



ETHICS OFFICE

Continuing Success

ANNUAL REPORT 2019

CONTENTS

3
**MISSION
STATEMENT**

4
**MESSAGE
FROM THE
ETHICS ADVISOR**

6
**SECTION 1
2019 ACTIVITIES
AND OPERATIONS**

11
**SECTION 2
TRAINING
AND OUTREACH**

16
**SECTION 3
MAJOR
DEVELOPMENT**

18
**SECTION 4
GOING
FORWARD**

20
**THE FUND'S
CORE VALUES**



MISSION STATEMENT

The Ethics Office provides independent ethics advice to the Fund and its staff and promotes ethical awareness through outreach and training.

The office is headed by the Ethics Advisor who reports directly to the Managing Director under a limited term appointment not to exceed six years.

MESSAGE FROM THE ETHICS ADVISOR: Continuing Success

My arrival in October 2015 marked a new phase for the Ethics Office: to focus on advice, training and outreach to promote the Fund's ethics standards—relinquishing an investigative mandate. The change enhanced the efficiency of the advisory function through greater specialization. Over the past four years, the Office has experienced a constant increase in requests for advisory services as compared to previous reporting periods. I believe this upward trend can be directly attributed to heightened awareness of the value of the Ethics Office's robust training and outreach program. This positive trend reflects a continuation of the successful implementation of the Ethics Office's mandate to focus on advisory services in support of managers and employees.

Taking stock of our accomplishments over the past year, the most significant was the introduction of the Fund's revised retaliation policy. The Ethics Office advocated for and worked with the other offices of the Dispute Resolution System to conduct a review of the Fund's retaliation policy with a view towards strengthening the overall policy framework for how retaliation concerns are addressed within the organization. The revised policy was introduced in February 2019 following consultations with key stakeholders and an extensive benchmarking exercise against current policies at comparable international organizations.

Another major accomplishment would be launching the current Mandatory Ethics Training cycle in March 2019. During this cycle nearly 2,700 headquarters-based staff, contractual employees and managers have received training, including the Managing Director and all Deputy Managing Directors: representing a completion rate of more than 80 percent. With the third cycle of Mandatory Ethics Training for all Fund employees at headquarters nearly complete, the Ethics Office will deliver similar training this year to our colleagues in the field. The Office also received a request from the Offices of the Executive Board of the Fund to deliver ethics training to the Executive Directors, Alternates, Advisors and staff on issues relating to their Code of Conduct.

The Ethics Office continued other outreach activities such as presenting at the First Day Briefing for new staff, attending senior departmental staff meetings and briefing Resident Representatives in preparation for their assignments in the field. The Office was also privileged to chair the 11th Annual Meeting of the Ethics Network of Multilateral Organizations. In addition, the Ethics Office continued its collaboration with the University of Cergy-Pontoise School of Law by hosting students from the law and business ethics program.

Looking forward to 2020, the Ethics Office will launch the next cycle of Preventing Workplace Harassment training program for all Fund employees.

I want to thank the Managing Director and the senior management team for their support for ethics at the Fund over the past year.

The Ethics Office team looks forward to working with all of you in the coming year.

Olivia N. Graham
Ethics Advisor
International Monetary Fund



Ms. Graham joined the Fund on October 26, 2015. She has a long and distinguished career in ethics, with over 25 years of experience in international settings, including at the World Bank and the United Nations World Food Program. Prior to her appointment with the Fund, she was Director of Ethics for the International Fund for Agricultural Development in Rome, Italy.

SECTION 1

2019 ACTIVITIES AND OPERATIONS

Categories of Advice	7
Caseload: Advice	8
Advisory Cases—2019	9

The following section provides 2019 data illustrating the range of ethics issues on which the Ethics Office was contacted directly for advice. All the matters brought to the attention of the Ethics Office were responded to and resolved through advisory consultations or referrals to other appropriate offices within the Fund.

The tables and charts in this section assist the Ethics Office and Management in identifying issues that may require targeted attention. The tables for Advice by Category show a review of data from 2017, 2018 and 2019 to demonstrate overall trends since the 2016 change in the mandate of the Ethics Office. The Ethics Office has fully implemented the mandate to focus on advice, training and outreach to promote the Fund's ethics standards. A review of the information below provides helpful indicators of how programs designed to develop greater awareness of and adherence to the Fund's ethical standards are being used, as well as indicators of their effectiveness.

