

Enhancing Institutional Resilience

ETHICS AND
BUSINESS CONDUCT
ANNUAL REPORT
2022

ABBREVIATIONS AND ACRONYMS

AHC	Anti-Harassment Coordinator
ATV	Advisory, Training, and Values Unit of EBC
A2D	Grades A through D
BIR	Business Integrity Review Unit of EBC
CII	Conference of International Investigators
CBR	IFC Compliance & Business Risk Unit
CEB	UN System Chief Executives Board for Coordination
CRW	Creating a Respectful and Harassment-Free Workplace
DEC	Development Economics Vice Presidency
DEI	Diversity, Equity, and Inclusion
DOI	Declaration of Interests
EAS	Ethics Awareness Session
EBC	Ethics and Business Conduct Department
ENMO	Ethics Network of Multilateral Organizations
GCS	Global Corporate Solutions
GEF	Global Environment Facility
GPE	Global Partnership for Education
GIA	Group Internal Audit
HLO	Human Library Organization
HRDVP	Human Resources Vice Presidency
HWE	Hostile Work Environment
HSD	Health and Safety Directorate
IBRD	International Bank for Reconstruction and Development
IDA	International Development Association
ICSID	International Centre for Settlement of Investment Disputes
IFC	International Finance Corporation
IJS	Internal Justice Services
ITAP	Independent Technical Assessment Panel in GPE
ITS	Information and Technology Solutions
LGBT	Lesbian, Gay, Bisexual, and Transgender
MDCAO	Managing Director and World Bank Group Chief Administrative Officer
MIGA	Multilateral Investment Guarantee Agency
OSD	Office of Suspension and Debarment
RWA	Respectful Workplace Advisor
TTL	Task Team Leader
UN	United Nations
WBG	World Bank Group
WFA	WBG Finance and Accounting
WTO	World Trade Organization

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CHIEF ETHICS OFFICER'S MESSAGE

The Ethics and Business Conduct Department (EBC) promotes the development and application of ethical standards by all World Bank Group (WBG) staff. As custodians of the WBG Core Values and Code of Ethics, EBC works proactively to embed ethics and compliance throughout the organization. EBC's efforts to promote a values-based workplace are critical to enhancing institutional resilience and sustainability to support the WBG in addressing today's global development challenges.

To this end, I am pleased to share this annual report detailing the activities carried out by EBC in fiscal year 2022, which spans from July 1, 2021 through June 30, 2022.

Among the notable trends we have seen in fiscal year 2022 are the following:

- Received the highest ever number of staff requests (over 1,400) for ethics advice and compliance
- For the second consecutive year, there has been significant increase in the use of services provided by the Anti-Harassment Coordinator (AHC)—attributed to the success of the program in increasing trust of staff; empowerment of staff to report cases; lowering the threshold that triggers an institutional response; and establishing protective measures for staff. These are all at the center of EBC's efforts to adopt a survivor-centered approach.
- Stability in the number of misconduct allegations received and reviewed; an increase in the number of allegations related to abuse of authority, harassment, discrimination, and retaliation, while allegations of sexual harassment are steadily declining; and an increase in the number of substantiated cases of retaliation.

Among EBC's main achievements and deliveries in fiscal year 2022 are the following:

- Launch of the EBC Strategic Plan for Fiscal Years 2022–2025. The strategy reaffirms the department's areas of focus, including fostering prevention; enhancing compliance; ensuring accountability; contributing to an ethical workplace culture, including through establishing permanent presence in regional hubs; and promoting excellence in EBC.

- Expansion of EBC's permanent presence in country offices, including in the regions of Eastern and Southern Africa, Western and Central Africa, East Asia and the Pacific, and Europe and Central Asia
- Complete implementation of over 70 recommendations in the *WBG Action Plan for Preventing and Addressing Sexual Harassment* and continuing to work closely with the WBG staff-led Sexual Harassment Working Group
- EBC leadership in key areas of the WBG Task Force on Workplace Culture, mainly on sub-group recommendations on anti-retaliation measures and increased transparency and managerial accountability
- Strengthening of anti-racism and anti-discrimination messages in the *WBG Code of Ethics*
- Launch of new training modules such as *From Bystander to Upstander* and *Preventing and Addressing Harassment and Sexual Harassment, specific training for Managers*
- Approval of the revision of Staff Rule 3.03 (Financial Interest and Disclosure) to ensure complete disclosure by staff of any potential conflicts of interest derived from business or personal relationships with entities that are directly involved in WBG operations.

These activities and ongoing efforts serve to embed our corporate values and ethical behavior throughout the WBG. EBC is deeply committed to making our organizational culture stronger and we will continue to address the needs and workplace concerns of WBG staff.

JORGE DAJANI
Chief Ethics Officer, World Bank Group



1 IMPROVING WORKPLACE CULTURE

Advancing Priorities of the WBG Task Force on Workplace Culture

In November 2021, the WBG President announced the constitution of a WBG Task Force on Workplace Culture to tackle several issues related to improving the work environment at the WBG. EBC has contributed to the work of the Task Force through its participation in relevant working groups and stands ready to contribute to the implementation of the Task Force's recommendations.

In particular, EBC actively contributed initiatives to address the fear of retaliation that has consistently emerged from employee engagement surveys. EBC also led the work of the Task Force in developing protective measures against retaliation to increase trust of staff and address potential fears in reporting.

The recommended actions of the Task Force are categorized into three areas of work: building trust; empowering and motivating staff; and strengthening culture as a core value proposition.

Their recommendations were still in draft form at the end of fiscal year 2022. Still, EBC's 2022–2025 strategy is fully aligned with the recommendations that have been drafted by the Task Force and will place EBC in a good position to be a driving force in the implementation of the recommendations, once they are approved.

Focus on Inclusion

Enhanced Code of Ethics

In fiscal year 2022, EBC partnered with the WBG's Anti-Racism Task Force and other stakeholders, including the Staff Association, to strengthen the WBG Code of Ethics' message of anti-racism and anti-discrimination to reflect the increasing global awareness of the issue.

Other revisions include additional aspects of personal attributes to be recognized as part of diversity, frequently asked questions on retaliation, and clarifying the managerial responsibilities to generally apply to those who supervise others without formal authority.



To complement these developments, EBC has produced a portfolio of outreach and training. This includes:

- **Code of Ethics at-a-Glance:** An informal guide to provide basic information on the Code of Ethics, such as its unique nature of staff-led content, difference from policies/rules, and focus on managerial responsibilities of modeling and creating a safe environment. It is meant to evoke staff's curiosity about the Code rather than its summary, and includes examples of staff input that shaped the values and the Code as well as a list of personal values that readers can reflect upon along with the organizational values.
- **Code of Ethics Learning Guides:** Three learning guides developed in partnership with employee resource groups and the Health and Safety Directorate (HSD) to raise awareness on LGBT+, disability, and mental health issues. They highlight the importance of building knowledge around these issues and applying the highest standards of actions, behaviors, and mindsets by staff of the World Bank Group when interacting with their colleagues. The guides also specify responsibilities of managers to be role models of inclusive actions. This is meant to be a series, and more guides are forthcoming.
- **Leaders' Guide to Code of Ethics:** Created to expand on the responsibilities of WBG managers and those with roles of authority to supervise others to model behaviors and actions aligned with the Core Values and to create work environments that feel safe. It includes a checklist consisting of questions for improving self-awareness of one's actions and their effects on others.
- **Our Core Values and Code of Ethics e-learning:** Launched as mandatory for all WBG staff, with the first phase of completion for existing staff closing in September 2021. The course continues to receive the highest rating among all the mandatory e-learning courses and is taken by new staff as they join the organization.
- **Team Conversation on Values:** A 90-minute "conversation" for units and teams. Rather than a top-down traditional "training," EBC facilitates conversations among members of the requesting unit or team on what the values and the Code of Ethics mean and could look like—in terms of actions, behaviors, and mindsets—within the unique context of the team's environment, and define and prioritize specific desired actions to commit to as a group.

Supporting vulnerable groups

EBC contributes, together with other departments such as HSD and its Domestic Abuse Prevention Program (DAPP), units of the Internal Justice Services (IJS) and some affinity

groups, to developing an atmosphere of psychological safety for all staff. EBC staff and, in particular, the Anti-Harassment Coordinator, participate in the DAPP Council to develop a coordinated approach to addressing domestic violence cases. The Anti-Harassment Coordinator can collaborate closely with the DAPP on specific cases. EBC's advisory services, which address issues related to personal legal obligations, also supports the DAPP (see page 19 for more information).

The WBG Code of Ethics states that individual differences strengthen the organization. As introduced previously, in fiscal year 2022 EBC published three learning guides (on disability, mental health, and LGBT+) to raise awareness of the unique challenges specific groups of staff face and, using the Code, to equip staff with knowledge and practical actions they can take to be inclusive of vulnerable groups that are in line with the nature of the WBG Core Values.

EBC also developed a proactive approach to working with staff affinity groups, with the Chief Ethics Officer and the Anti-Harassment Coordinator holding townhalls with some affinity groups (e.g., WBG Women's Network; GLOBE, the WBG employee resource group that advocates for LGBT+ staff and consultants; and INFRA United, an IFC staff affinity group), and working meetings also taking place between the leadership of these groups and the Chief Ethics Officer. Also, EBC, in close collaboration with the WBG Diversity, Equity, and Inclusion (DEI) office and the IJS, has spearheaded conversations on topics that were, until recently, rarely addressed in the organization, such as trans identities. In recognition of this initiative, the Chief Ethics Officer received the 2022 Hans Binswanger Award, which is given by GLOBE to LGBT+ allies.

Advancing dialogue on addressing discrimination and racism

In fiscal year 2022, EBC led a panel organized by the Ethics Network of Multilateral Organizations (ENMO) on addressing discrimination and racism in international organizations from the perspective of ethics offices. Chaired by the Chief Ethics Officer with the participation of EBC's Representative at IFC, the panel discussed the idea of any discrimination being a violation of an organization's rules, values, and code of behavior; and therefore, within the mandate of ethics offices. Also discussed were challenges of culture change within a diverse workforce; the role of prevention through training and outreach; tapping into DEI data for monitoring and measuring improvements; and the importance of creating psychologically safe spaces.

Other presenters from academia and other multilateral organizations also spoke of structural foundations that may have contributed to current organizational conditions; and the role of anti-discrimination policies and open, internal dialogue to impact change.

Ethics at Work Learning Session:

How to unjudge safely - The Human Library way
MAY 25TH 2022

ETHICS-AT-WORK
Learning Series

WORLD BANK GROUP
Ethics & Business Conduct



ETHICS AT WORK LEARNING SERIES

In its ninth year, this EBC program continues to attract staff interest. The session held on May 25, 2022, *How to Un-judge Someone Safely—the Human Library Way*, introduced the Human Library Organization (HLO) and its unique approach to “un-judging” and creating a safe space to learn about others who are different and correct one’s biases without the fear of “saying or doing the wrong things to offend others.”

According to keynote speaker Ronni Abergel, the founder of the HLO, judging others is part of human nature. “We all have opinions, and we form them all the time,” said Abergel. “But once we put people in a box, we don’t often revisit our judgments.” The Human Library approach can “help us challenge our unconscious bias, face prejudice and stigma, better understand discrimination and stereotyping, and how they impact our decision making.”

The WBG panel chaired by the Chief Ethics Officer discussed the relevance of the HLO approach to the World Bank Group as we continue to seek ways to improve our workplace culture and create a work environment that is inclusive for all WBG staff. Panelists offered insights from various viewpoints—those who are prone to being stereotyped or discriminated against and general managerial responsibilities in creating a safe space where staff do not have to be afraid of making mistakes.

At the end of the session, one participant shared, “this session changed my view of how the organization deals with the issue of diversity.” The World Bank manager for Diversity, Equity, and Inclusion also informed participants of the planned World Bank Group version of the Human Library event in fiscal year 2023.

May 2022 session with VP Susan Lund and the extended leadership team of the Economics and Private Sector Development Vice Presidency, IFC. ▶

Expanded Senior Leaders Onboarding and Other Leadership Outreach

Building on the initiatives launched last fiscal year and focusing on developing an ethical organizational culture, EBC has continued and expanded its engagement with the senior leadership of the World Bank Group. The Chief Ethics Officer has continued to meet regularly with the WBG President to inform him of key issues and trends relating to the ethics of the WBG. He also regularly meets with the MDCAO, both individually and with the corporate leadership. EBC has also continued to provide the Board with an Ethics and Compliance Awareness session.

The Senior Leadership Onboarding Program, where the Chief Ethics Officer commits to onboard personally every Director, Vice-President, or Managing Director who joins the WBG or is appointed to such roles, has expanded further, onboarding 42 senior leaders in fiscal year 2022, of which 14 were Vice-Presidents and 28 were Directors. At IFC, EBC decided to extend its program beyond newly appointed IFC senior leaders to include Directors and above who have been in their positions. In total, 14 IFC senior leaders attended the Senior Leaders Onboarding in fiscal year 2022, including six VPs, seven Directors and one Chief of Staff.

This initiative has continued to provide an opportunity to review the personal situation of the senior leader, ensuring that no conflict-of-interest needs addressing and preparing the Declaration

of Interest which, for Vice-Presidents and above, is published on the internet (except for private information such as the name of spouse or children, or address). This program continues to provide a first introduction of the senior leader to the WBG’s commitment to transparency and to an organizational culture that addresses all situations of conflict of interest, as well as an opportunity for the Chief Ethics Officer to present his vision of ethics in the organization and receive feedback from senior leaders, and to inform senior leaders about all the services that EBC makes available to staff. This approach has enabled senior leaders to reinforce EBC’s message and integrate the commitment to the Core Values and the Code of Ethics in their practice, contributing to a “tone at the top” supportive of ethics.

EBC has also continued implementing ethics training programs aimed at managers and directors (GH-GI levels), including two new offerings, focusing on first-time management and staff who are not formal managers, but have supervisory responsibilities. EBC’s manager training on promoting a positive and respectful workplace engages with WBG managers on how they can proactively be an example to their staff in creating a respectful and inclusive workplace. The overall aim is to ensure managers can identify risk and challenges to a positive workplace early and course correct as required.





2 PREVENTION

By focusing on prevention through ethics training and outreach, EBC continues to promote a values-based WBG. This involves creating awareness about the types of ethical issues staff may face, articulating and modeling desired behaviors, and creating safe spaces for staff to feel comfortable seeking help or guidance. Expanding EBC's presence in country offices has been another key factor in supporting a positive and respectful workplace culture.

Growing Impact of Training and Outreach

Over the last three years, over 20,000 WBG staff have participated in trainings provided by EBC. This creates a critical mass of staff who have attended ethics training and, as a result, can have a positive impact on the workplace culture and on the compliance culture of the WBG.

In fiscal year 2022, EBC engaged over 7,000 WBG staff through its training and outreach initiatives. Of these, more than 600 short-term consultants (STCs) and more than 1,500 IFC staff were trained. EBC engaged with staff working in all regions of the WBG, training approximately 3,142¹ staff based in country offices.

¹ This figure does not include the number of staff who attended townhalls which are not recorded in the Open Learning Campus (OLC), and thus where HR information, including location of staff, is not available.

