CONTENTS

1 Overview

3 Letter from the Vice President and Chief Ethics Officer

6 Outreach and Training

9 Policy Support

10 Addressing Conflict of Interest Risks

13 Investigations

20 Contacting EBC
The Office of Ethics and Business Conduct (EBC) of the World Bank Group promotes the development and application of high standards of conduct by staff in the performance of their duties based on the core values of the Bank Group through:

- Engaging in business ethics-related outreach and training
- Strengthening policy, reviewing and updating rules, and further developing the ethical dimension of policies and principles in Bank Group operations
- Providing guidance in managing conflict of interest risks
- Reviewing and investigating allegations of misconduct.

EBC is an independent vice presidency within the Bank Group that reports directly to the president.
LETTER FROM
The Vice President And Chief Ethics Officer

I am very pleased to introduce this Annual Report for the Office of Ethics and Business Conduct (EBC) for fiscal year 2016.

The World Bank Group has a corporate culture firmly rooted in ethical values and behavior. As the Bank Group’s ethics office, I see our role as being the custodian of this culture—knowing, with pride, that the bar is set very high to perform this role well.

Three principles guide our office’s work: integrity, independence, and impartiality. We are fully successful only when our colleagues and stakeholders are firmly convinced that we take these principles seriously and apply them in the course of our work.

This is why FY16 was a seminal year for EBC, as we turned our model on its head.

The fundamental value of an ethics office is to help make it possible for the institution, its leaders, managers, and staff to make informed ethical decisions. We will now lead with this at the forefront of our mission—emphasizing outreach, training, and partnerships.

From that base, it follows that EBC will manage the Bank Group’s transactional ethical issues from a position of increased strength. By this I mean we will continue to improve our delivery of advisory services—such as those we provide on conflict of interest—and investigations of staff misconduct.

We have broad support from many of my colleagues for this direction. I thank you for your support, both now and as EBC rolls this vision out.

I’d like to highlight some key accomplishments from the year:

First, EBC began an external review to learn our strengths and areas that need improvement. This review is both retrospective and aspirational. It will inform the Office’s direction in the upcoming years and ensure that we are in line with (and ideally leading) international best practices.

Second, the decision was made to integrate the team working on the Values Refresh initiative for the World Bank Group into EBC. The synergies are clear: we will consult with staff across the institution to understand what values resonate, firmly adopt them, and integrate their application into our organizational culture.
Third, we instituted an informal Sounding Board comprising representatives from staff, management, and the World Bank Group Staff Association. I have found this very helpful to receive informal feedback and understand the ethical dilemmas that our colleagues face.

In addition, EBC increased our outreach and training in country offices. We want to ensure that the Bank Group’s support to its ethical culture is felt equally—no matter where colleagues reside and work.

As we know that this is on colleagues’ minds, we commissioned a study to help look at the prevalence of retaliation at the Bank Group. In particular, it will follow up with people who have reported misconduct or cooperated with EBC to determine whether they experienced retaliation. We are also looking at the efficacy of the anti-retaliation training delivered in the previous fiscal year. I look forward to reporting on this upon completion of the study.

EBC’s efficiency has increased. We answered a full ninety percent of conflict of interest inquiries within two days and the average time we take to investigate misconduct allegations has decreased by approximately one week.

Importantly, our data shows that EBC investigations increasingly are resolved through consultation and advisory activities—not escalated to the Human Resources Development Vice-Presidency. This is more proportional and efficient for the institution, and demonstrates staff confidence in EBC’s involvement and advice.

For these accomplishments, I would like to express my deep gratitude to my staff for their advice, hard work, and enthusiasm for our new direction.

I also want to thank you for taking the time to read this Annual Report. In an environment of transparency, respect, and trust, we all work toward eliminating extreme poverty and boosting shared prosperity with less preoccupation—and more confidence that we are models to both colleagues and clients.

I look forward to continuing to advance this environment together.