CATEGORIES OF ADVICE



CONFLICTS OF INTEREST

Obligations as an International Civil Servant

Financial Conflicts of Interest

Personal Conflicts of Interest

Gifts

Political Activities

Post-Fund Employment

External Activities



EXTERNAL COMPLIANCE

Household Obligations
(e.g. G4/G5, taxes and domestic relations disputes)



RESOURCES & INFORMATION

Publications and Public Statements

Misuse of Resources and Non-Public Information



WORKPLACE FAIRNESS

Discrimination

Harassment

Retaliation

Unfair Preferential Treatment/Bias

CASELOAD: ADVICE

The Advice categories correspond to the twelve Key Ethics Issues of primary concern to the Fund. Detailed guidance on these issues, as well as on other ethics issues, can be found on the Ethics Office website under “Key Ethics Issues.”

The information provided on the Ethics Office website includes links to relevant provisions of the Fund’s Code of Conduct, GAOs, and Staff Handbook, as well as helpful intranet articles and other resources.

KEY ETHICS ISSUES



Obligations as an International Civil Servant



External Activities



Discrimination



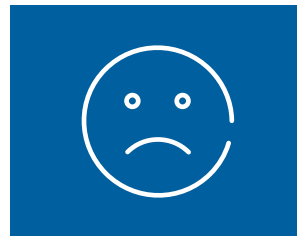
Publications and Press Statements



Gifts



Financial Conflicts of Interest



Harassment



Misuse of Resources and Non-Public Info



Personal Conflicts of Interest



Political Activities



Post-Fund Employment



Household Obligations

ADVISORY CASES—2019

In 2019, the Ethics Office responded to 507 requests for advice. The total number of cases during the year increased by 38 (eight percent) as compared to 2018. This may indicate staff are more aware of potential ethics issues, in addition to their knowledge of the Ethics Office as a resource based on outreach activities.

There was an overall decrease in requests for advice involving Workplace Fairness issues from 96 in 2018 to 84 in 2019 (12.5 percent). During the reporting period, concerns relating to Discrimination significantly increased from one to five (80 percent); however, the other areas remained constant or decreased. Specifically, requests pertaining to Retaliation declined from three to one (67 percent) and requests for advice involving Harassment decreased by 21 percent to 52 [34 hostile work environment; 12 bullying; two mobbing; two sexual harassment; and two abuse of authority] from 66 in 2018. Requests involving Unfair Preferential Treatment/Bias remained the same: 26.

Of note, the number of requests for advice about Harassment trended downward for the first time over the past several years [16 in 2015, 22 in 2016, 41 in 2017, 66 in 2018, and 52 in 2019]. A major factor that may be contributing to this positive trend are the resources the organization has put forth to help employees to not only identify instances of workplace conflict and harassment, but also training about how to respond to and resolve these concerns.

There was an increase in requests for advice about External Compliance as compared to 2018: from 12 to 17 (42 percent). This increase can probably be attributed to the introduction of the current cycle of Mandatory Ethics

Training, which highlights the importance of taking care to ensure full compliance with Household Obligations such as taxes, G5 Visa domestic employee issues, and domestic relations disputes.

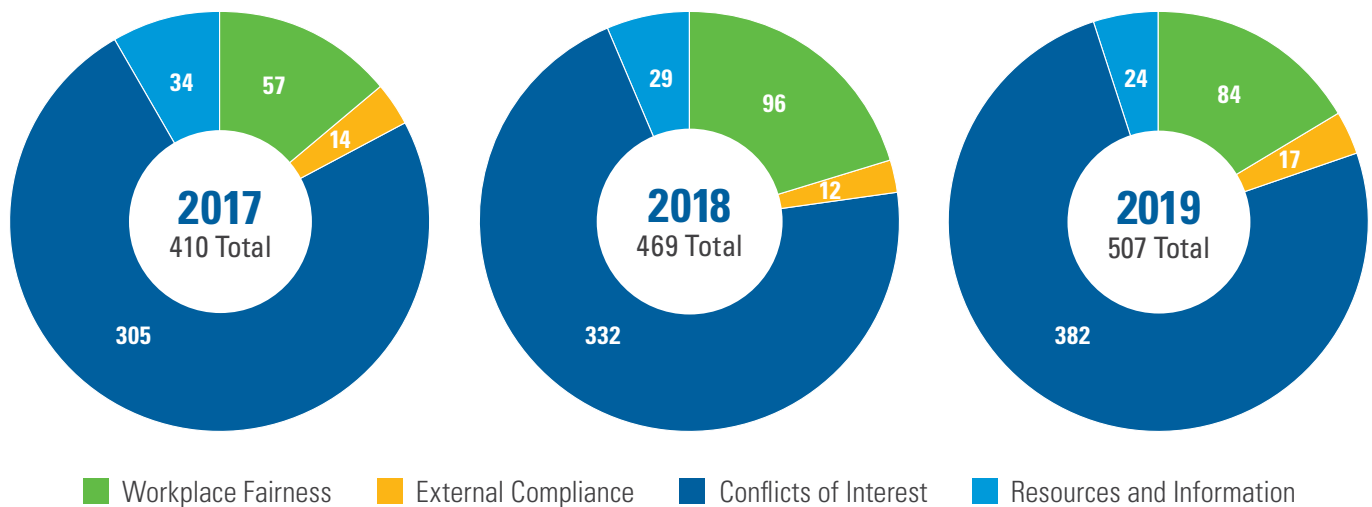
In the area of Resources and Information, there was an overall decrease in requests for advice from 29 in 2018 to 24 (17 percent). However, on closer review, requests pertaining to the Misuse of Resources and Non-Public Information decreased from 18 to eight (55.5 percent) and advice about Publications and Public Statements increased to 16 as compared to 11 in 2018 (45 percent). The changes in these metrics can likely be directly attributed to the training and outreach activities undertaken by the Ethics Office to specifically address these issues.

