



ETHICS OFFICE

# Providing a Safe Space

ANNUAL REPORT 2021



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## 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.

# JOINT MESSAGE FROM LAURA NELSON AND URSULA WELLEN

The 2021 Annual Report of the Ethics Office of the International Monetary Fund is entitled, "Providing a Safe Space."

Over a year in which the work environment has been remote, hybrid, and then remote again, the Ethics Office adapted to these changes, providing Fund management and staff reliable and timely advice and guidance flexibly, in whatever format or time zone. With virtual meetings no longer a novelty, we connected with colleagues, whether working remotely away from HQ or overseas, through phone, Webex and Teams calls and meetings. We also worked to adapt training and outreach efforts from in-person to online to hybrid.

The Ethics Office strengthened connections with all colleagues with two significant firsts: the online Positive Workplace training course offered through Workday; and the introduction of the significantly expanded Ethical Conduct and Core Values Certification, now administered by the Ethics Office. For the first time employees in overseas offices were included in both of these initiatives, and HQ-based, long-term contractuals for the first time were included in the Certification exercise. Both initiatives, which are discussed in more detail in this report, aim to ensure a consistency of expectations and obligations. In this way, they help create a safe space for our working together for the Fund. They also underscore the guiding belief, as set forth in the Ethics Office 2020 Annual Report, that what we do in our work for the Fund is as important as how we do it.

Yet, what we are most proud of has been our work to ensure that all who come to the Ethics Office feel safe and able to trust us with their questions and concerns, as we believe is reflected in the Advisory Cases brought to the Ethics Office in 2021. Moving into a hybrid work environment, we remain committed not only to continue to offer a safe

space in whatever format or time zone. We also are committed to being proactive in anticipating and addressing potential concerns, including regarding equal treatment and non-discrimination, and the (re)integration of colleagues, as we return in person to Fund offices.

In late November 2021, the Managing Director announced the appointment of Ursula Wellen as the new Ethics Advisor, effective beginning of January 2022. Colleagues in the Ethics Office reached out and welcomed the new Ethics Advisor, thereby putting her in a position to work closely with the Working Group on Institutional Governance and Staff Voice and the External Review Panel to strengthen the Dispute Resolution and Ethics System at the Fund. The Ethics Office is also preparing for and piloting the launch of the next cycle of Mandatory Ethics Training, which is required every three years for all Fund staff and long-term contractual employees, including overseas employees; and the redesign of our website to better meet the needs of employees in the hybrid work environment and beyond.

On behalf of the Ethics Office, we would like to thank the Managing Director and senior management team for their commitment to ethics at the Fund. While Laura Nelson also would like to thank the Managing Director for the opportunity to serve as Acting Ethics Advisor for more than 15 months, the Ethics Office team would in turn like to thank Laura

for her outstanding commitment and dedication to the mandate and work of the Ethics Office, as reflected in this annual report.

The Ethics Office team looks forward to continuing to work with all of you throughout 2022 and beyond.



**URSULA WELLEN**

Ethics Advisor (since January 2022)



**LAURA S. NELSON**

Acting Ethics Advisor (January to December 2021)





**RAJNA NIKOLOVSKA**  
[In Memoriam](#)



# SECTION 1 2021 ACTIVITIES AND OPERATIONS

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The following section provides 2021 data illustrating the range of ethics issues on which the Ethics Office was contacted directly for advice. 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 are intended to assist the Ethics Office and management in identifying trends or issues that may require response or attention.

## 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 AND INFORMATION**

Publications and Public Statements

Misuse of Resources and Non-Public Information



### **WORKPLACE FAIRNESS**

Discrimination

Harassment

Retaliation

Unfair Preferential Treatment/Bias

## CASELOAD: ADVICE

These Advice categories correspond to Key Ethics Issues identified by the Ethics Office. Information about 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 N-Rules, Code of Conduct, GAOs, and Staff Handbook, as well as helpful intranet articles and other resources.