Ousmane Diagana
Vice President and Chief Ethics Officer
Outreach and Training

As part of its responsibilities to help staff understand, develop, and apply the highest ethical standards in the performance of their duties, EBC regularly trains and engages with colleagues across the World Bank Group at headquarters and in country offices.

This Fiscal Year, EBC:

- Designed a custom training program for the World Bank’s Operational Policy and Country Services (OPCS) Vice Presidency to address the fear of reprisal and encourage respectful workplace behavior. EBC staff co-delivered seven sessions for intact OPCS work units, reaching 150 staff.

- Trained more than 180 World Bank Treasury staff—the sixth time EBC has delivered training at Treasury since 2005. This year, the training partnership included the CFA Institute—a global association of investment professionals that is the industry’s standard-setter—to customize a training that blended industry standards on ethics with the rules of the Bank Group.

- Continued to participate in orientation/induction programs for IFC and the World Bank. This included new employees, with additional sessions for more than 80 short-term consultants.

- Presented its mission and processes to approximately 30 IFC Human Resources Business Partners.

- Visited Country Offices in Bamako, Braggaville, Chennai, New Delhi, Khartoum, Kinshasa, Nairobi, Paris, and Riyadh. In addition to meeting with staff and management to understand and address concerns, the visits provided an opportunity to conduct ethics awareness training that included staff in neighboring country offices joining by videoconference.

- Briefed the Human Resources Committee and Ethics Committee of the Bank Group Executive Directors on the Office’s processes, findings during FY15, challenges, and future direction.

- Presented to Staff Association Volunteer Counsellors and representatives at a Staff Association Ethics Awareness and Q&A forum.

- Continued its successful Ethics-at-Work Learning Series, which presents organizational ethics topics that are substantive and relevant to staff’s daily work and operations. EBC held three well-attended sessions with Bank Group partners, including the Urban, Rural and Social Development Global Practice and the Staff Association. The sessions were live-streamed and video was made available for colleagues in country offices.
Started and maintained an active and well-received blog presence on SPARK. EBC’s Vice President and Chief Ethics Officer published seven blogs during the fiscal year.

Began course development and planning for a mandatory, all-staff rollout of a face-to-face anti-harassment training to be deployed in FY17. EBC held several focus groups and pilots, partnering with the Staff Association, GLOBE, the 50/50 Society, and the World Bank’s External and Corporate Relations Vice Presidency.

In Addition

EBC instituted an informal Sounding Board comprising representatives from staff, management, and the World Bank Group Staff Association. The Sounding Board’s role is to provide an opportunity for EBC to receive informal feedback and understand the ethical challenges that its constituents face in their work.

PARTNERSHIPS

In FY16 EBC also increased its engagement outside the Bank Group. In particular, EBC advanced collaboration and innovation with other multilateral organizations and development institutions. EBC visited the United Nations Ethics Office in New York and also met with representatives of the UN’s Legal Department, Ombuds/Mediation Office, the UN Administrative Tribunal, and representatives of the Ethics Office of UNDP and UNICEF.

EBC collaborates regularly with the multilateral development institutions based in Washington, DC—the International Monetary Fund, the Inter-American Development Bank, and the Pan American Health Organization.

While visiting the country office in Saudi Arabia, EBC’s high-level delegation visited the Islamic Development Bank in Jeddah. Similarly, while in Nairobi, EBC met with the senior management of the Eastern and Southern African Trade and Development Bank (PTA Bank) eager to learn from EBC’s best practices as they establish an ethics program. In Europe, EBC met with the European Commission, the European Data Protection Supervisor, the Organisation for Economic Co-operation and Development, the Council of Europe Development Bank, and the European Bank for Reconstruction and Development.

While in Europe, EBC also met with ethics counterparts from private-sector companies Nestlé and L’Oreal to understand their approaches and systems.

This year, EBC also met with the United States Office of Government Ethics to discuss potential cooperation in training and implementing best practices.
Policy Support

The Bank Group’s goals of eliminating extreme poverty and boosting shared prosperity are fundamentally ethical. It follows that EBC’s work should be a critical part of the organization’s policies and activities.