TABLE 1. TRAINING AND OUTREACH FOR ALL WORLD BANK GROUP STAFF, FY22

	Number of staff
Townhall outreach	3,182
New staff onboarding	774
Ethics Awareness	729
Creating a Respectful and Harassment-free Workplace	630
From Bystander to Upstander	550
Preventing and Addressing Harassment and Sexual Harassment, specific training for Managers	215
Ethics-at-Work	207
Refresher Training: Preventing and Addressing Sexual Harassment	204
Conversation with the Anti-Harassment Coordinator	198
Preventing and Addressing Harassment: Conversation with Supervisors	194
Dialogue on Civility	190
Ethics and Compliance Awareness for First Time Managers (FTM)	47
Ethics and Compliance for Young Professionals	34
Total WBG staff reached	7,154

TABLE 2. TRAINING AND OUTREACH OF STCs, FY22

	Number of participants who were STCs ²
Conversation with the Anti-Harassment Coordinator	25
Creating a Respectful and Harassment-free Workplace	64
Ethics Awareness: Ethics at the WBG	72
From Bystander to Upstander	40
Refresher Training: Preventing and Addressing Sexual Harassment	50
Townhall engagements	296
Dialogue on Civility	36
New IFC staff engagement (IFC Virtual Induction, Virtual WBG Corporate Orientation—Global, and Virtual FCS—HRD Onboarding)	51
Total STCs reached	634

² An STC who took part in several sessions is counted several times. As some STCs attended several sessions, the total number of STCs who attended at least one session is 563.

TABLE 3. TRAINING AND OUTREACH FOR IFC STAFF, FY22

	Number of staff
Townhall engagements	530
Ethics Awareness	420
Creating a Respectful and Harassment-Free Workplace	287
New IFC staff engagement (IFC Virtual Induction and Virtual WBG Corporate Orientation—Global)	188
Harassment: A Conversation with Managers	88
Ethics and Compliance Awareness for First Time Managers	20
Preventing and Addressing Harassment: Conversation with Team Leads	14
Dialogue on Civility	13
From Bystander to Upstander	11
Ethics and Compliance for Young Professionals	9
Refresher Training: Preventing and Addressing Sexual Harassment	1 ³
Total IFC staff trained	1,581

New training offerings respond to the needs of staff and the organization

In fiscal year 2022, EBC developed new training for WBG staff to encourage bystander interventions when staff witness inappropriate behavior and to learn effective strategies for dealing with sexual harassment.

From Bystander to Upstander

This new offering builds on collective responsibility for a safe and respectful workplace and reinforces the idea that fostering an ethical and values-based culture must come from the top, bottom, and middle as a joint effort. This highly anticipated module raises awareness on techniques and strategies that may be used by bystanders to intervene when colleagues encounter unwelcome behaviors. With a positive reception by staff, EBC has successfully engaged with over 550 participants in the two months following the launch on April 27, 2022. The module takes into consideration that many factors may influence how we choose to intervene (e.g., power dynamics, workplace norms, frequency or severity of the behavior, etc.) and highlights the importance of helping the affected person as they want to be helped. It allows a candid and fruitful conversation addressing bystanders’ reluctance to intervene, reasons to overcome it, and a range of techniques to do so comfortably and safely.

This training has been designed to address different types of learning styles and utilizes diverse materials and strategies to engage participants and captivate their attention—from videos and infographics to role-played scenario by facilitators and case scenario questions. The module creates a dynamic learning experience that helps staff comprehend and internalize the intervention techniques. Relevant scenarios have been developed to depict unwelcome situations that could be experienced by staff in the workplace. The module allows all WBG staff to respectfully express their beliefs and concerns and to envision how to apply the techniques and strategies in those situations.

³ The record pertains to an IFC staff member who participated in a face-to-face session conducted by EBC in November 2021 with 204 total attendees. The staff member was the sole individual mapped to IFC for this engagement.

Its key purpose is to ensure awareness on how a suitable and thoughtful bystander intervention can positively impact the workplace.

This offering has become one of the most requested and popular, with 21 sessions delivered since its release in late fiscal year 2022. It rose quickly to the third place in terms of attendance, after *Ethics Awareness Session* and *Creating a Respectful and Harassment-Free Workplace*, which continue to be ranked as the two top EBC learning courses in terms of attendance at the WBG.

MEASURING IMPACT

Cognizant of the need to assess trainings' impact, quality, and effectiveness to follow benchmarked best practices⁴, EBC's Advisory, Training, and Values (ATV) team piloted an impact assessment system for the new *Bystander to Upstander* module. Training facilitators establish a baseline of audience's level of comfort when encountering unwelcome situations and then conduct a post-training survey to determine how the audience feels their level of comfort changed after the training.

For the 21 training sessions ATV conducted in fiscal year 2022, the assessment showed an increase of 25.6 percent in staff's level of comfort to intervene after attending the session, with an average variation from 3.43 out of 5 to 4.31 out of 5. Although a preliminary finding, the difference shows the positive impact that a session on techniques and strategies has for staff to feel more comfortable and potentially inclined to intervene

when witnessing unwelcome behaviors. Respondents to an anonymous pledge question indicated a commitment to remain vigilant and intervene as an upstander when witnessing unwelcome situations. The increased level of awareness on potential positive impact of their interventions can be distilled from their pledges. Figure 1 provides a snapshot of a few of the commitments and pledges EBC has received from participants this past fiscal year. They demonstrate EBC's training impact and commitment to creating a better work environment.

Notably, EBC delivered 15 *Bystander to Upstander* sessions this fiscal year to WBG Finance and Accounting (WFA), reaching 342 WFA staff. Participants' aggregate pre-session comfort level was 3.53 out of 5, increasing to 4.35 out of 5 post session—indicating an improvement of 23.3 percent.

In addition, *Creating a Respectful and Harassment-Free Workplace*, the most attended course from the EBC catalogue, currently addresses participants' reaction to the training and continues to receive very positive feedback reviews rating 4.6 out of 5.



Although a preliminary finding, the difference shows the positive impact that a session on techniques and strategies has for staff to feel more comfortable and potentially inclined to intervene

FIGURE 1. SAMPLE COMMITMENTS PLEDGED BY BYSTANDER TRAINING PARTICIPANTS



What's Your Role? Preventing and Addressing Sexual Harassment at the WBG Refresher.

As the new mandatory training on preventing and addressing sexual harassment in the workplace, this online video features a six-episode arc that encourages audiences to explore effective strategies and various resources for dealing with sexual harassment and potential misconduct from 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, and
- iv. the manager.

This course is an effective tool for individuals or teams to assess how they can foster a respectful and harassment-free workplace. More information on this and other related courses is available on [EBC's intranet site](#).

⁴ See *Global Ethics & Integrity Benchmarks (GEIB) 2020*, by Joan Elise Dubinsky and Alan Richter.

Collaboration in promoting a respectful workplace

EBC has collaborated with other IJS-related services in promoting a respectful workplace and in providing services to address conflict. In fiscal year 2022, EBC partnered with Mediation Services to facilitate a discussion on anti-discrimination and inclusion for a country office in the Middle East and North Africa region. The module included an open discussion on how discrimination can manifest in the workplace, root causes and how we can each become an ally. The session was rated 4.9 out of 5 by participants.

As part of its ongoing efforts to foster a respectful workplace environment in the Chennai office, EBC launched *ChennaiToons* in fiscal year 2022. ChennaiToons are a series of cartoons conceptualized and curated by EBC in collaboration with the Chennai Country Office Staff Association (COSA) and center manager that is shared with WBG staff based in Chennai on a regular basis. They illustrate examples of respectful workplace behaviors, reinforcing the WBG Core Values and reminding staff of the resources available for handling uncomfortable or challenging situations in the workplace.

During the fiscal year, ten cartoons were shared with staff on various topics, including respecting the private space of colleagues, dealing with a creepy team member, handling work-life balance issues, treating STCs with respect and dignity, creating better awareness on the role of managers and supervisors in preventing and addressing harassment and sexual harassment, becoming an effective upstander, managing conflict of interest risks, etc. Staff feedback and inputs on the cartoons are sought through an anonymous survey and the responses have been very positive and encouraging.

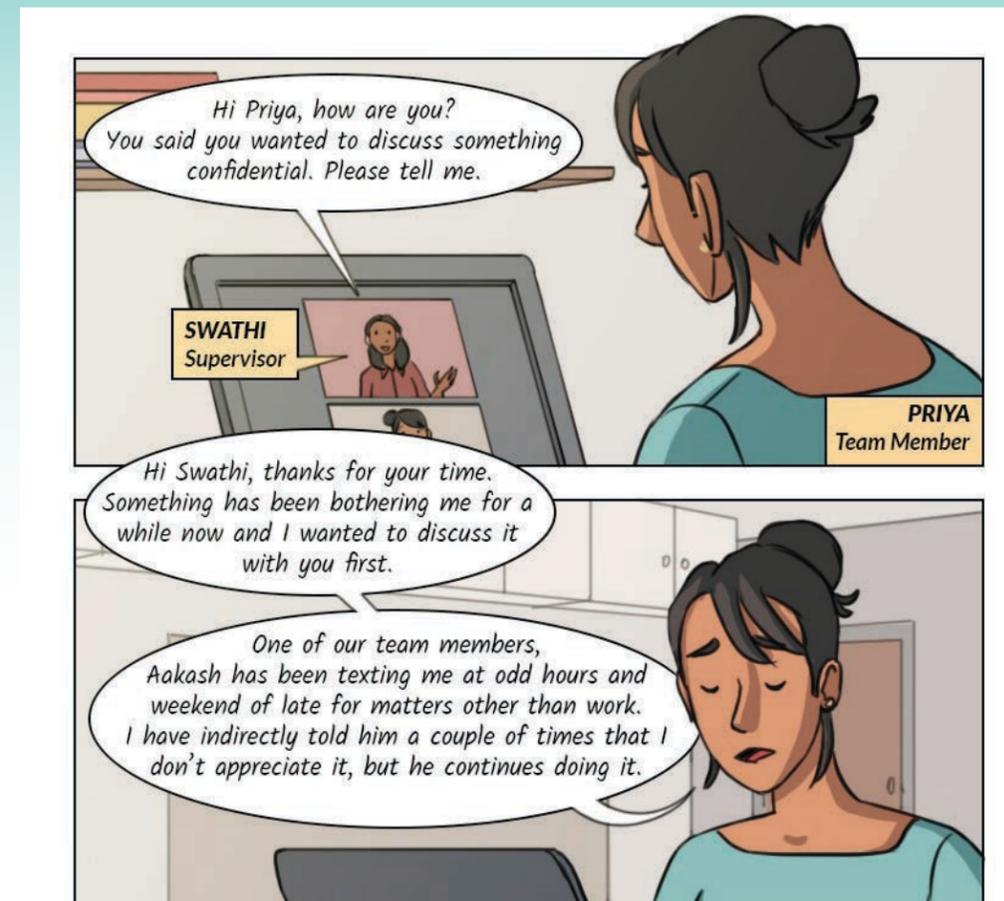
In addition, EBC has continued its collaboration with World Bank regions on their internal campaigns promoting respectful and inclusive workplace behaviors among their staff. These were shared in the form of cartoons and vignettes to illustrate relevant scenarios of inappropriate workplace behaviors, elaborate on guidance to address them, including resources available to staff, such as EBC's Anti-Harassment Coordinator.

For example, as part of the Safe and Respectful South Asia Region (SaR SAR) campaign, EBC has continued to collaborate with the region's communication team in reviewing "SARtoons" scenarios and preparing and reviewing debriefs pertaining to topics such as inappropriate workplace behaviors, harassment, sexual harassment, anti-racism/anti-casteism, etc. Many of these cartoons have been featured on the WBG intranet home page and have been widely appreciated by staff.

EBC also collaborated with South Asia Region's Social Development (SARSD) team in their "Race, caste, and ethnicity" training series, which reinforced the role of EBC in promoting a safe and respectful workplace for WBG staff.

Similarly, EBC has been working with the East Asia and Pacific (EAP) team, by reviewing the scenarios for EAP vignettes on addressing inappropriate workplace behaviors. EBC also engaged with EAP management and the Disability Advocacy and Resource Employee Group (DARE) to brainstorm and create cartoons on the topic of disability; these are expected to be rolled out in fiscal year 2023.

FIGURE 2. EXAMPLE OF A 'CHENNAITOON' ENCOURAGING SUPERVISORS AND MANAGERS TO CREATE SUPPORTIVE WORK ENVIRONMENTS



Increasing EBC Presence in Country Offices

A key part of EBC's strategy is to enhance our proximity to clients; namely, the global workforce of the WBG.

Dedicated EBC representatives in the regions

Following the WBG's drive to decentralize its operations and create a global footprint of its services, EBC continues to increase its presence in country offices to support the delivery of ethics training, outreach, and advisory services for WBG staff.

In fiscal year 2022, EBC introduced dedicated representatives covering specific sub-regions across Africa: EBC's representative for the Western and Central Africa region (AFW) is based in Dakar, Senegal; and EBC representatives for the Eastern and Southern Africa region (AFE) are based in Nairobi, Kenya and Pretoria, South Africa. Their proximity to staff allows the new EBC representatives to be a resource for staff who have interpersonal issues, face ethical dilemmas, or need advice on conflicts of interest. Country office

staff have also appreciated fast turnaround rates of queries, adaptable training material to suit their local country office context, French language adoption in facilitations and engagements (AFW region), and a personable, confidential contact to help increase their trust in EBC services. In addition, the appointment of a new EBC resource for the East Asia and Pacific region based in Singapore was announced in fiscal year 2022 that has become effective in August 2022.

Building on its existing presence in the WBG office in Chennai, the organization's largest office outside of Washington, EBC continued to enhance and strengthen its outreach initiatives there. In fiscal year 2022, EBC delivered various training programs including the new *From Bystander to Upstander* module and *Preventing and Addressing Harassment and Sexual Harassment—A Conversation with Team Leads/Supervisors*. EBC's presence in Chennai also enabled delivery of training for WBG staff in the country offices of East Asia and South Asia regions such as sessions on *Ethics Awareness* and *Creating a Respectful and Harassment-free Workplace*.

In addition to the "Ethics Onboarding" sessions for new staff in Chennai, in fiscal year 2022, EBC also rolled out specially curated "Team Leaders Ethics Onboarding" sessions for new team leads and senior team leads in Chennai. WBG Chennai celebrated its 20th anniversary in 2021 and EBC's ongoing efforts to foster a respectful workplace at the Chennai Center was appreciated by the Chennai leadership team and Shared Services Committee.

Recent engagements

In fiscal year 2022, the reopening of WBG locations and resumption of travel allowed EBC to engage in person with country office-based World Bank and IFC staff.

Western and Central Africa. In May 2022, the Chief Ethics Officer and EBC representative for the AFW region conducted missions to the country offices in Dakar, Senegal and Accra, Ghana. One objective of the trip was to introduce the new EBC representative

for the region to AFW colleagues, as a resource for staff and management in providing guidance on ethics-related matters. Another objective was to engage not only with senior leadership teams, but also with select focus groups in both IBRD and IFC, particularly with vulnerable groups. Meetings were held with a range of stakeholders, including task team leaders (TTLs), short-term consultants, practice leaders, COSA representatives, DEI advocates, Respectful Workplace Advisors (RWAs), Administrative and Client Support (ACS) staff, and



During its May 2022 mission to the Ghana country office, EBC colleagues attended the Project Steering Committee of the Public Sector Reform for Results Project (PSRRP).

contractors to better understand and gain insight into country office dynamics and offer key recommendations.

The missions highlighted the importance of new staff onboarding and constant refresher training to familiarize staff with the institution's core values, Code of Ethics, compliance rules and inclusiveness towards cultural diversity. Supervisors and TTLs also appreciated learning of new trainings to empower them with strategies and tools to lead their teams.