Generally, Conflicts of Interest advice remains a substantial part of the Ethics Office's work and is crucial to safeguarding the Fund's reputation for integrity. In 2019, there was a 15 percent increase (332 in 2018 as compared to 382 in 2019) in requests for advice about Conflicts of Interest. In this category, there was a significant increase in requests for advice on issues involving Obligations as an International Civil Servant from 21 to 46 (119 percent). The Ethics Office also saw a large increase in requests for advice about Gifts in 2019, there were 60 requests for advice as compared to 40 in 2018 (50 percent). This may be a direct result of training and outreach activities. Requests for guidance on External Activities (which included requests for leave without pay) remained constant.

In general, requests for advice and guidance in all other areas remained essentially at the same levels as the two previous reporting periods.

ADVICE BY CATEGORY	2017	2018	2019
Obligations as an International Civil Servant	27	21	46
Financial Conflicts of Interest	22	20	23
Personal Conflicts of Interest	16	19	21
Gifts	29	40	64
Political Activities	6	4	6
Post-Fund Employment	9	16	17
External Activities	196	212	205
Publications and Public Statements	18	11	16
Misuse of Resources and Non-Public Information	16	18	8
Discrimination	6	1	5
Harassment	41	66	52
Household Obligations	14	12	17
Retaliation	3	3	1
Unfair Preferential Treatment/Bias	7	26	26
TOTAL	410	469	507

ADVISORY MATTERS BY TOPIC GROUP



SECTION 2

TRAINING AND OUTREACH

Training	11
Outreach	13

TRAINING



Mandatory Ethics Training. In 2011, management authorized Mandatory Ethics Training for all Fund employees for the first time. The training was implemented Fund-wide beginning in 2012 and is required to be completed every three years. The current Mandatory Ethics Training cycle was launched in March 2019 and nearly 2,700 headquarters-based staff, contractual employees and managers have received training, including the Managing Director and all Deputy Managing Directors: representing a completion rate of 83 percent. The training will continue in order to achieve the maximum goal.

Ethics training is an invaluable educational exercise to raise awareness not only of the Fund’s core values, ethics rules and related policies, but also to raise awareness of resources available to assist staff facing a problem in the workplace. The current training focuses on identifying and resolving different types of conflicts of interest, such as external activities, gifts, post-Fund employment; the appropriate use of social media, and the importance of copyright compliance. The training also focuses on discrimination and retaliation—providing frameworks to address specific aspects of workplace fairness facing Fund employees.



Peers for a Respectful Workplace. In 2019, the Ethics Office worked with the Mediator and other Fund offices to help continue to expand the Peers for a Respectful Workplace (PRW) Program across the Fund. The Program provides an informal, confidential, trustworthy and readily available source of early assistance for staff with questions or concerns about stressful or difficult workplace issues, or who want information about dispute resolution options available at the Fund. In November 2019, the Ethics Office participated in training for new PRWs on ethics issues.

Other Training. In partnership with the Headquarters Security Team, the Ethics Office presented two 90-minute training sessions addressing sexual harassment in the workplace as part of Women’s Security Awareness Training. The training provided an overview of the Fund’s harassment policy and, utilizing an interactive polling tool, reviewed a series of scenarios that prompted a discussion about resolution options.

OUTREACH

University of Cergy-Pontoise School of Law.

In June 2019, the Ethics Office hosted 36 students from the law and business ethics program of the University of Cergy-Pontoise School of Law—a high profile program aimed at students graduating and trained to become Ethics and Compliance Officers. Since the creation of the program in 2008, the Fund has hosted students during their learning trip to Washington, D.C. This year, the visit included an in-depth ethics discussion, a presentation by Mr. Raphael Anspach [Senior Communications Officer] about the history and work of the Fund, and a tour of the Managing Director's office, with remarks by the Managing Director.





Ethics Office Open House. The Ethics Office hosted its seventh annual "I ♥ Ethics" open house gathering in 2019. This annual event allows interested staff to learn more about the role of the Office, test their knowledge of the Fund's ethics rules, and challenge the Ethics Office staff by asking their own questions.



