. In FY13, EBC will release a series of communications on workplace retaliation to increase staff awareness.

EBC cannot achieve meaningful outcomes by working in isolation: these endeavors require extensive partnership. Looking to the future, EBC will be working closely with the IJS and other WBG stakeholders to identify effective solutions.

Addressing Conflict of Interest Risks

EBC RAISES AWARENESS OF INSTITUTIONAL RISKS ARISING FROM PERSONAL AND OPERATIONAL CONFLICTS OF INTEREST (COI) AND HELPS STAFF TO ADDRESS THEM.

ADVISORY SERVICES: PERSONAL COIs

WBG staff members engage in a range of activities that could give rise to real or perceived personal conflicts of interest. A personal conflict of interest arises when staff members' personal interests are, or appear to be, divergent from or in conflict with their duties to the WBG and its mission. It is natural for such COIs to arise from time to time. The existence of a COI does not necessarily mean that a staff member has done something improper; however, it is important to promptly identify and manage a COI and its associated risks to avoid potentially serious consequences.

Below are examples of personal COI queries that EBC has received:

- An investment officer owns stock in a company doing business with the WBG.
- A program assistant in the Bank discovers that an IFC office has hired his or her aunt.
- A staff member participates in a public protest wearing a WBG T-shirt.
- A consultant competing in a bidding process invites a staff member involved in the process out for a drink.
- A task team leader is asked to serve on the board of a non-governmental organization that is interested in receiving WBG funding.

- A manager receives a job offer from a firm doing business with his or her unit.

In providing COI advice to staff, EBC applies a stakeholder analysis to assist staff in identifying affected stakeholders, their interests, and the associated risks. Effective management of COI risks requires careful attention to detail. EBC tailors its guidance to the specific circumstances, following applicable Staff Rules, policies, and principles, to help ensure that appropriate risk management safeguards are developed. EBC's website provides information on how to handle different types of personal COI concerns.

Sometimes, even if the likelihood of a COI occurrence is low, there may be large potential impact on the institution, such as reputational risk and problems with WBG relationships with stakeholders.

ADVISORY SERVICES: OPERATIONAL COIs

In addition to personal COIs, EBC helps identify and manage operational COIs for IBRD and IDA (see box 1).¹ Such queries generally

¹ The World Bank Conflicts of Interest Office works with WBG institutions to manage inter-institutional operational conflicts of interest (for example, IFC-Bank, Bank-MIGA, etc).

OPERATIONAL COI CASE STUDY OF THE AFRICA CAPACITY BUILDING FOUNDATION

The Africa Capacity Building Foundation (ACBF) was established in 1991 with the World Bank as one of its founding members. The Bank was represented on ACBF's executive board and its board of governors over the next two decades, supporting ACBF through allocations from the Development Grant Facility and from multidonor trust funds. When the Bank shifted to a more traditional form of support through regional IDA funding in 2011, an operational COI arose. The Bank was now funding—and thus supervising—an entity while also being involved in approving management decisions for that entity through its presence on the executive board. A number of stakeholders were concerned that a decision by the Bank to discontinue its role on the executive board (in

order to eliminate the COI) might be misread as a signal of a decline in the Bank's support for ACBF. Therefore, the process for shifting from executive to arms-length fiduciary oversight had to be carefully managed. Together with other Bank units, EBC recommended withdrawal from the executive board and helped design a solution to manage the associated COI. EBC objectively assessed the associated risks and advised on practical measures that would help the Bank transition to its new role while continuing to provide strong support for ACBF and ensuring formal supervision of the use of IDA resources. EBC attended the IDA Board discussions to support the team and provide clarifications as needed.

account for 4–6 percent of EBC's annual COI consultations. During FY11 and FY12, EBC provided operational COI guidance through both formal and informal partnerships with units throughout the Bank, including with the Human Development Network, Treasury, Partnerships/Trust Funds, the Africa Region, and Corporate Procurement. Several examples of EBC's operational COI advisory services follow:

- Providing ongoing COI guidance as a standing member of the Carbon Finance Risk Management Committee
- Assisting operations teams in managing the Bank's multiple roles in an endeavor (for example, as a trustee, secretariat, and implementing agency)
- Assisting task teams with client COIs, such as family relationships between project and government staff
- Providing EBC's perspective at the Board when personal COIs have operational implications (for example, post-WBG employment of senior managers in entities doing business with the WBG)

COI ADVISORY SERVICES: DATA AND OUTCOMES

In FY11 and FY12, EBC provided 894 and 848 COI consultations on personal and operational COIs, respectively (see table 1). A 19 percent spike in queries that occurred between FY10 and FY11 may be partially attributable to increased awareness of conflicts of interest

from the deployment of the "Living Our Values" mandatory e-learning course. Roughly one-quarter to one-third of these proactive queries came from individuals based in country offices. By grade level, half came from GE–GG level staff and another third from GH and above. It is also noteworthy that vice presidents and members of the senior management team actively sought

TABLE 1 CONFLICT OF INTEREST CONSULTATIONS BY CATEGORY, FY10–FY12

CATEGORY	FY10	FY11	FY12
Outside activities	270	275	261
Future or former employment	98	157	128
Vendor procurement	32	75	66
Operational	43	64	51
Close relatives	75	61	49
Relationships	33	49	59
External service	51	48	59
Gifts and entertainment	37	47	47
Personal financial interests	34	41	33
Public statements	31	19	40
Medals and awards	21	10	11
Other	28	48	44
Total	753	894	848
% change from prior fiscal year	2	19	-5

EBC’s advice, with 22 and 23 queries in FY11 and FY12, respectively.

The most frequently received COI queries concern staff members’ personal outside activities, constituting about one-third of total queries in both years. Questions regarding future or former WBG employment were the next most common topics addressed, representing one-fifth of queries. EBC also assisted with a wide range of other personal COI topics for all WBG staff, including professional interactions with close relatives, acceptance of gifts, external service, and financial interests, among others.

COI SERVICE STANDARDS

EBC’s service standard is to respond to COI queries within five business days. The average response time for COI queries was five days in FY11 and seven days in FY12, with the slight increase in FY12 reflecting staffing constraints (see figure 1). Nonetheless, half the queries received responses within two days of receipt in both years. Included in the averages are institutional queries, which can require prolonged discussions with multiple stakeholders and disproportionately affect average response time.

