

*WOMEN, BUSINESS AND THE
LAW*
MANUAL AND GUIDE

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1. INTRODUCTION

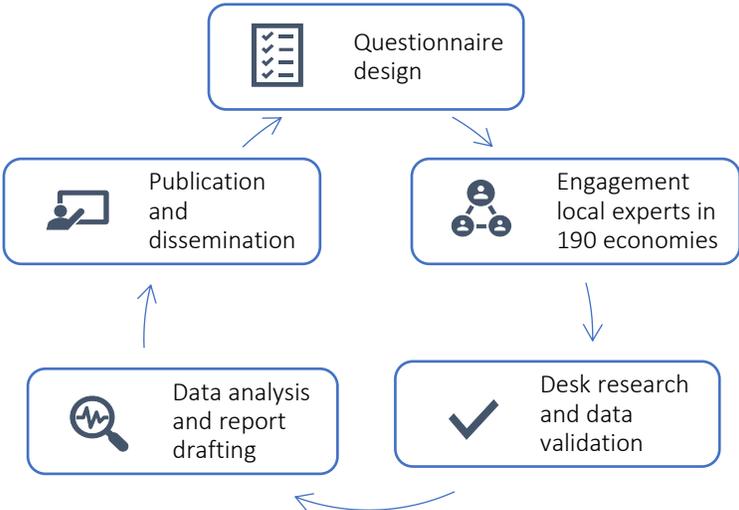
Women, Business and the Law (WBL) provides objective measures of laws and regulations that affect women’s economic opportunity in 190 economies.¹ By examining the economic decisions women make throughout their working lives, as well as the pace of reform since 1970, the *Women, Business and the Law* reports aim to inform policy discussions on how to remove legal restrictions on women and promote research on how to improve women’s economic inclusion. The WBL index measures only laws and regulations on the books; it does not measure implementation or practice, although this is a separate area of emerging research.

The *Women, Business and the Law* Manual and Guide (WBLMG) describes the production process for the WBL reports. It serves as an official source of information for WBL team members and interested stakeholders. It aims to depict, consolidate, and codify WBL rules and protocols in a comprehensive way. It builds on previous work by the WBL team, which over the years has developed rules and practices to inform the steps of the data collection and report preparation process. This document also includes processes intended to shield the WBL team from the undue influence of internal and external stakeholders, presenting the available resources to report and address any such instances. It aims to ensure the transparency, quality, and integrity of WBL data and research. The WBLMG is updated, as necessary, once a year, at the start of each data collection cycle, to ensure that the rules and protocols described are aligned with data integrity and transparency best practices and that they accurately describe the systems and procedures put in place by the team.

As World Bank Group (WBG) employees, WBL staff are subject to all applicable WBG staff rules and standards of conduct. Those rules take precedence over the content of this Manual. The WBLMG provides supplemental guidance relevant to the WBL context. While striving to be comprehensive, the WBLMG is written as a succinct description of WBL processes due to the expansive nature of the areas covered.

The WBL report production cycle consists of 5 phases, broadly covered in the following sections, with a particular focus on the phases that touch on data collection and data validation (see Figure 1).

FIGURE 1. WBL REPORT PRODUCTION CYCLE



¹ For more information, see <https://wbl.worldbank.org/en/aboutus>.

2. GLOSSARY

Back-to-Office-Report (BTOR) – A written report prepared by the team that conducts a Data Collection Mission. The team prepares both External and Internal BTORs. The External BTOR states the mission’s main purposes, key mission highlights, and next steps. It also indicates each public sector agency met by the team during the mission. The Internal BTOR contains the names and contact information of all local experts met by the team members during the mission and their individual responses, as well as contextual information and the findings of the data collection mission.

Bank-Wide Review (BWR) – An institutional review process of the draft *Women, Business and the Law* report, including economy data tables, initiated by DEC management asking for feedback from within the WBG.

Board of Directors – The World Bank Group Board of Directors refers to four separate Boards of Directors, namely the Board of the International Bank for Reconstruction and Development (IBRD), the International Development Agency (IDA), the International Finance Corporation (IFC), and the Multilateral Investment Guarantee Agency (MIGA). Executive Directors are appointed or elected by the Governors. Separate elections are held for the Bank and MIGA Board of Directors. Bank Executive Directors serve ex-officio as Directors for IFC and IDA. In line with the Bank’s Articles of Agreement, the Executive Directors select the World Bank President, who is the Chairman of the Board of Directors.

Chief Economist – The Senior Vice President and Chief Economist of the World Bank Group, responsible for providing intellectual leadership and direction to the Bank’s overall international development strategy and economic research agenda at the global, regional, and country levels.

Contributor Relationship Management (CRM) system – Database with contact information and questionnaire tracking for the local experts that WBL engages in the data collection and dissemination process.

Country Director/Country Manager – Depending on the size of the program and nature of the country relationship, the World Bank Country Offices are headed by either a Country Director (level GI), Country Manager (level GH), or Resident Representative (level GG).

Country Management Units (CMU) – World Bank offices located in its client countries, often covering a group of countries. Each of the seven Regional Vice Presidencies within the World Bank—Eastern and Southern Africa, Western and Central Africa, East Asia and the Pacific, Europe and Central Asia, Latin America and the Caribbean, Middle East and North Africa, and South Asia—has several CMUs. Each CMU is responsible for World Bank dialogue with the country government and the preparation of the country partnership framework, which is the basis for the Bank’s financial support to the country.

Data Collection Mission – WBL missions with the principal aim of collecting and confirming data with the private sector and specific public agencies.

Data Management System (DMS) – Main repository for data collected during each WBL cycle and coding decisions for each topic.

Data Update Submission (DUS) – Information on reforms or queries on published data submitted by governments and colleagues through an online portal during each data collection cycle.

Data Update Submission Lead – WBL staff member that oversees the preparation of responses to DUS.

Feedback Server (FBS) – A tool within the Survey Management System platform used to design and create both versions of the questionnaire (online and in Word).

Law Library – Internal repository of digital copies of current and historical laws, used as a reference during the coding phase.

Local Experts – Experts from 190 economies that every year complete WBL questionnaires containing the questions on which the WBL report is based. Local experts are sometimes referred to as contributors or respondents.

Local Experts Manager – WBL team member who oversees the process of maintaining and expanding the pool of WBL local experts and supports relationships between the WBL team and these experts. The team member also coordinates with IT counterparts on tasks, issues, and enhancements concerning the CRM system.

Production Leader – WBL team member who oversees the writing and production process of the annual *Women, Business and the Law* report, including coordination with the Publications Office or external editor and typesetter and compilation and response to BWR feedback.

Reform advisory – Any activity that involves providing specific guidance on reforms that directly affect the WBL indicators, scores, or rankings.

Questionnaire Generation Function Team – Composed of WBL team members, this function team is in charge of generating the prepopulated questionnaires, in relevant languages and formats, for later dissemination to carry out the data collection phase.

Survey Management System (SMS) – IT platform used for the questionnaire generation process. The SMS is used for the generation, distribution, and extraction of questionnaires.

Topic Leader – Senior member of the WBL team that leads the team working on one topic of the *Women, Business and the Law* report.

Topic Team – The team working on one topic of the *Women, Business and the Law* report.

Travel Request (TR) – Pre-travel request that must be submitted and approved in SAP for authorization for WBG staff to travel.

3. DATA COLLECTION

3.1. Source of data

Women, Business and the Law data is based on laws and regulations. Copies or links to the laws and regulations, as well as information on the applicable legal bases underlying each of the 35 index questions, are obtained through questionnaire-based data collection with legal experts, data collection missions, desk research, and consultation with secondary sources such as government websites and legal databases. Local experts may also be contacted for follow up conversations (via email or telephone) where there is legal ambiguity or questions about the applicable law remain.

3.2. Questionnaire-based data collection

Questionnaire-based data collection is the primary method used by the WBL team. Each year, detailed questionnaires are sent to local experts in 190 economies on the following topics: family law, labor law,

and violence against women legislation. WBL uses case study assumptions outlined in the questionnaires to verify and collect information about relevant laws that pertain to the WBL index in each economy.

Using their own legal knowledge as well as specific economy information, last cycle answers, and last cycle legal bases, local experts complete the questionnaire (online, via Microsoft Word, or through telephone) on a pro-bono basis. They provide an expert opinion on the applicable legal text and its interpretation, indicating whether any updates to the information are needed or if there have been changes in the law. Preliminary data analysis is based on the relevant law or regulation, accessed through desk research. Analysis is then validated through the comparison with at least one completed questionnaire, confirming that the relevant law or regulation is indeed the latest and no reforms have been recorded in the relevant period. If reforms or changes to the law are identified, through desk research or reported by the expert(s), a minimum of two completed questionnaires is required to validate the reform.

A Local Experts Manager oversees the process and supports the relationship between the WBL team and the local experts.

3.2.1. Questionnaire respondents

WBL collects information from a range of private and public sector experts, including solo practitioners, lawyers working in large firms, members of civil society organizations, judges and government officials (see Table 1). Some local experts, including many lawyers, participate in multiple questionnaire topics.

TABLE 1. TYPE OF EXPERT RESPONDENTS BY INDICATOR

WBL questionnaire instrument	Indicator <i>For details about data points measured under each indicator and methodology, see https://wbl.worldbank.org/en/methodology</i>	Local experts (a non-exhaustive list)
Family law	Mobility	Lawyers specializing in family law, civil law, or corporate law; gender experts; notaries; national registration and identification systems; land registries; judges; ministry of justice; ministry of gender/women; central banks; financial inclusion experts; academics; civil society representatives
	Workplace	
	Marriage	
	Entrepreneurship	
	Assets	
Labor law	Workplace	Lawyers specializing in labor and employment law, or social security law; judges; gender experts; social protection and pension experts; ministry of justice; ministry of economy/finance; ministry of social protection/social development
	Pay	
	Parenthood	
	Pension	
Violence against women law	Workplace	Lawyers specializing in criminal law or domestic violence; gender experts; academics; civil society representatives
	Marriage	

The WBL team also follows a process to evaluate if local experts meet the level of expertise required. The general guidance for evaluating local experts consists of the following points:

- *Work and educational history.* Increasingly, experts around the world have a profile on LinkedIn. Some have a basic work history, while others include more details. Review their

background to see if they have professional degrees, certifications, and work history related to the topic.