Some key recommendations moving forward include delivering new facilitated conversations on the core values to build inclusiveness, bystander interventions, conversations with supervisors, and customized offerings to bolster respect and inclusion in the workplace. It is also important for management to hold regular meetings with their smaller teams, including STCs and other colleagues, to listen to ways they could support their needs.

With the coordination and support of WBG colleagues in the field, the Chief Ethics Officer and EBC representative for AFW also visited local projects to gain insight on ethics-related issues in WBG operations that may impact staff and the institution. In Dakar, they visited the Bus Rail Transport system, the first of its kind in Africa to provide electric buses that connect between the farthest cities; in Accra, they were invited to a Special Committee Meeting with the Senior Presidential Advisor, Heads of the Office of the Head of Civil Service (OHCS) and Public Services Commission (PSC) to learn how Ghana is making progress in improving its civil service performance, organizational efficiency, and work environments.

Europe (IFC). Following EBC's presentation to the IFC Diversity, Equity, and Inclusion board in fiscal year 2022, the members of the council invited EBC to conduct ethics awareness training in their country offices, including in Europe. They also wanted to provide opportunity for their staff to share their workplace concerns and seek EBC's assistance. EBC conducted a mission to Vienna, London, and Paris in June 2022. The objectives of the mission were (i) to deliver ethics training including *Creating a Respectful and Harassment-free Workplace*, *Ethics at the WBG Awareness session*, and *From Bystander to Upstander*; and (ii) to engage with staff through bilateral and small group meetings to better understand their workplace concerns or challenges and discuss available WBG resources that could be accessed to support staff.

During each of these visits, IFC management and staff were very engaged and led to a few subsequent requests for additional training. Staff also sought consultations with EBC related to conflicts of interest and workplace harassment.



June 2022 bystander intervention training with staff in IFC's London office



3 COMPLIANCE

EBC actively works to improve good governance at the WBG. This includes the Declaration of Interests (DOI) Program, which EBC administers on behalf of the Bank Group; providing guidance to staff on conflicts of interest; and conducting root cause analysis to assess the situations in which staff failed or hesitated to comply with the ethical rules of the WBG, identify underlying causes, and share lessons learned with operational and other affected units.

Supporting Organizational Governance

Updating Staff Rules

A revision of the Staff Rules is a time-consuming process that requires seeking the consensus of multiple parties. Nevertheless, EBC regularly proposes improvements to the existing rules.

In fiscal year 2022, the WBG President approved a new version of Staff Rule 3.03. The main focus of Staff Rule 3.03 is the description of the Declaration of Interest programs and of the individual staff obligations that derive from such programs. The revision of the rule was the opportunity to build on ten years of experience of Declarations of Interest programs and incorporate lessons learned. The new version also explicitly requires staff who have developed investments, business relationships or personal relationships with entities that are directly involved in WBG operations, to disclose these before participating in these specific operations on behalf of the WBG. Both the staff involved, and their managers, are required to implement the mitigating measures put forward by EBC, unless a Vice-President agrees to an exception. Such interference of personal matters in WBG operations are referred in the rule as “business-related conflicts of interest.”

Senior Leaders Declaration of Interests

EBC implements and manages the Senior Leaders Declaration of Interests program, where filers are the “top 50” members of the WBG leadership team (of grade levels GJ and above, including the WBG Chief Ethics Officer). This program is separate from the WBG Staff Declaration of Interests program because summaries of the declarations of senior leaders are made publicly available and the format is meant to facilitate publication.

Following best practices of good organizational governance and transparency, the WBG Senior Leaders DOI program requires publication of certain financial assets, outside

positions and interests (in the public portion of the DOI form). Public disclosure of this information helps demonstrate to the WBG’s stakeholders that, in the discharge of their official duties and responsibilities, the WBG leadership team is not, and does not appear to be, influenced by any consideration associated with private interests.

On an annual basis, active WBG senior leaders are required to file a DOI by the end of the former calendar year, which reflects their financial interests and outside affairs during that previous calendar year. In addition, newly joining senior leaders are requested to file an onboarding DOI to report on their financial interests and activities upon joining the WBG.

After launching the annual exercise on January 31, 2022, the Senior Leaders DOI program was completed in early March 2022, with EBC achieving full compliance of 52 senior leaders (51 active filers since 2021 and one new entrant, who joined the WBG leadership team in January 2022). As part of this process, EBC provided guidance on applicability of Staff Rules to some of the disclosures, and assessed the submitted information for conflicts of interest. This exercise was concluded absent any conflicts of interest or reputational risk findings. The public forms under the program are available online (since March 10, 2022) at [Public Financial Disclosure for WBG Leadership](#).

Staff Declaration of Interests

The annual Staff Declaration of Interests Program requires approximately 5,000 WBG staff members to submit a DOI. This is done via a confidential and secure web-based software application, which has been accredited by the WBG’s Office of Information Security. Participants in the program include all staff at grade levels GH and GI, as well as other staff deemed to hold sensitive roles which present unique conflict of interest risk profiles. All staff in the Integrity Vice Presidency (INT), EBC, Corporate Procurement, and Office of Suspension and Debarment (OSD), regardless of grade level, are required to submit an annual DOI.

Once submitted, a team of highly trained and experienced analysts in EBC carefully review and analyze each DOI to identify actual or potential conflicts of interest. If any are detected, EBC then works closely with the staff member and their management team to implement appropriate safeguards to mitigate the risks posed by the conflicts of interest.

The process for administering the DOI program was not significantly impacted by the Coronavirus pandemic and maintained its program completion standards in a fully virtual environment.

TABLE 4. STAFF ANNUAL DOI PROGRAM, FY20–FY22

Staff Annual DOI Program	FY20	FY21	FY22
Total filers	4,567	5,138	5,201
DOIs closed at initial review	3,900	4,670	4,655
DOIs that required further review	667	468	546
<i>Of which mitigation measures were required</i>	<i>319</i>	<i>270</i>	<i>289</i>

Complementing the annual Staff DOI Program is the Staff Onboarding DOI Program. The program requires all staff hired at, or promoted to, grade level GH or GI (and junior staff in specific units deemed to present unique risks for financial conflicts of interest) to complete a DOI within 30 days from the date of their onboarding. In fiscal year 2022, 33 staff members were required to complete an onboarding DOI.

Following the completion of EBC’s review and analysis of the DOIs, there were 289 cases in which actual or perceived conflicts of interest were identified in the 2022 DOI Program. EBC resolved these conflicts of interest by implementing several mitigation measures.

TABLE 5. DECLARATION OF INTERESTS RESOLUTION, FY20–FY22

Mitigation measure	FY20	FY21	FY22
Requested additional information from staff member	194	163	128
Provided advice and guidance to staff member	97	71	150
Advised to seek manager/Chief Ethics Officer approval	7	12	3
Required disclosure to manager	6	9	5
Required divestiture of personal holding	2	2	0
Required disclosure to manager and divestiture of personal holding	0	1	0
Prohibited any transactions in personal holding unless approved by EBC	1	3	2
Other	12	9	1

Ethics advisory services

EBC’s advisory services significantly reduces compliance risk by addressing staff queries on conflicts of interest and other ethical issues quickly. In fiscal year 2022, EBC received 1,401 requests for advice—the highest ever level of requests received. The number of requests for advice have increased slightly compared to last fiscal year’s 1,373 (a two percent increase) and a rise of 33 percent from 1,053 queries in fiscal year 2019. Queries were responded to within eight business hours on average, in line with the service standards established in prior years. The most prevalent topics of inquiry remained consistent with prior years, with outside activities and employment (including employment after leaving the WBG and relationships with previous employers) remaining the highest category and about half of all queries received.

Starting in fiscal year 2021, EBC’s advisory services team established quarterly meetings with the IFC Business Risk Department (CBR) increasing collaboration in advising business teams on how to identify and mitigate conflicts of interest risks in IFC projects.

In addition to responding to requests of a compliance nature, the advisory services team saw an increase in matters involving ethics dilemmas in the context of personal legal obligations in child support, spousal-support, and other domestic matters. In fiscal year 2022, the team provided advice and guidance to resolve 15 cases involving personal legal obligations, compared with nine cases in fiscal year 2021. The advisory services team worked with managers, Human Resources (HR), the Institutional Administration Practice Group of the Legal Vice Presidency and, where necessary, the Domestic Abuse

Prevention Program (DAPP) team, to resolve concerns relating to child-support and ethics dilemmas in divorce matters.

EBC has also seen an increase in the past couple of years in matters involving social media postings as reflected in the overall increase of requests for advice related to public statements and disclosures, representing more than a 35 percent increase from fiscal year 2020 to fiscal year 2022.

While a few years ago IFC staff were asking proportionately fewer questions, this imbalance has been corrected due to EBC's very active outreach in IFC. The requests come more from headquarters (HQ) than from country offices, showing the importance of continuing the outreach efforts towards country offices. The requests tend to come more from staff under open-ended or term contracts than from short-term consultants. Staff in more senior grades tend to ask more questions than staff in more junior grades. The data from fiscal year 2022 confirm very largely the observations that could be made in previous years.

TABLE 6. ADVISORY REQUESTS BY INSTITUTION, FY22

Institution	FY22	
	Number	Percentage
IBRD	885	63%
IFC	335	24%
MIGA, ICSID, and Other ⁵	191	13%
Total	1,401	100%

TABLE 7. REQUESTS FOR ADVICE RECEIVED IN FY22 BY TOPIC AND COMPARISON WITH PREVIOUS YEARS

Topic	FY17	FY18	FY19	FY20	FY21	FY22
Outside activities and employment	311	317	362	477	540	569
Future or former employment	103	94	115	156	136	172
Close relatives/relationships	112	129	121	117	91	115
Vendor procurement	60	95	110	91	110	82
Public statements and disclosures	40	63	51	58	85	78
External services	48	42	38	49	20	31
Gifts, medals, and honors	47	61	74	45	43	47
Personal financial interests	17	21	16	40	44	50
Operational	20	6	19	6	8	12
Other	88	97	147	252	296	245
Total	846	925	1,053	1,291	1,373	1,401

⁵ "Other" refers to advisory requests from GEF as well as cases with external/anonymous requestors that don't have an institutional affiliation in the World Bank Group.

TABLE 8. ADVISORY REQUESTS IN FY22 BY GRADE LEVEL

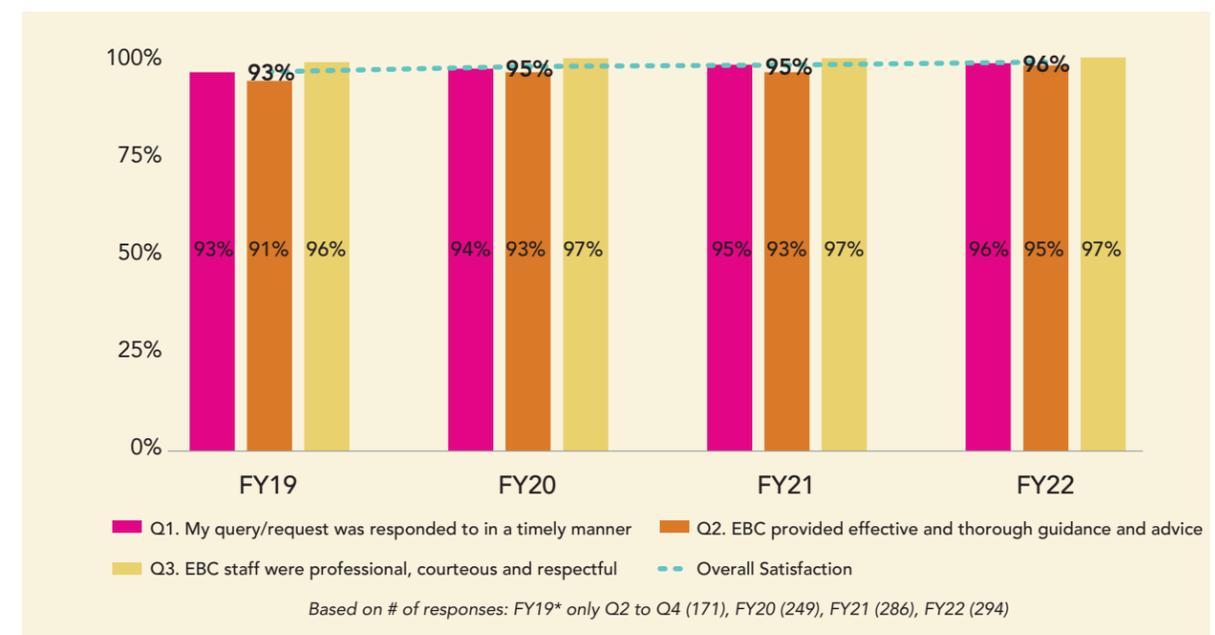
Grade	FY22	
	Number	Percentage
GH+	277	20%
GG	401	29%
GF	224	16%
GE	61	4%
GA-GD	100	7%
ETC/Ts	61	4%
UC-UA (STC/T)	106	8%
Non-classified (external/anonymous)	171	12%
Total	1,401	100%

TABLE 9. ADVISORY REQUESTS BY LOCATION (HQ/COUNTRY OFFICE)

Location	FY22	
	Number	Percentage
HQ	712	51%
Country Office	518	37%
Non-classified (external/anonymous)	171	12%
Total	1,401	100%

The advisory service within EBC's ATV unit administers client satisfaction surveys on a quarterly basis to ensure effective compliance and consistent service to meet the needs of WBG staff. Respondents to the anonymous surveys have indicated a high degree of satisfaction with the timeliness of the service and information provided by EBC.

FIGURE 3. ETHICS ADVISORY CLIENT SATISFACTION SURVEY RESULTS, FY19–FY22



Compliance risk education at IFC

One of the important ways to manage compliance risk is to ensure people feel comfortable to speak up about workplace concerns. To this end, EBC devoted a substantial amount of effort during the fiscal year through different training offerings to promote psychologically safe spaces for IFC staff. EBC shared with IFC staff the WBG's strong commitment against retaliation and ongoing work to strengthen the institutional safeguards around safe speech and managerial accountability. EBC also emphasized the importance of being able to report workplace concerns confidentially or anonymously. Particularly, the role of the Anti-Harassment Coordinator has been at the front and center of addressing inappropriate unwelcome behavior in the workplace. A major pillar of the Anti-Harassment Coordinator's office is that staff reporting concerns can remain anonymous and have a say in how their concerns are addressed. As previously mentioned, EBC began delivery of new bystander intervention training in the latter part of fiscal year 2022, which teaches staff the various strategies for intervening or responding when they witness inappropriate conduct.

In addition, medical benefits fraud awareness sessions were delivered to staff and managers in IFC's Latin America and Caribbean region to address medical benefits fraud risk. The session, which was developed in conjunction with the regional HR Business Partner, focused not just on the various iterations and how this risk is prejudicial to staff and the organization, it also focused on the various financial assistance offered by the institution. The session spoke to the WBG Core Values and the responsibilities of staff as international civil servants to observe the highest standards of decorum and integrity.

Participation in corporate committees

EBC increasingly develops a proactive approach to promoting adherence to ethical principles and compliance with the WBG rules. To this effect, EBC is active in several corporate decision-making committees; in particular, the WBG Procurement committees, the Operational Risk Committee, the Enterprise Risk Committees, the Corporate Responsibility Committee, and the Real Estate Committee.