Toward the close of FY11, EBC established an exit survey for clients who sought COI-related advice. Responses were received from 54 staff in Q4 of FY11 and 284 in FY12. EBC’s guidance was rated as helpful by 91 percent of Q4 FY11 respondents and 88 percent of FY12 respondents, respectively,

while three-quarters indicated that EBC’s guidance was provided in a timely manner.

OUTSIDE INTERESTS COMMITTEE

As revealed by the high number of queries received by EBC each year, staff are often involved in outside activities such as employment, board memberships, and teaching. Certain outside activities that staff may wish to carry out in a private capacity require the prior approval of the WBG’s Outside Interests Committee (OIC). Typical OIC deliberations address petitions relating to positions with outside entities, the acceptance of external awards and honors unconnected to staff members’ Bank Group service,² and the seeking of public office (see table 2).

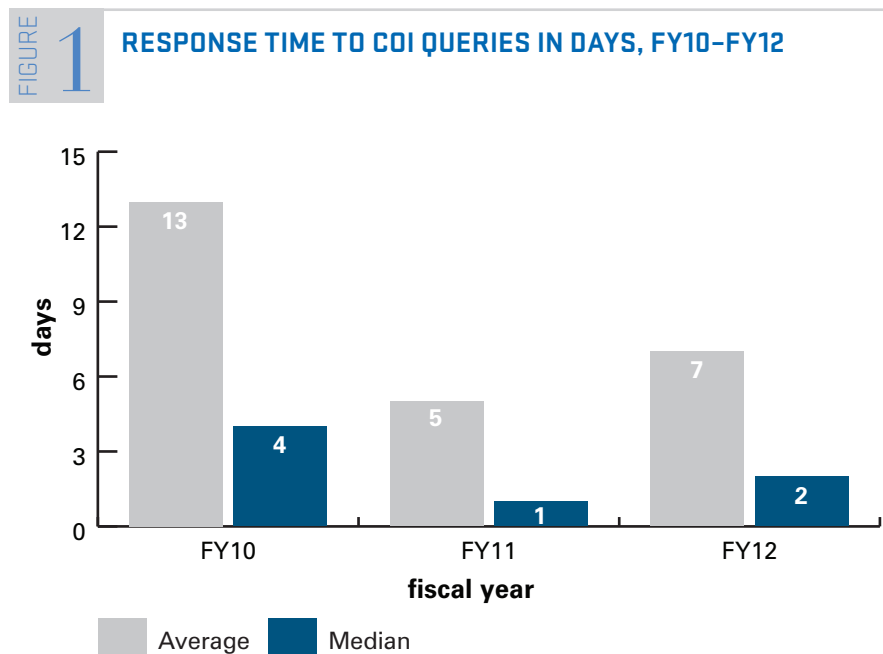
EBC chairs the OIC, whose membership is drawn from

representatives of HRSVP, the Legal Department, nominees from the Staff Association, and WBG staff members at large. Members have renewable two-year terms and are appointed by HRSVP. Additional details on the OIC and the committee’s current members can be found in Staff Rule 3.05.

The larger number of petitions in FY11 relates primarily to a significant number of external awards or honors offered to senior WBG managers, unrelated to their WBG service.

WBG’S DECLARATION OF INTERESTS PROGRAMS

All staff should periodically assess whether their personal financial and business interests could come into conflict with those of the WBG. To facilitate COI identification, EBC manages two mandatory DOI programs for staff. One program focuses on



² Acceptance of external awards related to WBG service is prohibited (Staff Rule 3.01, section 11).

All staff have a duty to identify, disclose, and manage conflicts of interest.

staff whose roles and responsibilities could expose the WBG to greater COI risk, while the other is tailored to the senior management team and the vice presidents (SMT/VPs).³

In FY11, EBC expanded the programs' analysis to outside positions held by staff members in both their official and their personal capacities. The names of the programs were therefore updated from Financial Disclosure Programs to reflect this broader review of interests beyond the financial.

Staff DOI Program

Staff holding positions at grade levels GH and above and those with certain roles and responsibilities that may give rise to greater COI risk are required to file an annual declaration of interests. These interests include financial assets, real property, business interests, liabilities, outside income, and positions held outside the WBG by the filing staff members, their spouses or domestic partners, and their dependent children. EBC administers the program in accordance with Principle 3 under the Principles of Staff Employment and Staff Rule 3.03.

As possible COIs are identified, EBC works with staff members and their managers to address the associated risks. Elements of risk management can include disclosure to appropriate

TABLE 2 COI REQUESTS, FY11 AND FY12

	TOTAL REQUESTS	REQUESTS APPROVED	DESCRIPTION
FY11	26	22	Acceptance of awards or honors (12); positions held with or services to be provided to outside entities (14)
FY12	15	12	Acceptance of awards or honors (3); positions held with or services to be provided to outside entities (10); holding subnational political office (2)

stakeholders, management of information access, and control of ability to influence outcomes (see figure 2). In recent years, 6–7 percent of filers have been contacted for follow-up discussions on possible COIs (see table 3).

Most identified issues can be dealt with through measures such as informing management and recusal from dealings with the entities as a part of the staff member's official role. Some situations, however, require more intensive risk management, for example:

- An investment officer has personal investments in an IFC investee entity, for which he or she has some job responsibility.
- A task team leader gives policy advice in a sector and holds shares of firms active in that sector in countries where he or she is working.

Filing is mandatory for most of the program's participants, and EBC may impose late fines on individuals who fail to file by the submission deadline.⁴ All fines collected by EBC are donated to the WBG's Community Connections Campaign.

Compliance remains a challenge and imposes a significant administrative burden on EBC: US\$38,600 in fines were collected for the 2010 program and US\$19,200 in 2011. Fines start at US\$200.

