

Restrictions on Current and Former World Bank Group Staff and Eligibility of World Bank Group Vendors

The World Bank Group's Corporate Procurement Policies and Procedures contain the following policy regarding vendor eligibility of entities affiliated with current and former World Bank Group staff:

Current and former World Bank Group staff, regardless of appointment type held [including but not limited to Regular, Local Staff Regular, Open-ended, Term, Executive Director's Assistant, Special Assignment, Short Term Consultant (STC), Short Term Temporary (STT), Extended Term Consultant (ETC), Extended Term Temporary (ETT), and Junior Professional Associate (JPA)], are ineligible to be World Bank Group vendors or subcontractors to World Bank Group vendors, whether as sole proprietors or independent contractors, during their appointment and for a period of twelve months ("Cooling Off Period") from the termination date of their World Bank Group appointment. This Cooling Off Period also applies to companies in which a current or former World Bank Group staff member is an owner, principal, director or officer, or holds a financial interest. The Cooling Off Period also applies to companies with which close relatives (spouses, parents, full and half siblings, children, aunts, nieces, nephews and domestic partners) of current or former World Bank Group staff are owners, principals, directors or officers, or hold a financial interest. In the context of the Cooling Off Period, "financial interest" does not include negligible stock holdings in entities listed on the S&P 1200.

The World Bank Group's Staff Rules contain restrictions on current and former World Bank Group Staff with respect to future employment with the World Bank Group and future employers.

Frequently Asked Questions

1. [Are all appointment types subject to the World Bank Group's staff rules and procurement policies?](#)

Yes, all appointment types including but not limited to Short Term Consultant (STC), Short Term Temporary (STT), Extended Term Consultant (ETC), Extended Term Temporary (ETT), Junior Professional Associate (JPA), Regular, Local Staff Regular, Open-Ended, Term, Executive Director Assistant and Special Assignments are subject to the World Bank Group's staff rules and procurement policies.

2. [As a Short-Term Consultant \(STC\), am I a World Bank Group staff member or an independent contractor?](#)

For the duration of your service as an STC, you are considered to be a World Bank Group staff member subject to the Staff Rules and applicable World Bank Group policies.

3. I have worked as a STC for the World Bank for less than 150 days in this Fiscal Year. I would like my company to become a World Bank Group vendor. May I do this?

Not immediately. To avoid any actual or perceived conflict of interest problem, World Bank Group policy requires a 12 month cooling off period from the date your appointment terminates before an entity in which you are an owner, officer, partner or board member or in which you have a financial interest is eligible to receive World Bank Group contract awards. Subject to the World Bank Group conflict of interest rules, you may, at the termination of your appointment, provide services to the World Bank Group as an employee of an outside vendor without being subject to the twelve month waiting period. However, such employment cannot put you in a position to work for projects that would directly support the World Bank Group's work program or be involved as part of the vendor's team involved in a World Bank Group procurement, as this would infringe on the transparency and fairness of the World Bank Group's procurement process.

4. Does this cooling-off period also apply to vendors with which a relative is connected?

The cooling off period applies equally to entities where certain categories of relatives, including spouses, parents, full and half siblings, children, aunts, nieces, nephews and domestic partners are an owner, officer, partner or board member or companies where the relative has a financial interest.

5. I am a current World Bank Group staff member and my spouse is the owner of a company. May my spouse's company become a World Bank Group vendor?

No. Your spouse's company and any company in which you are an owner, officer, partner or board member or in which you have a financial interest, is ineligible to become a World Bank Group vendor and/or receive a World Bank Group contract award for a period of 12 months from the termination of your appointment.

6. My sister owns stock worth \$10,000 (representing less than 2% interest in the company) in a billion dollar company listed on the S&P 1200. Is this company restricted from becoming a World Bank Group vendor?

The fact that your sister owns \$10,000 in stock in this company would not restrict its eligibility, although other eligibility qualifications would still need to be satisfied. Although your sister has a financial interest in this company, the value and amount of stock she holds is considered negligible, so would not allow her to have a material influence over the company's business decision. Therefore, this would not, in and of itself, restrict the company from becoming a World Bank Group Vendor

7. Does this cooling off period also apply to non-profit organizations?

Yes. The 12-month cooling-off period applies to non-profit organizations and non-profit corporations.