### 12 KEY ETHICS ISSUES



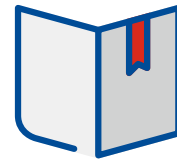
Obligations as an  
International Civil Servant



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—2021

In 2021, the Ethics Office responded to 332 requests for advice. This number represents a decrease of 31 percent in the total number of cases during the year, as compared to the 481 requests received in 2020. This presents a change from the level number of cases in 2020, after a several year period of increasing numbers of cases, as can be seen in the tables for Advice by Category, showing data from 2017, 2018, 2019, 2020 and 2021, since the 2016 change in the mandate of the Ethics Office away from an investigative function.

We believe this decrease is an outlier, possibly affected by two concurrent considerations. First, the Ethics Office launched two major programs in 2021, which are discussed in Section 3 of this report - the online Positive Workplace course and the Annual Ethical Conduct and Core Values Certification, which was a wholly new work area for the Ethics Office. Relating to these two programs, the Ethics Office responded to 247 distinct matters of varying complexity. Indeed, considering the 247 new program-related queries with the 332 advisory matters, the total number of cases responded to by the Ethics Office within the year is 579. The focus of the Ethics Office on these programs involved extensive outreach efforts specific to the programs, and that may have led to fewer requests for advisory services, as other outreach was necessarily impacted. Second, we believe the decrease in advisory cases must be considered in light of the evolving role of the Ethics Office for both years 2020 and 2021, due to the global Covid-19 pandemic. The change for Fund employees in the working status quo from

in-person to fully remote to hybrid to remote again, provides a lens through which data may be viewed to more fully understand the changes experienced. In addition, this data also may benefit from consideration in the broader context of the caseload of other Dispute Resolution Offices in 2020 and 2021.



**332**  
Advisory Matters



**247**  
New Program Queries



**579**  
Total Cases

There was a slight decrease in the overall number of requests for advice involving Workplace Fairness issues, from 35 in 2020 to 27 (a 23 percent decrease). Of this number, concerns relating to Discrimination increased from four in 2020 to five in 2021 (a 20 percent increase), and those pertaining to Retaliation increased significantly from one to three; while requests involving Harassment decreased from 21 to 16 (a 24 percent decrease), and those involving Unfair Preferential Treatment/Bias decreased significantly from nine to four (a 65 percent decrease). Prior reports of this

office have addressed trends regarding Workplace Fairness and noted that a contributing factor to fewer requests for advice may be related to the substantial resources and commitment the Fund has put forth to help employees identify instances of workplace conflict and harassment. We recognize that that factor may continue to be relevant at the same time that questions about the Fund's resources and commitment were under review in 2021. Although the results of that review will not be available until 2022, the Ethics Office looks forward to working to ensure the workplace at the Fund is a positive workplace, building on its Positive Workplace Training (discussed in Sections 2 and 3 of this Report).

Generally, Conflicts of Interest advice remains the bulk of the Ethics Office's work, at 86 percent of the matters coming into the Office directly, with 287. As the overall number of requests for guidance decreased from 2020 to 2021 by 32 percent, the number of matters involving Conflicts of Interest decreased similarly, from 413 in 2020 compared to 287 in 2021 (a 30 percent decrease). In this category, there was a similar decrease in requests for advice on issues involving External Activities, from 287 to 194 (32 percent); greater decreases for Obligations as an International Civil Servant, from 26 in 2020 to 10 in 2021 (62 percent), Post-Fund Employment, from 18 in 2020 to six in 2021 (67 percent), and