DOI Program for Senior Management Team Members and Vice Presidents

Given the breadth of the roles and responsibilities of the vice presidents and the senior management team, their disclosures

TABLE 3 STAFF DOI PROGRAM, CY09–CY11

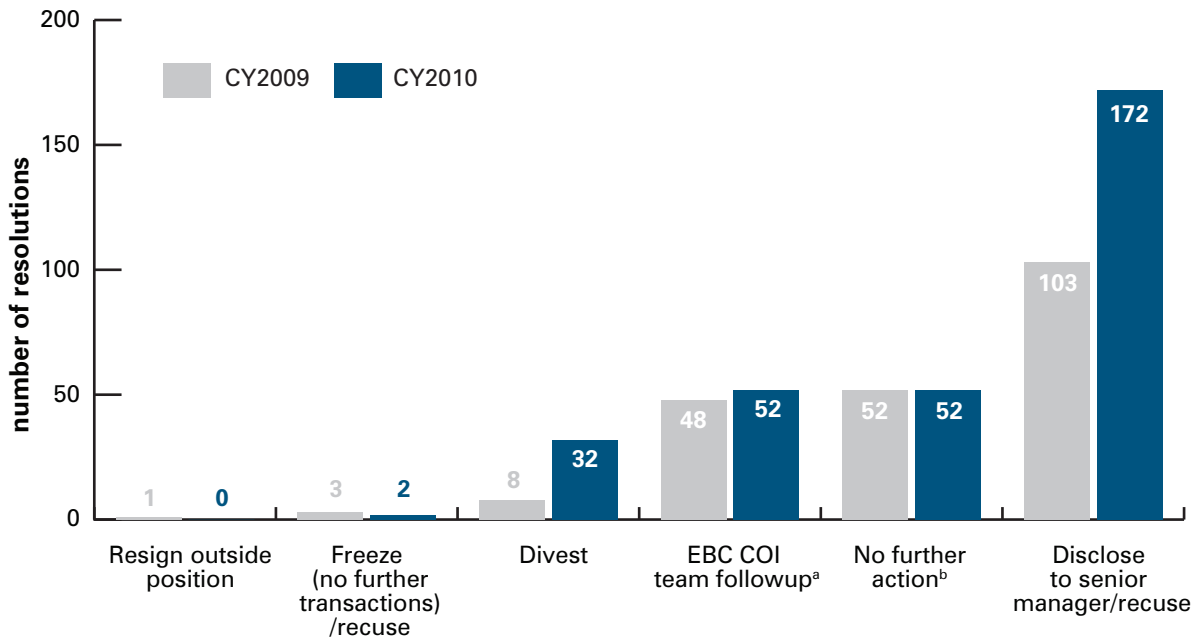
PROGRAM YEAR ^a	TOTAL FILERS	COIs IDENTIFIED ^b
2009	1,945	131 (6%)
2010	2,027	145 (7%)
2011	2,045	TBD

- a. DOI program year indicates the calendar year of the reporting period. Each annual program spans two fiscal years. The filing period usually closes end-April, with analysis and resolution carrying over into the next fiscal year.
- b. Indicates number of declarations that revealed a possible COI and required follow-up with the staff member. A single declaration may reveal multiple COIs.

³ A third program, mandated by the Conflicts of Interest section of the Code of Conduct for Board Officials, is administered by the Corporate Secretariat. All Board officials are required to participate.

⁴ Participation is voluntary for staff who work in the Carbon Finance unit.

STAFF DOI PROGRAM COI RESOLUTIONS BY NUMBER OF FINANCIAL HOLDINGS OR OUTSIDE INTERESTS, CY09-CY10



a. Generally involves outside activities or positions.

b. "No further action" indicates that questions were answered and information provided that resolved COI concerns.

are more comprehensive than those filed under the Staff Program. Also, in the spirit of good organizational governance and transparency, summaries of the SMT and VP disclosures are made public through a posting on the WBG’s external website. There were 44 participants in the 2011 SMT/VP Program; one VP position was exempted from the public disclosure requirement for security reasons.

The on-boarding process for newly appointed vice presidents and members of the senior management team now includes an individualized ethics briefing and the collection and review of a new-entrant DOI form. EBC has implemented an exit process for vice presidents and members of the senior management team who are departing the WBG that includes a discussion of their obligations to the WBG when

dealing with future employers and pursuing professional opportunities. These exit discussions also allow EBC to obtain feedback from senior management on ethics at the WBG.

THE COI WORKING GROUP: STRENGTHENING RISK IDENTIFICATION AND AWARENESS

In FY11–FY12, COI-related institutional risks began to receive heightened attention from management and the Board. Examples included a perceived “revolving door” between the WBG and external stakeholders and close personal relationships between WBG staff and other project stakeholders—situations that could pose significant reputational risk to the WBG. Such cases highlighted the need to increase COI awareness among staff through

communications and training and to update the policies and resources available to identify and manage COI risks.

In FY12, a COI Working Group was established as a joint effort led by EBC, with the Integrity Vice Presidency, Human Resources, the Legal Vice Presidency, and Operations Policy and Country Services. The working group is tasked with addressing COI risks at the policy level, such as through updating Staff Rules, and at the operational level through identifying risky business practices and ways to change them. The process of revising relevant Staff Rules began in FY12 and is expected to be completed in FY13. This effort will be followed, starting in FY13, by the integration of COI messages into operational communications and training.

Investigations

EBC INVESTIGATES ALLEGATIONS OF STAFF MISCONDUCT BY APPLYING AN EXPEDITIOUS AND FAIR PROCESS THAT RESPECTS THE DUE PROCESS RIGHTS OF ALL PARTIES (SEE BOX 2).

MATTERS HANDLED BY EBC

Allegations of staff misconduct reviewed by EBC include workplace grievances such as harassment, sexual harassment, and hostile work environment; abuse of authority; fraud related to benefits or allowances; failure to meet personal legal obligations (such as tax payments or court-ordered spousal or child support); retaliation; and other violations of WBG rules, policies, and Principles of Staff Employment.

THE INVESTIGATIVE PROCESS

Assessment

Upon receiving an allegation of misconduct, EBC assesses the matter carefully to determine whether the allegation fits within EBC's mandate, whether the allegation would constitute misconduct if substantiated, or whether the matter would be more appropriately handled by another office within the WBG, such as Mediation Services, Peer Review Services, or the Integrity Vice Presidency.

BOX 2

GUIDING PRINCIPLES OF EBC'S INVESTIGATIVE FUNCTION

- Staff members are treated fairly and respectfully.
- There is a presumption of innocence until the Human Resources Vice President determines that misconduct has occurred.
- A staff member who is the subject of an investigation has the right to respond to allegations raised against him or her.
- Investigations are handled with discretion and transparency.
- Investigations are conducted in a timely manner.