- *Firm website.* Firm websites often have “About us” or “Specializations” or “Services” that explain in detail their types of expertise and staff. “Meet the team” biographies on firm websites also often include educational background, types of clients, and individual work history. In addition, many law firm websites have online directories that allow filtering by legal expertise and experience. Review the information to determine whether the local expert has experience related to the topic and economy.
- *Recent news.* Search the expert’s name in Google News to see if any results appear. For example, news articles about a lawyer’s recent trials or work with clients or the advocacy campaigns of a women’s rights civil society organization might be published. Be aware of any negative news or reputational risks.
- *Thought leadership.* Search the expert’s name in Google and journals and check their firm website for any recent blogs, guidebooks, articles, or papers they have written related to the topic.
- *Professional endorsements.* Check their LinkedIn profile for skill endorsements or recommendations; check their website for professional affiliations.
- *Impartiality.* Check for affiliations with the WBG and the public sector.

The WBL team also re-evaluates the quality of the contribution, after receiving the questionnaire, to assess whether the local expert should be contacted again during the next data collection cycle. For this, the team uses the following points as guidance:

- For a received questionnaire, evaluate expertise by reviewing the local expert’s responses to the questions and verifying the applicable legislation. If the local expert does not respond to all questions, include this area in follow-up emails or phone calls.
- When speaking with local experts on the phone or corresponding via email, the team asks questions relating to their expertise. They begin with factual data questions for which the answer is known to check the expert’s knowledge (such as asking about recent legal reforms known to have been implemented). In answering questions, local experts will often share their strengths and areas where they have less experience.
- In all cases, for both positive and negative observations, analysts write a note assessing their expertise in CRM’s General Notes section.
- Topic Leaders also provide details on how to assess questionnaire responses for relevant expertise specifically related to the topic. The following is general guidance:
 - *Recent knowledge.* Did the local expert share or not share information about reforms that are known to have been implemented?
 - *Lack of accuracy.* Did the local expert provide information that is factually and verifiably incorrect? If yes, a note is made in CRM General Notes, and the Analyst informs the Topic Leader.
 - *Thoroughness.* Did the local expert write thorough answers to the questions? A lack of thoroughness does not indicate a lack of expertise, but thoroughness can demonstrate strong expertise.
 - *Potential bias.* Are there the same spelling mistakes in 2+ questionnaires for the same country/topic? Is there similar wording or copy/pasted answers across multiple questionnaires? These can indicate biased responses that were coordinated with undue influence on the data (undue influence is defined in Section 2.3.2). A note is made in CRM General Notes, and the Topic Leader is informed.

3.2.2. Database of experts (CRM)

WBL maintains its records of thousands of experts in a Microsoft Dynamics Contributor Relationship Management (CRM) system. This database contains information about the local experts and which questionnaires they were sent. The team updates CRM records for the experts, their employers, and the status of the questionnaires they were sent.

The team tracks correspondence with local experts by indicating the appropriate status of the questionnaire in CRM. If the topic team does not want to contact the local expert again due to concerns about lack of expertise, it would mark the questionnaire in CRM with the status “Received and Remove from indicator forever” and explain the rationale in General Notes. Local experts’ privacy preferences are also recorded in CRM. Local experts who participate in the research and wish to be acknowledged are listed on the WBL website (name, firm, address, and phone) by economy. Each questionnaire includes a section for local expert contact information and asks their preferences on what information they want to be published. The WBL team must enter these preferences in CRM.

The WBL team fully aligns with the [World Bank Policy on Personal Data Privacy](#) and with the [Bank Directive on Personal Data Privacy Request and Review Mechanisms](#), when recording and storing the personal information provided by local experts.²

3.2.3. Questionnaire development

Each questionnaire includes a standardized cover letter, fields for local experts’ contact information, the case study assumptions, a series of legal questions, and research questions.

The Topic Leader clears the template questionnaire first. It is then sent to the WBL Program Manager for approval. If the questionnaire includes new questions, either for research purposes or due to a change in methodology (see Section 8), the Topic Leader then sends the questionnaire to peer reviewers, who are subject matter experts both within and outside the WBG. They provide comments and feedback on the questionnaire’s content. The Topic Leader decides whether to incorporate this feedback. If the Topic Leader decides to make changes to the approved questionnaire, the WBL Manager should clear these modifications. Clearance and approval correspondence are saved to the shared drive under the appropriate folder.

A Questionnaire Generation Function Team, composed of WBL team members, supports the topic teams in generating the questionnaires in multiple languages, ensuring the prepopulated information of last cycle answers are accurately reflected, and developing a standardized cover letter.

3.2.4. Questionnaire generation

The Survey Management System (SMS) is the IT platform used for the questionnaire generation process. It is responsible for the generation, distribution, and extraction of questionnaires. The Feedback Server (FBS) is a tool within the SMS platform used to design and create both versions of the questionnaire (online and Word).

SMS pulls the data on the previously coded cycle’s answers and corresponding legal bases from DMS, *Women, Business and the Law’s* data management system, and local expert information from Contributor Relationship Management (CRM) managed through Microsoft Dynamics. These data systems are used to prepopulate the template questionnaire with economy-specific information as well as the local expert

² For more information, see the Privacy Notice, available here: <https://www.worldbank.org/en/about/legal/privacy-notice>

contact information on file. SMS is also used to distribute the questionnaire to all active local experts in the database and to extract their responses into DMS.

DMS is the main repository for the data collected during each WBL cycle and the coding decisions made for each topic. In the questionnaire generation process, DMS serves as a source from which to pull data to prepopulate the questionnaires with answers from the previous data collection cycle.

The Topic Leaders in collaboration with the Questionnaire Generation Function Team, complete the required steps on DMS and SMS to ensure the proper generation of the questionnaires. The Questionnaire Generation Function Team provides guidance and rigorously tests the accuracy of the final questionnaires before distribution. Topic Leaders are responsible for ensuring thorough completion and for testing any unique needs emerging from new research topics included on an ad hoc basis.

3.2.5. Questionnaire distribution

Distribution is the process whereby the addressed prepopulated questionnaires are distributed to local experts. Topic teams provide email text for each distribution language to the Questionnaire Generation Function Team, which then runs a test distribution for each language/topic. Topic Leaders must review the tests and approve the distribution.

The IT team in conjunction with the Local Experts manager distribute the questionnaires. This involves leveraging a mass distribution process to send personalized individual emails to each local expert, by using SMS. Questionnaires are distributed from the corresponding WBL shared account email address (WBLlabor@worldbank.org, WBLfamily@worldbank.org, WBLvaw@worldbank.org). Large law firms, submitting several questionnaires across different economies, are contacted through the standard project email account (wbl@worldbank.org).

3.2.6. Correspondence with local experts

The WBL team manages the relationship with local experts exclusively. Communications are on a bilateral basis, and exchanges are separate from any stakeholder interactions with the WBL team.

To maintain privacy and data independence, the WBL team never shares which topic a local expert participates in with anyone outside the WBL team. Even if WBG colleagues ask about local experts, the WBL team only refers them to publicly available information on the website.

3.2.7 Interactions between public officials, World Bank Group colleagues, and WBL local experts

Public officials, World Bank staff, and other stakeholders must avoid any undue interference with local experts, and they should not directly or indirectly be involved in the data collection process.

Activities that are or may be perceived as interference with *Women, Business and the Law* data collection include: contacting local experts to influence their answers to *Women, Business and the Law* questionnaires; providing suggested questionnaire responses to current and/or possible future local experts; requesting information from local experts on responses provided in any year; organizing meetings with local experts to discuss data; requesting local experts to answer *Women, Business and the Law* questions in a certain way; interfering with *Women, Business and the Law* data collection visits to an economy; and pressuring or coercing current and/or possible future local experts to participate in the *Women, Business and the Law* data collection process or to change their responses.

Stakeholders are encouraged to disseminate and communicate reforms and regulatory improvements to the general public and to all relevant experts in the economy as a group. However, as noted above, communication that could be perceived as efforts to directly influence the responses of individual local experts should be avoided.

Stakeholders may send *Women, Business and the Law* questionnaires to their colleagues in public sector agencies and/or ask them to participate.

If the *Women, Business and the Law* team determines that stakeholders have engaged in activities that are or could be perceived as interference with the independence of potential experts in an economy, the *Women, Business and the Law* team, in consultation with Bank management, may take steps to preserve the integrity of the data, including by not updating data for the economy in a given report cycle, as well as by excluding the economy's data entirely.

3.2.8. Recruitment of new local experts

Each data collection cycle, the team recruits dozens of new local experts to answer the questionnaires. Experts are selected based on their expertise in the areas of law covered by each of the three WBL questionnaires. Various methods are used to recruit new experts, including through the WBL website sign-up page, LinkedIn, referrals, and desk-based research.

The expert should only be contacted if they have the expertise required to be sent the questionnaire and participate in the research. Additionally, the team ensures potential experts are not existing respondents for other topic teams by searching CRM. All potential local experts whether they respond to the team's requests are added to CRM and marked with the questionnaire status as "Sent" to ensure they are not contacted multiple times by different topic teams.

3.2.9. Processing completed questionnaires and information received from local experts

All written correspondence with local experts must copy the shared e-mail address corresponding to each topic team. The shared email inbox contains subfolders for each data collection cycle. Each data collection cycle subfolder is organized by economy so that e-mails can be stored systematically.

The team also stores the information provided from local experts (completed questionnaires, PDFs of laws, e-mailed answers, transcripts of telephone interviews) and any information collected via desk research in the designated folder on the secure folder structure assigned to the WBL team, protected behind the World Bank's firewall and only accessible to current WBL team members. The proper storage of data is essential for WBL data governance. It is the responsibility of Analysts and Topic Leaders—according to the distribution of economies assigned at the beginning of the cycle—to store all the data received and used for coding. Typically, these documents are:

- *Questionnaires* in PDF or Word format. Questionnaires should be stored in the corresponding economy subfolder within the folder that compiles all received questionnaires for the specific WBL data collection cycle.
- *Emails* containing follow-up responses from local experts or governments. Emails should be stored in the same economy folder where received questionnaires are saved.
- *Text documents with transcripts of phone conversations* between Analysts and local experts. Text documents should be stored in the same economy folder where received questionnaires are saved. If the transcript is directly inputted in a blank economy questionnaire, the Analyst should fill in the contact information for the local expert, including privacy and publishing preferences, and indicate that the questionnaire was received by phone. The file name should also indicate that the questionnaire was received by phone.
- *Attachments and supplemental information submitted by local experts*. Local experts often submit PDF copies of the applicable laws and regulations in their economies or other forms of supplemental information. These should also be saved in the same economy folder where received questionnaires are saved, as well as properly catalogued in the WBL team's Law Library.

