

WBG ACTION PLAN FOR Preventing and Addressing Sexual Harassment

FY19–FY21



WORLD BANK GROUP
Ethics & Business Conduct

Our Core Values



Abbreviations and Acronyms

AHC	Anti-Harassment Counsellor/Coordinator	IDA	International Development Association
CSO	Civil Society Organization	IFC	International Finance Corporation
EBC	Ethics and Business Conduct Department	IFIs	International Financial Institutions
ECR	External and Corporate Relations Vice Presidency	IJS	Internal Justice Services
ER	External Review	ITS	Information Technology Solutions Vice Presidency
FY	Fiscal Year	LEG	Legal Vice Presidency
GCS	Global Corporate Solutions Department	MIGA	Multilateral Investment Guarantee Agency
GBV	Gender Based Violence	PRS	Peer Review Services
GP/GPs	Global Practices	SA	Staff Association
HQ	WBG Headquarters in Washington, DC	SEA	Sexual Exploitation and Abuse
HR	Human Resources	STC	Short Term Consultants
HRDVP	Human Resources Vice President	UN	United Nations
HSD	Health and Safety Directorate	WB	World Bank (IBRD and IDA)
IBRD	International Bank for Reconstruction and Development	WBG	World Bank Group (WB, IFC, MIGA and ICSID)
ICSID	International Centre for Settlement of Investment Disputes		

Executive Summary

At the World Bank Group (WBG), we are committed to providing a safe environment for our people to do their best work. This means doing all we can to uphold systems of accountability and transparency. We must create a culture in which we feel safe to report incidents of sexual harassment¹ and are able to trust that robust systems are in place to address them—a culture of zero tolerance where sexual harassment is being systematically addressed.

Creating this culture and ensuring that our systems are as effective as they can be requires us to take a hard look at our behaviors, our values in action, and how effectively our systems are working. It requires us to be open to change.

This WBG Action Plan for Preventing and Addressing Sexual Harassment inside the Bank Group represents the commitment of staff and management across the institution. It takes inspiration from the staff-led movement to improve the culture, refresh our systems, and amplify courageous staff voices. It takes direction from—and goes beyond—an external review of our practices and protocols on sexual harassment.

This document is intended to be an action plan, not a diagnosis. It does not duplicate or replicate the review of the situation that is contained in the external review. In particular, it does not describe the role of the existing WBG units in addressing sexual harassment incidents and does not provide an assessment of the prevalence of sexual harassment by type of harassment or among different groups within the WBG.

The plan will integrate the prevention of sexual harassment in all aspects of the internal culture, organization and corporate activities. It sets concrete deliverables, including:

- Ensuring that all managers are aware of their responsibility to create team environments free from sexual harassment, as well as offering managers new guidance on addressing cases.
- Complementing our system with new people-centered services.
- Scaling up and broadening the scope of training.
- Transparently and regularly sharing information on the prevalence of sexual harassment and related sanctions inside the WBG.

¹ Sexual harassment is currently defined in the WBG anti-harassment guidance note as “any unwelcome sexual advance, request for sexual favor or other verbal, non-verbal, or physical conduct of a sexual nature which unreasonably interferes with work, alters or is made a condition of employment, or creates an intimidating, hostile, or offensive environment”

- Collaborating across departments on enhancing sexual harassment detection and risk assessment.
- Contributing to international efforts to share best practices.

Beyond these deliverables, which are outlined in this document, we are fully committed to building more trust and uphold a culture of respect for people. Together we have the power to create an environment in which people trust that, when they report sexual harassment, their voices will be heard, their dignity will be respected, fair and due process will ensue, and perpetrators will be held to account. This must be our aim as a collective of people bound by a common mission and core values.

At the request of the WBG President, the Ethics and Business Conduct Department (EBC) commissioned an external review by independent experts to assess the WBG policies, procedures, and practices relating to sexual harassment and to identify possible improvements. Drawing upon that review and significant contributions from internal stakeholders including the Staff Association, EBC led the formulation of this three-year Action Plan. This Action Plan has been endorsed by WBG's senior management, staff-led Working Group on Sexual Harassment, Internal Justice Services, among other key internal stakeholders. This plan will be reviewed and updated on a biannual basis and the Working Group on Sexual Harassment will monitor progress.

FIGURE 1 / The Key Conclusions of the External Review on Sexual Harassment

Clarify what is expected of staff	Provide a middle-road option	Improve investigation and sanction process	Explain better
<ul style="list-style-type: none"> • Improve communication to staff on expected behaviors • Strengthen training 	<ul style="list-style-type: none"> • Strengthen involvement and role of managers in addressing cases early • Fill in gap by creating an anti-harassment coordinator to help address cases that are not investigated 	<ul style="list-style-type: none"> • Provide draft investigation report to reporters and monitor any retaliation against them • More detailed sanction decisions 	<ul style="list-style-type: none"> • Importance of confidentiality for all those involved • Standard of proof

New Action Plan has over 50 proposals, including most of the 40 recommendations put forward by external reviewers and other initiatives beyond their recommendations and in line with international best practice