Initial Review

The initial review may involve reviewing documents relating to the allegation and conducting interviews with witnesses. During the initial review, EBC assesses the allegation to determine whether there is sufficient factual basis to proceed with further investigation. If EBC determines that the allegation is unfounded or that there is an insufficient basis to justify further investigation, the case may be closed at this stage or may be referred to another WBG resource or unit for resolution.

Investigation

An investigation enables EBC to establish whether there is evidence

to substantiate or refute an allegation. An investigation is initiated by providing the subject staff member with a written notice of alleged misconduct. The notice includes the following: a description of the allegations, the WBG rules and standards alleged to have been breached, an overview of EBC's investigative process, and a summary of the staff member's rights and obligations. The notice also invites the subject staff member to an interview where he or she will be given an opportunity to respond to the specific allegations.

EBC's role as impartial fact finder entails reviewing any relevant

information obtained from documents, witness testimonies, and the response from the staff member who is the subject of the investigation. After completing the investigation, EBC prepares a written report of its findings, which is submitted to the HRSVP for a determination of whether misconduct has occurred and for appropriate disciplinary action if applicable. A staff member may appeal the decision of the HRSVP to the World Bank's Administrative Tribunal.

In FY12, EBC initiated a new protocol for addressing less egregious misconduct allegations involving G5 visa holders, by referring the parties to mediation. The initial outcomes of this approach have been positive for both sides. Mediation has frequently brought about practical and quick resolutions to the underlying issues.

OVERVIEW OF OUTCOMES

In FY11 and FY12, EBC closed 288 and 276 cases, respectively. Table 4 shows at what point in the investigative process these cases were closed. Approximately 40 percent of FY11 and FY12 cases were closed at the point of initial review, because there was either insufficient evidence to proceed with a full investigation or the allegations were unfounded. Cases closed at the assessment stage generally do not

fall within EBC's mandate or are referred to another office within the WBG where they would be more appropriately handled.

During FY10, the first year of EBC's investigative mandate, EBC closed 54 percent of the cases at the assessment stage. This relatively high number may be partly attributable to the staff's lack of understanding of the types of issues EBC handles. As staff members' awareness of EBC's function and other Internal Justice System

resources has increased, knowledge and use of appropriate resources have improved. In FY11 and FY12, EBC closed 31 percent and 38 percent of cases at the point of assessment.

In FY11, 18 percent of the cases handled proceeded to full investigation; in FY12, the proportion declined to 12 percent. Substantiated cases constituted 11 percent of EBC's caseload in FY11 and 9 percent in FY12. These cases were either referred to HRSVP for a

TABLE 4

OVERVIEW OF EBC'S INVESTIGATIVE CASELOAD, FY10-FY12

	FY10 ^a		FY11		FY12	
	Number	Percent	Number	Percent	Number	Percent
Carried over from previous year	35	n.a.	81	n.a.	60	n.a.
Total opened	284	n.a.	267	n.a.	250	n.a.
Closed after assessment	130	54	89	31	102	38
Closed after initial review	72	30	115	40	114	41
Closed after investigation	25	11	52	18	34	12
Referred to HRSVP for disciplinary action ^b	11	5	32	11	26	9
Total closed	238	100	288	100	276	100
Carried forward to following year	81	n.a.	60	n.a.	34	n.a.

a. Any differences between EBC's FY10 Report and this report reflect changes in methodology and factual updates made following the close of the reporting period.

b. Includes substantiated cases closed by options letter.

n.a. = not applicable.

decision on disciplinary action or resulted in an options letter or mutual agreement (see box 3).

The largest category of cases handled by EBC during the period covered involved personal legal obligations (see table 5). These range from noncompliance with tax and G5 contractual obligations to non-payment of court-ordered arrears. Personal legal obligations accounted for 23 percent of EBC's total cases in FY11 and 28 percent in FY12.

The second largest category of cases handled by EBC was harassment, which, broadly defined, includes sexual harassment, discrimination, and other behavior that creates a hostile work environment. Eighteen percent of EBC cases in

FY12 and 17 percent in FY11 involved allegations of workplace harassment. The third largest category was allegations of abuse of authority, accounting for approximately 10 percent of EBC cases in both FY11 and FY12. There were seven allegations of retaliation in FY11 and six in FY12, of which whistleblowing-type retaliation accounted for one case in each fiscal year (see box 4).

The relative distribution of misconduct allegations across categories each year has been generally consistent. Exceptions took the form of an increase of certain matters in FY11, which coincided with the deployment of mandatory ethics e-learning. FY11 increases were seen in reporting of data or information breaches; misuse of WBG resources or assets;

BOX 3 **OPTIONS LETTERS AND MUTUAL AGREEMENTS**

If EBC's review or investigation reveals that strong evidence supports an allegation of misconduct, EBC may offer the staff member an options letter. This letter allows the individual to resign voluntarily without having to undergo a full investigation, provided that he or she accepts certain restrictions including a bar to rehire. HRSVP may also use an options letter as the disciplinary action when the evidence supports the finding of misconduct. The options letter is placed in the staff member's personnel file. Under a mutual agreement, the subject staff member agrees to a binding resolution to address the wrongdoing. This agreement can include measures such as voluntary resignation, restrictions on employment, or payment of restitution, among others.

TABLE 5 **EBC'S CASE CLOSURES BY CATEGORY, FY10-FY12**

	FY10 ^a		FY11		FY12	
	Number	Percent	Number	Percent	Number	Percent
Personal legal obligations ^b	49	21	66	23	78	28
Harassment ^c	52	22	48	17	50	18
Abuse of authority	23	10	22	8	32	12
Misuse of WBG assets/resources ^d	19	8	34	12	23	8
Fraud/misrepresentation/false reporting	8	3	20	7	9	3
Conflict of interest	17	7	14	5	9	3
Data/information breach	8	3	15	5	7	3
Retaliation ^e	4	2	7	2	6	2
Employment and assignment issues/management skills and behavior	30	13	40	14	4	2
Unprofessional conduct	0	0	9	3	33	12
Other ^f	28	11	13	4	25	9
Total	238	100	288	100	276	100

a. Any differences between EBC's FY10 Report and this report reflect changes in methodology and factual updates made following the close of the reporting period.
 b. "Personal obligations" includes tax and nontax personal legal obligations and G5 employee issues.
 c. "Harassment" includes harassment, sexual harassment, hostile work environment, discrimination, and interpersonal conflicts.
 d. "Misuse of assets/resources" includes misuse of assets and WBG resources and theft.
 e. "Retaliation" includes whistleblower retaliation under Staff Rule 8.02 as well as retaliation as described in Staff Rule 3.00.
 f. "Other" includes conviction for criminal acts and policy questions – not limited to misconduct. There were 14 policy questions in FY10, 6 in FY11 and 14 in FY12, respectively.