- *Government-provided information* obtained through the team’s interactions with external stakeholders. Information that is relevant for coding should be stored together with received questionnaires. If the documents are relevant for preparing engagements with governments or to respond to DUS, they can be saved in the corresponding folder designated by the Topic Leader.

The information received from local experts through questionnaires is uploaded into the Data Management System (DMS) through a process called extraction. This process is done automatically for questionnaires that are completed online but must be requested manually for Word questionnaires using SMS. The Questionnaire Generation team coordinates testing of extraction before questionnaires are distributed to ensure extraction is functioning correctly.

3.2.10. Completion of questionnaire-based data collection

Each topic team must obtain the primary laws and regulations of each economy. In addition, each topic team aims to obtain information (whether from completed questionnaires, e-mailed answers, or phone calls) from a minimum of two local experts per economy to consider data collection complete. Preliminary data analysis can be started before this threshold is reached and it is based on the relevant law or regulation, accessed through desk research. Analysis is then validated through the comparison with at least one completed questionnaire, confirming that the relevant law or regulation is indeed the latest and no reforms have been recorded in the relevant period. If reforms or changes to the law are identified, through desk research or reported by the expert(s), a minimum of two completed questionnaires is required to validate the reform. In rare cases where this threshold cannot be met, the Topic Leader notifies the Program Manager of the situation through email. The message should explain the circumstances encountered during data collection, the mitigation strategies adopted to remedy the situation, and why the threshold was not met. The Program Manager approves and puts in writing any exceptions made.

3.3. WBL Data Collection Missions

To collect accurate information, verify legal bases and to recruit local experts, the WBL team may visit several countries per year. Historically, the team traveled to countries that were newly added to establish the baseline and recruit local experts. When the team travels for other purposes, such as dissemination or conferences, data verification and recruitment of local experts is added to the trip. The team may also validate data with the government counterparts and present the data for the country to interested authorities.

3.3.1. Identification of economies for data collection mission

Selection criteria

The WBL team conducts data collection missions to economies where data collection missions will be most beneficial and based on budget. The relevant criteria used by topic teams include the number of responses previously received, the existing local expert pool, data challenges, ongoing reform programs, and the need to verify previously collected data.

Consultations with CMUs

Once selected, the WBL mission team members consult with the local Country Management Unit (CMU) to prepare the data collection mission. This consultation covers, among other topics, the dynamics of the data collection mission, mission dates, country clearance, expected engagements with government agencies to be held during the mission, expectations of the client, logistical assistance, and the source of the funding. The WBL team also shares with the CMU the *Guidance on Women, Business and the Law* Local Expert

Engagement for informational purposes. The team then plans the mission accordingly. Finally, the local CMU clears the mission and the team members.

Concurrent events and presentations

Data collection meetings may also occur as the WBL team is on mission to present and disseminate its findings in different economies. In such cases, the data collection mission can be supported financially either by WBL funding, a regional or Global Practice (GP), or a CMU.

3.3.2. Notification protocol for an upcoming mission

The WBL mission team members check the Country Office home page in the intranet or call the CMU for any country-specific travel requirements at least two weeks before mission departure. Should there be any specific requests or requirements, the team members inform the WBL Manager. The mission team prepares the mission memorandum and any country-specific documents to be sent to the local CMUs in advance of the mission.

The mission team members share with the Program Assistant the names of staff in the Country Office, CMU, and GP who need to be copied in the Statement of Mission Objectives (SMO) and the dates of the mission. When a mission covers two or more countries, the dates in each country must be specified accordingly.

Based on the information provided by the team members, the Program Assistant prepares and sends the draft notice to the WBL Manager and the Country Director or Country Manager for review/clearance at least two weeks before the mission, as well as any country-specific documents that may be necessary (for example, the mission announcement letter to the government).

For security reasons, the team members must send a copy of their itinerary to the Program Assistant before departing on mission. If this itinerary is modified during the trip, an updated version should also be shared.

3.3.3. Data collection Travel Requests (TR)

Topic teams prepare a TR for each data collection mission economy. TRs contain the specific questions and data points that the team members need to focus on during the mission. Those documents should also include a list of potential local experts that the mission team should schedule meetings with and the minimum number of local experts from which the travel team should collect information during the mission. In principle and depending on mission priorities, TRs should not contain the entire topic questionnaire and instead focus on key data points. The WBL Manager discusses and reviews TRs and mission requirements at the topic level.

Once TRs are cleared by Topic Leaders and shared with the mission team, mission team members meet with each topic team (Analyst in charge of the economy or team leader) to discuss data details and clarify any questions.

3.3.4. Rules of engagement with CMUs during mission

Kickoff meeting

At the beginning of the data collection mission, the WBL mission team members meet with the CMU to discuss the main purpose of the mission and the public agencies with which the team has scheduled meetings. The World Bank staff in charge of private sector development reforms, the Country Director, Country Manager, or Resident Representative are usually present at this meeting. The CMU can also organize a second kickoff meeting with government officials present.

Logistical assistance

When necessary, WBL team members may request logistical assistance from the CMU during the mission. This assistance may be in the form of booking rental cars, organizing transportation to and from the airport, preparing meeting rooms at CMU offices, or arranging interpretation services. Additionally, the CMU may assist the team in scheduling meetings with public agencies. Depending on the local circumstances, WBL team members can also request assistance to schedule meetings with the private sector.

Wrap-up meeting

At the end of the data collection mission and at the request of the CMU, WBL team members organize a wrap-up meeting to explain the key mission highlights and the next steps. Government officials may take part in this meeting. The team does not share any information regarding the results of the mission, or the data collected.

3.3.5. Rules of engagement with public authorities during mission

Public meetings protocol

At the government's request, WBL team members may participate in a kickoff meeting with high-level government officials (a minister, for example) or the team in charge of the reform committee of the economy.

In these cases, the team meets with public agencies involved in each topic where information is collected (for example, gender equality agencies, tribunals, land registries, business registries, municipalities, and so on), depending on the request of the topic teams. Public sector meetings are preferably scheduled at the beginning of the data collection mission. If the agenda allows it, all WBL team members composing the data collection mission attend the public sector meetings. CMU staff and staff from the World Bank Reform Advisory team can be present during these meetings.

Generally, public agencies present the undertaken reforms, if any, and the legislative agenda.

3.3.6. Rules on gifts

WBL team abides by the rules set out in the Staff Rule 3.01, Standards of Professional Conduct³. WBL team members may not accept gifts, regardless of value, that could reasonably be perceived as intending to influence their work decisions, or that could cause reputational harm to the World Bank Group.

WBL team members may accept a gift under certain circumstances: if the gift is presented in a public forum and refusal would cause offense or embarrassment to the giver, or the gift is directly associated with the demands of work (for example, working meals). In these cases, WBG staff may accept the gift on the WBG's behalf rather than in a personal capacity. If valued at more than US\$100, the gift must be declared and surrendered to the Asset Management Unit, Global Corporate Solutions (GCS).

The cumulative value of all gifts from the same individual or entity cannot exceed US\$100 in a 12-month period.

Any personal benefit or value, such as free or discounted services, favors, entertainment, or hospitality (meals or accommodations), are also considered gifts.

³ See the World Bank Group's Code of Ethics, available here: <https://documents1.worldbank.org/curated/en/147281468337279671/pdf/WBG-Code-of-Ethics.pdf>

3.3.7. Rules of engagement with Local Experts during mission

WBL team members can meet with public and private sector experts that they consider relevant for the data collection. CMU staff, other World Bank colleagues, and public sector officials do not typically participate in meetings with private sector experts. Should World Bank colleagues express an interest in participating in these meetings, the mission team should contact the mission manager, copying the WBL Manager, who would directly reach out to the relevant WBG Country Office to clarify the rules of engagement outlined in this Manual.

3.3.8. Hospitality with local experts

If a local expert is particularly helpful, it is acceptable to invite the local expert for a meal and cover their expenses. Having a professional lunch or dinner with one or more local experts is an expense eligible for reimbursement. The event might happen either while one is on mission and needs additional information or when a local expert is visiting the Washington, DC area.

Before taking action, the staff must write to the WBL Manager requesting authorization to incur the expense. In an email, the staff should explain the rationale for the expense and provide the number of local experts they expect to invite. Depending on the explanation, the WBL Manager can either approve or disapprove the expense or ask for more details and set an expense limit.

Whether an expenditure was made on mission or not, when claiming reimbursement, in addition to an Excel file detailing basic information—the name, city, and county of the restaurant; the host name; the number of participants; the date of the event—staff must submit the following supporting documents: a list of the participants who were present at the event, including their title, agency, and contact details, the restaurant receipt with proof of payment, and the WBL Manager’s email authorization.

3.3.9. Post-mission deliverables

External Back-to-Office Report (BTOR)

Upon the mission team’s return, and no later than three weeks after completing the mission, the mission team sends a BTOR to the same recipients who received the upcoming mission notification. However, the relevant Executive Director—the government’s representative within the World Bank—is removed from the carbon copy list. The BTOR states the main purposes of the mission, the key mission highlights, and the next steps. It also indicates each public sector agency met by the team during the mission. Before sending it out, the mission team requests the clearance and comments of the WBL Manager, and in some cases, the CMU/GP Manager.

Internal back-to-office report

The mission team also prepares an internal WBL BTOR and shares it with each topic team. The WBL BTOR is drafted for each topic based on the TRs prepared by the topic teams. It contains the names and contact information of all local experts met by the team members during the mission and their individual responses, as well as contextual information and the findings of the data collection mission. The WBL BTOR is intended for the exclusive use of DECWL staff and is not meant to be shared outside the unit without the WBL Manager’s clearance.

The WBL BTOR, which is always saved on the team’s shared network drive in a designated folder, should be delivered to the team within three weeks of returning from a data collection mission. The WBL BTOR delivery deadline is agreed with the WBL Manager, depending on the scope or timing of the mission (earlier or later in the cycle).

Updating CRM with new contact information

The mission team is responsible for updating CRM with the contact information of newly recruited local experts. If they provided agree, they are recognized in the current cycle's report and included on the distribution list for future questionnaires.

4. ENGAGEMENT WITH STAKEHOLDERS

4.1. Rules and Procedures for Meetings with Governments

Government officials may submit a request for a videoconference or in-person meeting with the WBL team through a dedicated online portal (Government Engagement Portal). World Bank staff working in country offices or on projects involving WBL can also request a videoconference or in-person meeting with the WBL team and a specific government.