Collaboration with WBG units

EBC also provides tailor-made support to units that develop specific initiative requiring an active ethics and compliance approach from the design stage onwards. In fiscal year 2022, EBC provided dedicated support to the new Independent Technical Assessment Panel (ITAP) process of the Global Partnership for Education (GPE), reviewing with the members and the GPE Secretariat any risk of conflict of interest. Specifically, EBC developed a declarations of interest program for ITAP to preserve the impartiality and independence of the ITAP assessment that guides the future actions of GPE. EBC is also working with the Development Finance Vice Presidency (DFi) to develop a policy regarding the conflicts of interest that are specific to this activity.

In addition, EBC has started working with the Development Economics Vice Presidency (DEC) on the new country-by-country assessment of the business environment, to establish mechanisms to avoid both conflicts of interest and undue pressure on the analyses or published results. EBC's contribution has been threefold. First, EBC contributed to a guide on conflicts of interest specific to DEC. Second, EBC provided advice on

specific steps of the processes and procedures that are being developed to produce a high-quality report, with EBC focusing on existing or emerging ethics and compliance issues. Third, EBC has made dedicated staff available to help individuals in DEC address past or present workplace issues, in addition to the other means available to all staff to contact EBC. As a separate exercise, EBC is also developing a procedure of declaration of interests for the DEC Working Papers in close collaboration with DEC.

Root Cause Analysis

Since fiscal year 2019, EBC has been implementing a root cause analysis methodology on its investigations and advisory consultations. The goal of the root cause analysis is to identify the conditions and gaps that allow non-compliance to occur.

The root cause analysis methodology analyzes whether the situations of non-compliance that EBC handles are due to:

- i. A gap in rules, procedures, or internal controls
- ii. Poor implementation of the rules or internal controls
- iii. Insufficient knowledge of the rules by staff
- iv. Any organizational or leadership factors, or
- v. Wider communications and workplace culture inadequacies.

How EBC is using and sharing this knowledge

The root cause analysis framework allows EBC to look beyond individual cases and anecdotal observations, towards a data-driven focus. Looking at aggregate cases helps EBC

Chief Ethics Officer Jorge Dajani participated in this January 2022 WBG Data Privacy Day event.



to see patterns and underlying systematic factors that allow lapses to emerge. Lessons learned are incorporated in EBC outreach and training content and informs future reviews and consultations on similar matters. It also allows EBC to contribute to WBG-wide discussions on corporate and operational risks, and compliance matters, providing our partner units with insightful comments and observations for their action (i.e., to close gaps within their purview).

Findings

EBC's analysis of misconduct cases over the past three years has identified control weaknesses in:

- a. Eligibility of HR benefits and entitlements
- b. Management of WBG assets and equipment
- c. Travel benefits and accounting
- d. Overtime payments
- e. Country office closure procedures and evacuation of non-national staff
- f. Country office administrative expenses, and
- g. Medical insurance benefits.

In the area of behavioral misconduct, the analysis showed:

- a. A need for continued EBC trainings on respectful workplace behaviors and becoming an upstander
- b. Increased outreach, particularly to country offices, with a targeted approach towards vulnerable groups of staff (such as consultants and new and junior staff members)
- c. Continuing to reinforce the message that reporting to the AHC is a protected activity and key to stopping unwanted behaviors
- d. Encouraging the use of performance management tools by managers to prevent unwanted behaviors from escalating, and
- e. Working with HR, HSD, and others to mitigate and limit external factors that may lead to unwanted behaviors.

In the area of advisory, the root cause analysis in fiscal year 2022 reviewed:

- a. How relationships of staff or their close relatives with IFC investee entities or business partners, could create reputational damage and must be disclosed to senior management
- b. The need for Corporate Procurement to permit disqualifications at any point in bidding processes (even canceling vendors' bids after shortlisting if necessary), in situations that cause reputational risks or conflicts of interests

- c. The need to liaise with HR to clarify that staff on external service remain WBG staff, subject to Staff Rules and limitations, and
- d. A lack of clarity in the policy regulating the resignation (required of staff before taking public office), that allows those resignations to be delayed or withdrawn.

See Appendix B of this report for some key root cause analysis findings and recommendations of EBC cases since 2019.

Promoting the Coordination of Compliance Activities

In fiscal year 2022, EBC joined the World Bank Compliance Steering Group to review and prioritize the implementation of the recommendations of a compliance risk assurance mapping exercise conducted in fiscal year 2021 and in which EBC also collaborated.

Six priority areas were identified, including the following in EBC's purview:

- Annual Compliance Certification: a mandatory annual certification for staff to attest their knowledge of and compliance with key applicable rules and policies, including those in the Code of Ethics and Staff Rules.
- Intra-WB Operational Conflicts of Interest: systematic application of guidelines to address intra-World Bank operational conflicts of interest, in close relationship with key stakeholders.
- Ethics Framework of WBG Data & Research: supporting the revamping of institutional processes to promote ethics and compliance standards in WBG research.

Work on these three areas is in progress and should be finalized or in implementation in fiscal year 2023.



Chief Ethics Officer
Jorge Dajani with
Ethics Officer
Stella-Monica Mpande at
the World Bank country
office in Senegal



4 SPECIAL REPORT ON HARASSMENT AND SEXUAL HARASSMENT

The World Bank Group continues to advance its commitment to tackling harassment and sexual harassment in the workplace. It has expanded approaches and resources for preventing and addressing sexual harassment and support for survivors, internally and in collaboration with external partners. The success of these continued efforts is reflected in the notable 46 percent increase in the use of Anti-Harassment Coordinator (AHC) services as compared with the already substantial AHC activities in fiscal year 2021.

Advancing and Operationalizing a Survivor-Centered Approach to Addressing Sexual Harassment

The WBG adopts a survivor-centered approach to addressing sexual harassment. EBC is leading the implementation of the [Principles on Advancing a Common Understanding of a Victim-centered Approach to Sexual Harassment](#) endorsed by the Chief Executive Board (CEB) Task Force on Addressing Sexual Harassment within the Organizations of the United Nations System. The Task Force has developed a detailed survey to gather feedback from victims/survivors who use informal or formal mechanisms to address sexual harassment concerns, which will be launched shortly and will help inform future initiatives.

EBC's steps to implement and embed these principles into WBG practices and culture are illustrated in its new resource publication: [A Survivor-Centered Approach to Sexual Harassment—A Guide for WBG Staff](#). In this connection, EBC and Human Resources partnered to provide innovative approaches and concrete actions to enhance support and protection for survivors. These include: streamlining the process for implementing protective measures during investigations; a new practice for the HRDVP to meet with survivors to hear their views and concerns prior to making a decision on disciplinary sanctions; and the development and implementation of a new protocol among key stakeholders (EBC, HR, and line management) to provide ongoing support to survivors after the conclusion of investigation, including career support.

INSIGHTS AFTER RESUMPTION OF MISSION TRAVEL AND RETURN TO IN-PERSON WORK



The AHC saw a marked change in the nature of sexual harassment cases it received in the last quarter of fiscal year 2022, with the resumption of mission travel and return to in-person work and engagements.

In three separate situations, affected staff members reported to their managers unwelcome behaviors immediately as the situations evolved. The respective managers and the AHC partnered to offer immediate support and protection to affected staff, in line with their wishes, and cautioned alleged offenders to ensure that the alleged behavior stopped and does not reoccur. In one of these situations, a senior WBG official cautioned a government

counterpart and met with the affected staff member to reassure the affected staff member of his and the WBG's support. Affected staff expressed that they felt supported and relieved that the situation could be resolved quickly, in a way that allowed them to safely pursue and focus on their mission travel and work program. The resumption of in-person contact calls for further outreach and awareness raising of proper boundaries in the workplace and during mission travel.

In some other situations, staff reported past situations of sexual harassment for the first time, noting that recent WBG and EBC outreach and communications demonstrated to them that the WBG would take their concerns seriously. Crucially, the AHC's survivor-centered approach resulted in working with multiple affected staff to feel comfortable seeking formal investigation of sexual harassment allegations, moving the needle towards increased accountability steps.

The WBG Staff-led Working Group on Sexual Harassment continues to meet and advise on issues related to sexual harassment at the WBG, including on concrete actions to remove the barriers for reporting and to increase awareness on sexual harassment as staff return to office and resume mission travel. The working group and EBC have increased communications and engagements with staff to highlight the WBG's important progress in preventing and addressing sexual harassment and provide outreach on the available resources through townhalls, open forums for country offices and HQ staff, and focused written communications to all staff. Several senior leaders and managers also took this opportunity to reinforce the message with their staff.

Raising awareness and meeting staff where they are: visiting missions and outreach

With the lifting of pandemic-related restrictions, the AHC resumed mission work and conducted an outreach and training mission in fiscal year 2022 in partnership with ATV. Connecting in person with staff and proactive involvement of management was key in building trust and encouraging staff to voice their concerns in townhall, training sessions, focus groups or individual consultations. As a direct result of these mission engagements, several staff have reached out to the AHC individually.

EBC has launched a new sexual harassment e-learning module and *From Bystander to Upstander* trainings. It continues ongoing delivery of flagship trainings, including *Creating a Respectful and Harassment-Free Workplace* and dedicated trainings for managers on preventing and addressing harassment and sexual harassment. EBC also partnered with a regional leadership team to facilitate dialogues on civility in the workplace.

The AHC supported the elaboration and delivery of some of these trainings to incorporate experiences shared by staff, highlight systemic issues, and increase face-to-face contact with staff. The AHC also participated in townhalls and other outreach sessions to raise awareness on civility in the workplace, sexual harassment, harassment, and resources to address inappropriate behaviors. The AHC engaged with approximately 2,000 staff and managers through 27 townhalls, team meetings and other outreach/training events in both HQ and country offices this fiscal year. These include 12 Bank-wide, affinity groups, VPU and departmental townhalls attended by over 1,400 staff, as well as various country offices, teams' meetings, and organized focus groups to discuss harassment and sexual harassment topics in smaller settings of 8 to 50 people.

EBC's more recent initiatives to expand the global presence of EBC staff outside HQ has created new collaborative outreach opportunities between globally based EBC staff and the AHC. These efforts have directly led to some staff in these regions seeking AHC services. In some situations, the AHC has partnered with the on-the-ground EBC colleagues to best support affected staff where they are.

The Evolving Anti-Harassment Coordinator Role

Since November 2019, the AHC has been a confidential first point of contact within EBC to review and address reports of harassing, sexually harassing, and other inappropriate behaviors, including situations involving staff and external parties. The AHC provides specialized support, follows a survivor-centered approach, and only acts with the consent of the affected person following their report. The AHC also serves as a resource to managers who seek guidance about how to address, manage, and prevent such behaviors.

In fiscal year 2022, 219 affected staff and external parties reported 187 situations to the AHC. Some situations involved up to five complainants against the same alleged offender. The significant increase in the number of situations the AHC received in fiscal year 2022, up approximately 46 percent from the already significant case load in fiscal year 2021, demonstrates increasing demand for these unique services and reflects the trust EBC and the WBG have fostered in this area. Recent handling of situations of

sexual harassment (discussed previously) reveals promising trends in dynamically using AHC services: on-the-spot while situations were in progress; allowing the AHC to identify recurring behavior or patterns based on previous records; and where survivors finally felt comfortable sharing their experiences for the first time.

Increased institutional response

Seventy-nine out of the 172 cases (46 percent) the AHC addressed this fiscal year triggered an institutional response through intervention by the AHC, management, or HR; or a referral for formal review by EBC's investigation unit, Business Integrity Review (BIR).

- Thirty-five situations reported resulted in the AHC cautioning (or less formally advising) a total of 26 staff members (as some situations involved the same alleged offender), generally with the participation of their manager to reinforce the message and proactively monitoring the situation thereafter. These include 13 staff from GH to GK grades. Of these, six were in grades GI, GJ, or GK.⁶
- Twenty-nine additional situations were addressed by management or HR, in collaboration with the AHC. These include situations where the alleged offender is an external party, such as government counterpart or contractor, as well as situations more appropriate for managerial interventions. In such situations, managers, in consultation with the AHC, addressed the situation directly with their staff, through caution or advice and at times other remedial measures such as performance management, change of work program, or coaching.
- In addition, the AHC, with the consent of the affected staff, referred 15 cases for investigation, either because the AHC determined that the allegations, if established, could possibly amount to misconduct or affected individuals sought a formal review of their allegations.

Targeting AHC services

This striking increase in demand for AHC services also presents new opportunities to focus targeting the AHC's services to situations where it adds most value. Specifically, situations of sexually harassing behaviors and harassing behaviors that warrant an institutional response to either stop the alleged inappropriate behavior through an AHC intervention before it escalates to misconduct or to bring accountability through a referral for investigation if the alleged behavior may constitute possible misconduct. For example, the AHC regularly cautions staff members, with the consent of affected staff, about unwelcome, objectively unreasonable behaviors that are more isolated, such as single instances of making inappropriate comments of sexual nature, sharing offensive material, or proposing unwelcome invitations for dates. In turn, the AHC has referred cases for investigation where the behaviors manifest through a series of incidents, such as a pattern of aggressive behaviors; where there are multiple complainants; and where the alleged behaviors are otherwise severe, such as unwelcome touching or other physical activity.

⁶ One subject in grade GJ had four separate reporters come forward against her. A subject in grade GI had two separate reporters come forward with concerns against him.

The AHC has received multiple situations that IJS partners are better suited to address, including situations involving performance or employment decisions staff seek to challenge, as well as situations involving interpersonal conflicts and management style. The AHC continues to collaborate with IJS and other institutional partners to initially direct or smoothly transfer cases to the most appropriate resource with staff members' permission, and to provide outreach and information to help direct staff to the most targeted and appropriate resources for effective support.

Fear of retaliation and the role of post-intervention monitoring

Fear of retaliation or reprisal continues to be a deterrent for staff to report or even to give permission to the AHC to take action to address their concerns or to refer the case for investigation. Approximately 34 percent of the complainants who contacted the AHC this fiscal year expressed fear of retaliation at the outset. These include not only staff in vulnerable positions, such as consultants, but also managers. This is a factor that is being taken into account in discussing options to address the concerns raised. For example, in cases referred for investigation where staff typically feel particularly at risk, the AHC took proactive actions, with the affected staff's permission, to address these concerns by bringing the situation to the attention of line management and/or HR for them to take proactive measures to protect staff and to closely monitor their condition. During fiscal year 2022, the AHC monitored 75 cases in which they previously intervened. Many staff expressed that they were pleasantly surprised by the positive reaction of their manager or the alleged offender following the intervention. A few staff reported concerns of possible retaliation and, when it was raised, the AHC followed-up with management to address them.

The AHC worked closely with the WBG Task Force on Workplace Culture to make recommendations to enhance protection against retaliation and will continue to proactively work in implementing these recommendations in fiscal year 2023, including through a consolidation and enhancement of the Staff Rules on protection against retaliation. Building trust in the institution and its resources to address workplace concerns remains a key priority and requires ongoing engagement with staff, managers "walking the talk," and strong commitment from the institution.

Despite the increased demand, the AHC continues to deliver high quality level of service. Anonymous survey feedback results remain largely consistent with the previous fiscal year. Feedback providers rated AHC services 4.6 out of 5 overall, with a rating of 4.81 out of 5 on the question if they were able to express their concerns in a safe and confidential environment.