FIGURE 2 / Sexual Harassment Strategy: Main Drivers





1. Providing Staff and Managers with Skills, Knowledge and Resources to Prevent and Address Sexual Harassment

To create and maintain an environment free from sexual harassment, the World Bank Group aims to boost tools and resources for all staff. A significant ramp-up of outreach and training will clarify staff roles and responsibilities in preventing sexual harassment, with a special focus on managerial accountability. Training will also help empower colleagues to address inappropriate behaviors whenever and wherever they occur and to galvanize managers through role modeling. EBC will work closely with senior and middle management to ensure clear and consistent communications with staff and to implement a transparent monitoring system as the basis for open dialogue. In addition, EBC will further embed ethics throughout the Bank Group by integrating explicit ethical considerations into WBG activities. EBC will also work with other international organizations to ensure we are incorporating best practices.

1.1 It is the responsibility of managers to promote a positive environment, prevent sexual harassment and address inappropriate behaviors

Our ultimate objective is to ensure that the work environment is a safe place where staff can report sexual harassment, where witnesses to inappropriate behavior or harassment also report it, and where managers act promptly and appropriately whenever incidents are reported to them.

Addressing inappropriate behaviors early is part of the responsibilities expected from all managers. While not altering managers' formal duties, this Action Plan clarifies their role in managing teams to avoid sexual harassment situations. The WBG is moving to a more empowered reading of the rules, combined with active support from Senior Management.

All individuals who supervise WBG staff must be responsible for:

- Creating a safe and open environment for staff, with no tolerance for inappropriate behaviors: one in which staff feel free to express concerns and are encouraged to voice discomfort with any occurrence of inappropriate behavior of a sexual nature.
- Proactively leading an open dialogue about workplace culture and issues of sexual harassment, including at least one face-to-face conversation of managers with their teams each year in line with best practices.
- Taking active steps to prevent sexual harassment situations and manage early any inappropriate behavior that could have a negative impact on co-workers.
- Remaining accountable for promoting a positive work environment, tackling inappropriate behaviors and supporting the most vulnerable groups.
- Reporting to EBC allegations of sexual misconduct: EBC will work with the affected staff on identifying the best measures to resolve the matter.
- Giving the affected staff the opportunity to express a choice regarding the different options to address the case in situations of inappropriate behaviors that do not rise to the level of misconduct.
- Informing staff that they may seek other avenues to discuss or report a sexual harassment situation.

EBC will provide support to the manager² to address the matter and adopt remediation initiatives with other relevant services. Moreover, EBC will develop a *root-cause analysis*³ of the incident. In practical terms, this means that the manager will have the tools and data to assess whether the incident is the result of an unhealthy team culture or team dynamics, or whether it is simply due to the poor behavior of one staff member.

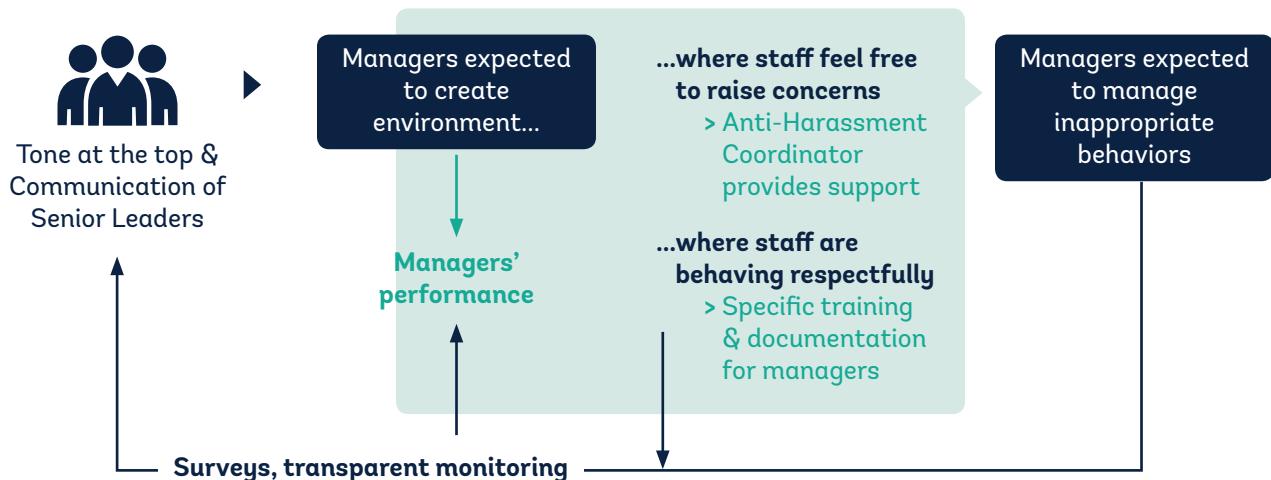
2 The occurrence of sexual harassment in a unit does not constitute a violation of duty by the manager, except in circumstances where the manager is the perpetrator of sexual harassment, has been willfully ignoring inappropriate behaviors, or fails to take action after becoming aware of a sexual harassment situation.