4.1.1. Process for requesting and scheduling videoconferences and in-person meetings

The meeting request is made by filling out the Meeting Request Form, which includes information regarding: (i) the WBL indicators to be covered during the videoconference or in-person meeting; (ii) the type of meeting (videoconference or in-person); (iii) the type of discussion requested (reform or data correction); (iv) list of outstanding issues to be discussed; (v) potential dates and times for the meeting to take place; (vi) list of participants joining the meeting (full name, title, agency, and email); (vii) government focal point person and contact information for purposes of coordinating the meeting; (viii) the need for interpretation; and (ix) attachments providing specific documentary information.

The meeting request will be allocated to a WBL team member (the Coordinator), who will contact the requester or focal point from the government by email, in order to schedule the meeting at a mutually convenient time and date. Once the date is scheduled, the Coordinator will share the connection details and platform to be used for the connection with the requester and all the participants. The Coordinator will send them a reminder two days before the day in which the meeting takes place.

4.1.2. Scope, content, and format of videoconference or in-person meetings

The purpose of the videoconference or in-person meetings is to discuss the reform information or data queries provided by the government, in a respectful and productive setting. The discussion follows an "issue-by-issue" format and focuses on the technical aspects of the specific items of the agenda stated in the Meeting Request Form. The information provided will be used by the WBL team members for reference purposes only. The WBL team will not provide reform advisory during the videoconferences or in-person meetings.

The meetings will be generally conducted in English. Based on the availability of WBL team members who speak languages other than English, the discussion can be conducted in another language. If there is a need to follow up on a specific issue discussed during the videoconference or in-person meeting or to obtain pending documentation or additional information, the Coordinator communicates this to the government focal point, or the World Bank staff who requested the meeting. The government focal point or World Bank staff who requested the meeting can send the information to the Coordinator by email. Such information is requested and shared by email and can be submitted after the portal is closed.

4.1.3. Timeline

The Meeting Request Form is available online during each data collection cycle from one month after the start of data collection until two weeks after the data cutoff date. Videoconferences or in-person meetings will take place on a rolling basis.

4.1.4. Other meetings with governments

The WBL team (in some cases jointly with the DECIG Director, and other senior management) may, when appropriate, conduct additional interactions with high-level government representatives, especially during the World Bank's Spring and Annual Meetings. These discussions may cover general issues related to the *Women, Business and the Law* report but do not cover specific data discussions which should be handled through the meetings described above. In the case of in-person meetings during Spring and Annual Meetings, the team will inform the relevant Executive Director office and Country Management Unit colleagues.

4.2. Rules and Procedures for Data Update Submissions (DUS)

Government officials and World Bank colleagues may provide the team with information regarding potential reforms or data corrections in an economy by completing the online WBL DUS (Data Updates Submission) Form available on the Government Engagement Portal. The WBL team reviews all submitted information and provides responses to information received under the specific circumstances described below.

4.2.1. Rules on what the WBL team replies to

A DUS Submission Lead is assigned to monitor, coordinate, review and respond to the data update submissions received from government officials through the Government Engagement Portal and the WBL DUS Form. The DUS Submission Lead ensures that all information submitted through the Government Engagement Portal is reviewed and addressed by the WBL team, who is responsible for responding to each online submission. In exceptional circumstances when the government officials have trouble accessing the online form, information sent to the WBL team without using the DUS Form (for example, by email, letter, and so on) is also reviewed and considered.

Submitters select all indicators for which they would like to provide information. They then can complete memos for the indicator mentioned at the top of each page. Each indicator page may contain an unlimited number of memos. Each memo contains the following information: (i) type of data update, (ii) indicator impacted, (iii) description of data update, (iv) question impacted, (v) suggested data modification, (vi) date of entry into force (if applicable), and (vii) legal basis (if applicable).

All boxes in each memo should be completed. Each box in the form has a character count limit. A different memo should be used for each type of data update, question impacted, and suggested data modification. After submitting the DUS Form, a PDF is generated and sent to both the WBL team and the submitter.

The DUS Form does not have a limit to the number of memos that can be created.

All supporting documents (evidence, laws, regulations, etc.) must be submitted separately through the "Supporting Documents" link at the end of the form, which generates a pre-populated email for document attachment. No changes or additions to the subject line or content of the email should be made, except to add the names of the supporting documents.

All supporting documents must be submitted prior to the closing of the online Government Engagement Portal.

4.2.2. Timeline

The DUS Form is available online during each data collection cycle from one month after the start of data collection until two weeks after the data cutoff date. Information submitted outside this timeline is also reviewed and considered by the WBL team if it is received during BWR period. The team sends written responses to all accepted information no later than two months after data collection closes.

4.2.3. Guidelines on DUS content

Type of information allowed in WBL responses

The WBL team provides a response to each memo by explaining the assessment of the particular economy data to the issue raised based on the relevant methodology and providing a conclusion.

Type of information not allowed in WBL responses

The WBL team does not provide information on the impact of reforms and corrections on the score of an economy. The WBL team does not provide advice regarding reforms undertaken by governments. The WBL team does not provide responses to comments submitted by governments regarding economies other than their own.

Reforms may be recognized in the DUS response provided by the WBL team. The data is adjusted accordingly where applicable. However, even if such reforms may affect the data, they may not necessarily be included in the reforms section of the WBL report. For a reform to be included in the reform section of the report, the impact of the data changes must meet the criteria documented in the data notes available on the WBL website. Such analysis is not specified in the WBL team's responses to the DUS, as many responses are finalized prior to the final data being available and hence prior to the impact of the data changes being known to the WBL team.

Review of DUS content and submission

Each topic team is responsible for the format and content of responses to memos related to their indicators, under the supervision of the DUS Submission Lead. Responses are subject to two rounds of review, by the WBL Program Manager and by the DECIG Director, before the DUS Submission Lead sends them to the submitters within the deadline.

Publishing DUS responses and information submitted

The DUS response to information received from governments will be published on the WBL website, along with a copy of the original unedited submission. Both documents will be accessible to the general public. Information submitted in the supporting documents will not be published on the WBL website.

Economy-specific information received as part of Bank-Wide Review (BWR)

After sending the report to BWR, World Bank colleagues are invited to provide economy-specific comments related to the data. The WBL team will provide a written response to such information within six weeks of the BWR deadline for comments. The WBL team will not provide a written response to queries sent from governments to colleagues and then passed on to the WBL team. The WBL team will also not provide a written response to all issues already raised in the DUS submitted through the Government Engagement Portal as described above.

4.3. Rules on Other Communications Received During the Data Collection Cycle

WBL staff members should inform the WBL Program Manager of any communications not pertaining to the normal data collection process (for example, via WBL questionnaires) received from a government on WBL data outside of the framework depicted in this section.

4.4. General Communications with the Board of Executive Directors

The WBL Program Manager prepares written communication sent via email when the data collection period begins to the Board of Executive Directors through the corporate secretariat announcing the launch date of the Government Engagement Portal and an open call to Executive Directors to send updates on ongoing reforms and data queries. This communication includes information about WBL cycle milestones, the reform cutoff date, the rules for government interactions (including the DUS process and videoconference or in-person meetings), and any additional relevant updates. The DECIG Director clears and sends this email. The same email is sent to relevant counterparts within the WBG.

Before report publication, DECIG sends a written communication to the Board of Executive Directors with an embargoed version of the *Women, Business and the Law* report.

The WBL Manager and DECIG management have an open and permanent dialogue with the Board of Executive Directors throughout the WBL cycle on general issues pertaining to the *Women, Business and the Law* report. Country-specific data queries from Executive Directors are handled through the procedures described above.

5. DATA CODING AND ANALYSIS

Coding is the process whereby the WBL team analyzes the laws and regulations of a given economy to answer the questions presented in the WBL index and included in the topic questionnaires. All answers are derived from codified laws and regulations. Responses from local experts are analyzed in conjunction with the law and other relevant secondary sources to ensure accuracy. The coding process is carried out in the Data Management System (DMS).

5.1. Data Management System (DMS)

The WBL team uses a custom-built Data Management System to code its data. DMS was designed to ensure:

- *Data confidentiality*: The system is accessible online only when connected to the World Bank's network and requires a username and password to sign in. Access is granted individually by a Product Administrator (usually a Topic Lead or the DMS Focal Point), who creates profiles for analysts with designated roles (e.g., analyst, topic lead, product manager, guest) and grants access only to the topics they are assigned to work on.
- *Efficient processing of information*: DMS, which is connected to SMS, allows users to view last cycle answers and cited laws side-by-side with the local experts' answers and cited laws for each question included in the questionnaire.
- *A log/record of data changes*: Any changes in data indicate the date and name of analyst or user who changed the data to ensure it can be tracked.

- *All corrections, reforms or changes to data are flagged:* DMS alerts users of any changes in data and requires a justification be provided. If justification has not been provided, DMS will prevent the data from being submitted for the next level of review.
- *Efficient reporting of data, corrections, and reforms:* A number of reports are downloadable to Excel that compile lists of corrections, reforms, or historical data. Data can also be downloaded to Excel from DMS for individual or multiple cycles.
- *Multi-level review processes (see Section 6 for more details):* The coding platform features a component that allows analysts to submit coding for review by a Topic Leader. The Topic Leader can accept or reject the coding, which will either revert it back to the analyst to make necessary changes or elevate it to the next level of review by a Data Reviewer. The Data Reviewer also can also accept or reject the coding; if accepted, the coding is then reviewed by the Program Manager.
- *Protection and storage of data:* All historical data is “locked” in DMS, meaning it cannot be altered by a user unless the economy is “recalled from review.” The current cycle data is locked at each level of review unless it is rejected or recalled from review.

Before coding, each indicator team prepares a coding template, coding sheet, and coding rules. Values for answers, legal bases, URLs and comments are coded in DMS by the team’s review of the applicable legal instruments, as cross-checked with local experts’ answers and other secondary sources.

The WBL team coordinates closely with the World Bank’s IT team to monitor the functioning of the DMS system, test and implement enhancements that further strengthen the points listed above and keep up to date with the technology developments in the field. DMS is regularly adjusted to meet the team’s needs.

