



# Ethics Office

ANNUAL REPORT 2017  
Taking Stock and  
Moving Forward

INTERNATIONAL MONETARY FUND



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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.

# MESSAGE FROM THE ETHICS ADVISOR

## Taking Stock and Looking Forward

Taking stock of our accomplishments over the past two years, the most significant has been the change in focus of the work of the Ethics Office. Focusing on advice, training and outreach to promote the Fund's ethics standards while relinquishing the responsibility to conduct investigations has changed the way the Office is viewed across the Organization. This shift, which I believe has been overwhelmingly positive, is very much reflected in the increase in requests for advice over the past year—90 additional requests for advice comprising a nearly 30 percent increase.

In addition to the work the Ethics Office contributed to revise the Fund's anti-harassment policy during 2017, the Office continued its outreach activities such as attending senior departmental staff meetings and briefing Resident Representatives in preparation for their assignments in the field. The Office was also privileged to be invited by the University of Illinois, College of Business to deliver the Leighton Lecture on Ethics and Leadership. The lecture, in its 20th consecutive year, was an opportunity to interact with students, faculty and community members on the issues confronting ethics offices within international organizations. In addition, the Ethics Office hosted students from the law and business ethics program of the University of Cergy-Pontoise School of Law. Internal to the Fund, with the introduction of the first Women's Security Awareness Training in 2016, the Ethics Office was invited back in 2017 to present a session on sexual harassment in the workplace that was well received—we look forward to continuing this collaborative work with our colleagues in the Security Services Division.

The major activity for 2018 will be to launch the Preventing Workplace Harassment training program for all Fund employees. Further, it will be imperative to monitor changes to the program about how harassment concerns are reported within the Fund in order to assess the effectiveness of the new policy as soon as practicable during 2018. This first assessment will provide an opportunity to report on key lessons learned and provide recommendations on any changes that should be considered immediately to strengthen the effectiveness of the Fund's anti-harassment policy. The Ethics Office will also be working with the offices of the Dispute Resolution System to conduct a review of the current retaliation policy with a view towards strengthening the overall policy framework for how retaliation concerns are addressed within the Fund. From conducting benchmarking to drafting new policy provisions, the Office is encouraged by the level of interest that has been shown for this initiative, which will address another aspect of workplace fairness issues facing Fund staff.

Finally, the Office looks forward to working with Human Resources to identify entry points where the Fund's core values may be embedded to strengthen the overall competency framework relating to performance management and assessment.

I want to thank the Managing Director and the senior management team for their unwavering support to the Ethics Office over the past year.

The Ethics Office team looks forward to working with all of you in the coming year to successfully accomplish a very ambitious work program.

**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 20 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

# 2017 ACTIVITIES AND OPERATIONS

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The following section provides 2017 data illustrating the range of ethics issues on which the Ethics Office was contacted directly for advice. All of 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 2015, 2016 and 2017 to demonstrate overall trends since the change in the mandate of the Ethics Office to focus on advice, training and outreach to promote the Fund’s ethics standards. A review of this information 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 & Public Statements

Misuse of Resources  
& Non-Public Info



### 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 “Advice and Guidance.”

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.

### TWELVE KEY ETHICS ISSUES



**Obligations as an  
International Civil Servant**



**External Activities**



**Discrimination**



**Publications &  
Press Statements**



**Gifts**



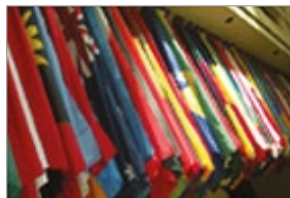
**Financial Conflicts  
of Interest**



**Harassment**



**Misuse of Resources  
& Non-Public Info**



**Personal Conflicts  
of Interest**



**Political  
Activities**



**Post-Fund  
Employment**



**Household  
Obligations**

## 2017 ADVISORY CASES

In 2017, the Ethics Office responded to 410 requests for advice. The total number of cases during the year increased by 90 (28 percent) as compared to 2016. 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 Mandatory Ethics Training and other outreach activities.

There was a large increase in requests for advice about Publications and Public Statements as compared to 2016: 18 as compared to five (72 percent). The Ethics Office also saw an increase in requests for advice about Misuse of Resources and Non-Public Information—in 2017, there were 16 requests for advice as compared to eight in 2016.

In addition, there was a significant increase in the requests for advice involving Workplace Fairness issues.