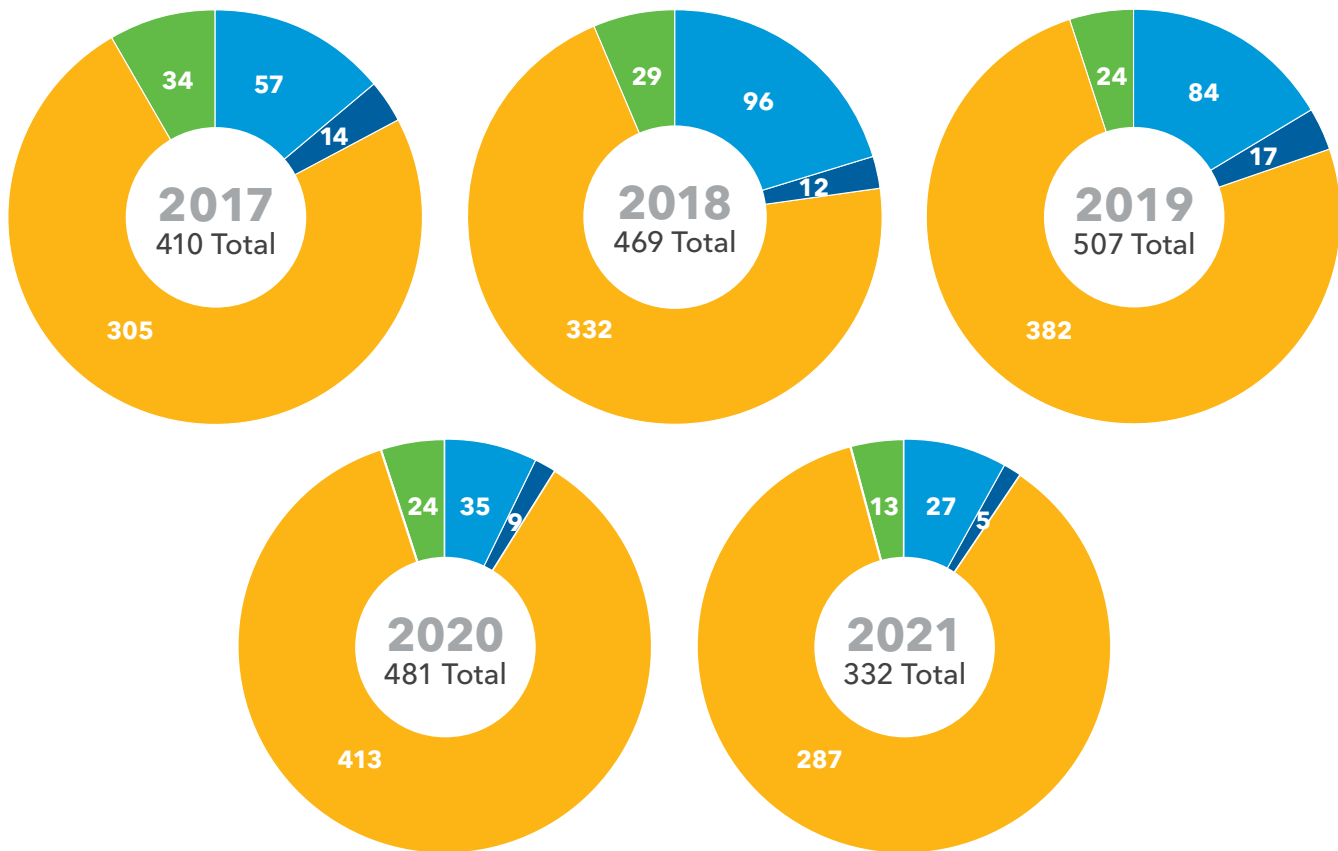
Political Activities, from nine in 2020 to two in 2021 (a 78 percent decrease); and a less marked decrease in Financial Conflicts of Interest, from 48 to 39 (19 percent). Numbers of requests for advice relating to Conflicts of Interest rose in other areas, as regarding Personal Conflicts of Interest, which saw an increase from 11 requests to 13 (8 percent); and Gifts, from 14 requests to 23 (39 percent).

At the same time, requests for advice about External Compliance, which includes Household Obligations, decreased as compared to 2020, from nine to five in 2021 (44 percent). In the area of Resources and Information, requests for advice stayed the same year on year at nine for Resources and Non-Public Information, while there was a decrease from 15 in 2020 to 4 in 2021, for Publications and Public Statements.

As previously addressed, changes in the number and type of requests may be related to various factors, including the focus of the Ethics Office on its two major programmatic developments during 2021 – the online Positive Workplace course and the Ethical Conduct and Core Values Certification – as well as the change in the working environment of Fund staff over the past two years, due to the global pandemic. Thus, changes in the number and types of requests bear further consideration.