5.2. Topic Leader responsibilities

In addition to setting up the coding process and ensuring datapoints are formatted correctly, Topic Leaders are responsible for training Analysts on the WBL methodology and providing guidance during the coding process. Every cycle, Topic Leaders share coding rules—which are more detailed versions of the WBL methodology included in the data notes section of the *Women, Business and the Law* report⁴—with their respective teams. The Coding Rules provide practical guidance to all WBL team members on how data points are coded with examples of different variations in the law to ensure the highest degree of comparability.

Topic Leaders are responsible for coding a subset of economies as well.

5.3. Analyst responsibilities

Each Analyst is responsible for coding a subset of economies. Analysts are responsible for inputting the current cycle answers, applicable legal basis, URLs to laws, and explanatory comments into DMS for each datapoint for each economy assigned. They determine these values by reviewing and analyzing the applicable legal basis in conjunction with the last cycle values, the information provided by local experts, and any other secondary sources. Analysts also must ensure consistent application of the methodology and evaluate whether any changes to the data should be made due to corrections or reforms.

Any change that impacts a data point used to calculate the WBL index score must be logged in DMS. To log this change, the Analyst (or Topic Leader if coding) must:

⁴ For the WBL data notes, see <https://wbl.worldbank.org/en/methodology>.

- Identify, from valid sources as per the methodology and coding rules, a change in the raw data compared to the preexisting value coded in DMS. This is commonly called a confirmation of change.
- Identify the basis of the change, such as a new law or regulation, an incorrect application of the methodology, or a missed legal reform in a previous cycle.
- Assign a date on which this change entered into force. This process is essential to distinguish between a reform and a correction.
- For reforms, identify the impact of such change (positive, negative, neutral).
- Obtain the necessary confirmations to validate the change as per coding rules.

All of this information is inputted in a separate tab in DMS designed precisely to log either reforms or corrections. For corrections, the Analyst must correct the inaccurate values for all years affected. This process is commonly called back-calculation.

To justify a change due to legal reform, the topic team should include the following detailed information in the reform description in DMS:

- *Date of enactment.* The enactment date is the date that a bill officially becomes law. For questions on leave and pensions, WBL applies the laws in force on the last day of the coding cycle (“the cut-off date”).
- *Date of entry into force and/or implementation of provision.* The date of entry into force or implementation of the legal provision is the date the legal provision takes effect. WBL uses this date as the date of reform.
- *Who implemented what new measures?*
- *Information on what has been repealed and what has changed.*
- *Level of confirmation.* DMS includes fields for analysts to note the number of questionnaires received and number of local experts confirming the reform.
- *Any other useful details.* This may include government websites, legislative history, news articles, and other secondary sources or information.

To justify a correction to the previous year’s published data, the topic team should include the following information in the correction description in DMS:

- *What is the applicable methodology for that data point? What was the issue in the previous year’s coding?*
- *How should the coding be corrected this year, and why?*
- *Level of confirmation by local experts.* The number of responses received and the number of responses confirming the correction should be recorded in their respective fields in DMS, even when the correction description already includes the details of the local experts’ responses.
- *Back-calculation until WBL[year], and why the data was back-calculated until that year.*
- *Any other useful details.*

To log a reform or correction to historical data, the topic team should include the following information in the reform or correction description in DMS:

- *Type of historical data change.* Clarify whether this is a missed reform (positive or negative) or a historical data correction (with positive or negative impact).
- *Date of enactment and date of entry into force of the applicable legal basis.* The team should also clarify the relevant WBL[year] impacted by the reform or correction and whether any data needs to be back-calculated (specifying the range of back-calculation).

- *Details of the reform or correction:*
 - For missed reforms: include information about who implemented the reform, what has been repealed and what has changed.
 - For historical data corrections: include applicable methodology, identified issue with the data, how the coding should be corrected, and any other useful information (such as applicable legal basis or whether a historical reform should be adjusted/removed).
- *Level of confirmation by local experts*

5.4. Submitting data for review

Once the Analyst or Topic Leader finishes coding an economy according to the methodology and coding rules for each of the eight indicators, they submit the completed economy for review in DMS. The submission locks the data for this particular economy for review in DMS. If the topic team needs to update any scored data point for this economy, the topic team recalls the economy from review in DMS, updates the data, and resubmits it for review.

5.5. IT flags for proper data production

The *Women, Business and the Law* team works closely with the IT team to address any technical issues that may arise in DMS during the coding cycle. Team members must log tickets with information about any IT issues encountered in Microsoft Teams in the DMS support channel. The tickets are addressed usually within 24-48 hours and any pending tickets are discussed on a weekly basis by representatives for the WBL team and the IT team. This ensures the accuracy and integrity of the WBL data.

6. DATA REVIEW

The data for all economies across all topics are subject to a three-layer review and approval process in DMS by the Topic Leader (level 1), Data Reviewer (level 2), and Program Manager (level 3). Three additional layers of review are conducted outside DMS by a Data Team Review (level 4), followed by DECIG Management Review (level 5) and, finally, a Bank-Wide Review (BWR) (level 6). A Review Lead is designated to coordinate the review processes each report cycle.

The three-layer review and approval are recorded at the economy level for each topic in DMS, including comments by the reviewers at each level, when applicable. Each layer of data review is conducted based on the following standards:

- Coding decisions are based on applicable laws and regulations, supported by other sources of information.
- The coding is in English. Additional information and text of legal provisions can be included in the original language, followed by an English translation in the comments section. The methodology and coding rules for each of the indicators should be applied consistently across economies during coding.
- Any change to previously published data should be well justified, so the Topic Leader, Data Reviewer, and Program Manager can understand the rationale behind the coding decision.
- Any change to previously published data should have the required level of confirmation from local experts and be supported by applicable law, regulation, or other official information, where applicable.

Coding that does not meet the standards outlined in this section is rejected and sent back to the topic team. The topic team then revises the coding, provides comments where applicable, and resubmits the economy for further review and subsequent approval.

The Topic Leader, Data Reviewer, and Program Manager provide review comments through the review log comment box. When the reviewer rejects an economy, the grounds for rejection and the recommended action should be clearly documented in the comment box. When the reviewer approves an economy, a review summary can be provided to facilitate the next layer of review. If a reviewer has a question about the coding that does not require rejecting the economy in DMS, the reviewer can follow up with the team outside DMS and should summarize the discussion in the review comments.

If the topic team recalls an economy from review and revises the coding, changes made after the previous reviews should be clearly explained in the comment box when the topic team resubmits the economy.

6.1. Topic Leader review (level 1)

The Topic Leader leads a team of Analysts in charge of collecting and coding the data for a topic. The Topic Leader performs coding for a set of economies, reviews the data coded by the Analysts of the topic, and approves the coded data for all economies under the topic in DMS.

Topic Leaders are responsible for ensuring the consistent application of the methodology and coding rules for all economies. In cases where the assessment differs between the Topic Leader and the Analyst, the Topic Leader makes the final coding decision based on consistent application of the methodology.

6.2. Data Reviewer review (level 2)

The Data Reviewer is a Topic Leader or Analyst from a different topic within the WBL team. The Data Reviewer plays the role of a peer reviewer for all economies for another topic by reviewing and approving in DMS the coded data that have been reviewed and already approved by the respective Topic Leader.

6.3. Program Manager review (level 3)

The Program Manager reviews the coded data for a set of topics already reviewed and approved by the respective Topic Leaders and Data Reviewers. The Program Manager performs the final approval in DMS for the coded data for this set of topics for all economies.

6.4. Data Team review (level 4)

Once all economies for a topic receive the three-layer approval in DMS, the Data Team downloads the approved data and presents them in the decomposition file.

The decomposition file includes the approved indicators and scores for all economies under the topic in the current year and previous years, as well as the change to WBL scores between the current year and the past year due to reforms, corrections, and methodology updates (if applicable). The Data Team then cross-checks the changes in data and scores in the decomposition file against the reforms and corrections logged in DMS. Discrepancies are analyzed by the Topic Leaders, Data Reviewers and Program Manager, and recorded in DMS.

The Data Team shares the decomposition file, which displays the economies in alphabetical order, highlighting changes in scores due to reforms or corrections, with the Program Manager, the Topic Leaders and Data Reviewers. The Data Team starts the production of the decomposition file during the second layer

of review (by Data Reviewers) to ensure that there is ample time to address data discrepancies impacting scores ahead of further review.

Each decomposition file, including the final file produced after the third layer of review (Program Manager review) is locked: only the Data Team and the Program Manager have editing rights, while the Topic Leaders and Data Reviewers have reading rights (and may be allowed to copy the data to a new spreadsheet for analysis purposes). Each version of the file is dated and saved in a in a designated folder in the network drive. The final decomposition file is prepared two business days before the data review meetings.

6.5. DECIG Management review (level 5)

The approved data are reviewed by the DECIG Director with the Topic Leaders, Data Reviewers, and Program Manager in a documented data review meeting. The topic team takes the minutes of the data review meetings, documenting what has been discussed and agreed and what are the next steps if the topic team is required to perform additional data verification. The minutes of these meetings are saved in the topic teams' designated folders on the network drive.

Following the meeting, the topic team performs additional data verification—if the Program Manager and DECIG Director provide additional comments—and confirms or updates the data as required. Any changes made to the data are subject to three-layer approval again in DMS. The Data Team then downloads the latest approved data and updates the final decomposition file.

6.6. Bank Wide Review (BWR) (level 6)

In collaboration with the Program Manager, the Topic Leaders perform a thorough review and validation check of the final master file. The Program Manager clears the BWR version of the master file, which is circulated to the DECWL function leads, including those for data analysis and production.

The Data Team prepares the BWR version of the economy tables in Excel. The BWR economy tables are circulated back to the topic teams, who confirm that the data in the file match their BWR data in DMS. The following section (Section 7) presents in more detail the BWR process.

If a topic team needs to make a change to its data in DMS after the BWR country tables are circulated internally to the WBL team, the topic team recalls the relevant economies and preforms the necessary changes, which are subject to three-layer approval again in DMS. The WBL team repeats the steps described in the beginning of Section 4.1.6. The revised BWR country tables are recirculated only to the specific topic teams with changes for a recheck.

The Production Leader converts the BWR country tables from Excel to Word and circulates the Word file back to the topic teams, who confirm that the data in the Word file match the data in the Excel BWR country tables.

In collaboration with the Program Manager, the Topic Leaders communicate the date and time for which DMS is locked for BWR to the WBL team as a whole. During BWR no data changes are allowed on DMS. Also, no data extractions from received questionnaires are permitted during the same period.