During the reporting period, requests pertaining to Unfair Preferential Treatment/Bias more than doubled from three to seven as compared to 2016; and concerns relating to Discrimination doubled from three to six. Specifically, requests for advice involving Harassment almost doubled to 41 [23 hostile work environment; 13 bullying; and five sexual harassment, one involving an incident while on mission] from 22 in 2016.

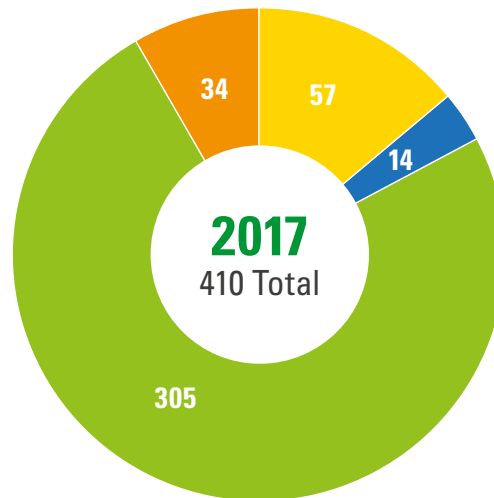
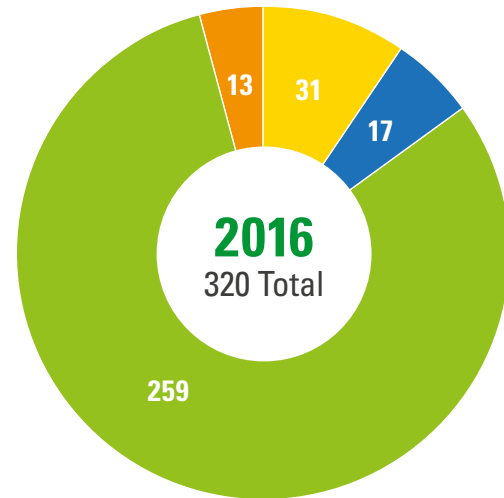
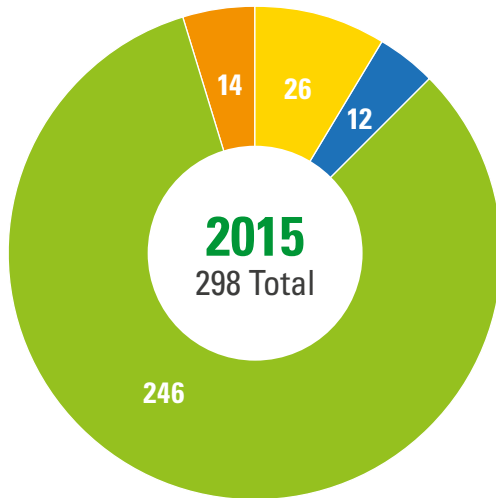
Requests for guidance on External Activities (which included requests for leave without pay) rose by 30 percent this year.

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

	2015	2016	2017
Obligations as an International Civil Servant	14	23	27
Financial Conflicts of Interest	24	20	22
Personal Conflicts of Interest	17	22	16
Gifts	35	30	29
Political Activities	6	3	6
Post-Fund Employment	14	10	9
External Activities	136	151	196
Publications & Public Statements	8	5	18
Misuse of Resources & Non-Public Information	6	8	16
Discrimination	1	3	6
Harassment	16	22	41
Household Obligations	12	17	14
Retaliation	7	3	3
Unfair Preferential Treatment/Bias	2	3	7
<b>TOTAL</b>	<b>298</b>	<b>320</b>	<b>410</b>

### ADVISORY MATTERS BY TOPIC GROUP



Workplace Fairness External Compliance Conflicts of Interest Resources and Information

SECTION 2

# TRAINING AND OUTREACH

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## TRAINING

### Mandatory Ethics Training for Colleagues in the Field

With the second cycle of Mandatory Ethics Training for all Fund employees at headquarters nearly complete—the training continued through 2017 to ensure 415 new staff were trained. The Ethics Office delivered similar training to our colleagues in the field. Overseas training was carried out through a combination of in-person and videoconferencing (VTC) both in English and French in partnership with colleagues in CSF who provided simultaneous translation support for French speaking locations.