3 EBC will develop analytical guidance on root-cause analysis, where "root cause" means the identification of the organizational pathology that is conducive to sexual harassment incidents. Root-cause analysis identifies perverse incentives, inappropriate feedback mechanisms, communication failures and other organizational features that can create an environment where sexual harassment develops.

EBC will collaborate with the offices of the President, Managing Directors, CEOs, and VPs, and with the relevant services—particularly HR and the Ombuds—to:

1. Continue to lead with an engaged “tone at the top,” to keep the creation of a workplace free from sexual harassment high on the institution’s agenda.
 2. Clarify that the responsibilities described above are integral to the manager’s role and will be assessed as part of the annual performance measurement. Those who fail to uphold such responsibilities will be held accountable.
 3. Develop training and support for WBG staff who supervise other staff members. This may include advice, coaching, guidance, and facilitated interactions (either face-to-face or through online technologies).
 4. Develop written guidance on sensitive issues (e.g., reconciling the obligation of managers to report misconduct cases to EBC with their duty to address inappropriate behaviors early and effectively).
 5. Encourage managers to have an open-door policy and listen to staff members, irrespective of whether they are their direct reports or not, including to voice concerns about their direct supervisors.

FIGURE 3 / Empower Managers and Enhance Accountability

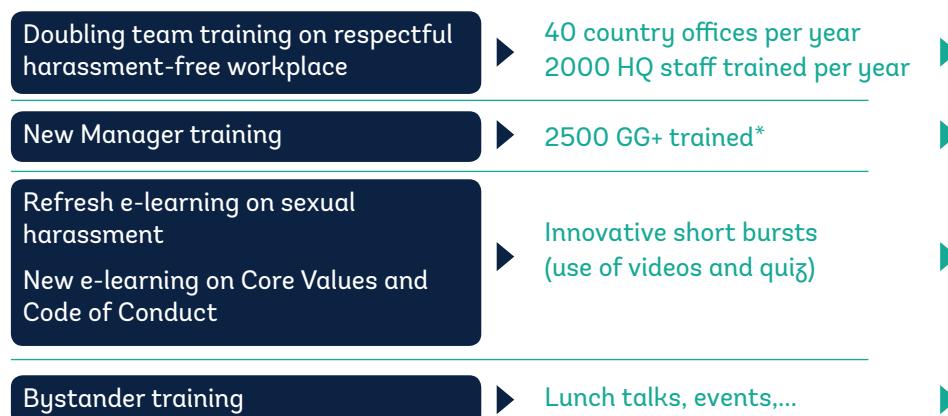


1.2 Scale up outreach and training

Staff at all levels need a thorough understanding of what constitutes sexual harassment, the applicable rules and what they can do to prevent or address it. Specifically, EBC will:

1. Develop and deliver new training courses and content, including:
 - a. Targeted training for managers, emphasizing their roles and responsibilities in preventing sexual harassment, and providing them with guidance, tools and techniques, for example in monitoring the environment and handling inappropriate behaviors and allegations of misconduct.
 - b. Training course for all staff on bystander interventions.⁴
 - c. Mandatory online training, including a new e-learning module on the WBG Core Values⁵ and the Code of Ethics and Conduct,⁶ as well as updates to the course on preventing and addressing sexual harassment when new tools or guidelines are available.
2. Scale up existing training and outreach activities:
 - a. Increase face-to-face training to reach at least 40 country offices and 2,000 staff members in headquarters per year.⁷

FIGURE 4 / Scaling up training



* GG+ corresponds to senior WBG professionals starting at grade level G in the institution who usually have some supervisory or managerial roles and responsibilities. This means staff at grade level G and above up to and including senior management.

4 It is not proposed to make it a duty of bystanders to intervene, but to encourage them to step in when they feel that they can usefully contribute to resolution of a situation, and to provide them with the tools to do so.

5 The Friendly URL (FURL) <http://values> is available to staff inside the firewall.

6 The Friendly URL (FURL) <http://codeofconduct> is available to staff inside the firewall.

7 Contingent on active demand from Country Directors and Country Managers.

- b. Step up the delivery of “Creating a Respectful and Harassment-free Workplace”⁸ facilitated conversations to leaders and teams.
- c. EBC will develop an action plan for face-to-face training of all staff on harassment/sexual harassment.
- d. Increase outreach to smaller country offices using video and online tools, in coordination with IJS Secretariat, to raise awareness for staff in those offices.
- e. Expand the outreach program on preventing and addressing sexual harassment, including external speakers, events, townhalls and online engagement.
- f. Continue to deliver “Creating a Respectful and Harassment-free Workplace” facilitated conversations to Respectful Workplace Advisers (RWAs), emphasizing their role in assisting in cases of sexual harassment. The Ombuds office will assess the role of RWAs in contributing to the WBG’s efforts to address sexual harassment.
- g. Continue to address sexual harassment issues during onboarding, and to require newcomers to complete the e-learning course within 90 days of joining the WBG.
- h. Monitor the effectiveness and outcomes of various training programs.