7. REPORT CLEARANCE AND REVIEW PROCESS

The *Women, Business and the Law* report and data are produced as part of an Advisory Services and Analytics (ASA) project. The general WBG Accountability and Decision-Making (ADM) framework for ASA applies to the WBL review and clearance processes. The following sections provide additional specific details relevant to WBL.

7.1. Process for obtaining approval for BWR circulation

1. The WBL Manager sends chapters of the draft report to other DECIG and DEC units for comments. The WBL team incorporates comments into the BWR version of the report.
2. The Program Manager sends an email to the Production Leader to seek concurrence on the data included in the BWR version of the country tables, confirming that all comments from the data review meetings have been addressed, that all economies for all topics have received the three-layer approval in DMS, and that all topic teams have confirmed the country tables submitted to the Production Leader match the final data with the three-layer approval in DMS.
3. The Production Leader sends an email to the Program Manager, copying the Data Team, to seek concurrence on the final BWR version of the report and annexes. The Production Leader also uploads the BWR report and annexes to the SharePoint site.
4. The WBL Manager concurs and submits the BWR report and annexes to the DECIG Director for written approval for BWR circulation, copying the Data Team and Production Leader.
5. The DECIG Director clears the BWR report and annexes for circulation by email.
6. Upon written request by the DECIG Director, the DEC Senior VP and WBG Chief Economist decides to circulate the BWR report and annexes for BWR.
7. All Practice Groups and relevant stakeholders within the World Bank Group receive a digital copy of the draft report and have 2 weeks to provide written comments to be incorporated in the final report.

7.2. Archiving of BWR version of the master file and approval for BWR circulation

The Production Leader archives the BWR version of the master file in the Production folder of the network drive. The Production Leader archives the approval for BWR circulation by the DECIG Director in the Production folder of the network drive.

7.3. Preparing for the BWR meeting

The Program Manager and DECIG Director review the comments received during BWR in a meeting with the Data Team, report authors, Topic Leaders, and Production Leader. BWR comments are categorized as general comments and economy-specific comments (comments on specific data points pertaining to an economy). General comments are circulated to the same distribution lists for the BWR prior to the BWR meeting.

7.4. Process for responding to economy-specific comments

The DECWL team responds to the economy-specific comments in a separate communication after the BWR meeting. The format is the same as the DUS responses. The Production Leader coordinates the process.

7.5. Archiving of BWR comments received

The Production Leader archives emails received with BWR comments in the Production folder of the network drive.

7.6. Data Changes After BWR

7.6.1. Process for clearing data changes after BWR

1. Data are categorized as current data (data for the current and previous year) and historical data (data for any year before the previous year). The current data are included in the BWR country tables. The current data are hereinafter referred to as “BWR data”.
2. After data are circulated for BWR, the WBL team will only make additional changes to incorporate BWR comments, if warranted, or (exceptionally) to correct errors that may be found after circulation for BWR.
3. All suggested data revisions received during the BWR process are verified by the topic teams.
4. If a topic team decides to make a change to the BWR data (“post-BWR data change”), the topic team sends an email to its Data Reviewer to provide justification and seek approval for the change, with a copy to the Data Team and Production Leader. The Data Reviewer reviews and approves the change in email, after which the Program Manager reviews and approves the change in email. Upon the Manager’s approval, the Topic Leader recalls the specific economy in DMS for the topic team to make the approved data change. The Data Team saves the request and approval emails in the network drive and logs the request and approval in the master file.
5. All changes made to the BWR data are subjected to three-layer approval again in DMS.
6. The Program Manager concurs and submits the post-BWR data changes to DECIG Director for written approval, with a copy to the Data Team and Production Leader.
7. The DECIG Director clears the post-BWR data changes by email.
8. If a topic team decides to make a change to the historical data after BWR, the topic team sends an email (Section 5.2.2.ii) to its Data Reviewer and the Program Manager to provide justification and seek approval for the change copying the Data Team and Production Leader. The Program Manager reviews and approves the change in email. Upon approval, the Topic Leader recalls the specific economy, and the topic team processes the correction and any relevant back-calculations in DMS. The Data Team saves the request and approval emails in the network drive.
9. All changes made to the historical data after BWR are subjected to three-layer approval again in DMS.

7.6.2. Email template for requesting post-BWR data changes

Following BWR, the Data Team requests from IT the reactivation of the recall function in DMS in order to allow for any data changes to be applied in the system, following the process documented in this section.

The Program Manager approves by email any changes made to the data after BWR for the topic teams to perform these changes in DMS and resubmit for the same three-layer internal approval process. Any clarification or additional documentation received by local experts to validate the data change is included, in the form of attachments, alongside the data correction in DMS.

All changes made to the BWR data will be documented with the original source of the request, including the classification of the change type to enhance traceability and monitoring of such changes. The topic team submits the following information in the email request for post-BWR data changes:

- Topic
- Economy. Changes are recorded at the economy level for 190 economies. The topic team uses one group of bullet points for one economy.
- Indicator(s). The topic team includes all indicators requiring modification for each economy.

- Explanation for the change(s)
- Number of confirmations from local experts
- Data impact
 - Current year: For example, [indicator name] changes from [score] to [score].
 - Previous year:
 - Previous year using previous year’s methodology (if applicable):
- Back-calculated until (if correction)
- Classification of the change. The topic team selects one of the following options:
 - *Adding reform compared to BWR data.* No change due to reform previously recorded in BWR data
 - *Adding correction compared to BWR data.* No change due to correction previously recorded in BWR data
 - *Modifying reform recorded in BWR data.* A change due to reform was already recorded in BWR data, but the type of reform needs to be modified, or the reform needs to be removed
 - *Modifying correction recorded in BWR data.* A change due to correction was already recorded in BWR data but needs to be modified, or the correction needs to be removed
 - *Other.* The topic team explains if none of the above classifications suits the change
- Original source requesting the request:
 - BWR comment or others: The topic team puts “BWR comment” or explains otherwise
 - BWR comment sent by: The topic team provides the sender’s email address

The topic team submits the following information in the email request for changes to historical data.

- Topic
- Economy. Changes are recorded at the economy level for 190 economies. The topic team uses one group of bullet points for each economy.
- Historical year(s)
- Indicator(s)
- Explanation for the change(s)

7.6.3. Logging post-BWR data changes in the master file

All changes made to the BWR data are logged in the master file, “Post-BWR changes” tab to ensure the traceability and monitoring of such changes.

The “Post-BWR changes” tab includes all information in Section 7.6.2 for each change. The tab is submitted to the Program Manager and DECIG Director for approval.

7.6.4. Process for preparing country tables for final publication

1. The Program Manager reviews the Coding Status report and monitors the status of the review process in DMS to ensure 100% compliance with the three-layer approval in DMS for final publication. The Data Team save the Coding Status report in the network drive.
2. Topic teams double-check that the final indicators and scores in DMS match for all economies for both the current year (including the current year using the previous year’s global variables) and the previous year. Each topic team ensures that its topic data matches. Each topic team saves its own checking file in the topic folder.
3. The Data Team communicates the date and time for which the data are final for publication. Topic teams confirm to the Data Team that DMS matches their Excel coding sheet as of 24 hours before data are final for publication. The Data Team downloads the final index from DMS after the data are final and prepares the master file for final publication.

4. The Data Team performs a thorough review and validation check for the master file. The Program Manager clears the publication version of the master file, which is circulated to the DECWL function leads, including those for the data summary for Country Directors, media, presentation, production, and Senior Management briefing.
5. The publication version of the master file is circulated with the DECWL Topic Leaders for their information. The “Post-BWR changes” tab documents the justification provided when a topic team requests to reject an economy in DMS after BWR. After the economy is rejected, no request can be made to retroactively modify the justification that was previously provided. The topic team can flag if the record in the “Post-BWR changes” tab does not match what was provided in the approved request. The final data will be circulated back to the topic teams for review.
6. The Data Team prepares two locked Excel files with final data (editable only by the Data Team): the country tables in BWR format for recirculating to the same distribution lists for the BWR (190 economies with scores), and the underlying data file used for preparing the publication version of the country tables (190 economies with scores). Both Excel files are circulated back to the topic teams, who confirm that the data in both data files match their final data in DMS.
7. The Data Team sends an email to the Program Manager, with a copy to the Production Leader, to seek concurrence on the final data to be included in the final report. They confirm that all economies for all topics have received the three-layer approval in DMS and that all topic teams have confirmed that the underlying data file used to prepare the publication version of the country tables match the final data with the three-layer approval in DMS.
8. The Program Manager concurs and submits the final data to the DECIG Director for written approval to circulate back to the BWR distribution lists, with a copy to the Data Team and Production Leader.
9. The DECIG Director clears the final data by email.
10. Upon approval, the DECIG Director recirculates the final data in the BWR format to the same distribution lists for the BWR at least two weeks prior to the publication of the report.
11. The Production Leader prepares the final reform count file (for the √ and × symbols in the publication version of the country tables) and sends it to the Data Team.
12. The Data Team prepares the publication version of the country tables in Excel based on the approved underlying data file and the final reform count file.
13. The Production Leader sends the Excel publication version of the country tables for PDF layout and circulates the PDF layout version of the country tables back to the topic teams and Data Team, who confirm that the data in the PDF layout match the data in the approved underlying file. The data for each topic is reviewed by the topic’s Data Reviewer. The Program Manager then reviews all data for major errors. The economy name, region, income group, indicator scores, and overall scores are reviewed by the Data Team and the production team.

7.6.5. Process for archiving the publication version of the master file, approval for post-BWR data changes, and approval for final data

The Production Leader archives the publication version of the master file in the Production folder of the network drive. The Production Leader archives the approval for post-BWR data changes by the DECIG Director in the Production folder of the network drive. The Production Leader archives the approval for final data by the DECIG Director in the Production folder of the network drive.

7.7. Final Clearance of Report for Publication

7.7.1. Process for preparing the final report

- The Production Leader sends the PDF layout version of each chapter to the respective authors, who review and clear that the PDF layout match with the final Word chapter.
- Upon clearance by the authors, the Production Leader sends the PDF layout chapters to WBG Publications and receives the final eBook of the report (“final report”) in PDF layout from WBG Publications.
- The Production Leader sends an email to the Program Manager, copying the Data Team and Topic Leaders, to seek concurrence on the final report, confirming that all topic teams have confirmed that the PDF layout version of the country tables matches the approved underlying data file.
- The Program Manager concurs and submits the final report to the DECIG Director for written approval for publication, with a copy to the Data Team and Production Leader.
- The DECIG Director clears the final report for publication by email.
- Upon written request of the DECIG Director, the DEC Senior VP and WBG Chief Economist decides on the final publication of the report and data.
- Upon approval, the Production Leader refers the clearance of the final report to WBG Publications. The cleared files are converted into electronic formats for dissemination, including the World Bank’s Open Knowledge Repository and eLibrary.
- The DECIG Director sends the embargoed final report to the DEC Senior VP and WBG Chief Economist and other WBG Senior Management.
- The DECIG Director sends the embargoed final report to the Executive Directors.
- If a paper copy of the final report is required, the Production Leader sends the final files to the WBG Publications print coordinator for printing.