EBC has an important role in

> strengthening ethics policies
> contributing to the identification and analysis of the ethical dimension of other Bank Group policies
> reviewing and updating rules
> ensuring the application of ethical principles in Bank Group operations.

In agreement with the Human Resources Development Vice Presidency (HRDVP) and all relevant services, in FY16 EBC completed the revision of the staff rules on gifts, benefits, and favors to clarify such issues as accepting free transportation in official capacity, requests for sponsoring, or gift-giving. EBC also completed a revision of the rules on outside activities, allowing research and artistic activities as well as activities of local public interest (for example, working for the local library or volunteering as a firefighter) without prior authorization.

Following an audit of operational conflicts of interest management in the World Bank Group, EBC—in agreement with OPCS and the Legal Vice Presidency—committed to proposing a process to address conflicts of interest with impact on World Bank operations. This is in order to ensure that conflicts of interest are addressed early to avoid problems or delays in operations.

Also, EBC and the Integrity Vice Presidency—the two internal investigative units of the World Bank Group—clarified and harmonized their investigative standards. This harmonization sought to provide all World Bank Group staff, consultants, and temporary employees clarity and consistency regarding their rights, obligations, and procedural safeguards whether they are subjects, complainants, or witnesses to an internal investigation.

In addition, EBC provided support to the Climate Investment Fund as they defined and drafted their Code of Conduct.
Addressing Conflict of Interest Risks

EBC provides timely and actionable advice to address queries related to both personal and World Bank operational conflict of interest matters.

EBC received 777 requests for advice on conflicts of interest in FY16. Two-thirds of these requests were answered on the same business day; 90 percent were answered within two days.

In general, the office saw a decrease in conflict of advisory requests (by 6.4 percent, from 830 to 777) from last fiscal year. Advice on outside activities took up the bulk (37 percent) of EBC’s conflict of interest work, followed by advice about future/former employment and close relatives/relationships—very similar to FY15’s distribution.

Consistent with years past, more than one third of EBC’s advisory requests were related to outside activities that staff members wish to perform in addition to their Bank Group work. Activities such as teaching, lecturing, writing, and contributing to non-profit organizations generally do not require authorization, provided that they are permissible by law, are unconnected with the Bank Group, and do not negatively reflect on the institution. However, other activities require authorization by the Outside Interests Committee.

<table>
<thead>
<tr>
<th>TABLE 1. CONFLICT OF INTEREST CONSULTATIONS BY CATEGORY, FY16</th>
</tr>
</thead>
<tbody>
<tr>
<td>Outside activities</td>
</tr>
<tr>
<td>--------------------</td>
</tr>
<tr>
<td>Future or former employment</td>
</tr>
<tr>
<td>Close relatives /relationships</td>
</tr>
<tr>
<td>Vendor procurement</td>
</tr>
<tr>
<td>External service</td>
</tr>
<tr>
<td>Gifts, medals, honors</td>
</tr>
<tr>
<td>Personal financial interests</td>
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<tr>
<td>Public statements</td>
</tr>
<tr>
<td>Operational</td>
</tr>
<tr>
<td>Other</td>
</tr>
<tr>
<td>Total</td>
</tr>
</tbody>
</table>

EBC received 777 requests for advice on conflicts of interest in FY16. Two-thirds of these requests were answered on the same business day; 90 percent were answered within two days.
Outside Interests Committee

For the period July 1, 2015 to June 30, 2016, the Outside Interest Committee considered 11 requests to engage in outside activities. Nine were approved and two were denied. The approved requests included receiving honorary citizenship status, teaching a university course on international financial institutions, serving on a government grant body, and holding a managerial role in a family-owned business. Those denied were requests for board membership in for-profit companies, which are generally not allowed.

QUERIES RECEIVED IN FY16:

54 percent of EBC’s advisory requests were from grade GE-GG-level staff

27 percent were from grade GH and above; the remainder were from other groups.

89 percent of queries came from open, term, and regular staff members

9 percent came from consultants. The remaining queries came from retirees, future hires, and relatives of staff members.