BOX 4 WHAT IS RETALIATION?

Retaliation is any form of retribution or threat of retribution taken against an individual because he or she officially

- Reports to management, INT, or EBC an allegation of misconduct that may threaten the operations or governance of the Bank Group or serves as a witness in a related investigation (see Staff Rule 8.02)
- Reports any other allegation of misconduct to management, INT, or EBC, or serves as a witness in a related investigation (see Staff Rule 3.00)
- Uses any of the resources of the WBG Conflict Resolution System, which includes Ombuds Services, Mediation Services, and Peer Review Services (see Staff Rule 3.00)

fraud, misrepresentation, or false reporting; and “employment and assignment issues and management behavior.” Also noteworthy with respect to that last category was the significant decline in cases from FY11 to FY12: in FY11, 40 cases were seen in contrast to only 4 in FY12. The sharp decline may be an indication of staff’s increasing awareness of EBC’s mandate and differentiating that mandate from the function of reviewing management and employment-related decisions, which is the purview of Peer Review Services.

As detailed in tables 6, 7, and 8, the number of substantiated cases was 11 in FY10, 32 in FY11, and 26 in FY12. Included are cases referred to HRSVP for a decision on whether misconduct occurred, and any disciplinary

measures, if appropriate. Tables 6, 7, and 8 also list the categories of cases substantiated by EBC, as well as the resultant actions taken by HRSVP. Where HRSVP has not rendered a decision, the case is noted as “decision pending.” Also shown are substantiated cases resolved by options letters and mutual agreements.

Examples of the types of substantiated allegations referred to HRSVP in FY12 include the following:

- Misuse of WBG assets involving the use of driver and WBG vehicle for personal matters
- Failure to disclose a previous conviction for a drug offence
- Failure to disclose and manage a COI arising from the sponsorship of a book co-authored by a staff member

TABLE 6 SUBSTANTIATED CASES BY CATEGORY, ACTIONS TAKEN, AND SUBJECT’S GRADE, FY10

Number of cases and category of misconduct		Actions taken	Subject’s grade ^a
6	Personal legal obligations, Washington (6)	Conditional restriction on employment (5)	UC (3) ETC (1) GE (1)
		Temporary conditional restriction on employment	ETC
1	Abuse of authority, Washington (1)	Conditional restriction on employment	GC
1	Interpersonal conflicts, Washington (1)	Peace order was imposed on the subject by HR	UC
1	Misuse of assets, country office (1)	Mutual separation agreement including a “bar to rehire”	GD
1	Theft, Washington (1)	Mutual separation agreement including a “bar to rehire”	GC
1	Other, Washington (1)	Mutual separation agreement including a “bar to rehire”	GG

a. UA/UC=ungraded staff; ETC= extended-term consultant.

SUBSTANTIATED CASES BY CATEGORY, ACTIONS TAKEN, AND SUBJECT’S GRADE , FY11

Number of cases and category of misconduct		Actions taken	Subject’s grade ^a
16	Personal legal obligations: country office (1), Washington (15)	Temporary conditional restriction on employment (5)	UC (1) GE (1) ETC (2) GG (1)
		Mutual agreement memorandum of understanding	GE
		Conditional restriction on employment (7)	UA (3) GF (1) GD (1) UC(1) ETC (1)
		Written censure (2 years); temporary conditional restriction on employment	GI
		Written censure (2 years); ineligibility for promotion (2 years)	GB
		Written censure (3 years). Hiring restriction on file until compliance.	GF
2	Unprofessional conduct/negligence, country office (2)	Mutual separation agreement	GA
		Decision pending	GG
2	Abuse of authority, country office (2)	Suspension without pay (60 days)	GD, UA
		Mutual agreement/option letter	GG
2	Discrimination, Washington (2)	Written censure	GD
		Suspension without pay (30 days); letter to remain in file (3 years)	GF
2	Harassment, Washington (2)	Written censure (2 years); ineligibility for promotion (2 years)	GG
		Written censure	GF
2	Misrepresentation: country office (1), Washington (1)	Decision pending	GF
		Decision pending	UA
2	Theft: country office (1), Washington (1)	Termination of STC contract; conditional restriction on employment; access restriction	UC
		Mutual separation agreement including a bar to rehire	ETC
1	Conviction for criminal actions, country office (1)	Termination	GC
1	Corruption/bribery/ kickbacks, country office (1)	Decision pending	GC
1	Data or information breach, Washington (1)	Conditional restrictions on employment	GF
1	G5 domestic employees, Washington (1)	Termination, reinstated by WBAT	GF

a. UA/UC=ungraded staff; ETC= extended-term consultant.

TABLE 8

SUBSTANTIATED CASES BY CATEGORY, ACTIONS TAKEN, AND SUBJECT'S GRADE, FY12

Number of cases and category of misconduct		Actions taken	Subject's grade ^a
16	Personal legal obligations, Washington (16)	Written censure (in file for 3 years) and ineligibility for promotion for 3 years	GC
		Memorandum of understanding (2)	ETC (1) GC (1)
		Decision pending (8)	GD (3) GC (3) GG (1) GA (1)
		Conditional restriction on employment (3)	GC (1) GD (1) UC (1)
		Written censure (in file for 3 years)	GE
		Written censure (in file for 2 years); Hiring restriction on file until in compliance	GC
2	Harassment, Washington (2)	Options letter (subject staff member resigned)	GF
		Written censure (in file for 5 years); reassignment to another, non-managerial position in a different location	GG
2	Misuse of bank assets: country office (1), Washington (1)	Options letter (subject staff member resigned)	GE
		Suspension from duty without pay (for 2 months)	GC
1	Abuse of authority, country office (1)	Suspension from duty without pay (for 30 days); letter in file for 5 years	GD
1	Corruption/ bribery/kickbacks, Washington (1)	Decision pending	UC
1	Fraud, country office (1)	Suspension from duty without pay (for 30 days); letter in file for 5 years	GD, GE, GE
2	Theft, country office (2)	Options letter (subject staff member resigned)	GA
		Decision pending	G1
1	Unprofessional conduct/negligence, country office (1)	Decision pending	GF

a. UA/UC=ungraded staff; ETC= extended-term consultant.