The impact of the training will need to be evaluated and follow-up training programs will need to be designed on the basis of the evaluation results.

1.3 Engage with senior leadership and mid-level management to ensure continued dialogue

To create a workplace culture free of sexual harassment, we will need ongoing commitment and focus. Implementing this Action Plan successfully will require professional change management initiatives and credible communications. EBC will seek the advice of change management specialists in the WBG to maximize the plan’s impact.

In consultation with the External and Corporate Relations Vice Presidency (ECR), EBC will ensure full implementation and update of the following actions:

1. Develop and implement an engagement plan for senior leaders to increase awareness and transparency, including through regular communication on sexual harassment issues.
2. Publish all sanctioned cases in an anonymized manner and how they were addressed

⁸ “Creating a Respectful and Harassment-Free Workplace” an EBC-facilitated conversation with an entire VPU or Department that focuses on what each member of the team can do – individually and collectively – to building a culture of respect together. It covers the topics of respect in the workplace, harassment and sexual harassment, and strategies for dealing with harassment from four different perspectives: (i) the person who feels they are being harassed, (ii) the person who is told they are engaging in harassing behavior, (iii) the witness/bystander, (iv) the manager. This has been an extremely popular session that receives very positive feedback from senior leaders and staff alike.

through the Anti-Harassment Coordinator (see section 2.2.1) or through the investigation process, including what sanctions were taken.

3. Provide staff with information setting out managers' responsibility to deal with inappropriate behaviors of a sexual nature, or sexual harassment.
4. Develop quick reference guides, e.g., expected behaviors during work missions.
5. To demonstrate the institution's commitment, continue communicating and engaging feedback from staff about key milestones. In particular, (i) update an intranet page⁹ with all resources for staff on preventing and addressing sexual harassment at the WBG, and (ii) update an external web page¹⁰ with all public resources on sexual harassment, including the existing form¹¹ for anyone (WBG staff or not) to report to EBC allegations of sexual harassment against a WBG staff member.
6. Develop a specific section on sexual harassment in EBC's annual report,¹² with disaggregated data and case studies.
7. Increase the number of initiatives to raise awareness on issues such as micro-aggression and bystander interventions.

1.4 Implement transparent monitoring as a basis for open dialogue

We need to be sure that these actions are working to create a workplace culture free of sexual harassment. EBC will monitor the WBG's organizational culture and transparently communicate the results by:

1. Carrying out an annual or biennial survey of all staff about sexual harassment, ensuring full confidentiality will be essential to obtain unbiased information.
2. Organizing targeted surveys, focus groups or individual interviews as required, for instance to assess the prevalence of or the types of sexual harassment in specific country offices or with specific groups.
3. Identifying groups that may be more vulnerable to sexual harassment or fearful of reporting it in specific contexts.
4. Identify or confirm trends in relation to sexual harassment based on information from EBC's new data management system.

The Chief Ethics Officer will regularly report to the President on these trends and issues.

9 FURL <http://antish>/available to WBG staff inside the firewall.

10 For more information, visit: <http://www.worldbank.org/ethics>

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

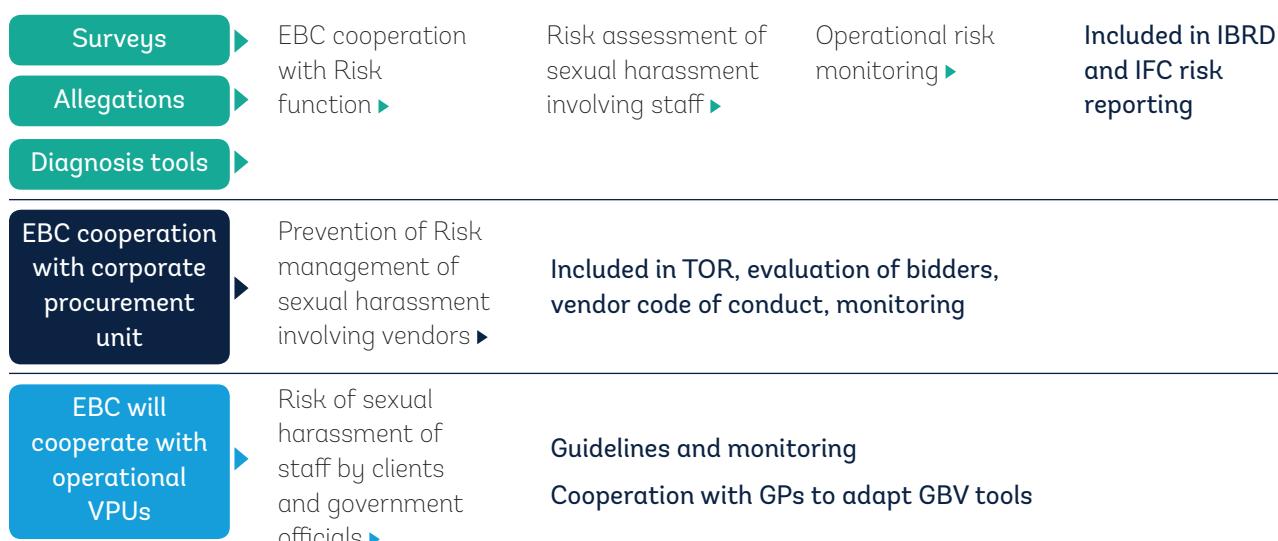
12 In fiscal year 2018, EBC commissioned a special report on sexual harassment at the WBG. The full report is available here: <http://pubdocs.worldbank.org/en/172361546547469758/EBC-AR18-FINAL-Web1.pdf>