68 percent of conflict of interest queries to EBC came from headquarters-based staff

32 percent came from country offices.

75 percent of inquiries emanated from the World Bank

21 percent came from IFC.
Declaration of Interests Program

EBC oversees two Bank Group Declaration of Interest (DOI) programs, which are designed to mitigate real or perceived conflict of interest risks.

The Senior Management Team and Vice Presidents Program requires the 40 most senior individuals in the organization, including the Bank Group President, to complete a declaration that is summarized and publicly posted on the internet. All new vice presidents receive individual briefings at the start of their appointment on compliance with the conflict of interest requirements of the Bank Group and senior management regularly consult EBC for guidance on conflicts of interest concerns.

The Staff DOI Program requires manager-level staff members, as well as designated staff in other sensitive roles, to complete a confidential DOI that is reviewed by EBC and external consultants to identify possible conflict of interest risks. (Members of the Bank Group Board are also subject to financial disclosure in a program that is run independently by the Corporate Secretariat.)

Of 2,255 declarations received for the staff program, 2,052 were closed after an initial review. Nine percent (203 cases) were referred by the external contractor to EBC for further review. This is consistent with the proportion of filings requiring review in other organizations with DOI programs. Some declarations required further research on the items declared by filers in light of the staff member’s roles and responsibilities. In three-quarters of these cases, more information was needed from the filer. Upon completion of its review and after receiving additional information when relevant, EBC determined that no further action was required in 158 of the referred DOIs. In 31 referred cases, EBC provided guidance to staff members but did not request further action from the filers. In 14 cases, EBC implemented additional remedies, such as directing filers to disclose a particular asset to their manager, or recommending that they refrain from working on certain projects or deals. In two of these 14 cases, the filer agreed to consult EBC prior to any sale or purchase of a specific asset (“asset freeze”) and in one case, EBC required the filer to divest.

In FY16, all 2,352 staff required to file a Declaration of Interest complied with this obligation and no fines were imposed.
Investigations

EBC reviews allegations of staff misconduct including workplace-related grievances, travel and benefits fraud, and staff noncompliance with personal legal obligations. In FY16, EBC saw a 22.5 percent decrease in enquiries and allegations of misconduct (from 297 to 230), with notable decreases in cases involving alleged abuse of authority, harassment, and misuse of resources (Table 2).

Of the cases that EBC closed in FY16:

- **88 percent** of reporters were regular staff.
- **12 percent** were consultants.
- **56 percent** of reporters were from Part 1 countries.
- **43 percent** were from Part 2 countries.
- **52 percent** of reporters were women.
- **47 percent** were men.

### Table 2: Case Load FY14–FY16 by Category

<table>
<thead>
<tr>
<th>Category</th>
<th>FY14</th>
<th>FY15</th>
<th>FY16</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non-Compliance with Staff Rules</td>
<td>251</td>
<td>297</td>
<td>230</td>
</tr>
<tr>
<td>Harassment</td>
<td>55</td>
<td>64</td>
<td>72</td>
</tr>
<tr>
<td>Abuse of Authority</td>
<td>58</td>
<td>88</td>
<td>51</td>
</tr>
<tr>
<td>Misuse of Bank Resources</td>
<td>45</td>
<td>48</td>
<td>26</td>
</tr>
<tr>
<td>Personal Legal Obligations</td>
<td>28</td>
<td>36</td>
<td>19</td>
</tr>
<tr>
<td>G-5 Domestic Issues</td>
<td>10</td>
<td>14</td>
<td>15</td>
</tr>
<tr>
<td>Retaliation</td>
<td>14</td>
<td>15</td>
<td>11</td>
</tr>
<tr>
<td>Sexual Harassment</td>
<td>14</td>
<td>7</td>
<td>10</td>
</tr>
<tr>
<td>Discrimination</td>
<td>4</td>
<td>10</td>
<td>8</td>
</tr>
</tbody>
</table>
Investigative processing time has been decreasing since FY15. The increase in investigative staff coupled with improved internal procedures and revised performance metrics has resulted in a shortening of EBC investigative reviews by approximately one week. As EBC fully realizes its staffing plan, we expect this downward trend to continue.