Ethics Network of Multilateral Organizations.

The Fund chaired the 11th Annual Meeting of the Ethics Network of Multilateral Organizations (ENMO), conducted at the European Patent Office in Munich, Germany in July 2019. Membership in ENMO is institutional and comprised of the most senior ethics officers or representatives with the main responsibility for ethics functions in the international financial institutions (Bretton Woods), the United Nations family of organizations and other multilateral and intergovernmental organizations institutionally related to the UN.



Other Outreach. During the year, the Ethics Office continued other outreach activities such as presenting at the First Day Briefing for new staff, attending senior departmental staff meetings and briefing Resident Representatives in preparation for their assignments in the field. In addition, the Office presented at the quarterly mandatory G4/G5 Orientation sessions conducted in partnership with the World Bank Group.

The Ethics Office will continue to be available for department-specific training requests and other outreach activities.

SECTION 3

MAJOR DEVELOPMENT

Revised Retaliation Policy 16

REVISED RETALIATION POLICY

The Ethics Office advocated for and worked with the other offices of the Dispute Resolution System to conduct a review of the Fund's retaliation policy with a view towards strengthening the overall policy framework for how retaliation concerns are addressed within the organization.

The revised policy was introduced in February 2019 following consultations with key stakeholders and an extensive benchmarking exercise against current policies at comparable international organizations.



It accomplishes three main goals:

- Clarifies the scope and applicability of the policy;
- Introduces a clear definition of retaliation and the protected activities to which it relates (e.g., raising an ethics concern in good faith through any of the established reporting mechanisms); and,
- Introduces a framework that includes an expedited review process to address complaints of retaliation, including a new type of administrative leave with pay as an interim protective measure available in appropriate cases.

SECTION 4

GOING FORWARD

Preventing Workplace Harassment Training for all Employees, Part II	18
Mandatory Ethics Training for Colleagues in the Field	19
Ethics Training for Members of the Executive Board	19

Priority activities for 2020 will include the following:

PREVENTING WORKPLACE HARASSMENT TRAINING FOR ALL EMPLOYEES, PART II

An e-learning tool is being developed to provide the next cycle of Preventing Workplace Harassment Training for all Fund employees. First mandated by the Managing Director in 2018, the training program will be launched through the Fund's Learning Portal in early 2020. This module, similar to the first, is being developed in accordance with the Fund's harassment policy to provide training on issues related to the different forms of harassment, to increase awareness of these issues, and to promote a work environment and a climate of trust and tolerance, free of all forms of harassment.

MANDATORY ETHICS TRAINING FOR COLLEAGUES IN THE FIELD

With the third cycle of Mandatory Ethics Training for all Fund employees at headquarters nearly complete, the Ethics Office will deliver similar training to our colleagues in the field. Overseas training is expected to be carried out through a combination of in-person and electronic training options.

ETHICS TRAINING FOR MEMBERS OF THE EXECUTIVE BOARD

At the request of the Offices of the Executive Board, the Ethics Office will deliver ethics training to the Executive Directors, Alternates, Advisors and staff. This training will focus on issues relating to their Code of Conduct.

INTEGRITY

We do what is right for our members, our communities, the Fund, and each other. We make hard decisions and tough choices. We do not compromise our values.

RESPECT

We treat our colleagues, whether supervisors, peers, or subordinates, with courtesy and respect, without harassment, or physical or verbal abuse.

IMPARTIALITY

We are objective, neutral, and impartial in providing advice and in discharging our professional obligations. Our professional judgment is not influenced by partisan politics, outside authorities or personal bias. We are responsible to our members and earn their trust and confidence every day.

HONESTY

We tell the truth. We are straightforward in our actions and honest in our relationships. When we say we will do something, we follow through and honor our commitments.

INCLUSION

We value diversity. We build diverse professional networks and teams fostering an engaging and inclusive environment that values individual uniqueness. We treat people as we would like to be treated. We respect each other and do not tolerate discrimination.

EXCELLENCE

We strive for excellence in our work and in all our interactions with our member countries and all stakeholders of the Fund. We work together to the highest professional standards for the common public good of our global membership.

THE FUND'S CORE VALUES

Information disclosed by staff to the Ethics Office will be handled confidentially unless it involves possible past misconduct or raises a potential threat of physical harm. In such cases, information may be disclosed to other IMF officials on a need-to-know basis.

If you have an ethics question, please contact the office at ext. 39665, visit our office in HQ2 4A-152 or send us an email at ethics@IMF.org. You may also seek advice or report concerns about potential misconduct to the Ethics Office anonymously via the Integrity Hotline at 1-800-548-5384 or www.integrity-helpline.com/IMF.jsp.

