



ETHICS OFFICE

Building on Success

ANNUAL REPORT 2018

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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:

Building on Success

Reflecting on the past year, the impact of the “#MeToo” movement on the work of the Ethics Office cannot be overstated. The movement followed on the heels of the Fund’s 2017 Global Staff Survey results, which set the stage for discussion about the challenges, approaches and lessons learned when addressing workplace harassment. Because harassment has serious consequences for individuals, teams and the organization as a whole, the Fund is committed to promoting a work culture in which every individual can carry out his or her personal responsibilities by respecting the dignity of colleagues. Building on the success of its advocacy and outreach program, the Ethics Office, in partnership with key stakeholders across the Fund, developed and delivered training and other initiatives to confront this challenge.

A major activity for 2018 was to launch a Preventing Workplace Harassment training program for all Fund employees, comprised of online and in-person training. The Ethics Office developed and implemented the anti-harassment awareness training to help Fund employees build a positive work environment and a climate of trust and tolerance, free of all forms of harassment. The training, which was launched by the Managing Director on February 14, 2018, is mandatory for Fund employees depending on the nature of their employment contract. More than 3,700 employees have completed the online training. To augment the mandatory training, the Ethics Office also developed and delivered targeted in-person training to nearly 500 supervisors, departmental Human Resources Teams, Department Heads and members of Management to help create a respectful workplace and effectively address allegations of harassment.

Coupled with training, the Ethics Office, in consultation with the Director of the Human Resources Department, also monitored changes to the program about how harassment concerns are reported within the Fund in order to assess the effectiveness of the anti-harassment policy. The first assessment published in October 2018, provided an opportunity to report on key lessons learned and recommendations on changes that should be considered immediately to strengthen the effectiveness of the Fund’s anti-harassment policy.

In addition to the work the Ethics Office contributed to the Fund’s anti-harassment initiatives, the Office represented the Fund as a member of the Chief Executives Board [CEB] High Level Task Force on Addressing Sexual Harassment within Organizations of the United Nations System. We look forward to continuing this collaborative work with our colleagues across the Bretton Woods organizations.

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 be invited by the University of Maryland public policy graduate program to deliver a lecture on ethics and leadership. The lecture was an opportunity to interact with a cohort of Chinese

graduate students on the issues confronting ethics offices within international 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 2019, the Ethics Office will launch the next cycle of Mandatory Ethics Training for all Fund employees. Along with the offices of the Dispute Resolution System, the Ethics Office will also work to introduce a revised retaliation policy that will strengthen the overall policy framework for how retaliation concerns are addressed within the Fund.

I want to thank the Managing Director and the senior management team for their unwavering and continued 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 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

2018 ACTIVITIES AND OPERATIONS

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The following section provides 2018 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 2016, 2017 and 2018 to demonstrate overall trends since the change in the mandate of the Ethics Office was fully implemented 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

Gifts

Political
Activities

Financial Conflicts
of Interest

Post-Fund
Employment

Personal Conflicts
of Interest

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

Retaliation

Harassment

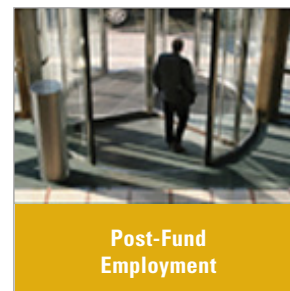
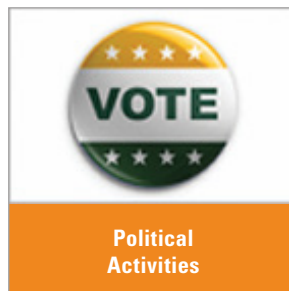
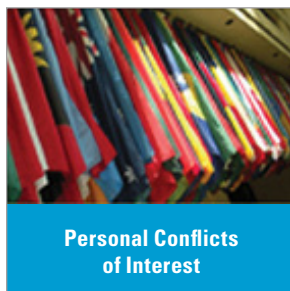
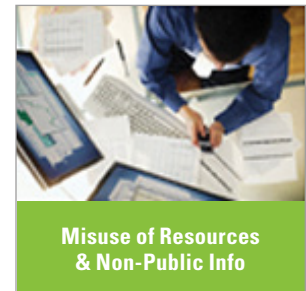
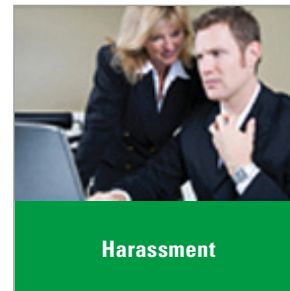
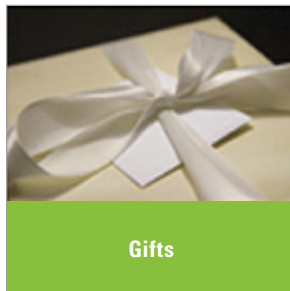
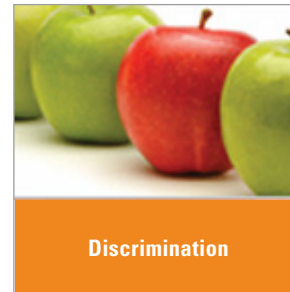
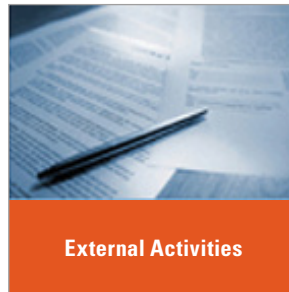
Unfair Preferential
Treatment/Bias

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.