Between January and July 2017, the Ethics Office provided in-person training to 63 Fund employees in four overseas locations: Paris Office, Brussels, the Joint Vienna Institute, and the EUR Resident Representative Retreat in Paris. From September through December 2017, 175 employees were trained via VTC. Using VTC, the Office was able to provide training to 43 different locations in the Africa and Western Hemisphere Area Departments, including four ICD training centers.

### Peers for a Respectful Workplace

In 2017 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 December 2017, the Ethics Office participated in training for new and advanced/experienced PRWs on ethics issues to address workplace fairness and other issues facing Fund staff.

## OUTREACH

### 2017 Leighton Lecturer at the University of Illinois College of Business

On October 30, 2017, the Fund's Ethics Advisor was invited to deliver the 20th annual Leighton Lecture on Ethics and Leadership at the University of Illinois, College of Business located in Champaign-Urbana, the main campus of the University. The lecture was an opportunity to interact with students, faculty and community members on the issues confronting ethics offices within international organizations.

The exchange also provided a unique opportunity to highlight the similar challenges faced by both national and international organizations. For example, the role an ethics and compliance program can play to mitigate overall risk in business operations by ensuring advisory, training and awareness programs are available to help managers and employees resolve ethics dilemmas in their day to day decision making on behalf of their organization.







### University of Cergy-Pontoise School of Law

In June 2017, 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. Xavier Debrun [Division Chief, Research Department] about the history and work of the Fund, and a tour of the Managing Director's office, with remarks by the MD.





### Ethics Office Open House

The Ethics Office continued to engage in outreach activities by hosting its fifth annual “I ♥ Ethics” open-house gathering in 2017.

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.







### **Copyright Compliance Policy**

Working closely with LEG and various departments across the Fund, the Ethics Office helped to promulgate a Copyright Compliance Policy for the Fund—a first for the Organization.

The new policy underscores the Fund’s commitment to respecting the protections afforded to certain works pursuant to general principles of copyright and license agreements entered into by the Fund. While the Fund is committed to safeguarding its own intellectual property rights, the policy also outlines the Organization’s position on copyright compliance and the corresponding obligations of individuals who use copyright-protected works in the course of their Fund duties.

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

## SECTION 3

# MAJOR DEVELOPMENTS

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New Ethics Office Website ..... 17

## REVISED ANTI-HARASSMENT POLICY

In July 2017, the Fund’s anti-harassment policy was revised. The policy reflects an extensive benchmarking exercise against policies in place at comparable international organizations, as well as stock-taking and reflection on key lessons learned from previous cases of harassment.

It accomplishes four main goals:

- Clarifies the scope and applicability of the policy and introduces clearer definitions of forms of harassment such as bullying, mobbing, abuse of authority, and hostile work environment;
- Clearly articulates the responsibilities of employees and managers, to establish an accountability framework, and provides guidance on the channels available to employees to address harassment and alleged harassment;



## SECTION 4

# GOING FORWARD

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Priority activities for 2018 will include the following:

## PREVENTING WORKPLACE HARASSMENT TRAINING FOR ALL EMPLOYEES

An e-learning tool has been developed to provide Preventing Workplace Harassment training to all employees. The mandatory training program will be launched through the Fund's Learning Portal in early 2018. The module has been developed in accordance with the Fund's July 2017 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 that is free from hostility or harassment of any kind. To augment the e-learning training session, targeted face to face training will be offered to managers and supervisors, Senior Personnel Managers and Assistant Senior Personal Managers. To round out the overall training and awareness of this initiative, the MD will also convene a session with the Heads of Departments to communicate expectations about managing and addressing harassment concerns.

## REVISED RETALIATION POLICY

The Ethics Office looks forward in 2018 to working with the other offices of the Dispute Resolution System to conduct a review of the current retaliation policy with a view towards strengthening the overall policy framework for how retaliation concerns are addressed within the Fund. From conducting benchmarking to drafting new policy provisions, the office is encouraged by the level of interest that has been shown for this initiative, which we believe will address another aspect of workplace fairness issues facing Fund staff.

## LIVING OUR VALUES

In the coming months, a new awareness campaign will be launched to assist all employees to embrace and uphold the Fund's core values—values that are the guarantors of the Fund's highly respected position in the global arena.

The Ethics Office welcomes your feedback and suggestions to keep the ethics program at the Fund as useful, meaningful and effective as possible.

## 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.

## 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.

## RESPECT

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

## 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.

## 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.

# 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](mailto: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](http://www.integrity-helpline.com/imf.jsp).