- Failure to disclose a COI resulting from the hiring of staff members
- Sexual harassment involving inappropriate behavior by one staff member toward another
- Withholding of information with a view to preventing appropriate actions by the WBG: failure to disclose a motor vehicle accident involving a WBG vehicle in which a pedestrian suffered serious bodily harm
- Failure to use all or part of the tax allowances to pay income tax and misrepresentation to authorities
- Theft of petty cash
- Fraudulent misrepresentation regarding ownership of assets
- Failure to comply with a child support order
- Unprofessional conduct: inebriation that led to the subject's disruptive behavior

Turn-Around Time

EBC has implemented service standards and tracks the number of days it takes to process cases (see *Guide to EBC's Investigative Process*). In FY12, the average processing time for case

closure, excluding tax matters, was 91 days, a 17 percent drop from FY11 (see figure 3). This case-processing time is within the six-month maximum recommended by the 2007 Volcker panel for handling workplace conflict matters.

Tax Cases

Tax-related cases require more time to review and process because of the necessary interface with government tax authorities. Before EBC's investigative function formally commenced in July 2009, pursuant to changes in Staff Rule 8.01, EBC received 25 tax cases that had been formerly handled by INT. EBC, therefore, began investigative operations with a preexisting backlog of tax cases. Average days open peaked at 419 days in FY11 and dropped to 281 days in FY12.

In partnership with other units (the Legal Department, HR, Office of the Controller), EBC worked to streamline the processes for handling such cases. As a result, the backlog was fully resolved by FY12, with only

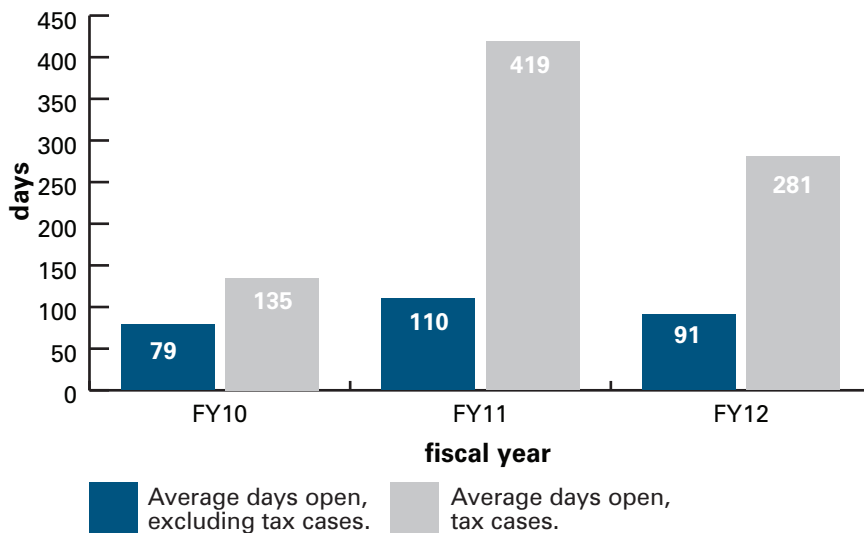
one tax case remaining open at the close of FY12.

Educating Staff on EBC's Investigations

In addition to investigations, EBC undertook efforts to increase staff members' understanding of the investigative process, releasing two publications in FY12: *Staff Misconduct: What Staff and Managers Need to Know* and *Guide to EBC's Investigative Process*. These publications, available on the EBC website, also describe staff members' obligations and rights should they become part of an investigation.

EBC investigators regularly join outreach and training sessions, particularly when visiting country offices, to help educate staff on EBC's investigative process and to address questions. (See also the next section, "Outreach, Communications, and Training.")

FIGURE 3 EBC CASE-PROCESSING TIME TO CLOSURE, FY10-FY12



Outreach, Communications, and Training

EBC CREATES AND DELIVERS ETHICS LEARNING PROGRAMS AND TOOLS THAT ARE TIMELY, INTERACTIVE, AND RELEVANT.

E-LEARNING

To build a foundation of knowledge for all staff of the WBG’s business conduct expectations, EBC developed and released the mandatory “Living Our Values” introductory e-learning course on the Bank Group’s Code of Conduct. By the end of FY12, nearly 24,000 individuals had completed the module. This number represented all employment categories including those with short-term contracts of more than 30 days. Some units encouraged contractor employees to take the training as well (see table 9). As part of WBG on-boarding, new staff are required

to take the module within 30 days of their date of appointment.

To address respectful workplace issues, EBC developed a second e-learning module in FY12 in close partnership with Ombuds Services. Entitled “Ethics 102: Supporting a Positive Work Environment,” this new e-learning course is planned for release in FY13.

FACE-TO-FACE TRAINING

To provide more in-depth learning experiences and build skills in handling business conduct issues that

By the end of FY12, nearly 24,000 people had completed EBC’s mandatory e-learning on the Code of Conduct.

can arise in day-to-day work, EBC offers a range of interactive face-to-face workshops (see table 10). EBC partners with client groups to customize the workshops’ content to increase their relevance to the issues and pressures faced by

TABLE 9 COMPLETION OF “LIVING OUR VALUES” E-LEARNING COURSE, AS OF END FY12

	IBRD	ICSID	IFC	MIGA	Other ^a	Total
Staff ^b	10,912	21	3,765	124	108	14,930
Contractor	1,385	0	813	0	0	2,198
ETC/ETT	1,624	13	1	7	8	1,653
STC/STT	3,982	11	1,147	23	12	5,175
Total	17,903	45	5,726	154	128	23,956

a. “Other” consists mostly of staff of the Global Environment Facility.
b. Regular, term, open-ended.

different groups of staff.