TWELVE KEY ETHICS ISSUES



2018 ADVISORY CASES

In 2018, the Ethics Office responded to 469 requests for advice. The total number of cases during the year increased by 59 (14 percent) as compared to 2017. 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 a significant increase in the requests for advice involving Workplace Fairness issues from 57 in 2017 to 96 in 2018 (68 percent). During the reporting period, requests pertaining to Unfair Preferential Treatment/Bias rose from seven to 26 as compared to 2017; concerns relating to Discrimination significantly decreased from six to one; and Retaliation remained the same: three.

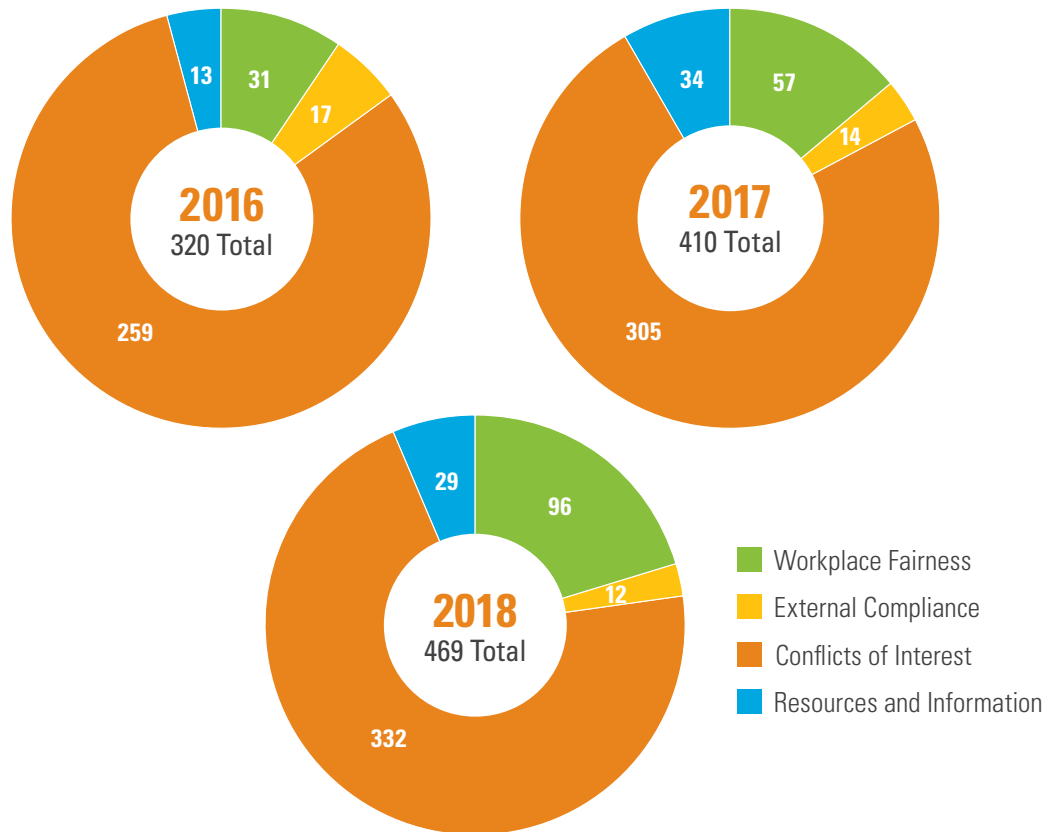
Requests for advice involving Harassment increased by 60 percent to 66 [39 hostile work environment; 15 bullying; seven sexual harassment (six involved alleged offenders who were not employees of the Fund, i.e., vendor personnel); and five abuse of authority] from 41 in 2017.

The number of requests for advice in this area has continued to trend upward over the past several years. A major factor that may be contributing to this 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.

ADVICE BY CATEGORY

	2016	2017	2018
Obligations as an International Civil Servant	23	27	21
Financial Conflicts of Interest	20	22	20
Personal Conflicts of Interest	22	16	19
Gifts	30	29	40
Political Activities	3	6	4
Post-Fund Employment	10	9	16
External Activities	151	196	212
Publications & Public Statements	5	18	11
Misuse of Resources & Non-Public Information	8	16	18
Discrimination	3	6	1
Harassment	22	41	66
Household Obligations	17	14	12
Retaliation	3	3	3
Unfair Preferential Treatment/Bias	3	7	26
TOTAL	320	410	469

ADVISORY MATTERS BY TOPIC GROUP



In 2018, there was a large increase in requests for advice about Post-Fund Employment as compared to 2017: 16 as compared to nine (43 percent). This increase can probably be attributed to the approval of the revised “Policy on Conflicts of Interest and Post-Fund Employment Negotiations”. The Ethics Office also saw an increase in requests for advice about Gifts in 2018, there were 40 requests for advice as compared to 29 in 2017.