Process and outcomes for FY16

Upon receipt of a complaint, EBC follows a consistent three-stage process: intake and assessment, initial review, and investigation.

<table>
<thead>
<tr>
<th>TABLE 3: CASELOAD FY14–FY16</th>
</tr>
</thead>
<tbody>
<tr>
<td>Carried over from previous years</td>
</tr>
<tr>
<td>New Complaints</td>
</tr>
<tr>
<td>Subtotal</td>
</tr>
<tr>
<td>New Consultations/Advisory Services</td>
</tr>
<tr>
<td>Total Matters (Cases &amp; Consultations)</td>
</tr>
<tr>
<td>Complaints Closed</td>
</tr>
<tr>
<td>Consultations/Advisory Closed</td>
</tr>
<tr>
<td>Ending Case Load</td>
</tr>
</tbody>
</table>

INTAKE AND ASSESSMENT

EBC receives enquiries and complaints from all World Bank Group staff members irrespective of their location. Of the 230 enquiries and complaints received in FY16, 58 percent emanated from staff in headquarters and 33 percent came from country offices. Nine percent came from external or anonymous sources.

Upon receiving an enquiry, EBC evaluates whether the issue as alleged would constitute misconduct under the Staff Rules and would be suitable for investigation or more appropriately resolved by a less formal resource within the Internal Justice Services (IJS). A tenet of the IJS is to try to resolve matters at the lowest level. In FY16, seven enquiries were referred to the IJS.

In some instances, staff members seek guidance from EBC on how to manage situations confronting them in the workplace. In FY16, three complaints were simply noted in EBC’s case files for its records only, generally reflecting a staff member’s desire to discuss a workplace situation without pursuing further action at the time. In FY16, a total of 109 enquiries were closed after intake.
INITIAL REVIEW

When a complaint progresses to initial review, EBC assesses the allegation to determine whether there are sufficient grounds to initiate an investigation. The initial review typically involves interviews with witnesses and a review of documents. The initial review is carried out without the involvement of the staff member who is the subject of the allegation. After an initial review, if EBC determines that the allegation is either unfounded or unsubstantiated, or that the evidence collected does not otherwise justify an investigation, the case will be closed. The reporter of the allegation is notified of such a closure. A case closing memorandum is prepared for EBC’s records. An alternative outcome of an initial review is that EBC assists the parties concerned in reaching a resolution of their differences.

In FY16, 80 allegations were reviewed and closed after the initial review process.

INVESTIGATION OF CASES

If EBC determines that there is sufficient basis to the complaint, the matter will proceed to investigation. An investigation enables EBC to either establish enough evidence of possible misconduct, determine that there is insufficient evidence to conclude that the allegation is true, or to refute the allegation and exonerate the staff member.

EBC’s role as impartial fact-finder entails reviewing any relevant information including documents, witness testimonies, and the response from the subject of the allegation.

If EBC finds sufficient evidence to substantiate an allegation of misconduct, EBC provides a report of the investigation to HRDVP for a determination of misconduct and imposition of sanctions. If the allegation is unsubstantiated, the matter is closed.

In some instances, EBC’s review finds that, although the allegation cannot be substantiated, the concern could result in a serious workplace issue if not properly addressed. In these cases, EBC will provide guidance to staff members for addressing these concerns. In other cases, EBC will involve Human Resources Business Partners and management at various levels to facilitate a resolution of the issue.

In FY16, EBC investigated 39 cases of alleged misconduct. Of those cases, 28 resulted in the submission of investigative reports to HRDVP for a disciplinary decision. This reflects a 3 percent decrease from FY15. A total of 241 staff interviews were conducted in the course of these investigations in addition to extensive review and analysis of other evidence. In 11 of the cases investigated, EBC did not find sufficient evidence to substantiate the alleged misconduct and
Investigations

Continued

consequently closed the cases. During the course of investigating these 11 unsubstantiated cases, a total of 78 staff interviews were conducted in addition to extensive review and analysis of other evidence.