1.5 Integrate explicit ethical considerations into other WBG activities

We need to apply an awareness of sexual harassment when assessing risk throughout the WBG's operations. EBC will work with both corporate and operational Vice Presidential Units (VPUs) to develop early detection of trends and potentially risky situations for sexual harassment. EBC will:

1. Collaborate with experts on gender-based violence (GBV) to (i) ensure consistency between rules applied to operations and the internal regulatory framework and (ii) adapt available diagnosis tools to risk assessment and internal detection of sexual harassment.
2. Collaborate with relevant MIGA, IFC and IBRD risk departments to include sexual harassment risk in operational and enterprise risk frameworks.
3. Collaborate with the corporate procurement unit to ensure good understanding of the protection available to employees of vendors who are working on WBG premises.
4. Monitor the emergence of good practices related to sexual harassment and implement these in cooperation with the most relevant services.
5. Review scenarios or case studies to identify, anticipate and manage any potential unintended consequences of the measures that are proposed under this Action Plan or already in place.

FIGURE 5 / Addressing Sexual Harassment As a Risk



1.6 Leading and setting international best practices

Addressing sexual harassment is a global issue affecting all countries, organizations and corporations. Hence, given our leading role in development worldwide, how the WBG addresses sexual harassment can make a difference well beyond our institution.

EBC will actively participate in international conferences and other multilateral fora regarding sexual harassment, including the UN Chief Executive Board (CEB) Task Force. EBC will also interact with relevant IFIs, CSOs and leading public and private corporations to benchmark against best practices and to exchange innovative ideas to address sexual harassment in the workplace.





2. Enhancing Trust in the System's Ability to Address Inappropriate Behaviors

Addressing sexual harassment requires that all of us can trust the systems for reporting, investigations and sanctions. We need to ensure that allegations are managed quickly and effectively and that they lead to sanctions when misconduct is established. It is important to lower the barriers to reporting as much as possible. Lowering the barriers to reporting includes simplifying and clarifying the rules, providing a “one-stop shop” in EBC to report allegations of sexual harassment against WBG staff members, accelerating the investigation process, clarifying the sanctions criteria and practices, and ensuring that we coordinate all of our support (e.g., psychological or legal) to affected staff.

Strengthening trust in our systems is essential to prevent and address harassment.

2.1 Improving the regulatory framework: Consolidating and clarifying the rules

To complete the regulatory framework, EBC will, in consultation with the relevant services, consolidate and clarify the following rules:¹³

1. Including the new WBG Code of Ethics and Conduct that sexual harassment is not tolerated and contrary to the core values of the institution.

¹³ Revision of Staff Rules: As of April 13, 2018, the [WBG revised Staff Rule 3.00 \(Office of Ethics and Business Conduct\)](#), paragraph 6.01 (Allegations of Misconduct Addressed by EBC) to clarify and explicitly state that sexual exploitation and abuse is a sanctionable form of misconduct and is prohibited. Clarifying definitions of sexual exploitation and abuse were also adopted.

2. Strengthening and clarifying the definition of sexual harassment in the WBG regulatory framework, in line with UN and international standards. The definition (and prohibition) applies equally to all gender identities and to all sexual orientations.
3. Improving the regulatory framework and clarifying the role of managers in addressing sexual harassment and inappropriate behaviors, as mentioned in paragraph 1.1.
4. Reaffirming that anyone (internal or external to the WBG) can report to EBC allegations of misconduct by WBG staff members).¹⁴
5. Confirming and establishing by rule the existing practice of continuing an investigation until a conclusion is reached even if the staff member whose behavior is under review resigns from the WBG during the investigation.
6. Confirming that retaliation protection applies to staff who inform their managers that they believe they are or have been sexually harassed, that they receive unwanted sexual attention, or that they work in an atmosphere inconsistent with dignity and respect.
7. Reviewing the rules and practices to enforce appropriate screening and reference checks on history of sexual misconduct for external candidates applying to WBG positions.¹⁵

The following defacto conflicts of interest constituted by consensual sexual relationships between supervisors/managers and their direct reports will be adopted:

- Requiring both supervisor and supervisee to disclose if they develop a sexual relationship and requesting them to follow EBC's recommendations to address the conflict of interest created by their relationship. At present, the obligation is on the supervisor to "seek resolution."
- Establishing an obligation to disclose relationships with non-staff members who are working with the WBG (employees of contractors, government officials, employees of partner organizations), and to resolve any resulting conflict of interest.