<b>ADVICE BY CATEGORY</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
Obligations as an International Civil Servant	27	21	46	26	10
Financial Conflicts of Interest	22	20	23	48	39
Personal Conflicts of Interest	16	19	21	11	13
Gifts	29	40	64	14	23
Political Activities	6	4	6	9	2
Post-Fund Employment	9	16	17	18	6
External Activities	196	212	205	287	194
Publications & Public Statements	18	11	16	15	4
Misuse of Resources & Non-Public Information	16	18	8	9	9
Discrimination	6	1	5	4	5
Harassment	41	66	52	21	15
Household Obligations	14	12	17	9	5
Retaliation	3	3	1	1	3
Unfair Preferential Treatment/Bias	7	26	26	9	4
<b>TOTAL</b>	<b>410</b>	<b>469</b>	<b>507</b>	<b>481</b>	<b>332</b>

## ADVISORY MATTERS BY TOPIC GROUPS 2017–2021



■ Workplace Fairness   
 ■ External Compliance   
 ■ Conflicts of Interest   
 ■ Resources and Information



## SECTION 2

# TRAINING AND OUTREACH

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The following section addresses Training and Outreach activities of the Ethics Office for 2021. While the operating status of HQ continued to impact in-person training and outreach plans, the Ethics Office embarked on reconsidering and redesigning its training and outreach efforts to meet the needs of the changing work environment. In addition, the Ethics Office launched major programs involving Training and Outreach: the online Positive Workplace course and the new Ethical Conduct and Core Values Certification. The Ethics Office remained committed to the value of training to raise awareness not only of Fund rules but also of Fund resources available to employees; and the value of outreach to share information and promote an ethics perspective both within the Fund and outside it.

## TRAINING

The Ethics Office reached approximately 4,000 employees through its online Positive Workplace course in 2021. Comprising the next cycle of Preventing Workplace Harassment Training, which was first mandated in 2018, the refreshed training provides an important opportunity to increase awareness of issues surrounding harassment, including sexual harassment, discrimination and retaliation. Of equal importance, the course explores the role all Fund employees have to promote a workplace free from such negative behaviors, including additional obligations for managers. A detailed discussion of this initiative is in Section 3 of this report.


Augmenting the online Positive Workplace course, the Ethics Office developed targeted training for managers and supervisors for a departmental senior staff retreat. With the baseline for discussion established by the online course, the training focused on responsibilities of managers and supervisors to model appropriate behavior as well as to address behavior inconsistent with the Fund's policies and Core Values supporting a positive workplace. The training was delivered in a hybrid setting and featured interactive discussions for those at HQ and those participating virtually, including on how to have challenging conversations about the workplace environment and keeping open to such conversations and concerns.



## OUTREACH

During the year, the Ethics Office continued internal outreach activities both virtually and in a hybrid format, including addressing the mandatory online Positive Workplace training and new Ethical Conduct and Core Values Certification through a Fundall, individual email communication and at a monthly SHRP breakfast meeting. Other outreach highlights included contributing to training for new Peers for a Respectful Workplace, and briefing Resident Representatives in preparation for their assignments in the field. In addition, the Office spearheaded publication of an updated version of the Fund-wide brochure on the Dispute Resolution and Ethics System Offices. The Office also participated in a virtual Townhall organized by SAC with other Offices comprising the Dispute Resolution and Ethics System at the Fund. The Ethics Office worked as well as a partner across the Fund, including as a member of the Domestic Violence Prevention Program, the Integrity Hotline Oversight Committee, and the EU Pillars Working Group.

The Ethics Office engaged in external outreach activities, including collaboration with Ethics colleagues at other multi-lateral organizations with offices in the Washington, D.C. area and globally, through the Ethics Network of Multilateral Organizations (ENMO). The Ethics Office also represented the Fund as a member of the Chief Executive Board (CEB) Task Force on Addressing Sexual Harassment within Organizations of the United Nations System.