Requests for guidance on External Activities (which included requests for leave without pay) rose by eight percent this year. 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 general, requests for advice and guidance in all other areas remained essentially at the same levels as the two previous reporting periods.

SECTION 2

TRAINING AND OUTREACH

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TRAINING



Mandatory Preventing Workplace Harassment.

The Ethics Office developed and implemented an e-learning training tool to help Fund employees build a positive work environment and a climate of trust and tolerance, free of all forms of harassment. The training, which was launched by the Managing Director on February 14, 2018, is mandatory for Fund employees depending on the nature of their employment contract. To date more than 3,700 headquarters and local employees have completed the training.

To augment the mandatory e-learning training tool, the Ethics Office also developed and delivered targeted, in-person training sessions for managers and supervisors to help empower them to take immediate corrective action when they observe or become aware of behavior that is contrary to the principles espoused in the anti-harassment policy.



The 90-minute training also reinforced their collective responsibility and obligation to immediately report or consult with another Fund official, such as the Senior Personnel Manager, the Ethics Advisor, or the Office of the Internal Investigator about possible harassment cases. Between March and June 2018, the Ethics Office conducted nearly 20 sessions, providing this targeted training to nearly 500 supervisors, departmental Human Resources Teams, Department Heads and members of Management, and those providing service to Fund employees.

Peers for a Respectful Workplace. In 2018 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 2018, 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.

Other Training. In early 2018, the Ethics Office provided Mandatory Ethics Training to colleagues serving in the Fund's Tokyo Office and was also invited to deliver training during the Asia and Pacific Department's (APD) retreat conducted in Bangkok, Thailand. Later in the year, APD invited the Office to give a presentation on anti-harassment during its mini-retreat conducted in headquarters.

OUTREACH

Ethics Network of Multilateral Organizations.

During the 10th Annual Meeting of the Ethics Network of Multilateral Organizations (ENMO), conducted at the United Nations Headquarters in New York in July 2018, the Fund was elected to chair the 11th Annual Meeting to be 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.

Guest Lecturer at the University of Maryland.

On September 28, 2018, the Fund's Ethics Advisor was invited to deliver a lecture to a cohort of Chinese graduate students in support of the public policy graduate program at the University of Maryland, located in College Park, Maryland, the main campus of the University.



The lecture was an opportunity to interact with students 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 2018, the Ethics Office hosted 35 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. David Vannier [Senior Communications Officer, Office of the Manager Director] 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 hosted its sixth annual “I ♥ Ethics” open-house gathering in 2018. 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.



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
DEVELOPMENTS

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PREVENTING WORKPLACE
HARASSMENT TRAINING
FOR ALL EMPLOYEES

An e-learning tool was developed to provide Preventing Workplace Harassment training to all employees. The mandatory training program was launched through the Fund’s Learning Portal in February 2018.

The module was 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 was also offered to supervisors, departmental Human Resources Teams, Department Heads and members of Management.

In addition to anti-harassment training, and in consultation with the Director of the Human Resources Department, the Ethics Office also monitored the program including how harassment concerns were reported within the Fund and by whom—such as gender, appointment type and grade level of the individual reporting concerns and that of the alleged offender. The first assessment published in October 2018, provided an opportunity to report on key lessons learned and recommendations on changes that should be considered immediately to strengthen the overall effectiveness of the Fund’s anti-harassment policy.



LIVING OUR VALUES

In partnership with the Office of Mediation, a new awareness campaign was 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. As part of the campaign, a workshop was developed to facilitate discussion of the core values at the departmental level.

The key purpose of the nearly dozen workshops conducted was to allow an opportunity for colleagues to discuss the behaviors in their everyday work that exemplify the Fund’s values, and actions that can be taken to promote and model these behaviors. The interactive discussions made the Fund’s values memorable to staff and gave them an opportunity to articulate the practical implications of the values, promoting a sense of ownership.



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

SECTION 4

GOING FORWARD

Revised Retaliation Policy 18

Mandatory Ethics Training 19

**Priority activities for 2019
will include the following:**

REVISED RETALIATION POLICY

The Ethics Office looks forward to working with the other offices of the Dispute Resolution System, Legal Department and Human Resources Department to introduce a revised retaliation policy that will strengthen the overall policy framework for how retaliation concerns are addressed within the Fund. During 2018, the Office along with these partners conducted extensive benchmarking and drafted new policy provisions. Across the organization, there has been a high level of interest shown for this initiative, which we believe will address another important aspect of workplace fairness facing Fund staff.

MANDATORY ETHICS TRAINING

In February 2019, the Ethics Office will launch the next cycle of Mandatory Ethics Training for all Fund employees. First mandated by the Managing Director in 2012, this will be the third cycle of Mandatory Ethics Training, which occurs every three years for HQ-based and overseas staff and employees.

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.