¹⁴ Including STCs after the expiry of their contract, retirees, or external parties (clients, vendor employees, etc.). Access the Internet form at <http://www.worldbank.org/reportsexualmisconduct>

¹⁵ Reviewing with all relevant parties the regulatory and legal consequences of potentially sharing with UN agencies the names of staff members who have been terminated for sexual misconduct, with the understanding that the name should be introduced after all appeals against termination are exhausted and erased after a period of time to be determined. In particular, it would also be necessary to determine how staff would have access to due process regarding their listing.

2.2 Complementing the system with people-centered services

2.2.1 Developing a new resolution option, between advising and investigating

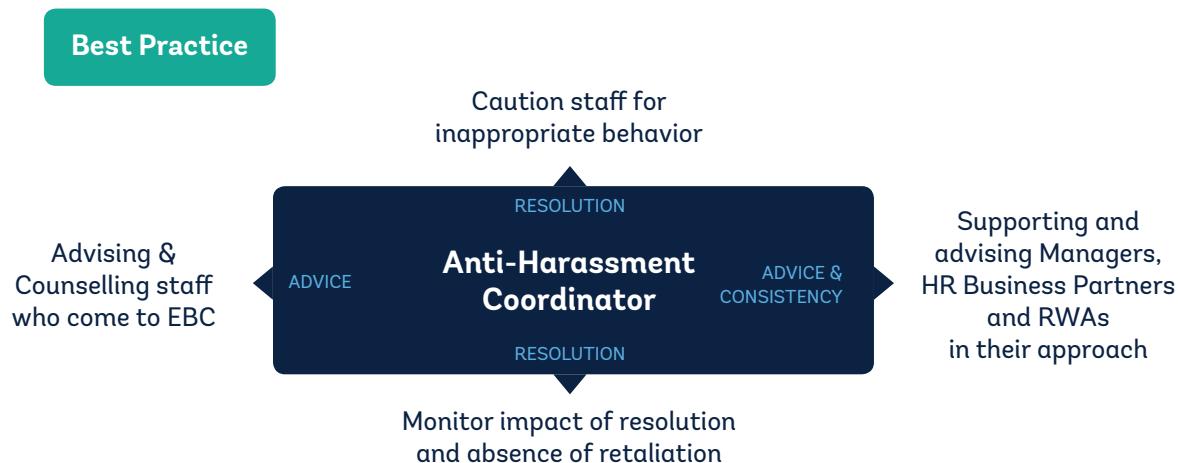
It is stressful and difficult to report sexual harassment. Sometimes people first need someone to talk to; sometimes they want help in finding additional medical, psychological, or legal resources. To provide more support for people needing to report harassment, EBC is putting in place an Anti-Harassment Counsellor/Coordinator to provide an alternative to formal investigations.

The Anti-Harassment Counsellor/Coordinator (AHC) in EBC will bridge the gap for staff seeking support between the informal services already available (Ombuds, Mediation, advice from EBC) and the formal investigation process. The AHC will be a one-stop shop within EBC, who will ensure a consistent approach for all allegations of sexual harassment and make it easier for EBC to support the individual. She or he will also support managers and HR Business Partners in addressing situations of inappropriate behavior. The AHC will also be a ready contact point that RWAs can provide to staff who need help to address inappropriate behaviors.

The AHC will have specialized expertise in handling sexual harassment allegations and will have three key roles:

1. Serving as a central point of contact within EBC to review allegations of sexual harassment and envisage the most appropriate course of action, including whether

**FIGURE 6 / A New Role: Anti-Harassment Coordinator
(one-stop shop concept in EBC)**



the allegations should be transmitted to the EBC investigation team for formal review, and/or when relevant, to other resources of the WBG Internal Justice Services, such as the Ombuds and Mediation, Human Resources Corporate Case Management unit (HRDCO) for interim measures, or EBC Advisory Services. These tasks have been performed by EBC investigators and EBC Advisory Services previously. Informing staff about available psychological and healthcare support should also be part of the process.

2. Addressing reported inappropriate behaviors of a sexual nature that do not rise to the level of misconduct,¹⁶ or when, at any stage of the investigation process, EBC concludes that there is insufficient evidence to provide a substantiated report to the HR Vice President for review and sanctions. The AHC will, as appropriate and in consultation with those who were directly affected by such behaviors:
 - i. Work closely with the individual and their managers to seek active resolution. The AHC could agree on a remediation program with the relevant managers who will be accountable for its implementation. The remediation should focus on stopping the behavior, preventing a recurrence through active supervision, and protecting the affected parties. It should include anti-retaliation measures, including monitoring (in cooperation with other relevant departments) that retaliation does not occur.
 - ii. Inform alleged perpetrators, when appropriate, of the nature of the alleged misconduct and explain that such conduct, if alleged as true, is inconsistent with the WBG values and will not be tolerated.
 - iii. Refer interpersonal conflict resolution to the most appropriate Internal Justice Service (Ombuds, Mediation, Peer Review Services [PRS]).
3. Monitoring all cases of sexual harassment to assess:
 - a. the impact of the remedial actions on the behavior of staff members concerned.
 - b. the evolution of the work climate in the affected units, following someone being cautioned or investigated in the unit; includes enlisting other relevant services when necessary to address deteriorations of the work atmosphere.