7.7.2. Archiving approval for final report

The Production Leader archives the DECIG Director’s approval for the final report in the Production folder of the network drive.

8. CHANGES AFFECTING THE *WOMEN, BUSINESS AND THE LAW* INDEX

8.1. Conceptual Definitions

Each indicator has a methodology that is published in the data notes annexed to each *Women, Business and the Law* report and on a dedicated section of the WBL website. The methodology establishes how the data is collected, the assumptions used to ensure comparability in the data, the scoring methodology (including the scoring criteria for every component and sub-indicator, and methods of aggregation), and the definition for categorizing data changes as reforms.

WBL aims to balance two core objectives: (i) maintaining the relevance of the methodology by updating it as necessary; and (ii) preserving comparability over time by only reviewing the methodology at regular medium-term intervals.

Methodological changes occur in two phases. In the first phase, the “design phase,” the WBL team conducts thorough research and discusses the suitability of the proposed change internally. In the second phase, the

“approval phase,” the WBL team presents the suggested change to internal and external stakeholders to assess the suitability of incorporating the change to the WBL methodology.

8.2. Design Phase

It is the Topic Leader’s responsibility to design any methodological change or data update that could impact the WBL scores. At the initial stage, the Topic Leader must ensure that thorough economic and topic-specific research has been conducted to justify the change. The Topic Leader should then prepare a concept note detailing at a minimum:

- Research objectives
- Suggested changes to the previous methodology or new additions
- Implementation methods (such as desk research, new data collection, and so on)
- Timeline to implement these changes
- Final reporting instrument (report, Excel spreadsheet, presentation, and so on)

The concept note is reviewed by the WBL Manager to ensure that the changes meet the research objectives and standards of the *Women, Business and the Law* report. The concept note is also peer-reviewed by WBG staff that specialize in the thematic area. The approved concept note is shared with the DECIG Director. The DECIG Director decides whether the suggested methodological change is substantial.

Whenever feasible, the suggested change should be tested in a subset of representative economies. A specific data collection exercise can be initiated to pilot new changes.

The design phase ends when the topic team has collected sufficient data from a representative set of economies to test the new changes. At that time, the Topic Leader prepares a final report consistent with what is described in the concept note. The report is then shared with the WBL Manager for approval. Finally, the report is sent to the DECIG Director for authorization to begin the approval phase.

If the methodological change introduces a new indicator, the design phase typically lasts three years after the WBL team announced the piloting of that indicator.

8.3. Approval Phase

The note governing the approval phase defines two types of changes: (i) methodological changes and (ii) other indicator changes.

8.3.1. Methodological changes

A methodological change is any modification to the way the methodology is applied across WBL indicators from one edition to another. Methodological changes include any addition or removal of individual existing *Women, Business and the Law* indicators, changes in the weights of individual indicators in the computation of the index, or the inclusion of additional cities in the calculation of the index. For example, a methodological change could be adding an implementation question to the Pay indicators or the inclusion of a completely new indicator set on childcare services.

Methodological changes are made after consultation with relevant stakeholders and (potentially) outside experts. All methodological changes (including proposed changes) must be disclosed in the WBL report and undergo Bank-wide Review. The WBL team commits to provide sufficient advance notice to relevant stakeholders about upcoming methodological changes. They must be discussed with and approved by the DEC Senior VP and WBG Chief Economist.

8.3.2. Other indicator changes

Other changes to the indicators include data updates that need to occur on an annual basis as well as the inclusion of additional economies in the calculation of indicators. These changes can happen on an annual basis. They must be discussed with and approved by the DECIG Director.

8.4. Final Clearance Process

The WBL Program Manager concurs with methodology change(s) and sends to the DECIG Director. The DECIG Director approves the methodology change(s) and sends to the DEC Senior VP and WBG Chief Economist for decision. The final decision on whether to introduce a change or not rests ultimately with the DEC Senior VP and WBG Chief Economist.

8.5. Timeline for Implementation

Decisions regarding all changes are made by the end of April of the previous year. For example, any changes that will affect the *Women, Business and the Law* report launched in February 2023 need to be approved by the end of April 2022.

These changes are communicated to Senior Management, the Board, and country offices by May 15 of the year preceding the publication of the *Women, Business and the Law* report.

Once methodological (or other) changes have been cleared by the Chief Economist of the World Bank Group and communicated to the Bank and the Board, the WBL team will adhere to the agreed-upon process for the year. No further changes will be made.

The WBL reports published following methodological changes will include two sets of data: one based on the new methodology and another based on the methodology used in the previous issue of the report. This practice will be implemented for two subsequent issues of the report, in the case of major changes to the methodology.

9. CONFLICTS OF INTEREST, ETHICS, AND RESOURCES

This section contains a description of the Ethics and Business Conduct (EBC) Department policies, procedures, and resources as of April 2021. WBL team members are encouraged to always refer to the content on the official website,⁵ which supersedes what is stated in the WBLMG in the event of discrepancies.

9.1. Core Values and Code of Ethics

The WBG [Core Values](#)—Impact, Integrity, Respect, Teamwork, and Innovation—guide everything members of the WBG do. WBL products have a great impact on client countries and other stakeholders. Doing this work with respect and integrity is essential to building and preserving trust among clients. The WBL team strives to achieve the highest standards for responsibility, accountability, and quality of WBL products.

WBL team members should be knowledgeable of the WBG [Code of Ethics](#), which articulates the WBG Core Values and the ethical norms and behaviors that the WBG expects from staff, that each of us should expect of ourselves, from one another, and from the institution. The Code of Ethics is complementary to the WBG staff rules that are the basis for determining misconduct and disciplinary sanctions. The [Staff Manual](#) contains the Principles of Staff Employment, the staff rules, and related procedures and guidance. WBL

⁵ The EBC internal website can be accessed here:
<https://worldbankgroup.sharepoint.com/sites/wbunits/ebc/Pages/index.aspx>.

team members should refer to the Code of Ethics as a resource that will help them incorporate the Core Values in what they do and to identify and speak up about conduct and behaviors that are inconsistent with the Core Values.

WBL staff complete mandatory e-learning on the [Code of Ethics and Core Values](#) and are encouraged to complete other available training offerings by EBC, including:

- *Ethics at the WBG*: A refresher session for staff to understand and navigate the most common questions that could give rise to ethical dilemmas and concerns. There is a WBL specific training organized with EBC at the start of each data collection cycle.
- *Creating a Respectful and Harassment-Free Workplace*: A conversation with colleagues designed to help staff understand harassment versus inappropriate behavior and how each is addressed by the institution; describes resources available to support staff.

WBL team members are encouraged to refer to this document and to the EBC resources described below for guidance on how to handle potential cases of undue pressure to manipulate the data (that is, alter the data disregarding the WBL methodology) from WBG management, government officials, or any other internal or external counterpart.

9.2. Conflicts of Interest

WBL staff owe their duty exclusively to the WBG and maintain their independence by not accepting any instructions relating to the performance of their duties from any governments or other entities and persons external to the WBG.

As working on WBL research involves interacting with stakeholders with varying interests, concerns about conflict of interest can arise when WBL staff receive instructions beyond the scope of the tasks under their assignments. Staff who need guidance on concerns about conflict of interest should consult directly with their Manager or Senior Management team. They can also seek guidance from the [EBC](#) advisory team. EBC will advise on applicable WBG staff rules and policies, work together with staff to assess the conflict-of-interest risk or reputation risk to the WBG, and provide guidance on how to proceed.

9.2.1. Employment and activities outside the WBL unit

Generally, WBG staff are restricted in the degree to which they may hold outside and concurrent employment. There is less restriction on outside employment activities with nonprofit entities provided that such activities are not paid and that they take place in the staff member's own time and without using WBG resources. Outside employment by full-time staff members in for-profit entities requires the Chief Ethics Officer's approval, which is only granted in limited and exceptional circumstances.

Some WBL team members, particularly short-term consultant (STC) team members, have concurrent employment or assignments both inside and outside of DEC. All WBL staff, including staff holding an STC/STT appointment, are required to inform their Manager of all other concurrent assignments, including other WBG assignments. For more information on outside employment and activities, see [Staff Rule 3.02](#) [Employment outside the WBG] and consult with EBC.

Generally, STC staff members may hold concurrent outside employment provided:

- They are not employed by or contract with member governments or other entities to work on WBG-financed projects during their period of STC employment if the WBG-financed project and the concurrent STC work involve the same country.

- They are not an employee of another public entity, including but not limited to governments and other international organizations, unless that entity has approved its employee working at the WBG.
- They do not provide services to the WBG through a vendor.

To mitigate against conflict of interest and reputational risk to the WBG, WBL staff may not accept concurrent work assignments from other WBG units that involve providing WBL Reform Advisory work in the subject area of the staff member’s responsibility in the WBL team/unit. In particular, WBL team members may not provide information on current cycle coding status of countries’ scores or whether certain reforms will count to anyone outside of the team. WBL team members cannot advise governments directly on legal drafting of laws that impact any of the WBL indicators.

WBL staff may, with approval by the DECWL Program Manager, undertake other cross-support assignments that are not WBL Reform Advisory-related. The DECWL Program Manager is responsible for assessing potential conflicts of interest from proposed cross-support assignments.

Additionally, WBL staff may not perform services relating to WBL Reform Advisory activities that could impact the WBL data. For example, WBL team members cannot participate in projects (RAS, loan programs, and so on) whose aim is to improve the WBL index scores or rankings of an economy covered by the report (for example, by providing guidance on how to reform gender equality legislation in an economy).

A WBL staff member who receives a request from a client or other external entity to perform WBL Reform Advisory work must direct such request to his/her Manager or relevant GP. The staff member should inform the client or stakeholder via email (copying his/her Manager) that the request has been directed to the Manager or to the relevant GP.