TABLE 10. SITUATIONS INVOLVING HARASSING OR SEXUALLY HARASSING BEHAVIORS RECEIVED AND ADDRESSED BY THE AHC, FY22

Situations, FY22	Carried over from FY21 or re-opened in FY22	Received in FY22	Addressed in FY22 ⁷	Under monitoring at the end of FY22	Open at the end of FY22
Harassment	32 ⁸	157	138 ⁹	41	51
Sexual harassment	8	23	27	9	4
Sexual exploitation and abuse	0	2	2	0	0
Other	0	5	5	0	0
Total	40	187	172	50	55

TABLE 11. OUTCOMES OF SITUATIONS ADDRESSED BY AHC¹⁰, FY22

Primary outcome ¹¹	Sexual harassment	Harassment	Sexual exploitation and abuse	Other	Total
Addressed through consultation/advice	10	62	1	3	76
Advised alleged offender	0	3	0	0	3
Cautioned alleged offender	3	29 ¹²	0	0	32
HR addressed in consultation with AHC	4	0	0	0	4
Management addressed in consultation with AHC	5	20 ¹³	0	0	25
Referred to investigations	3 ¹⁴	10	1	1	15
Referred to other IJS services	2	10	0	1	13
Closed without action (reporter failed to respond)	0	4	0	0	4
Total	27	138	2	5	172

⁷ Addressed situations are detailed in Table 11.

⁸ One harassment situation was carried over from fiscal year 2021 to fiscal year 2022 in addition to those reported in Table 17 of the *Ethics and Business Conduct Annual Report 2021*. Four harassment situations were re-opened due to developments.

⁹ Three harassment situations addressed in prior fiscal years, were re-opened and re-addressed.

¹⁰ Table 11 includes situations carried over from prior fiscal years and addressed in fiscal year 2022.

¹¹ This table captures the primary outcome of addressed situations; some situations involve multiple outcomes.

¹² This includes 13 situations in which different reporters came to the AHC to report concerns about the same five alleged offenders.

¹³ This includes two situations brought to the AHC by different reporters against the same alleged offender.

¹⁴ This includes two situations brought to the AHC by different reporters against the same alleged offender.

Additional Data Relating to Harassment and Sexual Harassment

While protecting the identity of the individuals involved, EBC is committed to transparency regarding cases of harassment and sexual harassment. The following tables provide an overview of the types of cases received, and general information about who reports allegations and who the alleged perpetrators are. A few elements stand out in these tables:

- The number of allegations of harassment has significantly increased in fiscal year 2022, while the number of allegations of sexual harassment has remained stable.
- Cases of sexual harassment are very diverse in their nature, with nearly half of them involving comments or gestures, nearly a quarter involving unwelcome requests, and a quarter involving touching.
- More than a third of the allegations of sexual harassment are reported by the managers and more than half by the victims, but more needs to be done to empower witnesses to report and none reported in fiscal year 2022.
- Managers remain key partners in reporting allegations of harassment and sexual harassment, with 35 allegations brought by managers in fiscal year 2022.
- The number of allegations of sexual harassment reported against someone in IFC is particularly low (one allegation only) when compared with the level of reporting at the World Bank (IBRD). By contrast, the reporting of allegations of harassment is now broadly comparable (after correcting by the size of the institutions) between IBRD and IFC.
- Allegations of sexual harassment involve more alleged offenders in country offices than in headquarters. Given that staff based in country offices tend to use other EBC services less than HQ (e.g., requests for advice) and have reported less cases of harassment than staff based in HQ, this is likely to be an indication that sexual harassment may be more prevalent in country offices and that further outreach efforts are required. This may be also linked with the fact that staff in county offices interact more closely with external parties, who represent almost a quarter of alleged offenders in situations of sexual harassment.
- Almost half of alleged offenders of sexual harassment are not staff members but rather consultants or external parties such as clients, other stakeholders, and contractors. The AHC experience shows that staff tend to be more comfortable reporting when the alleged offender is not a staff; they often report the situation to their supervisor or manager, who in turn seek guidance from the AHC.
- Allegations of sexual harassment involve significantly more men than women as alleged offenders, while by contrast, alleged offenders of harassment are evenly distributed between men and women.
- Alleged offenders of sexual harassment are present rather evenly at all grade levels, while the alleged offenders of harassment are predominantly at grade GG and above.

TABLE 12. ALLEGATIONS OF HARASSMENT OR SEXUAL HARASSMENT, FY17–FY22

	FY17	FY18	FY19	FY20	FY21	FY22
Sexual harassment	11	35	28	AHC 20 BIR 18	AHC 26 BIR 3	AHC 23 BIR 4
Sexual exploitation and abuse	0	0	2	BIR 5	BIR 1	AHC 2 BIR 2
Harassment	60	79	83	AHC 60 BIR 71	AHC 102 BIR 16	AHC 157 BIR 16
Other types of inappropriate behaviors reviewed by the AHC	0	0	0	0	0	5
Total of situations reviewed by the AHC	0	0	0	80	128	187
Total of situations reviewed by the AHC and BIR	71	114	113	174	148¹⁵	209¹⁶

TABLE 13. CLASSIFICATION OF SEXUAL HARASSMENT, EXPLOITATION AND ABUSE ALLEGATIONS OR SITUATIONS RECEIVED BY BIR AND THE AHC, FY22

	Allegations received by BIR	Situations received by the AHC
Sexual assault	0	1
Hostile work environment (HWE):		
HWE—Comments/gestures	0	10
HWE—Unwelcome requests	0	5
HWE—Sharing and displaying offensive material	0	0
HWE—Touching	4	5
Sexual exploitation and abuse	2	2
Quid pro quo	0	0
Survivors seeking support or protection relating to previous situations		2
Total	6	25
Total reviewed by BIR and AHC		31¹⁷

The AHC received a wide array of cases that are reported in the above table. The vast majority concerns unwelcome comments, requests, and/or touching in the workplace involving two staff members or one staff member and an external party such as a client, either that were ongoing or where survivors felt comfortable sometimes years after the situation had ended to report it. The table also includes one situation that was not connected to work and rather relates to alleged incidents of sexual nature involving a WBG staff member in their private capacity. Two cases relate to situations that were previously reported and addressed prior to the establishment of the AHC by other units, including with disciplinary sanctions imposed against the perpetrator, and where survivors sought support to re-establish their career or other forms of support.

15 Twelve cases were reviewed by both the AHC and BIR.

16 Nineteen cases were reviewed by both the AHC and BIR.

17 Four cases were reviewed by both the AHC and BIR.

TABLE 14. SEXUAL HARASSMENT ALLEGATIONS ADDRESSED BY BIR DURING INVESTIGATION STAGE, FY22

Total number of allegations processed in FY22	4
Total number of allegations addressed in FY22	4
Closed at intake	0
Referred to AHC	0
Closed during preliminary inquiry	0
Closed during investigation	0
Reports to HRDVP	1
Allegations carried over to FY23	3

TABLE 15. CLASSIFICATION OF REPORTERS OF SEXUAL HARASSMENT SITUATIONS RECEIVED BY THE AHC, FY22

Reporter classification	Number
Manager	8
Victim/Survivor	12
Witness	0
HR	1
Other	2
Total	23

TABLE 16. SITUATIONS OF HARASSMENT AND SEXUAL HARASSMENT RECEIVED BY THE AHC BY INSTITUTION, FY22¹⁸

Institution	Number of situations
IBRD	138
Harassment	114
Sexual harassment	21
Sexual exploitation and abuse	2
Other	1
IFC	30
Harassment	27
Sexual harassment	1
Sexual exploitation and abuse	0
Other	2
ICSID/MIGA	1
Harassment	1
Sexual harassment	0
Sexual exploitation and abuse	0
Other	0
Former staff	4
Harassment	4
Sexual harassment	0
Sexual exploitation and abuse	0
Other	0
Undisclosed	9
Harassment	8
Sexual harassment	0
Sexual exploitation and abuse	0
Other	1
Other/External	5
Harassment	3
Sexual harassment	1
Sexual exploitation and abuse	0
Other	1
Total	187

18 The institution indicated is that of the alleged offender.

TABLE 17. LOCATION OF ALLEGED OFFENDERS IN SITUATIONS RECEIVED BY THE AHC, FY22

Location	Sexual harassment	Harassment	Sexual exploitation and abuse	Other types of concerns	Situations reported to the AHC
Country office	13	57	2	1	73
HQ	10	95	0	3	108
Other/External	0	5	0	1	6
Total	23	157	2	5	187

TABLE 18. GRADES OF COMPLAINANTS (AFFECTED INDIVIDUALS) IN SITUATIONS RECEIVED BY THE AHC, FY22¹⁹

	GA-GD	GE-GG	GH-GI	Consultants	Former staff	External	Anonymous	Total
Sexual harassment	5	7	0	8	0	1	2	23
Harassment	13	78	18	18	11	3	16	157
Sexual exploitation and abuse	0	0	0	0	0	1	1	2
Other	1	3	0	0	0	1	0	5
Total	19	88	18	26	11	6	19	187

TABLE 19. GENDER OF COMPLAINANTS (AFFECTED INDIVIDUALS) IN SITUATIONS RECEIVED BY THE AHC, FY22²⁰

Complainant's gender	Sexual harassment	Harassment	Sexual exploitation and abuse	Other concerns	Total
Female	20	91	0	3	114
Male	0	33	0	1	34
Anonymous/External/Other	3	33	2	1	39
Total	23	157	2	5	187

TABLE 20. SITUATIONS BROUGHT TO THE AHC BY MANAGERS OR HR ON BEHALF OF OTHER COMPLAINANTS (AFFECTED INDIVIDUALS), FY22

Category	Manager/Supervisor	HR Business Partner/Manager
Sexual harassment	8	1
Harassment	25	0
Sexual exploitation and abuse	1	0
Other	1	0
Total	35	1

19 Information provided is based on the primary complainant in the situations reported. Seventeen of 187 situations involve more than one complainant, with a total number of 219 complainants.

20 Information provided is based on the primary complainant in the case as described in footnote 17.



TABLE 21. GRADES OF INDIVIDUALS WHO WERE THE ALLEGED OFFENDERS OF SITUATIONS RECEIVED BY THE AHC, FY22

	A-D	E-G	H-I	J-K	Consultant	External party	Former staff	Undisclosed	Total
Sexual harassment	3	6	4	0	4	5	1	0	23
Harassment	3	57	59	11	1	4	6	16	157
Sexual exploitation and abuse	0	1	0	0	1	0	0	0	2
Other	1	0	2	0	0	0	0	2	5
Total	7	64	65	11	6	9	7	18	187

TABLE 22. GRADES OF ALLEGED OFFENDERS IN SITUATIONS WHERE THE AHC, MANAGEMENT AND/OR HR INTERVENED TO ADDRESS THE SITUATION, FY22

	A-D	E-G	H-I	J-K	Consultant	External party	Undisclosed	Total
Sexual harassment	1	3	0	0	4	3	1	12
Harassment	2	22 ²¹	14 ²²	3 ²³	0	1	1	43
Sexual exploitation and abuse	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0
Total	3	25	14	3	4	4	2	55

TABLE 23. GENDER OF ALLEGED OFFENDERS IN SITUATIONS RECEIVED BY THE AHC, FY22

Alleged offender's gender	Sexual harassment	Harassment	Sexual exploitation and abuse	Other concerns	Total
Female	2	67	0	1	70
Male	21	73	2	2	98
Undisclosed ²⁴	0	17	0	2	19
Non-binary	0	0	0	0	0
Total	23	157	2	5	187

²¹ This represents 24 situations; two alleged offenders were involved in more than one situation.

²² This represents 18 situations; three alleged offenders were involved in more than one situation.

²³ This represents six situations; one alleged offender was involved in more than one situation.

²⁴ Some situations were brought to the AHC's attention by reporters who sought advice without disclosing the identity of the alleged offenders.



5 ACCOUNTABILITY

Accountability is a key pillar to EBC's mission of ensuring staff adhere to the highest ethical standards in the performance of their duties. EBC's investigative unit, Business Integrity Review, plays an instrumental role in ensuring WBG staff are held accountable for committing misconduct. During fiscal year 2022, BIR continued to review allegations of misconduct with the highest integrity in an independent, transparent, and impartial manner. BIR's achievements are notable. Specifically, BIR made significant strides and advancements in the following categories.

Increased Coordination

Throughout fiscal year 2022, the BIR team increased coordination with its stakeholders internally and externally in its review of allegations. Notably, the Intake Coordinator continued to enhance, clarify, and streamline EBC's intake process by triaging and referring cases when appropriate to ATV, the AHC, and INT. As a result of a more effective triage and pre-screening process, the share of allegations addressed at intake increased from 60 percent of the total in fiscal year 2021 to 70 percent of the total in fiscal year 2022.

Table 24 summarizes the investigative activity during fiscal year 2022 and the impact of an effective and streamlined intake process.

TABLE 24. HOW EBC MANAGED INVESTIGATION ALLEGATIONS RECEIVED IN FY21 AND FY22

	FY21	FY22
Total number of allegations processed²⁵ in FY22	162	185
Brought forward from previous year (FY21)	21	32 ²⁶
Reported in FY22	141	153
Total number of allegations closed in FY22	122	153
Addressed at intake	73	109
Closed during preliminary inquiry	29	23
Closed during investigation	9	7
Reports to HRDVP	11	14
Open cases (carry over to FY23)	40	32

The number of cases closed in the early stages of the review (intake or preliminary review) was sharply reduced this year, in large part because the AHC now addresses many of such cases, while the number of reports provided to the HRDVP for decision has remained comparable. In coordination with the AHC, investigation work is now prioritized on cases of misconduct or those most appropriately handled through formal investigation rather than cases better addressed informally or through other internal mechanisms.

TABLE 25. ACTION TAKEN ON CASES CLOSED AT INTAKE IN FY22

Action taken	Number of allegations
Allegation not misconduct under WBG Rules	3
Allegation unfounded/insufficient evidence	15
Consultation and advisory	18
EBC records only	16
Referred to Domestic Abuse Prevention Program (DAPP)	1
Referred to Legal	3
Referred to AHC	12
Referred to ATV	16
Referred to HR	2
Referred to INT	8
Referred to Management	2
Referred to PRS	2
Withdrawal/unable to reach reporter	11
Total	109

²⁵ "Processed" refers to all cases EBC's BIR team worked on during fiscal year 2022 (including carry-over cases from fiscal year 2021, new allegations received in fiscal year 2022, and cases that remained open on July 1, 2022).

²⁶ In EBC's annual report for fiscal year 2021, four cases were counted in error as carry-over cases from fiscal year 2021 to fiscal year 2022.

Types of misconduct

In fiscal year 2022, BIR received 131 allegations of misconduct unrelated to harassment, sexual harassment, and sexual exploitation and abuse. This represents a stability in number of these types of allegations when comparing to the 121 similar allegations received in fiscal year 2021. BIR also received 16 allegations of harassment, four allegations of sexual harassment, and two allegations of sexual exploitation and abuse. EBC received 209 allegations and concerns of harassment and sexual harassment in fiscal year 2022, of which 19 cases were reviewed by both the AHC and BIR.

As discussed in more detail in the Special Report on Harassment and Sexual Harassment of this report, the AHC is now the first point of contact in EBC for staff seeking to address situations involving harassment, sexual harassment, and inappropriate behaviors.

The types of allegations received have varied compared to previous years.