Of the 28 reports submitted to HRDVP in FY16, HRDVP determined that misconduct had occurred in 10 cases and imposed disciplinary sanctions. Examples of these substantiated allegations appear below. In 15 cases, HRDVP exonerated the subject staff, concluding either that no misconduct had occurred or that there was insufficient evidence—an equally important outcome for both the Bank Group and its staff. Decisions are pending on the remaining three* FY16 cases. The determinations made by HRDVP for cases submitted in FY16 is set forth in table 4. Figure 2 shows the types of cases investigated.

* Corrected from printed version.

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**Figure 2: 28 Cases Investigated by EBC in FY16**

- **Abuse of Authority, 1**
- **Misuse of Bank Resources, 12**
- **Non-Compliance with Staff Rules, 6**
- **Personal Legal Obligation, 3**
- **Sexual Harassment, 3**
- **G-5 Domestic Harassment, 1**
- **Harassment, 1**
- **Discrimination, 1**
- **Misuse of Bank Resources, 12**
<table>
<thead>
<tr>
<th>Number of Cases</th>
<th>Category of Misconduct/Location</th>
<th>HRDVP Decision</th>
<th>Subject's Grade</th>
</tr>
</thead>
<tbody>
<tr>
<td>12</td>
<td>Misuse of WBG resources (travel &amp; assets): Washington, D.C. (1), country offices (11)</td>
<td>No misconduct found (9)</td>
<td>GA (8); GI</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Written censure in file for five years</td>
<td>GD</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Termination, bar to rehire, restriction of access to WBG buildings, written</td>
<td>GE; GD</td>
</tr>
<tr>
<td></td>
<td></td>
<td>censure in file indefinitely</td>
<td></td>
</tr>
<tr>
<td>9</td>
<td>Noncompliance with Staff Rules (leaks of confidential information, intentional misrepresentation</td>
<td>Three years bar to rehire and written censure in file for three years</td>
<td>UC*</td>
</tr>
<tr>
<td></td>
<td>of facts, conviction of criminal actions, conflict of interest): Washington, D.C. (6),</td>
<td>Conditional bar to rehire and written censure</td>
<td>UC*</td>
</tr>
<tr>
<td></td>
<td>country offices (3)</td>
<td>Ineligibility for promotion for three years and written censure (in file for</td>
<td>GG</td>
</tr>
<tr>
<td></td>
<td></td>
<td>three years)</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Bar to rehire, restriction of access to WBG buildings and written censure</td>
<td>GG</td>
</tr>
<tr>
<td></td>
<td></td>
<td>(in file indefinitely)</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>No misconduct found</td>
<td>GG (2), GH</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Decision pending</td>
<td>UC*, GF</td>
</tr>
<tr>
<td>2</td>
<td>Sexual harassment: country offices</td>
<td>No misconduct found</td>
<td>GI, GH</td>
</tr>
<tr>
<td>1</td>
<td>Abuse of authority (making threats, intimidation): Washington, D.C.</td>
<td>Ineligibility for promotion for two years and letter on file for two years</td>
<td>GH</td>
</tr>
<tr>
<td>1</td>
<td>G-5** domestic issue (failure to pay wages and other legal obligations): Washington, D.C.</td>
<td>Withholding of termination benefits, conditional bar to rehire, restriction of</td>
<td>GC</td>
</tr>
<tr>
<td></td>
<td></td>
<td>access to WBG buildings</td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>Harassment: Washington, D.C.</td>
<td>No misconduct found</td>
<td>GH</td>
</tr>
<tr>
<td>2</td>
<td>Failure to pay child/spousal/divorce support and other legal obligations: Washington, D.C.,</td>
<td>Bar to rehire for one year</td>
<td>UC*</td>
</tr>
<tr>
<td></td>
<td>country office</td>
<td>Decision pending from external court</td>
<td>UC*</td>
</tr>
</tbody>
</table>

* Unclassified category that includes consultants and former consultants

** The U.S. Department of State allows World Bank Group staff to bring domestic help into the United States provided certain conditions are met.
In FY16, HRDVP issued several disciplinary decisions ranging from letters of censure, terminations, and permanent bars from rehire, to restrictions of access to Bank Group facilities for engaging in misconduct based on substantiated cases. A staff member has the right to appeal HRDVP’s disciplinary decision to the Administrative Tribunal, the judgments of which are binding on the Bank Group.