All materials produced or acquired during WBL assignments—written, graphic, film, video recordings, or otherwise—remain the property of the WBG, and the WBG retains ownership and copyright, and the right to publish or disseminate reports, books, and documents arising from such materials in all languages. WBL staff may not personally/privately use information acquired in the performance of their assignments with DECWL unless such use has been authorized in accordance with WBG staff rules. They should consult with EBC or ECR on the policy regarding using WBG information for personal writing and publication.

9.2.2. General conflicts of interest

Many issues of professional ethics center either on conflicts of interest or interpersonal conflicts between colleagues. WBL staff members are encouraged to consult EBC for confidential consultations and guidance to ensure that their personal and professional activities are in compliance with the WBG’s staff rules and policies. Common topics EBC advises on include:

- Writing and publishing material in your personal capacity
- Public statements (WBL staff speaking on WBG activities, including on social media)
- Holding concurrent employment outside the WBG
- Employment of relatives and relationships in the workplace
- Political activities
- Financial conflicts of interest

9.3. Concerns Arising in the Workplace

9.3.1. Overview

Working on the WBL team and conducting WBL research involves interactions with many colleagues and external stakeholders, which can sometimes be complex or difficult to navigate. Creating a respectful workplace that is free of harassment is a key aspiration for the WBG. Staff members can contribute to this goal as bystanders, colleagues, and managers to address concerns raised. The WBG provides staff with comprehensive Internal Justice Services (IJS) to confidentially support the resolution of their concerns with assistance ranging from counseling to formal review and investigation of concerns to preserve fairness in the workspace. All staff, including former staff, managers, and consultants, can access IJS resources. Common concerns that may arise in the workplace include:

- Employment and performance (contracts, performance evaluation)
- Interpersonal conflict with a colleague or colleagues
- Inappropriate behavior by colleagues and external counterparts
- Violations of WBG staff rules and policies
- Suspected fraud or corruption in WBG projects and activities
- Stress and mental well-being

9.3.2. Where to go with concerns (IJS options)

IJS has created a [Decision-Making Tool](#), which helps staff identify options based on the type of issue assistance required. Staff can take any first step they are comfortable with because there is no “wrong place” to go with a concern—the contact person in any of the IJS teams can explain the different services and options for next steps. However, it is best to address and resolve workplace conflict at the lowest level and at the earliest opportunity. Staff can refer to the table below for contact information and a summary of assistance available from the IJS and related services.

9.3.3. Issues relating to employment (contracts, performance, and so on)

Administrative Review (AR) is the first step of a two-tier process available to staff requesting a review of performance management decisions, including performance evaluation, salary increase rating, placement on an Opportunity to Improve (OTI) Plan, and terms of OTI. A staff member may seek review of a performance management decision by requesting [administrative review](#) within 60 days of the decision.

For other employment decisions, actions, or inactions (such as nonrenewal of contract), staff may submit a request to [Peer Review Services \(PRS\)](#) for an independent review within 120 days of the decision, action, or inaction. If staff are concerned that an employment or performance decision has been taken in retaliation, they may also contact EBC for further guidance.

Staff may also reach out to any Staff Association Counselor. A Staff Association Counselor can be an advocate on behalf of an individual. Colleagues do not have to be a member of the Staff Association to [speak with a Staff Association Counselor](#).

9.3.4. Interpersonal conflict with a colleague or colleagues

If staff have a concern that relates to an interpersonal conflict with a colleague, they should consider raising the issue informally and directly with the colleague. If they do not feel comfortable raising the issue directly with the colleague, they can discuss the concern with their Manager or consult this FAQ on [where to start](#) to help with taking the first step in using one of the IJS offices. In general, staff prefer to start with one of the Respectful Workplace Advisors (RWA) or the Ombuds Services. They have all the information to point staff in the right direction.

Staff can also consider speaking with an RWA, a specially trained volunteer colleague who familiar with your work situations. The RWA's primary role is to be a confidential, trusted, and readily accessible resource that help staff with workplace problems when they feel uncomfortable seeking help from routine channels, such as their supervisors or HR staff, or want information about where to seek assistance.

The Ombuds unit additionally provides a confidential, impartial, and informal service independent from the WBG formal management channels that facilitates the resolution of workplace issues. An ombudsperson helps staff analyze problems and assists in identifying options and can, only if requested by the staff member, become involved in trying to resolve issues.

If staff prefer to have an independent third party mediate the concern or conflict, they can further consider Mediation Services. Mediation is an informal, confidential conflict resolution process in which an impartial third party helps two or more participants better understand their issues, interests, and needs and empowers them to bridge their difference through a voluntary agreement. Mediation is strictly confidential, both for the mediator and the participants. Participants have ultimate control and decision-making power over the outcome of the mediation.

9.3.5. Inappropriate behavior by colleagues or external counterparts

Inappropriate behavior is any behavior that is unprofessional or unwelcome that an individual finds offensive or humiliating. Inappropriate or unwelcome behavior may constitute harassment, which is a form of misconduct under WBG staff rules. For any concerns about inappropriate behavior, staff may speak to their Manager and/or contact EBC.

Managers have a special responsibility as role models to regularly communicate with staff about the Core Values and the Code of Ethics and to ensure that staff have access to resources that support staff to live by the Code. Managers are also expected to provide a safe space for those who have questions and seek clarity and those who raise good faith concerns about potential harassment, abuse of authority, or other inappropriate behavior. The WBG will make every effort to protect staff from retaliation for reporting concerns in good faith.

The Anti-Harassment Coordinator (AHC), located within EBC, is another resource available to those who are subjected to inappropriate and unwelcome behavior or feel intimidated in their work environment. Consultations with the AHC are fully confidential. The AHC can take action to address inappropriate behaviors through coaching and intervening with consultation with the offender and the offender's Manager. The AHC may also refer the matter for misconduct investigation or to another IJS-related service.

9.3.6. Violations of WBG staff rules and policies

Concerns about potential misconduct may include:

- Harassment/sexual harassment
- Abuse of authority (including pressuring a staff member to distort facts or break rules)
- Discrimination
- Actions or behavior that create a hostile work environment
- Retaliation

Staff can contact EBC if they wish to report suspected misconduct. Managers have an obligation to report suspected misconduct to EBC. All staff are strongly encouraged to report suspected misconduct to EBC. Staff may also report anonymously. WBL staff are encouraged to refer to the brochure on [Harassment, Sexual Harassment, Abuse of Power, and Discrimination](#).

EBC also investigates allegations relating to fraudulent claims for benefits, failure to meet personal legal obligations (for example, tax payments or court-ordered spousal or child support), and other violations of WBG rules and policies.

9.3.7. Suspected fraud or corruption in WBG projects and activities

All staff (including consultants) have a duty to report suspected fraud or corruption in WBG-financed projects or WBG business to the [Integrity Vice Presidency \(INT\)](#). INT handles allegations of misconduct involving WBG staff relating to misuse of WBG funds or other public funds, abuse of position, fraud, corruption, collusion, or coercion occurring in Bank Group-financed operations or in the administration of WBG business

9.4. Stress and Mental Well-Being

Workplace concerns can lead to added stress. The Mental Health and Well-Being Unit provides guidance on stress, personal, and work concerns to help staff manage stress and maintain a work-life balance. Staff who seek support to manage stress are encouraged to contact the Mental Health and Well-Being Unit for confidential counseling.

9.5. Resources for Staff

<p>Ombuds Services is a confidential, impartial and informal service that facilitates the resolution of workplace issues. It is independent from the World Bank Group’s management channels. ombudsman@worldbank.org (202) 458-1056 http://ombudsman</p> <p>Respectful Workplace Advisors (RWAs) are volunteer peers who serve as an informal and confidential sounding board and help colleagues identify options to address workplace concerns by providing information about available resources. rwa@worldbank.org (202) 458-105831 http://rwa</p> <p>Mediation Services (MEF) offers mediation, facilitation, training, and team building. MEF has 23 mediators available to support staff and to provide these services. mediation@worldbank.org (202) 458-0424 http://mediation</p> <p>Staff Association (SA) promotes and safeguards the rights, interests, and welfare of staff, and fosters a sense of common purpose among staff in promoting the aims and objectives of the World Bank Group. staffassociation@worldbank.org (202) 473-9000 or walk-in MC1-700</p> <p>Mental Health and Well-Being Unit provides guidance on stress, personal, and work concerns to help you manage stress and maintain balance in your life. HSDCounseling@worldbankgroup.org (202) 458-4457 or DAMA 5220-84457.</p>	<p>Peer Review Services (PRS) offers a confidential review of staff’s employment-related concerns before an impartial and independent panel of peers. peerreview@worldbank.org (202) 473-5884</p> <p>Performance Management Review (PMR) is the second of a two-tier streamlined administrative review of performance evaluations, SRI ratings, and OTI plans. performancemanagementreview@worldbank.org (202) 473-5884</p> <p>Administrative Review (AR) is the first step for requesting a review of a Performance Management Decision and must be exhausted before seeking PMR. adminreview@worldbankgroup.org</p> <p>The WBG Administrative Tribunal The Tribunal is an independent judicial forum staff can bring their grievances about their contract of employment or terms of appointment within 120 days of the occurrence of the event giving rise to the complaint. Staff must exhaust internal remedies before filing an application unless the complaint relates to misconduct and termination of employment, where staff may come directly to the Tribunal. Typically, this would be the date of receipt of a decision from the Bank following a recommendation from PRS. Extensions can be requested. All cases are considered by the judges. The Tribunal issues final and binding decisions.</p>	<p>Ethics and Business Conduct Dept. (EBC) For questions or advice regarding ethical issues and conflicts of interest, or if you wish to report suspected misconduct, please contact the EBC Department: ethics_helpline@worldbank.org The Ethics Helpline can be contacted confidentially and toll-free, 24 hours/ seven days a week: 800-261-7497 or: (202) 473 0279, 9:00-17:00 EST. View all information by typing http://ethics or http://EBC in your browser</p> <p>You can request EBC’s Anti-Harassment Coordinator for a confidential discussion on harassment/sexual harassment. Fill out a form at https://www.worldbank.org/en/about/unit/reporting-sexual-misconduct to report sexual misconduct anonymously, if necessary, or call the Ethics Helpline.</p> <p>Integrity Vice Presidency (INT) Colleagues concerned about fraud or corruption in WBG-financed activities can contact the Integrity Vice President (INT) http://int/. INT is an independent unit within the WBG whose core function is investigating fraud, corruption, collusion, coercion, and obstruction and pursuing sanctions related to these sanctionable offenses in WBG-financed activities.</p>
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