TABLE 26. ALLEGATIONS OF MISCONDUCT AND INAPPROPRIATE BEHAVIORS RECEIVED BY EBC'S BUSINESS INTEGRITY REVIEW (BIR) AND ANTI-HARASSMENT COORDINATOR (AHC) BY CATEGORY, FY17-FY22

Allegations received by category	FY17	FY18	FY19	FY20	FY21	FY22
Abuse of authority	31	34	22	9	17	21
Discrimination	7	7	4	2	14	12
G5 domestic	9	4	3	2	0	0
Harassment	60	79	83	AHC 60 BIR 71	AHC 102 BIR 16	AHC 157 BIR 16
Misuse of resources	21	18	15	20	25	11
Non-compliance with Staff Rules	60	44	39	49	57	71
Personal legal obligation	18	20	18	12	1	4
Retaliation	11	11	10	13	7	12
Sexual exploitation and abuse	0	0	2	5	1	AHC 2 BIR 2
Sexual harassment	11	35	28	AHC 20 BIR 18	AHC 26 BIR 3	AHC 23 BIR 4 ²⁷
Other types of situations received by the AHC	0	0	0	0	0	5
Total	228	252	224	AHC 80 BIR 201	AHC 128 BIR 141	AHC 187 BIR 153
				281	269	340²⁸

²⁷ BIR received a misuse of resources allegation with sexual harassment as a secondary misconduct allegation.

²⁸ Nineteen cases were reviewed by both the AHC and BIR.

TABLE 27. ALLEGATIONS OF MISCONDUCT AND INAPPROPRIATE BEHAVIORS RECEIVED BY EBC'S BUSINESS INTEGRITY REVIEW (BIR) AND ANTI-HARASSMENT COORDINATOR (AHC) BY CATEGORY AS A PERCENTAGE OF THE TOTAL, FY17–FY22

Allegations received by category	FY17	FY18	FY19	FY20	FY21	FY22
Abuse of authority	14%	13%	10%	3%	6%	7%
Discrimination	3%	3%	2%	1%	5%	4%
G5 domestic	4%	2%	1%	1%	0%	0%
Harassment	26%	31%	37%	47%	44%	50%
Misuse of resources	9%	7%	7%	7%	9%	3%
Non-compliance with Staff Rules	26%	17%	17%	17%	21%	22%
Personal legal obligation	8%	8%	8%	5%	0.4%	1%
Retaliation	5%	4%	4%	2%	3%	4%
Sexual exploitation and abuse	0%	0%	1%	14%	0.4%	1%
Sexual harassment	5%	14%	13%	9%	11%	7%
Other types of situations received by the AHC	0%	0%	0%	0%	0%	1%

Around eight percent of allegations of inappropriate behaviors or misconduct were connected to situations involving sexual harassment. Overall, allegations related to situations involving harassment or sexual harassment represented 57 percent of overall allegations received by EBC in fiscal year 2022. The allegations of misconduct received focused, for 29 percent of cases, on non-compliance with Staff Rules and abuse of authority. While allegations related to abuse of authority represent seven percent of overall allegations received, there were 340 total allegations in fiscal year 2022 versus 269 reported last fiscal year. Two-thirds of the allegations received concern individuals somehow alleged to have abused their powers (i.e., abuse of authority, discrimination, retaliation, harassment), which signals the importance for EBC to continue working with the Task Force on Workplace Culture towards a culture change.

SOME BACKGROUND ON CLASSIFICATION OF THE CASES

The classification of the misconduct cases of inappropriate behaviors poses a number of challenges, which have been addressed in the following way in this report:

- Situations of misconduct often involve several types of misconduct. The same can be said of inappropriate behaviors. For instance, there may be harassment and sexual harassment combined; there may be fraud and harassment, etc. To preserve consistency regarding the number of cases

reported, the tables in this report register the cases under the form of misconduct or inappropriate behavior that is most severe, or when they are of equivalent level of severity, that is more prevalent.

- There were also several instances where multiple separate complainants reported against the same person. When reports are about separate situations or incidents, the reports are addressed individually (although it sometimes happens that such cases are later examined together during investigation). However, when several reports concern

a single situation or a single incident, they are all combined into one case. To avoid creating distortion in the total number of cases, the tables presenting the characteristics of complainants focused on the first complainant to come forward in each case.

- The Anti-Harassment Coordinator is regularly consulted by staff who do not want to reveal the identity of the alleged perpetrator and would like either to consider their options or to receive guidance on how to address the issue. This explains that,

in some cases, the gender of the perpetrator, for instance, is not recorded.

- Anonymous reports are considered both for investigation and for review by the Anti-Harassment Coordinator, even if the anonymous reporters do not provide any detail about themselves. In some cases, therefore, the characteristics of the complainants are not known (e.g., gender). Some external reporters, without being anonymous, do not necessarily agree to provide all the details of their identity.

Enhanced Transparency

EBC continued to foster transparency and accountability by publishing on a quarterly basis on the [Bank Group intranet](#) the cases substantiated by EBC and sanctioned by the HRDVP. The report includes location (headquarters or a country office), type of misconduct found by HRDVP, type of sanction, and the subject's grade level. This data is reproduced in Appendix A of this report.

In addition, BIR clarified common misperceptions about the investigatory process by publishing a series of articles on the Bank Group's intranet: [Spotlight on Ethics: A Conversation with Jodi Glasow](#); [Spotlight on Ethics: Meet EBC's Investigative Team](#); and [EBC & INT Investigations: What Should Staff Know?](#)

BIR continued to refine its analytics and revise its case management system to meet the evolving needs of the unit. It published new categories of data, including tracking cases where staff expressed fear of retaliation, and produced monthly reports to identify common trends.

EBC openly releases information about cases of discrimination as one of the indicators for monitoring workplace culture. There were 12 allegations of discrimination in fiscal year 2022, with most allegations based on race. In addition, the AHC addressed 10 cases where staff raised allegations of discrimination, along with harassment.



TABLE 28. DISCRIMINATION ALLEGATIONS RECEIVED, FY17–FY22

	FY17	FY18	FY19	FY20	FY21	FY22
Age	0	1	0	0	1	0
Disability	0	0	2	0	1	0
Gender	1	2	0	0	1	0
Health	0	0	0	0	0	0
Nationality	2	2	1	2	5	1
Racial	3	2	2	2	8	9
Religious/creed	1	0	0	0	0	0
Sexual orientation	0	0	0	0	0	0
Other/unknown ²⁹	—	—	—	—	0	2
Total	7	7	5	4	16	12

A third of the complaints received by EBC, aside from harassment and sexual harassment, are not against a specific individual but against a process or a systemic issue. Two-thirds of the complaints were against male staff (73 reports) and one-third against female staff (37 reports) in complaints where the subject (i.e., alleged perpetrator) was identified.³⁰

Eighty-eight situations involving potential misconduct were reported by WBG staff members who identified themselves, 28 cases were reported anonymously, and 37 cases were reported by external parties. For cases where WBG staff members identified themselves, approximately 47 percent were reported by men (41 cases); 53 percent were reported by women (47 cases).

In fiscal year 2022, BIR received 21 percent of the allegations from managerial-grade staff (GH and above). WBG managers and those with supervisory authority have an obligation to report misconduct (under the Staff Rules, managers have an obligation to report misconduct and staff are encouraged to do so). About 45 percent of the cases were reported anonymously or by external parties. This helps explain, at least in part, the fact that only seven allegations were received from STCs. Forty-one percent of the subjects of allegations were at functions GG and above. Twice as many consultants are the subject of allegations compared to the number of consultants who are reporters of allegations.

²⁹ The intake interviews have not yet taken place for these two cases.

³⁰ EBC received 43 reports where the subject was not identified.

TABLE 29. ALLEGATIONS OF MISCONDUCT RECEIVED BY REPORTER AND SUBJECT GRADE, FY22³¹

Grade	Reporter of allegations	Percentage of total	Subject of allegations	Percentage of total
GA	0	0%	1	1%
GB	1	1%	3	2%
GC	1	1%	3	2%
GD	5	3%	4	3%
GE	7	5%	5	3%
GF	14	9%	13	8%
GG	18	12%	22	14%
GH	20	13%	26	17%
GI	10	7%	14	9%
GJ	1	1%	1	1%
ETC	2	1%	3	2%
Consultants	7	5%	15	10%
Anonymous	30	20%	—	—
External	37	25%	43	28%
Total	153	100%	153	100%

TABLE 30. ALLEGATIONS OF MISCONDUCT RECEIVED FROM CONSULTANTS, FY22³²

Misconduct category	Number of allegations
Abuse of authority	2
Harassment	3
Non-compliance with Staff Rules	2
Retaliation	2
Total	9

Leaving aside 28 anonymous cases where information cannot be collected, the share of complaints emanating from country offices is almost in line with the share of WBG staff in country offices.

TABLE 31. ALLEGATIONS OF MISCONDUCT RECEIVED BY LOCATION, FY22

	Number of complainants
Unknown	28
Country office	52
HQ	73
Total	153

³¹ This excludes the allegations of inappropriate behaviors connected to sexual harassment and harassment addressed by the AHC and presented previously.

³² This excludes the allegations of inappropriate behaviors connected to sexual harassment and harassment addressed by the AHC and presented previously.

In 86 cases, the allegations were made by an IBRD/IDA staff, and in 24 cases by an IFC staff, with anonymous reporting, retirees, and staff from other WBG institutions or partnerships making up for the remaining 43 cases.

Out of the 14 cases that led to a report substantiating misconduct and sent to the HRDVP for review and decision, the subjects were IBRD staff in 11 cases and IFC staff in three cases. Out of these 14 cases, 12 were initiated in fiscal year 2021 and two started in fiscal year 2022. Out of the two cases where sanctions were imposed this year, the subject was IBRD staff in one case and IFC staff in one case. Out of the 14 cases that led to a report, six were reported by GG grades, five by GH grades and one by GI grades, and the subjects were GC grade and below in five cases, GE or GF in four cases, GG in four cases and consultants in one case. This varies from one year to the next: the list of sanctions published on the intranet shows that, over a longer period than one year, a significant share of the sanctions were imposed on subjects at GH and GI grade levels. These numbers cannot be compared with the number of allegations by grade in Table 29, given that most of the cases (12 out of 14) concerned cases started in 2021.

Ongoing Innovation

Sexual harassment

As representatives of the World Bank Group on the Task Force on Addressing Sexual Harassment within United Nations Systems Organizations, EBC contributed to the many initiatives produced by the Task Force, including participating on the steering committee for producing the *Investigators' Manual for Investigations of Sexual Harassment Complaints in the United Nations*. The manual sets forth the foundation for consistent, effective, and efficient investigations for addressing sexual harassment, including the importance of ensuring survivors' interests and needs are respected and addressed in a compassionate and timely manner.

The BIR team led and facilitated a three-part training series on these documents with the local international financial institution (IFI) community, consisting of the International Monetary Fund (IMF), Pan American Health Organization (PAHO), and Inter-American Development Bank (IDB). The training topics for each session covered fundamental principles such as reporting and initial assessment; preliminary inquiry and investigation; and report writing. By fostering communities of practice and bringing together robust professional networks, BIR continued to stay at the forefront of the investigatory field in this area of sexual harassment.

Retaliation

The fear of retaliation exists in different degrees in most, if not all, organizations. The WBG is no exception: although the staff engagement survey shows that the majority of staff feel they can report misconduct without fear of reprisal, there is a significant minority of staff who report not feeling comfortable.

In fiscal year 2021, EBC commissioned an external expert with a distinguished career in ethics programs of international organizations, and in particular the UN system, to review the existing policies and practices of the WBG regarding retaliation. In fiscal year 2022,

the external expert finalized the report. Working with stakeholders such as the IJS, HR, Legal, and the Staff Association, EBC created an anti-retaliation action plan for implementation in fiscal year 2023.

Fear of retaliation is one of the many reasons why staff do not feel empowered to come forward to report misconduct. Under the WBG framework, retaliation is defined as any direct or indirect detrimental action recommended, threatened, or taken because an individual engaged in an activity protected by the Staff Rules, such as reporting misconduct or for cooperating or providing information during an investigation. In fiscal year 2022, of the 153 allegations brought to BIR's attention, less than 10 percent of the reporters mentioned fear of retaliation when raising their concerns. In addition, less than 10 percent of the overall allegations received involved allegations of retaliation. Set forth below is a more detailed overview of the number of reports of allegations of retaliation and those reporters expressing a fear of retaliation.

TABLE 32. NUMBER OF STAFF WHO RAISED RETALIATION CONCERNS TO BIR, FY22

Category of misconduct	Total allegations received by primary category of misconduct	Allegation of retaliation as secondary category of misconduct	Reporting fear of retaliation
Abuse of authority	21	2	1
Discrimination	12	3	1
G5 domestic	0	0	0
Harassment	16	2	2
Misuse of resources	11	0	0
Non-compliance with Staff Rules	71	2	3
Personal legal obligation	4	0	0
Retaliation	12	0	5
Sexual exploitation and abuse	2	0	0
Sexual harassment	4	0	1
Total	153	9	13

BIR submitted 14 reports to HRDVP in fiscal year 2022, compared with 11 in fiscal year 2021. Of those reports, BIR substantiated three cases of retaliation in fiscal year 2022 compared with four cases substantiated over an 11-year period (FY10–FY21). By developing a different and more complex approach, EBC has been able to substantiate more retaliation cases.

Reporting mechanisms

BIR is responsible for receiving and investigating allegations of staff misconduct from any source inside or outside the World Bank Group. Allegations of misconduct can be reported through many available sources, including through an internet web page, email to a dedicated email address or to EBC staff, a 24/7 hotline administered by a third

party, or in-person contacts (phone or walk-ins). Reports also can be anonymous. BIR worked with ITS to create a new and innovative form of reporting via an electronic platform. It is anticipated that this new form of reporting will be effective in fiscal year 2023.

Diversified Expertise

The investigative function is an area where techniques constantly evolve. With new recruits joining BIR in fiscal year 2022 with over 50 years' experience combined, EBC had the opportunity to diversify its expertise in this complex and multifaceted area.

More and more, electronic evidence is becoming an important source of evidence in EBC investigations. In six cases (five of which resulted in substantiating misconduct), BIR received authority to access electronic records in accordance with the World Bank Group (WBG) Procedure *Access to Staff Electronic Records Pursuant to INT/EBC Misconduct Investigations* ("Procedure"), paragraph 3.01 (d). Given the increasing reliance on electronic evidence as a means of refuting or substantiating misconduct, EBC hired a forensic specialist to assist in the conduct of such reviews. In addition, the investigatory staff received specialized training on forensic software and tools such as Intella Connect to further enhance its knowledge and expertise. EBC continues to partner with INT to further explore synergies and use of its forensics lab to increase its digital forensic capabilities.

The investigation team also shared its expertise by contributing to publications such as the Guide for Survivors of Sexual Harassment; revisions to Anti-Harassment Guidance; intake protocol and refining protocols for the disposition of cases with Mediation Services and Peer Review Services (PRS).

The sharing of knowledge, expertise and information is central to the success and impact of the BIR team. To assist in building a future generation of skilled investigators, the BIR team recruited, trained, mentored, and coached a number of legal interns throughout fiscal year 2022 in investigatory techniques and practices. The contributions of this new generation of young lawyers to BIR's work program were many, including refining databases of legal precedent, conducting quality assurance of evidentiary records, and conducting effective research and legal writing.

EBC is involved in many global partnerships that share best practices in conducting internal investigations. For example, many BIR investigators attended the Conference of International Investigators (CII) held virtually in June 2022 and attended other training opportunities throughout the year.

Promoting Fairness

BIR makes continuing efforts to enhance its investigatory expertise to keep abreast of current techniques and tools to substantiate and/or refute allegations of misconduct. In all of its reviews, it is very mindful that the due process rights of subjects and all participants are upheld. Not all investigations initiated by BIR, however, lead to a substantiation of misconduct. This demonstrates that the process is balanced and fair.