FY11–FY12 offerings included:

- Half-day “Living Our Values” ethics workshops
- Workshops for all Treasury staff (for certification by the CFA Institute)
- New staff orientation (Bank and IFC)
- “Controls, Ethics and You,” a course for transaction specialists sponsored by the Office of the Controller
- “Preventing and Addressing Harassment,” a course developed and piloted in partnership with the Conflict Resolution System

COUNTRY OFFICE OUTREACH AND TRAINING

To address a growing number of ethics-related questions from the regions and provide staff with relevant guidance, EBC partnered with the Bank’s Africa Region and IFC to deliver half-day “Living Our Values”

workshops to Bank and IFC staff in all Africa Region country office locations. EBC completed this initiative in FY12 having reached 14 country offices in FY10, 20 in FY11, and 5 in FY12. Additional country-based workshops were offered to staff in other regions in FY11–FY12, with sessions offered to Bank and IFC staff in Bangladesh, China, France, India, Indonesia, Jordan, Lebanon, Mauritania, Mexico, Thailand, Turkey, and Ukraine.

“Anyone could face any kind of situations that were discussed and also go against WB interest/ Core Values even without knowing it.”

“The training was very useful and felt quite relevant.... It clarified the support available within the World Bank and where to turn to get it.”

–Participant

MEASURING THE IMPACT OF TRAINING

EBC sends out evaluations to participants after face-to-face workshops to assess the content and presentation as well as to elicit feedback and suggestions. The workshops consistently attain scores exceeding 4 on a scale of 1 to 5, with 5 being highest in effectiveness. Participant evaluations show that country office staff in particular appreciate the content of the workshops and find it relevant, and they frequently suggest that the training last longer and be given annually. Training effectiveness was also assessed through the 2012 WBG Ethics Survey. (See the next section.)

OUTREACH AND COMMUNICATIONS

In addition to training, outreach and communications are key tools for identifying issues as well as solutions. In engaging in outreach, EBC focuses on how ethics can be integrated into daily operations, working in close partnership with other WBG units (see figure 4). In FY11–FY12, EBC contributed informative intranet feature stories on topics including conflicts of interest, workplace conduct, and questions on staff ethics (see box 5).

TABLE 10 NUMBER OF STAFF RECEIVING FACE-TO-FACE TRAINING BY TYPE, FY10–FY12

	FY10	FY11	FY12
Orientation (Bank and IFC)	1,434	1,562	1,236
TRE training	312	0	322
“Living Our Values” training	940	1,054	289
Specialized ethics training ^a	47	225	272
Manager training ^b	64	22	69
“Controls, Ethics, and You”	85	135	59
Training for HR professionals	0	0	32
Train-the-trainer sessions	22	29	18
Nonstaff (contractors)	0	39	0
“Preventing and Addressing Harassment” (pilot)	0	148	0
Total	2,904	3,214	2,297

a. Specialized ethics training is audience or topic specific. Examples include workshops for resource management staff, for summer interns, and on function-specific conflicts of interest.

b. Managers also join “Living Our Values” and other training offerings.

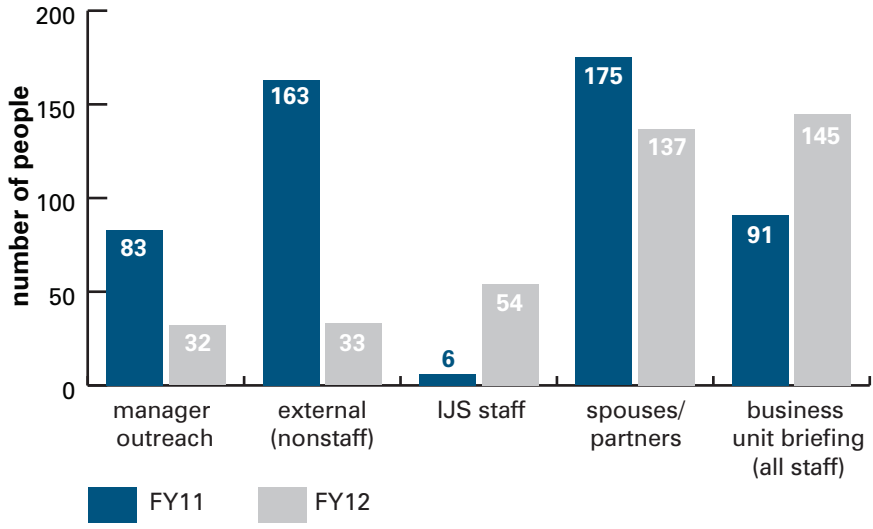
BOX 5 **WORKPLACE ROMANCE**

The 2012 Valentine's Day article EBC posted on workplace romance attracted more than 11,872 views by 8,876 staff, the highest number of views and unique visitors of any intranet home page story since 2006.



EBC regularly delivers briefings on such topics as conflicts of interest and handling misconduct at client request. Frequently, EBC outreach is informal in nature, including participation in events such as IJS Day, the ACS Forum, and the IFC HR Marketplace. An estimated 450 staff in FY12 were reached through such events. EBC staff also meet to discuss questions with WBG staff informally in connection with training offered in country offices or investigative missions. Increasing understanding among IJS staff of EBC's functions is a high priority, and in FY11–FY12, EBC gave presentations at IJS retreats and briefed Peer Review Services delegates, Staff Association counselors and country office delegates, and WBG mediators.

FIGURE 4 **PEOPLE REACHED THROUGH FORMAL EBC OUTREACH, FY11-FY12**



In addition to internal staff outreach, EBC works to promote ethics awareness among other stakeholders and supports exchanges to fellow ethics offices. In FY11–FY12 these have included outreach to Executive Directors on managing conflict of interest risks; presentations to annual conferences in 2010 and 2012 of the Ethics Network of Multilateral Organizations; and participation in quarterly orientations for spouses and partners each year through World Bank Family Network

orientations. EBC outreach to ethics offices included the African Development Bank, Central Bank of Nigeria, and UNIDO.