2.2.2 Developing guidance to support staff affected by sexual harassment

Sexual harassment is a trauma, and post-traumatic stress is a frequent result. We need to ensure that we follow best practice and offer psychological support as a matter of course, rather than on an exceptional basis.

¹⁶ The determination of what constitutes misconduct is a two-stage process. First, EBC identifies whether facts warrant an investigation. Second, once the investigation has taken place and EBC has produced a report, the Human Resources Vice President reviews the report and decides whether sanctions should be imposed on this basis. The inappropriate behaviors that do not lead to investigations would be the focus of the process described in this paragraph.

FIGURE 7 / Provide support to victims/survivors



HR and HSD will take the lead in developing guidance on how best to support staff affected by sexual harassment. The support will be related to their health and psychosocial well-being, as well as any regulatory/disciplinary issues.

2.3 Improving investigatory reporting processes and procedures

2.3.1 Improving the transparency of the investigation and sanction process

As part of the overall strategy to address sexual harassment, we must generate trust and confidence in the WBG's capacity to address misconduct and inappropriate behaviors. We also need to empower and incentivize staff to voice concerns and report incidents. As a key component, EBC will take actions to reduce the time elapsed between an allegation being brought and an EBC report being sent to HR. This will require EBC to:

1. Review the procedure and explore in detail the following options:
 - Establish and ensure consistent implementation of a protocol to fully inform those who bring allegations forward of their rights and duties. This will allow staff to make informed choices regarding the process, including the level of anonymity that they wish to retain.

- Ensure that staff who report allegations or provide testimony and seek anonymity are consulted and informed if their identity needs to be revealed or if the process could trigger an investigation.¹⁷
 - Inform the appropriate manager when one of their staff is under investigation for misconduct, and when the investigation is closed (whether it closes with or without a report).
 - Notify staff members who are the subjects of allegations as soon as possible without affecting the investigation process.
 - Provide the full draft report, not only to the subject of the allegations, but to the complainant. For both the complainants and subjects of allegations, give 10 calendar days to review the report and provide comments.
 - Systematically refer to any previous allegations of misconduct when reviewing allegations against a staff member. The intention is to address patterns of behavior, while remaining mindful of the risk of collusion between complainants. What would be considered as inappropriate behavior but not rise to the level of misconduct as an isolated incident, may be investigated as misconduct if repeated, especially when the alleged perpetrator had been informed of their inappropriate behavior.
 - Establish a protocol to (i) identify whether the victim shows signs of stress to a level requiring psychological support, and (ii) adjust the reporting, complaint and interview process as a result. Possible adaptations might include, for instance, interviewing outside the office, dividing the interview into several sessions, or having a counselor present.
 - Transfer the case back to the AHC for monitoring of the work climate when the investigation is closed.
 - Establish new guidelines, in cooperation with PRS, to avoid duplication of efforts for reporters of harassment whose cases concern both PRS and EBC; and resolve timing inconsistencies that can arise when the processes run in parallel.
 - Provide the AHC and investigation team with the subject of the investigation's annual relationship disclosure or Declaration of Interests (when it exists) and relevant information from the personnel file to ensure that this information is taken into consideration.
2. EBC acknowledges that it needs to improve communication with involved parties during an investigation. Currently, teams in which an investigation is taking place do not receive any official information. EBC will establish a protocol on what communication can take place to such teams during an investigation. In particular, in

¹⁷ The WBG Good Practice Note for Prevention of Sexual Exploitation and Abuse in Investment Project Financing involving Major Civil Works recognizes the need for persons who are reporting to be in control of who knows about their cases and how these are handled. It is important to establish consistency between the GBV approach outside the WBG and the sexual harassment approach inside the WBG.

consultation with those directly implicated, there should be communication about absence of findings of misconduct when this is the case.

2.3.2 Reducing the length of investigations

Faster investigations are needed to improve trust in the system's ability to address sexual harassment. Improving their speed is a complex task and will require that each investigation has milestones and deadlines, as well as quality standards.

Shortening investigations requires further training for the investigators, which has a budget impact. More investigators will be onboarded, so that we have more resources for sexual harassment investigations. At least two investigators in EBC will be dedicated to sexual harassment cases.

EBC will consider all possible ways to improve efficiency, in particular:

- Analyze options to speed up production of written transcripts.
- Shorten the investigative process and publish deadlines on each step of the investigation process (treating each investigation as a project with milestones and deadlines).

EBC will prioritize shortening the timelines for sexual harassment cases. Specifically, EBC commits to the following time line:

1. Preliminary inquiries completed within one month of receipt of an allegation.¹⁸
2. Reports submitted to HR VP more quickly, on average, during each year of this Action Plan. The targets are: within 145 days of receipt of an allegation in FY19, within 120 days in FY20, and within 110 days in FY21.¹⁹

EBC will provide a receipt and acknowledgment of an allegation within one business day, complete the intake and assessment within 10 days, and complete the investigation process (excluding report writing) within three months of receipt of the allegation.