TABLE 33. ACTION TAKEN ON PRELIMINARY INQUIRIES/INVESTIGATIONS THAT DID NOT RESULT IN A REPORT IN FY22

Action taken	Number of cases
Further review found allegation is not misconduct	3
Insufficient evidence to substantiate allegation	27
Consultation and advisory	1
Mutually agreed separation	2
Total	33

In fiscal year 2022, HRDVP made decisions on 13 EBC investigation reports. Half of the reports involved staff members at grade level GH or above. The table in Appendix A summarizes the outcomes of the HRDVP decisions. Of these decisions, five were outcomes from investigation reports that were submitted in fiscal year 2021 and eight were from reports submitted in fiscal year 2022. Additionally, EBC submitted four reports in the fourth quarter of fiscal year 2021 that are still pending decisions as of the end of June 2022.

Continuing Impact

In fiscal year 2022, BIR conducted 21 investigations, of which seven were closed at the investigation stage. BIR submitted 14 reports to HRDVP substantiating misconduct. Of those 14 reports, 10 cases involved substantiation of allegations involving staff members' misuse of WBG resources. At the end of the fiscal year 2022, 33 cases remained open and were carried over to fiscal year 2023.

Table 34 reflects a breakdown of the 14 matters that resulted in a report to HRDVP.

TABLE 34. ALLEGATIONS OF MISCONDUCT SUBSTANTIATED BY EBC THAT RESULTED IN A REPORT TO HRDVP, FY18-FY22³³

Cases	FY18	FY19	FY20	FY21	FY22
Abuse of authority	2	0	0	0	0
Discrimination	0	0	0	0	0
G-5 domestic	2	0	0	0	0
Harassment	7	1	1	1	0
Misuse of resources	1	4	4	6	10
Non-compliance with Staff Rules	3	7	2	2	2
Personal legal obligation	0	0	2	1	0
Retaliation	0	0	0	0	1
Sexual harassment	4	6	4	1	1
Sexual exploitation and abuse	0	1	0	0	0
Total	19	19	13	11	14

³³ While only the main category of allegation is reported in this table, many of the reports in fiscal year 2022 had multiple allegations of misconduct substantiated.

Of the 14 cases that resulted in a report in fiscal year 2022, the average processing time was 343 days, with 179 days being the lowest (sexual harassment case) and 497 days being the highest (non-compliance with Staff Rules case).

A number of factors contribute to the average processing time of each case. In fiscal year 2022, the BIR team saw an increase in the complexity of allegations coupled with the requirement to conduct digital forensic analysis, which often added to the review by an additional three to four months given the extensive time involved in obtaining and analyzing electronic evidence. In the case where the processing time reached 497 days, for example, the investigation team was tasked with reviewing an initial allegation of misconduct involving non-compliance with Staff Rules and willful misrepresentation of facts intended to be relied upon. Well into the investigation, the investigation team received a second allegation of misconduct—retaliation—against the same subject arising from the same set of facts and occurrences. Rather than conduct two separate reviews, the investigation team combined the allegations, conducted over 30 witness interviews, and sought and received access to review and analyze the subject staff member’s electronic records. Many of the underlying records were not in English, and both interpreters and translators were hired to assist in the review of the matters. Moreover, the processing time was extended by the number of requests for extension by the subject staff member to respond to the allegations. The final investigation report totaled 100 pages with a very extensive written record and exhibits.

Most misconduct review cases, however, were closed much earlier than those necessitating a report to the HRDVP. For cases that were closed at preliminary inquiry, the whole process, from intake to closure, was concluded in 122 days on average. For cases that were closed during the investigation phase (i.e., without a report and the review of the report by the subject), the process required 161 days on average, from intake to closure. This means that most cases are addressed in substantially shorter time than the ones requiring a report to the HRDVP.

At the conclusion of each misconduct review, BIR evaluates the root cause of the misconduct to determine if there are opportunities for feeding lessons back into the institution. Fiscal year 2022 was no exception; in eight cases, BIR provided important insights into identifying regulatory or procedural gaps and recommendations on how to mitigate incidents of high-risk impact, potential reputational risks, or high recurrence rates going forward.

Enhancing Trust

In fiscal year 2022, the BIR team continued to conduct investigative activity remotely due to the home-based work restrictions placed on staff because of the Coronavirus pandemic. As the restrictions began to lift in the last quarter of the fiscal year, BIR conducted two missions to country offices in cases involving sexual harassment allegations. In both instances, BIR was able to quickly constitute investigatory teams and send them to the respective country offices within 14 days of receiving the allegations of misconduct.

Although these circumstances brought unique challenges, including scheduling and conducting remote interviews, building trust and rapport with interviewees, and gathering and obtaining electronic evidence such as computers and phones, the BIR team worked closer and more effectively than ever. Working across continents and in different time zones, the investigators partnered together on multiple cases, helping investigations move forward in a timely and thorough manner by peer reviewing each other’s work and refining protocols and procedures.



6

EXCELLENCE IN EBC

EBC strives to be a center of excellence to provide the highest quality of service to our clients in the WBG. To this end, EBC contributes to advancing best practices and supporting innovations in ethics.

Leadership and Coordination with Other IFIs

EBC has been at the forefront of advancing global best practices in ethics. In fiscal year 2022, EBC gave two presentations to the Ethics Network of Multilateral Organizations (ENMO)—on declarations of interest and data analytics. The Chief Ethics Officer also participated extensively in the programming of the 2022 ENMO Conference and in leading its affinity group for international financial institutions (IFIs).

As discussed previously, on behalf of the WBG EBC continues to co-chair the working group of UN organizations on advancing victim-centered principles to address cases of sexual harassment.

And in June 2022, at the invitation of the World Trade Organization (WTO), EBC delivered a presentation on organizational ethics to inaugurate a new webinar series on ethics where international organizations share their insights with WTO employees.

Adopting Best Practices: Innovations in Data Analytics

To ensure that EBC remains up-to-date with current trends related to quantitative, evidence-based decision-making using data, and to continue responding to the need for strengthening institutional accountability (as well as in response to strong interest from the WBG Board, senior leadership, and other stakeholders), the department has engaged in integrating, developing, and streamlining its reporting approach and data analytics capabilities, to further measure the impact of ethics programs, and understand the behavioral impact of EBC's work.

To this end, EBC conducted change management diagnostics, developed operating principles, and is continuing to implement a robust project plan in collaboration with institutional partners—ITS Innovations Lab and Operations, Open Learning Campus (OLC), and HR Analytics teams.

FIGURE 4. WBG INSTITUTIONAL PARTNERS OF DATA ANALYTICS INITIATIVE



To date, EBC and its institutional partners have been working closely on delivering comprehensive, systemic improvements and changing the culture across the department as it relates to data and analytics. EBC has adapted an Analytics Maturity Model framework to inform and guide its data analytics journey and assist with prioritizing various use cases.

During Phase I, EBC reviewed its data recording processes related to training records in close collaboration with the OLC team and focused on implementing streamlined, customizable self-service dashboards developed in collaboration with ITS Innovations Lab, as well as other institutional partners; focused on training and core EBC functional activities to make reporting tasks nimble and intuitive, with ease of customization according to the needs of the user. These capabilities have increased effectiveness by providing just-in-time access to timely, accurate reporting metrics and have had a positive influence on EBC’s three-year strategy development by identifying gaps and helping to focus prevention efforts.

FIGURE 5. ANALYTICS MATURITY MODEL*



During Phase II, EBC focused on developing its advanced analytics capabilities by introducing statistical analysis to surface insights from available data. Following Kirkpatrick Training Evaluation³⁴ Model, additional data capabilities have supported a better understanding of the behavioral impact of EBC training offerings by evaluating changes in requests for interventions to the Anti-Harassment Coordinator and reports of misconduct to Business Integrity Review. This analysis of impact of training provides a specific view of behavior changes following facilitated ethics training attendance and evaluates the changes in the behavior of the same staff members before and after training to control for external factors, covering staff trained for up to one year prior, to allow for full four quarters of impact. Variations in behavior on a quarterly basis before and after training were assessed with R^2 —representing the proportion of the variance explained by training as an independent factor. Although not holistic, this analysis is a useful proxy for measuring impact based on discrete behavior changes.³⁵

FIGURE 6. IMPACT OF TRAINING ON REQUESTS OR REPORTS TO EBC

Training Type	Creating a Respectful Workplace Training Module				Ethics Awareness Training Module		
	Before	Δ	After		Before	Δ	After
Requests for Intervention of Anti-Harassment Coordinator	6	↑X9 $R^2=90\%$	52	Addressing Inappropriate Behaviors	8	↑X4 $R^2=80\%$	32
Reports of Misconduct to Business Integrity Review	9	↑X2 $R^2=50\%$	19		Investigating Misconduct	4	↑X3 $R^2=70\%$

Following a *Creating a Respectful Workplace* training, the number of requests for the intervention of the Anti-Harassment Coordinator increased nine times, from 6 to 52 in the year following the training, with a strong correlation ($R^2 = 90\%$) with training attendance. Similarly, within a year after *Ethics Awareness* training, there was a four-fold increase in requests, from 8 to 32, correlating strongly with training attendance ($R^2 = 80\%$). A similar trend was observed for reports of misconduct to Business Integrity Review—the reports doubled following a *Creating a Respectful and Harassment-free Workplace* training, with an increase from 9 to 19, with substantive correlation ($R^2 = 50\%$) with training attendance. They tripled following an *Ethics Awareness* training with a substantial correlation ($R^2 = 70\%$) with training attendance. The results help in evaluating the effectiveness of EBC training at increasing the number of requests for interventions and reports of misconduct received over the course of a year’s timeframe, along with a proxy of contributions to promoting a culture of safe speech in the institution and expanding understanding of what constitutes unethical behavior and methods for its reporting and remediation.

34 The Kirkpatrick Model is a tool for evaluating and analyzing the results of educational, training and learning programs. It consists of four levels of evaluation: Reaction, Learning, Behavior, and Results. Each successive level of the model represents a more precise measure of the effectiveness of a training program. First published in 1959, and updated in 1993, in “Evaluating Training Programs.”

35 We found a strong correlation between training and the use of EBC services, but recognize the R^2 needs to be complemented with other statistical values.

EBC has made demonstrated progress in advancing its analytics maturity. Aligned with its strategic commitment to share ethics best practices globally, EBC is continually and extensively engaged in knowledge sharing on ethics and compliance analytics topics with ethics offices of multilateral organizations, UN agencies, and private sector entities.

Supporting Professional Development and Innovation in EBC

EBC prioritizes developing excellence among its staff by providing opportunities and resources for training and professional development. Within the department, some initiatives from the past year include:

- Supporting EBC staff moving to new roles as EBC representatives in country offices
- Soliciting expressions of interest for new job openings among EBC staff first before considering external recruitment
- Active engagement and EBC representation in the institution's A2D Council, which was established to strengthen learning and career development for WBG staff in grades A through D
- Specialized training on forensics for the investigative team
- Specialized training of trainers
- Creating a library of conflict of interest (COI) cases to ensure consistency
- Collective review of complex COI cases with the Chief Ethics Officer and all the Senior Counsels and Counsels who provide advisory services
- Presentation of anonymized COI cases to trainers, so that they are familiar with recent or complex cases
- Systematic training of DOI reviewers whose work is systematically checked during the first month of performing reviews to ensure consistent quality
- Program of internal discussions or presentations on diversity, equity, and inclusion issues to foster better understanding (e.g., session on cultural traditions surrounding Ramadan, or on trans identities).

Another objective embedded in EBC's strategy is maintaining a culture of openness and psychological safety in EBC. Such an environment builds trust, encourages teamwork, and breeds innovation, and the Chief Ethics Officer has communicated on several occasions his commitment to promoting safe speech both within EBC and more broadly to staff-at-large.

In May 2022, the department celebrated its second annual EBC Core Values Awards, which recognizes colleagues who embody the WBG Core Values and support diversity and inclusion. The hybrid format of the gathering reinforced the importance of continuing to foster inclusion among colleagues, particularly as WBG headquarters and other locations transition to in-office work under a hybrid operating model.

EBC CORE VALUES AWARDS

IMPACT

Simisola Morenike Adejumo
 Gabriela Baez Beal
 Anne-Marie Burns
 Jorge Dajani Gonzalez
 Jodi Tuer Glasow
 Gül Güven
 Thaisa Tiglao Katz
 Bamidele Olugbuyi Sanya
 *Martin Wallner



DEI

Doreen Lulu Kapakasa
 Selina Katenga-Kaunda
 Stella-Monica Mpande
 Adebisi Victor Oyelade
 Junko Saito
 Abigail Yirrah



*no photo available

INTEGRITY

Marianne Deborah Rossert
 Stanley Pat Simpson
 Stuti Sood
 Lemlem Workalemahu



TEAMWORK

*Rim Seffar Benomar
 *Christina Atanasova Borisova
 *Maria Julieta Del Valle
 Hanbal Tahir Kahlon
 *Konstantia Katsouli
 Esra Uslu Kutlukaya
 Sadiya Ndiaye
 Leonard Orens Newmark
 Larikus Darndrell Scott
 Dion Frank Vinik
 Arthur Charles Wasunna
 *Adrian Nicolaus Weickart



RESPECT

Jules Garrett Baughns
 Philip Godfrey Caine
 Ina Dodica
 Leila Firdawcy
 Deepa Mahesh
 Dawn Mpati
 Marie Madeleine Ndaw
 Jose Luis Martinez Rivera
 Audrey Grace Sherpa
 Sylvia Sibö Winborne



INNOVATION

Yasmeen Nasser Al Tabbaa
 Kostyantyn K. Nesterov
 Esperanza Pastor Nunez de Castro
 Adrienne Leah Toomey



APPENDIX A

HRDVP Disciplinary Decisions, FY22

Location	FY of Case Closing	Misconduct Category	Case Summary	HRDVP Decision	Subject's Grade Level
CO	FY21 Q4	Abuse or misuse of WBG funds related to benefits; reckless failure to observe general applicable norms of prudent professional conduct; failure to observe budgetary, and administrative standards; willful misrepresentation of facts intended to be relied upon; and acts or omissions in conflict with the general obligations of staff members set forth in Principle 3.	A staff member knowingly and intentionally submitted fraudulent invoices for reimbursement of medical expenses.	(i) termination, (ii) a hiring restriction on future employment with the WBG; (iii) full restitution to WBG's medical provider, Cigna, (iv) access restriction to WBG premises; and (v) written censure to remain on personnel file.	GA
CO	FY21 Q4	Abuse or misuse of WBG funds related to benefits; reckless failure to observe general applicable norms of prudent professional conduct; failure to observe budgetary, and administrative standards; willful misrepresentation of facts intended to be relied upon; and acts or omissions in conflict with the general obligations of staff members set forth in Principle 3.	A staff member knowingly and intentionally submitted fraudulent invoices for reimbursement of medical expenses.	(i) termination, (ii) a hiring restriction on future employment with the WBG; (iii) full restitution to WBG's medical provider, Cigna, (iv) access restriction to WBG premises; and (v) written censure to remain on personnel file.	GC