Presenters at the Managing Conflict of Interest Seminar for WBG Executive Directors, 2011



December 2010 Conference of Ethics Officers from Multilateral Organizations, Hosted by the WBG and IMF

WBG Ethics Survey

In 2008, before finalizing an updated Code of Conduct and a new training program, EBC conducted a baseline ethics survey of 2,446 randomly selected staff, to which 1,091 or 45 percent responded. The survey had several objectives:

- To gauge staff perception of the alignment of organizational behavior with the espoused Core Values of the WBG
- To measure staff members' knowledge of ethical obligations as manifested in WBG principles, Core Values, rules, policies, and guidelines
- To identify institutional factors that may facilitate or hinder staff members' ethical workplace behavior
- To assess staff knowledge of resources and tools available to resolve business conduct issues
- To identify gaps in staff knowledge that can be addressed through EBC outreach, training, and the WBG's Code of Conduct⁵

In 2012, EBC re-administered the ethics survey to 3,027 staff, of which 1,400 or 46 percent responded. The survey included a limited

number of modifications. Two questions were added to assess knowledge and willingness to use the different offices of the Internal Justice System, and additional information was requested to deepen institutional understanding of staff fears of retaliation. A report on the 2012 findings will be completed in FY13 and posted to the EBC website.

Preliminary findings showed some positive change from 2008 to 2012, for example:

- Many more staff indicate they are familiar with the Code of Conduct and have used it for guidance.
- It is relatively rare for staff to state that they personally observe conduct they think violates the WBG Code of Conduct, organizational policy, or the law.
- Ninety-one percent of all respondents indicate they had not felt pressure to compromise the Code of Conduct, organizational policy, or the law—a 4 percent improvement over 2008.
- The data also suggest areas where additional attention is

needed to address business conduct and reputational risks:

- Over half the respondents (57 percent) feel well prepared to handle situations that could lead to violations of the WBG's Code of Conduct. This result improved over 2008, when fewer respondents (41 percent) felt well prepared; however, the number remains low.
- There are knowledge gaps in handling cases in which a staff witnesses retaliatory actions or inappropriate or harassing behavior by a manager. Less than half of respondents chose the correct responses.
- Some staff are still reluctant to speak up: they worry about confidentiality, fear retaliation, feel that nothing will change, or have concerns about bias against those who speak out.
- EBC, in partnership with other IJS offices, will be working to address these concerns in FY13 and beyond.

⁵ The report of survey findings can be found on the EBC website.

EBC Looking Ahead

As this report goes to press, EBC is organizing a senior management forum on the Core Values, ethics, and reputational risks for the WBG President and senior leadership, in partnership with WBG HR. This event will be the beginning of an institution-wide conversation on strengthening the WBG's organizational culture and business practices and enabling staff to work more effectively toward achieving the WBG's mission.

The leadership forum will be followed by organization-wide communications on ethics. In addition, EBC will be giving renewed attention to direct outreach to staff and integrating business conduct content into WBG operations through discussions on business practices as well as learning programs for staff and management.

Several areas of focus are planned for the upcoming year:

- ***Developing a range of standard and innovative tools to educate and to prevent and address misconduct concerns***, particularly for key audiences such as managers

and supervisors. A high priority in FY13 will be partnering with Ombuds Services to deploy the "Positive Workplace" e-learning course, which EBC would like to be made mandatory for managers. In addition, a number of brochures, topic-specific online learning tools, and informal outreach are being planned.

- ***Reworking policies, Staff Rules, and business practices relating to ethics***, if necessary, to make them both comprehensive and easily understandable to staff, building on the COI Working Group's efforts. EBC is also actively developing and promulgating a comprehensive list of staff rights in the investigative process.
- ***Managing business ethics-related risks***. EBC would like to lead institutional conversations on key issues, including retaliation, sexual harassment, COIs involving post-WBG employment, and staff noncompliance with personal legal obligations. Also under consideration is expansion of the DOI programs to better identify and manage COI risks. In FY13, EBC will release a series

of communications on many of these topics, starting with workplace retaliation in mid-FY13.

- ***Increasing transparency and access to EBC information and data***. EBC would like to facilitate knowledge sharing and timely response to emerging issues, working closely with other IJS offices and management. Among the information to be shared will be the findings from the 2012 ***WBG Ethics Survey Report***, which is forthcoming in FY13.

EBC cannot achieve meaningful outcomes on many of these fronts working in isolation. Close partnership is required. EBC will be collaborating with the IJS offices and other WBG stakeholders to identify effective solutions that contribute to a stronger organizational culture that upholds the WBG's Core Values.

Contacting EBC

REPORTING ALLEGATIONS OF MISCONDUCT

Staff are encouraged to report alleged staff misconduct either to their managers or to EBC; managers have an obligation to report such allegations to EBC.

Due Process

All individuals involved in the investigative process—including those reporting alleged misconduct, witnesses, and subject staff members—are afforded due process by EBC. (See *Guide to EBC's Investigative Process*.)

Confidentiality

Information about an investigation and the identity of staff involved are disclosed only to individuals who have a legitimate need to know, consistent with Staff Rules.

Retaliation

Retaliation or threat of retaliation by a staff member against any person who reports suspected misconduct, or who cooperates or provides information in connection with an investigation, is prohibited. Retaliation or threat of retaliation constitutes misconduct in and of itself and may be investigated as such by EBC.

Anonymous Reporting

Staff have the option of reporting misconduct anonymously. However, no finding of misconduct can be made based on anonymous allegations unless the allegation of misconduct is independently corroborated.

SEEKING CONFLICT OF INTEREST ADVICE AND GUIDANCE

Staff with questions relating to personal COIs (for example, questions on outside activities, gifts, post-WBG employment) or Bank business COIs are encouraged to write to the ethics helpline: ethics_helpline@worldbank.org.

Conflict of interest advice will be kept confidential between the COI advisory team and the staff member and may be shared with EBC or INT investigators who have a legitimate need to know.

Information that has been shared with EBC's COI advisory staff may be shared with EBC investigators if there is reason to believe that misconduct may have occurred. Staff are encouraged to approach EBC early, so that any COI concerns can be promptly addressed and effectively managed.

Due process protections are afforded to all staff who contact EBC.

ETHICS & BUSINESS CONDUCT

OFFICE OF ETHICS AND BUSINESS CONDUCT

TEL: 202.473.0279 **FAX:** 202.522.3093

EMAIL: ETHICS_HELPLINE@WORLDBANK.ORG

ETHICS HELPLINE: 800.261.7497 (24 HOURS 7 DAYS A WEEK)

INTRANET: [HTTP://ETHICS.WORLDBANK.ORG](http://ETHICS.WORLDBANK.ORG)

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