Some of the substantiated allegations of misconduct with the disciplinary actions are described below:

➢ A short-term consultant altered the effective date of her IFC appointment letter and submitted it to obtain a visa. She was barred from rehire for three years and a written censure was put in her file for the same amount of time.

➢ A GG-level staff member obtained the confidential personnel information of his ex-wife without authorization. He used personnel records and compensation history from WBDocs and the SAP portal in legal proceedings. The staff member was made ineligible for promotion for three years and a written censure was placed in his record for the same amount of time.

➢ A short-term consultant had in the previous year been found to have committed misconduct by failing to prove he was paying child support after an income withholding order was sent by the state child support services to the World Bank’s legal department. HRDVP barred the consultant from rehire until he demonstrated compliance. The contractor made one payment and was hired, so long as he showed payments for two additional months. He then refused to do so. He was barred from rehire for one year and barred from Bank Group buildings.

➢ A GC-level staff member did not comply with the obligations of employment vis-à-vis a G-5 domestic employee. EBC found that the G-5 domestic employee was not paid for 10 months, not provided with health insurance, and that the staff member did not comply with any of the documentary obligations of the G-5 program. While the staff member’s term ended, she was barred from rehire and from Bank Group buildings until she paid the determined back-salary.

➢ A GE-level staff member repeatedly exploited loopholes in the SAP portal to hide that he was using World Bank Group funds as a personal loan facility. His employment was terminated with permanent bar to rehire.
In FY16, the World Bank Administrative Tribunal assessed the merits of one application challenging EBC’s investigations. In Bauman vs IBRD (Decision 532), the applicant was a short-term consultant whose appointment was terminated allegedly for business reasons. The consultant had previously reported interpersonal and ethical issues both to the Ombudsman and to multiple colleagues (including management) in his unit. After being notified of the termination, the applicant filed a complaint to EBC alleging retaliation and challenged the termination decision before Peer Review Services. EBC did not find sufficient evidence to substantiate the allegation of retaliation. Peer Review Services, while opining that the applicant was not provided with a fair and proper process, found that the termination decision was a valid exercise of managerial discretion.

However, the Administrative Tribunal found that the termination of the applicant’s appointment constituted a disciplinary measure which lacked a reasonable and observable basis. The Administrative Tribunal also held that the burden of proof shifts from the applicant to the World Bank in prima facie cases of retaliation. In this case, the World Bank failed to provide “clear and convincing evidence” that the decision was taken devoid of retaliatory intent. The Administrative Tribunal ordered the World Bank to pay the applicant salary and benefits due for 120 days’ employment, as well as additional compensation in the amount of the salary due for 150 days’ employment.

Although the decision disputes EBC’s findings, it confirms a checks and balances in the World Bank Group’s Internal Justice System—as the Administrative Tribunal rules independently and may revisit facts and challenge determinations made by EBC.
Contacting EBC

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.

EBC affords due process to all individuals involved in the investigative process—including those reporting alleged misconduct, witnesses, and subject staff members.

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.

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.

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.

Staff with questions relating to potential conflicts of interest are encouraged to contact EBC early, so that any concerns can be promptly addressed and effectively managed. Conflict of interest advice will be kept confidential between the advisory team and the staff member, but may be shared with others who have a legitimate need to know. For example, information that has been shared with EBC’s conflict of interest advisory staff may be shared with EBC investigators if there is reason to believe that misconduct may have occurred.
TEL: 202-473-0279

FAX: 202-522-3093

EMAIL: ethics_helpline@worldbank.org

ETHICS HELPLINE: 1-800-261-7497
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independence, impartiality, and integrity