Location	FY of Case Closing	Misconduct Category	Case Summary	HRDVP Decision	Subject's Grade Level
HQ	FY21 Q3	Reckless failure to identify, or failure to observe, generally applicable norms of prudent professional conduct and acts or omissions in conflict with the general obligations of staff members set forth in Principle 3.	A staff member disclosed sensitive and confidential personal information. The allegations of harassment and mistreatment were not substantiated.	(i) potential loss of future employment and contractual opportunities with the Bank (the staff member resigned from the WBG); and (ii) written censure in the form of this letter to remain in personnel file.	GH
CO	FY22 Q1	Failure to observe obligations relating to information security and the unauthorized use of WBG equipment and computer resources; reckless failure to identify, or failure to observe general applicable norms of prudent professional conduct; acts or omissions in conflict with the general obligations of staff members set forth in Principle 3; and sharing of user IDs and passwords which is strictly forbidden per AMS 6.21.	A staff member shared his/her WBG-issued laptop and password with his/her spouse.	Oral censure.	GG
CO	FY22 Q1	Abuse or misuse of WBG funds related to benefits; reckless failure to observe general applicable norms of prudent professional conduct; failure to observe budgetary, and administrative standards; willful misrepresentation of facts intended to be relied upon; and acts or omissions in conflict with the general obligations of staff members set forth in Principle 3.	A staff member knowingly and intentionally submitted fraudulent invoices for reimbursement of medical expenses.	(i) termination; (ii) a hiring restriction on future employment with the WBG; (iii) full restitution to WBG's medical provider, Cigna, (iv) access restriction to WBG premises; and (v) written censure to remain on personnel file.	GC

Location	FY of Case Closing	Misconduct Category	Case Summary	HRDVP Decision	Subject's Grade Level
HQ	FY21 Q4	Reckless failure to identify, or failure to observe, generally applicable norms of prudent professional conduct; acts or omissions in conflict with the general obligations of staff members set forth in Principle 3; violating WBG/G5 Code of Conduct; and violating Section 2 of G5 Contract.	A staff member employed his/her G5 who was not at or in connection with his/her residence.	Written censure in the form of a letter.	GG
CO	FY22 Q1	Abuse or misuse of WBG funds related to travel, benefits, allowances (including tax allowances), P-Card, petty cash, or property; reckless failure to identify, or failure to observe, generally applicable norms of prudent professional conduct; failure to know, and observe, the legal, policy, budgetary, and administrative standards and restrictions imposed by the WBG; acts or omissions in conflict with the general obligations of staff members set forth in Principle 3.	A staff misused his/her Travel Card to obtain cash, goods and services which were personal and/or unauthorized.	(i) termination; (ii) a hiring restriction on future employment with the WBG; (iii) full restitution to WBG; (iv) access restriction to WBG premises; and (v) written censure to remain on personnel file.	GF

Location	FY of Case Closing	Misconduct Category	Case Summary	HRDVP Decision	Subject's Grade Level
CO	FY22 Q1	Reckless failure to identify, or failure to observe general applicable norms of prudent professional conduct; acts or omissions in conflict with the general obligations of staff members set forth in Principle 3; Standards of Professional Conduct, paragraph 12.01 misuse of Bank Group services, supplies or facilities for private gain; employment outside the Bank Group paragraph 3.01, while concurrently working at the WBG; and misuse of WBG assets to send, view, and download, pornographic material.	A staff member engaged in an outside business activity without obtaining the necessary approval and misused WBG assets by accessing and viewing pornographic websites on his/her WBG-owned laptop.	(i) reduction in pay in the form of withholding FY 2021 pay increase; (ii) ineligibility for promotion for a period of three years; and (iii) written censure to remain on personnel record.	GF
CO	FY22 Q2	Abuse or misuse of WBG funds related to benefits; reckless failure to observe general applicable norms of prudent professional conduct; failure to observe budgetary, and administrative standards; and acts or omissions in conflict with the general obligations of staff members set forth in Principle 3 including the requirements that staff avoid situations and activities that might reflect adversely on the Organization. (Principle 3.1); and conduct themselves at all times in a manner befitting their status as employees of an international organization.	A staff member misused the WBG Diplomatic Pouch Service by requesting, without authorization, personal shipments to be sent from the WBG Mail and Pouch Facility in Landover, Maryland to the Country Office.	(i) restitution to the WBG for financial losses; (ii) loss of future employment and contractual opportunities with the Bank Group; (iii) access restriction to the Bank Group's premises; and (iv) written censure to remain on personnel file.	GE

Location	FY of Case Closing	Misconduct Category	Case Summary	HRDVP Decision	Subject's Grade Level
CO	FY21 Q4	Abuse or misuse of WBG funds related to benefits; reckless failure to observe general applicable norms of prudent professional conduct; failure to observe budgetary, and administrative standards; willful misrepresentation of facts intended to be relied upon; and acts or omissions in conflict with the general obligations of staff members set forth in Principle 3.	A staff member knowingly and intentionally submitted fraudulent invoices for reimbursement of medical expenses.	(i) termination; (ii) ineligibility for future World Bank Group employment; (iii) full restitution to WBG's medical provider, Cigna, (iv) access restriction to WBG premises; and (v) written censure to remain on personnel file.	GB
HQ	FY22 Q2	Abuse of authority; reckless failure to observe general applicable norms of prudent professional conduct; acts or omissions in conflict with the general obligations of staff members set forth in Principle 3, including requirements that staff avoid situations and activities that might reflect adversely on the Organization (Principle 3.1) and conduct themselves at all times in a manner befitting their status as employees of an international organization; and retaliation against any person who provides information regarding suspected misconduct or who cooperates or provides information in connection with an investigation or review of allegations of misconduct.	A staff member abused his/her authority by recommending the non-renewal of a subordinate and retaliating against the subordinate.	(i) removal of supervisory role; (ii) reduction in pay in the form of withholding FY 2020 pay increase, (iii) ineligibility for promotion for a period of three (3) years; and (iv) written censure to remain on personnel file.	GG

Location	FY of Case Closing	Misconduct Category	Case Summary	HRDVP Decision	Subject's Grade Level
CO	FY22 Q1	Abuse or misuse of WBG funds related to benefits; reckless failure to observe general applicable norms of prudent professional conduct; failure to observe budgetary, and administrative standards; willful misrepresentation of facts intended to be relied upon; and acts or omissions in conflict with the general obligations of staff members set forth in Principle 3.	A staff member knowingly, intentionally, and recklessly submitted fraudulent invoices for reimbursement of medical expenses.	(i) termination; (ii) ineligibility for future World Bank Group employment; (iii) access restriction to WBG premises; and (iv) written censure to remain on personnel file.	GG
CO	FY22 Q4	Abuse or misuse of WBG funds related to benefits; reckless failure to observe general applicable norms of prudent professional conduct; failure to observe budgetary, and administrative standards; willful misrepresentation of facts intended to be relied upon; and acts or omissions in conflict with the general obligations of staff members set forth in Principle 3. Failure to observe obligations relating to health and safety, personnel information, disclosure of non-public information, information security, and the unauthorized use of Bank Group offices, equipment, computer resources.	A staff member knowingly and intentionally submitted fraudulent invoices for reimbursement of medical expenses. The staff member shared her WBG-issued password and laptop computer with her husband and other family members.	(i) termination (w/ permission to resign at line manager's request); (ii) ineligibility for future World Bank Group employment; restitution to the WBG; (iv) access restriction to WBG premises; and (v) written censure to remain on personnel file.	GC

APPENDIX B

FINDINGS AND RECOMMENDATIONS

HR Benefits

1. **Medical insurance:** Beginning in FY20, EBC saw a spike in cases of medical benefits fraud perpetrated by staff and/or their insured dependents. New staff are automatically enrolled in medical benefits programs. All eligible staff, at the time of appointment, should sign a clearly worded statement making them responsible for any medical claims submitted in their name (even if submitted by dependents). In FY22, EBC communicated its findings to the Human Resources Vice Presidency (HRDVP) and IFC HR, and has participated in staff awareness sessions on the implications of the misuse of medical benefits.
2. **Relocation benefits:** In FY19, lack of controls identified to confirm that dependents physically travelled to relocation destination with staff, led to the disbursement of benefits prior to the dependents' relocation. HR can consider implementing a staff-signed certification for reimbursement of relocation benefits.
3. **Global mobility premiums:** In FY19, there was no procedure in place for HR to request staff to notify the institution of a change in their immigration status which affect this benefit entitlement. Since this case, HR requests staff to confirm their immigration via an email notification sent out on a quarterly basis.
4. **Tuition assistance benefits:** In FY22, a few staff members misused WBG tuition assistance benefits by submitting payment claims exceeding the authorized limit. Management oversight on payment of education benefits can be enhanced and resource management staff should be fully onboarded with knowledge of rules and policies at the start of their role.

Travel

5. **United Nations Laissez-Passer (UNLP):** In FY19, there was no process in place to recover UNLPs from staff before they leave the WBG. EBC raised its concerns to the head of the UNLP program at Global Corporate Solutions (GCS), which led to a Group Internal Audit (GIA) review and new measures in place to ensure that UNLPs are returned.

6. **Statement of Expenses (SOE) claims:** In FY20, a travel accounting case showed that auto-approvals prevent management scrutiny, and allows staff to reallocate expenses in their claims to prevent triggering managerial review and approval. EBC recommends a regular spot checking of auto approved SOEs and to improve managers training on proof of payment documentation requirements.
7. **Development assignment allowance claims:** A case in FY22 showed that HR and Accounting systems are not synced, resulting in a staff member receiving development assignment allowance benefits after their assignment had ended. Allowance claim forms can be simplified and clarified, with instructions for staff and how to fill them in, and how often to make claims.

Diplomatic Pouch Services

8. The current **Mail Services** procedure permits country office-based staff assigned away from their duty station to have limited personal items, including books, to be sent via the Diplomatic Pouch Service. Resource limitations to check shipments for compliance, and the ambiguity around personal use led to the abuse of this service by either ordering excessive amounts of items or prohibited items. In FY22, EBC worked with GCS on a draft certification of personal goods shipment via diplomatic pouch, and a list of banned goods.

Use of WBG-issued Laptops and Devices

9. **Non-compliance with AMS 6.20 Information Security** has been identified in a number of EBC investigations, including staff sharing WBG-issued laptop login passwords with family members, and misuse of WBG-issued laptops and devices to access pornographic websites, which increases the risk of cyber threat exposure.

Country Office Expenses

10. Continued use of **petty cash** for admin expenses in country offices has led to a number of allegations on misuse of Bank funds (albeit small in value and with insignificant financial impact). EBC recommends using prepaid cards to the extent possible, and implementing better controls on required proof of payment for staff reimbursement.
11. Continued use of **WBG vehicles for personal use.** Include requirement to record purpose of trip and check system to verify usage such as electronic vehicle logs or GPS, and to increase communication in country offices on the appropriate use of WBG vehicles.
12. Continued use of **contractors** (cleaners/drivers/security) **for personal errands** by country office staff. In FY22, EBC collaborated with Corporate Procurement on a draft guidance on the proper use of vendor staff (and other wider risks related to co-employment).

HR Processes

13. **Employment screening framework:** In FY21, EBC recommended the expansion of staff screening beyond staff pre-employment, to be conducted annually or at more regular intervals throughout a staff member's tenure, and to also include consultants in the screening process. In FY22, this was taken up by the Risk VPU which has been leading a risk-based approach to screen WBG short term contingent workforce prior to appointment.
14. **Resignation requirements when running for national public office:** In FY22, HR policy for staff running for national public office allowed the mandatory resignation from the WBG to become effective, and offered the option to withdraw the resignation, within 90 days (essentially allowing staff to continue their employment while running for public office for 90 days). EBC's recommendation is that HR eliminates the possibility to delay resignations and the policy allowance to withdraw them.
15. **Automatic identification of job applicants' relationship with WBG staff:** External applicants were not asked in recruitment processes to provide the names of staff members they were related to. In FY21, EBC recommended to HR that applicants disclose the names and roles of their WBG staff relatives, for automatic identification and consideration of conflicts of interest by the recruitment panel.

Reputational Risks

16. **Lack of due payments to consultants:** In FY21, EBC reviewed a number of cases around issues of payments due to consultants, including the rejection of payments without proper rationale, instructions to charge in advance for work not yet conducted or to start work before contracts and terms of references were issued. EBC continues to convey compliance obligations to WBG staff managing consultants and intervenes, if required, to ensure due payment is made.
17. **Public statements:** In FY21, EBC scaled-up its preventive communications across the WBG, while expanding advisory and training on the applicable limitations, to clarify that public comments made by staff (including on personal social media accounts) could compromise WBG neutrality and lead to unwanted reputational risks.

Conflicts of Interest

18. **Financial interests:** In FY21, EBC identified lack of clarity in the policy on staff financial interests in companies that IFC was investing in. Since, EBC clarified Staff Rule 3.03, transferring the authority to define recusals/mitigants from the staff's managers (formerly) to EBC (currently). EBC trainings and advisory consultations have also clarified restrictions for staff personal investments in IFC investees. Some of EBC's mitigation recommendations have included disclosure, recusals, and temporarily freezing staff assets.
19. **Personal connections with WBG counterparts:** In FY22, potential reputational risks were triggered in situations where staff or their close relatives had employment or ownership relationships with IFC investee entities and business partners. EBC recommends that project teams disclose the relationships to senior management.

20. **Relations with vendors:** In FY21, EBC recommended that Corporate Procurement clarifies the policy on vendor disqualifications in situations where WBG consultants are involved in competing vendor teams during requests for proposals (RFPs). In FY22, EBC consulted with Corporate Procurement to permit the disqualifications of vendors after the shortlisting phase, in situations of potential reputational risks that could not have been foreseen earlier in the process.
21. **External service:** In FY22, EBC suggested that HR informs staff on External Service that they remain WBG staff and subject to Staff Rules including vendor regulations.

Staff Outside Activities

22. **Board memberships and other outside activities:** In FY22, EBC closed loopholes in Staff Rules 3.00 and 3.02, which had allowed managers to approve outside activities of their direct reports and EBC provided clarifying advisory and training on the restrictions to permitted outside activities of WBG staff.
23. **Academic activities:** In FY21, EBC highlighted conflicts of interest risks and issued clarifying guidance on permissible staff academic activities produced in a personal capacity. EBC also clarified that holding board positions at universities is not permitted.



The World Bank Group has two goals: end extreme poverty and promote shared prosperity in a sustainable way. For the diverse workforce of the WBG, integrity, ethical behavior, and adherence to corporate values are core to the success of these goals.

Our core values should drive everything we do every day. Not only do our core values serve as the North Star for WBG staff in how we treat our clients and partners, but they also guide clients and stakeholders in the best way to collaborate with WBG staff.

Clients approach the WBG to find the best solutions to address the world's most pressing development challenges. Impact, integrity, respect, teamwork, and innovation are integral to making us who we are and defining how we deliver for our clients. Therefore, the core values help us focus on how we achieve our twin goals. Jobseekers, investors, and public and private sector counterparts alike will see our core values in action.

impact

We help our clients solve their greatest development challenges

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

integrity

We do what is right

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

respect

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

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

teamwork

We work together to achieve our goals

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

innovation

We learn and adapt to find better ways of doing things

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

CONTACT EBC

Employees can seek advice directly from EBC staff during office hours or arrange to speak with team members at another convenient time. EBC maintains an email service account (ethics_helpline@worldbank.org) accessible to staff that is advertised on the internal and external websites. Staff members can also contact the multilingual Ethics Helpline by phone (1-800-261-7497) 24 hours a day, 7 days a week.

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

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All other photos: World Bank.*

Ethics and Business Conduct

ANNUAL REPORT 2022

Enhancing Institutional Resilience

TEL: 202-473-0279, 1-877-576-2569 from the United States
FAX: 202-522-3093

EMAIL: ethics_helpline@worldbank.org
ETHICS HELPLINE: 1-800-261-7497
(24 hours, 7 days a week; multiple languages)

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



Our Core Values

Impact. Integrity. Respect. Teamwork. Innovation.



WORLD BANK GROUP

THE WORLD BANK
IBRD • IDA

IFC
International
Finance Corporation

MIGA
Multilateral Investment
Guarantee Agency