**SAC Invites You**  
to meet representatives from the  
**Fund Dispute Resolution System (DRS)**

Get acquainted with the Dispute Resolution System, its workings,  
& how the DRS Officers & Advisors can help you resolve issues.

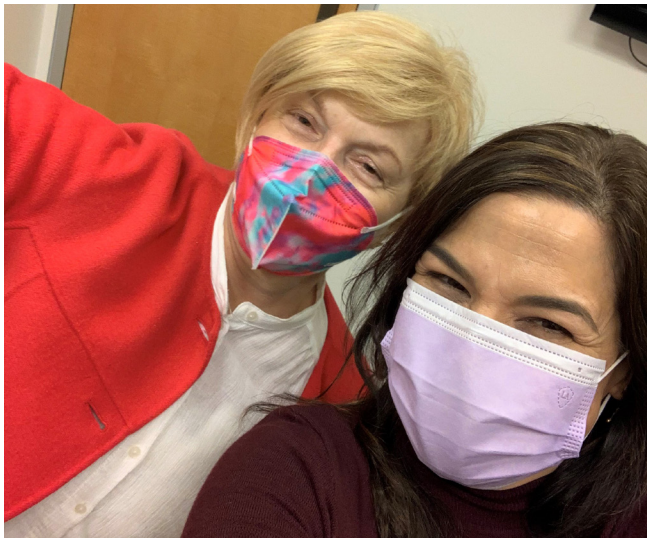
Ask questions through email (IMFSAC@imf.org) ahead of the meeting,  
Or use the chat publicly or privately (to the Host only)

**WHEN** | **Thursday,**  
**November 18<sup>th</sup>**  
**at 2PM**

**Moderator:** Martine Rossignol, SAC  
**Speakers:** John Barkat, Mediator  
Sabina Blaskovic, Internal Investigator  
Martin Endicott, HRD, Administrative Review  
Celia Goldman, Administrative Tribunal  
Laura Nelson, Acting Ethics Advisor  
Elliot Shaller, Grievance Committee Chair  
Thomas Zgambo, Ombudsperson

**Webex Link**  
**Here**

**Ethics Office Open House** The Ethics Office postponed its ninth annual “I ♥ Ethics” Open House gathering from its typical February timeframe, with the plan of holding it in person later in the year, upon what was anticipated to be HQ’s reopening. Looked forward to Fund-wide, 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 questions of their own. While the postponed event ultimately was not able to be held in person, due to the operating status of HQ, the Office looks forward to hosting the “I ♥ Ethics” Open House in 2022.



## SECTION 3 MAJOR DEVELOPMENTS

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### PREVENTING WORKPLACE HARASSMENT TRAINING FOR ALL EMPLOYEES, PART II

Working closely with ITD, an e-learning course was launched through the Fund’s Workday Learning Portal to provide the next cycle of Preventing Workplace Harassment Training for all Fund staff and contractual employees holding contracts of more than a year, at headquarters and overseas. The module, titled “Positive Workplace,” was developed in accordance with the Fund’s harassment policy to provide training on and increase awareness of issues related to the different forms of harassment, including sexual harassment, bullying, mobbing, intimidation and abuse of power. It also emphasized the role all Fund staff share, and the special role and obligations of Fund managers, to foster a positive work environment and climate of trust and tolerance, free of all forms of harassment, discrimination and retaliation. First launched in 2018, the refreshed course was piloted in consultation with the Staff Association Committee, other Dispute Resolution Offices, and counterparts in LEG and HRD. For the first time, the course was offered to employees in overseas offices as well as HQ, and reached approximately 4,000 employees.


It featured a video introduction by the Managing Director and virtual and hybrid workplace scenarios. Course scenarios also reflected timely concerns around bias and discrimination based on race and nationality. “Positive Workplace” is a mandatory training requirement for all new staff and long-term contractual employees. Additional work of the Ethics Office surrounding this training included responding to queries regarding the course and its content, as well as significant outreach about the course, as reflected in Sections 1 and 2 of this report.