2.3.3 Providing new or improved reporting tools

EBC will work with ITS to adopt or improve the following reporting tools:

- A new reporting tool to allow affected individuals the options of: (i) creating a time-stamped, secure record of the incident, preserving evidence for later reporting; (ii)

¹⁸ This allows for review of evidence, interviews of the complainant and other witnesses, and gathering of additional material.

¹⁹ In FY18, the duration of (all types of) misconduct investigations varied between 115 days and 322 days, with an average of 181 days.

reporting electronically by sending the record of the incident directly to EBC to initiate a review; or (iii) save the time-stamped, secure record but report automatically to EBC if another individual names the same perpetrator. Upon receiving this information, EBC follows up with the affected individuals to determine if they want to initiate a review. These types of reporting options will assist the affected individuals in making the right decision for them and increase the likelihood that disclosure will lead to action. It also empowers individuals to report as they realize they may not be the only one impacted by the perpetrator's behavior. The reporting system (which will likely also be available as a mobile app) also will provide affected individuals general advice and resources for assistance and support, as well as easy access to the key elements of policies and procedures.

- A reporting form (already available on the external web site) to enable confidential reporting to EBC of sexual misconduct situations involving WBG staff. Anyone can use the form (including non-staff members) and can do so entirely anonymously (EBC has no way of knowing the origin of the report). These reports may lead to investigations by EBC and are otherwise not available to anyone.

The reporting tools should be available both to computer and mobile phone users.

2.4 Enhancing the decision-making function for disciplinary measures

We must hold staff accountable if they are engaging in behavior that is inconsistent with the WBG staff rules and values. The Human Resources Vice President plays an important role in ensuring this. Upon receipt of EBC's report, the HR Vice President assesses the evidentiary findings and determines if misconduct occurred imposing the appropriate disciplinary measures. To help develop trust in the investigation and sanctioning process, HR will, in consultation with the relevant services, explore whether the following procedural steps need to be formalized and systematized:

- Enhance the transparency of decisions, exploring the possibility of meeting with the subject and/or complainant independently and consulting with the subject's manager before arriving at the decision.
- Inform both the subject and the complainant of the decision and resulting disciplinary measures.
- Explain and communicate to staff regarding the evidentiary standards required to establish misconduct. The WBG will generate avenues of discussion and benchmark current practices of evidentiary standards for establishing sexual harassment allegations in international organizations.
- Communicate systematically the threshold for standards of proof to anyone taking part in an investigation in one capacity or another and to staff more generally.

FIGURE 8 / Improve Accountability, Awareness and Trust

Easier reporting	<p>► Provide new or improved reporting tools (e.g. report matching and contingent reporting)</p> <p>Better inform staff on available reporting mechanisms</p> <hr/>
Clear roles for all protagonists	<p>► Clarify obligations of Managers (obligation to report vs addressing situations)</p> <p>Clarify roles of RWAs, HR Business Partners, EBC Anti-Harassment Coordinator, Investigators</p> <p>Clarify rights and obligations of contractors (Code of Conduct of Contractors)</p> <hr/>
Clearer rules	<p>► Clarify and align definition of sexual harassment in line with international standards</p> <p>Clearer requirement to declare consensual sexual relationships within teams</p> <p>Clarify that external parties can report sexual harassment committed by a staff member</p> <p>Clarify that retaliation protection policy also applies when reporting allegations to a Supervisor</p> <p>Assess how the standard of proof should be consistently and systematically communicated</p> <hr/>
Efficient and transparent process	<p>► Reduce average length of investigations 110 days in FY21, setting deadlines for each step in the process</p> <p>Improve transparency of investigations and of sanction process (including availability of reports to complainants)</p> <hr/>
Enhanced Accountability	<p>► Systematic accountability for inappropriate behaviors or sexual harassment</p> <p>Measures to screen recruitment to detect sexual harassers</p> <p>Provide better support for staff members who report being sexual harassed by external parties (clients, contractors, or government officials)</p>

2.5 Addressing sexual harassment committed by external parties towards WBG staff or on WBG premises

Our staff may also be at risk of sexual harassment as they work with the WBG's external partners, and we can do more to protect them. EBC will work with the corporate procurement unit, Legal, HR, ECR and other relevant units to implement the following initiatives:

- Review the Code of Conduct of Contractors and ensure that it contains all the relevant provisions concerning sexual harassment and abuse. How this will be implemented and enforced will need to be reviewed in detail with corporate procurement unit and Legal.
- Design behavioral guidelines for external participants in WBG-sponsored events, in consultation with ECR. EBC will review with GCS and Legal whether any enforcement mechanism (e.g. expulsion from the event) can be envisaged for those who violate the guidelines.
- Develop guidelines for managers on how to address harassment of staff by clients, or harassment of anyone by WBG contractors, and include templates for communications (e.g., letters) on the issue. The guidelines should identify the support available to managers in such cases.
- Develop a process for managers to report and receive support when a staff member has been harassed by a WBG client, contractor or government official.



Ethics and Business Conduct Department

Embedding Ethics throughout the World Bank Group

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