8. My STC appointment is ending next month and I want to register a firm that I am on the board of. Are there any restrictions?

Yes. Since you are on the board of this firm, the firm is ineligible to receive World Bank Group contract awards for a period of 12 months from the end date of your appointment. The firm can only register as a World Bank Group vendor upon the expiration of the 12 months.

9. My son owns a firm that would like to do business with the World Bank Group. Are there any restrictions?

Yes. Your son's firm is ineligible to receive World Bank Group contract awards for a period of 12 months from the termination date of your appointment.

10. What is the reason for the 150 day / 190 day limitations?

STC appointments are used to allow the Bank Group to obtain specialized skill sets for a limited duration. The Bank's Board decision to limit the number of days is intended to ensure the appropriate use of the STC appointment type. The limitation on the number of days is subject to change.

11. I am a former Bank staff member and have been working in the Bank Group through an outside vendor. Are the days that I have worked at the Bank Group through this outside vendor counted towards the 150-day limit?

Yes. You are limited to 150 days during any Fiscal Year whether you are working as an STC or through an outside vendor. However, after the end of the fiscal year in which you worked as an STC, you may work through an outside vendor at the Bank Group with no limit on the number of days. The Staff Rules, including the conflict of interest provisions of Staff Rule 3.02, para. 4.02, would also apply. For example, a retired Bank staff member may only work 150 days in a Fiscal Year either as appointed staff or through a vendor.

12. My STC appointment has just ended. May a company that I own be a subcontractor under a World Bank Group contract with another vendor?

No. The 12 month cooling off period applies to your firm as a direct contractor to the World Bank Group and as a subcontractor to another World Bank Group contractor.

13. My appointment has ended and I have waited out the twelve month cooling-off period. Are there any other requirements for my registering as a World Bank Group vendor?

Yes. You must meet the same eligibility qualifications that all World Bank Group vendors must have all criteria as listed in the WBG Guidelines on Vendor Registration and Eligibility meet.

14. I currently hold a STC appointment. Can I also work for the World Bank Group through a World Bank Group vendor (that I have no ownership interest in)?

No. During the period of your appointment, you may only provide services as a STC and cannot concurrently work for the World Bank Group through a vendor.

15. I am a former World Bank staff member. I am not eligible under the World Bank Group Staff Rules to be reappointed to the staff of the World Bank Group. May I provide services to the World Bank Group as a World Bank Group vendor?

No. If you are not eligible to be reappointed as a World Bank Group staff member, you are also not eligible to provide services to the World Bank Group in any vendor capacity.

16. I'm working as a STC at the World Bank. I am also an employee of another company where I work during the period when I am not working at the World Bank Group. Can the company that I work for receive a World Bank Group contract award?

Provided that you and/or your close relatives (spouse, parent, full and half sibling, son/daughter, aunt, niece, nephew and domestic partner) are not an owner, officer, partner, board member, have an influence on the selection process and do not have a financial interest in the company, the company is eligible to apply for World Bank Group vendor status.

17. I'm currently working as a STC. I understand that the company that I own is not eligible to receive a World Bank Group contract for a period of 12 months from the termination of my STC appointment. Can I market my company's services to the World Bank Group while working at the World Bank?

No. This would not be permitted under the World Bank Group's policies.

18. I'm working as a STC at the Bank. I have been asked by an outside company to join their project team for a contract with the World Bank Group that will be supporting the World Bank Group unit for which I am currently working as my technical expertise and knowledge would be valuable to the project. Can the company receive a World Bank Group contract award, and appoint me to the project team?

No. Your close knowledge of the work and the World Bank Group unit would place the company in an unfair competitive advantage, making them ineligible to contract.

19. How does this 12 month vendor cooling off period relate to the 2 year "post-WBG cooling off period" in staff rules?

While these two rules are both intended to address conflict of interest concerns, the two rules are unrelated. The 12 month vendor cooling off period relates to vendor eligibility. The 2 year post-WBG cooling off period in staff rules prohibits a former staff member (regardless of employment type and including STCs) from performing services for any other entity, or person related to an activity in which the staff member participated personally and substantially during their World Bank Group

employment. The 2 year cooling off period would apply to a former staff member with respect to any employer, regardless of whether it was a World Bank Group vendor. For questions related to the 2 year post-WBG cooling off period, please contact the World Bank Group's Office of Ethics and Business Conduct.