In addition to the Positive Workplace training, and in consultation with the Director of the Human Resources Department, the Ethics Office worked to restart a reporting and monitoring program including how harassment concerns were reported within the Fund and how they were addressed for the calendar year 2021. As this review was not yet complete as of the end of 2021, the Ethics Office will take stock in 2022 to consider the results, possibly leading to recommendations to address workplace conflict and harassment, including policy, resource, and awareness/perception issues.



## **POSITIVE WORKPLACE**

Preventing Harassment

If you are taking this course without speakers or audio otherwise, please use the closed captioning  feature at the bottom of the screen.

## ETHICAL CONDUCT AND CORE VALUES CERTIFICATION

The Ethics Office launched the new Code of Ethical Conduct and Core Values Certification through the Fund's Workday Portal. All Fund staff and contractual employees holding contracts of more than a year, at headquarters and overseas, are required to certify that they have read and are in compliance with the Fund's rules on staff conduct. These rules comprise the Fund's Standards of Conduct, including the Framework on Financial Disclosure and Financial Conflict of Interest, the N-Rules, and the Fund's Code of Conduct. In addition, employees must certify that they have read and will act in accordance with the Fund's Core Values. The Ethics Office developed the Ethical Conduct Certification in consultation with colleagues in HRD, LEG and OII, and worked closely

with colleagues in ITD and HRD on its launch. The Ethical Conduct Certification significantly expanded and replaced the annual Certification on Financial Conflicts of Interest, which was more limited in focus and only required of Fund staff. Thus, the Ethical Conduct Certification is the first time contractual employees at HQ and overseas, who hold contracts of more than a year, are included within the requirement. The Ethical Certification is a mandatory requirement for all new employees within these categories. As addressed in Sections 1 and 2 of this report, the Ethics Office responded to queries and issues regarding the Ethical Conduct Certification and engaged in substantial outreach about this new requirement.



## SECTION 4

# GOING FORWARD

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### CHANGE IN LEADERSHIP AND RENEWED DIRECTIONS

In late November 2021, the Managing Director announced the appointment of Ursula Wellen as the new Ethics Advisor, effective beginning of January 2022. A link to the announcement message with Ms. Wellen’s professional background can be found here: [Appointment of Ursula Wellen as the Fund’s Ethics Advisor and Head of the Ethics Office \(IMF.org\)](#)

With the change in leadership, the Ethics Office is reassessing its priority activities for 2022 and beyond, which will include the following:

### MANDATORY ETHICS TRAINING

In 2011, management authorized Mandatory Ethics Training for all Fund employees, to be taken every three years for HQ-based and overseas employees. The fourth cycle of Mandatory Ethics Training cycle will be launched in 2022. The Ethics Office is currently reviewing the Mandatory Ethics Training, to adjust it to the hybrid work environment, in terms of training format, logistics, and topics of focus, and anticipates collaborating across offices and departments in this regard.



## ETHICS WEBSITE REDESIGN

The Ethics Office website is a key resource for ethics information at the Fund. A redesign of the website is expected to include not only updated information but new content and functionality to better engage employees and serve a hybrid work environment. A new “Ethical Conduct Certification” tab will encompass FAQs, links and access to the Ethical Conduct and Core Values Certification for new employees. In addition, the redesigned website will feature Ethics Office news, outreach, and new training opportunities.

As always, the Ethics Office welcomes your feedback and suggestions. We also welcome requests for department-specific training requests, other targeted training, ethics briefings, and outreach activities. For colleagues based at Headquarters, we are ready to welcome you again to our physical office in HQ2, and, for all colleagues no matter where you may be based, we are available to welcome you virtually, in 2022 and beyond.

# THE FUND'S CORE VALUES

**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.

**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.

**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.

**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.

**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.



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 Ethics Office at ext. x39665, email us at [ethics@IMF.org](mailto:ethics@IMF.org), or visit our office in HQ2 at 3A-372. We are available for in person, virtual, and hybrid consultations and meetings. You may also seek advice or report concerns about potential misconduct anonymously via the Integrity Hotline at +(1) 800.548.5384 (in North America), or [IMF.org/integrityhotline](https://IMF.org/integrityhotline) (anywhere in the world).

