

# Guidelines to Manage Conflicts of Interest in Independent Evaluation <sup>1</sup>

## Introduction

1. All IEG staff members and consultants are subject to the World Bank Group guidelines regarding conflict of interest, as spelled out in the [Principles of Staff Employment](#) and the [Staff Rules](#). These cover, *inter alia*, gifts and favors, concurrent employment and self-employment, dealings with former or future employers, disclosure and use of non-public information, honoraria, medals and decorations, political activity, public statements, and use of World Bank Group services and facilities. Information on these guidelines can be found on the [website of the Office of Ethics and Business Conduct](#) (EBC).
2. In addition, all IEG staff members and consultants have a special responsibility to avoid situations that might lead to conflicts of interest that compromise the independence, impartiality, and integrity of IEG's evaluative work. The Evaluation Cooperation Group of the multilateral development banks defines four major criteria for assessing the independence of an evaluative body: organizational independence; behavioral independence; protection from external influence; and avoidance of conflicts of interest. In this regard, IEG evaluations must be – and must be perceived to be – free of conflicts of interest.
3. Conflicts of interest arise all the time, and there are many “grey areas” where it is often hard to discern whether there is a real or potential conflict of interest. The appearance or perception by others of a conflict of interest can often be as detrimental as a conflict itself. It is therefore important that IEG staff members and consultants be alert to situations that could lead to real, potential, or apparent conflicts of interest in the course of evaluation work. Promptly disclosing and dealing with any conflict is critical to avoiding potentially serious consequences for the effectiveness and integrity of IEG.

## Definitions and Applicability of Guidelines

4. For purposes of these Guidelines, the following definitions apply:
  - “*Conflict of interest*” is defined as a situation in which interests other than those associated with our duty of conducting an objective evaluation may materially interfere with the fulfillment of this duty, or may give the appearance of interfering materially with this fulfillment.
  - “*Materiality*” refers to the risk that the identified conflict is of such a magnitude it is likely to affect the process, findings, conclusions, or recommendations of an evaluation.

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<sup>1</sup> These guidelines replace an earlier version set out in *Independence of OED* in OED Reach, February 24, 2003, and subsequently revised by IEG's *Guidelines to Avoid Conflicts of Interest in Independent Evaluations*, November 10, 2008.

- “*Supervising Manager*” and “*Reviewing Manager*” are defined as follows:

	<b>Supervising Manager</b>	<b>Reviewing Manager</b>
Staff, Consultants, and Other Appointments	Senior Manager in IEGCS; Managers in IEGPS, IEGPE, IEGCC; and DDG in IEGDE	DDG in IEGCS; Director in IEGPS, IEGPE, IEGCC; DGE in IEGDE
Manager, Advisor, Senior Advisor	Director	DGE
Director, Senior Manager, DDG	DGE	Not Applicable
DGE	CODE Chair	Not Applicable

5. These Guidelines apply to:

- Everyone who works in IEG, including staff and managers (regardless of appointment type), short and extended term consultants, and all temporary, special, and coterminous appointments;
- All types of evaluative work, including sector and thematic evaluations, project-level and country-level reviews and evaluations, global program reviews, follow-up on IEG recommendations, etc.; and
- Any conflict of interest, whether raised by IEG staff members and consultants, or by other stakeholders, such as WBG staff members, clients, civil society organizations, or other external stakeholders

## **Roles and Responsibilities**

6. All IEG staff members are expected to recognize and appropriately manage conflicts of interest. They are also expected to ensure that all consultants that are hired by IEG are familiar with these Guidelines, and to monitor consultants’ compliance with the provisions of the Guidelines.

7. All IEG staff members and consultants have an obligation to disclose any real, potential, or apparent conflict of interest as soon as it arises to their Supervising Manager (and, in the case of a possible conflict of a financial or business nature, also to the Financial Disclosure Program Manager in EBC, as required by Staff Rules).

8. In response to a possible conflict of interest situation raised by the staff member, consultant, or external stakeholder, the Supervising Manager is responsible for: reviewing the case, assessing the materiality of the conflict of interest and any necessary mitigation measure, discussing the proposed response with the Reviewing Manager, informing the staff or consultant of the final decision on how to proceed, and logging the case and outcome in the IEG database.

9. Supervising Managers and Reviewing Managers are expected to serve as models of integrity and promote a workplace culture that ensures effective management of conflicts of interest. They are responsible for:

- Encouraging a regular dialogue and building staff capacity to recognize and manage conflicts of interest;
- Providing timely and effective guidance to staff who raise a conflict of interest issue;
- Ensuring that these Guidelines are applied consistently and fairly; and
- Making decisions based on fair assessments of work and on factual observations, regardless of internal and external pressures.

10. In addition to the requirements spelled out in these Guidelines, the [IEG Mandate](#) includes a specific provision to avoid conflicts of interest at the senior leadership level: the Director General, Deputy to Director General, and Directors are ineligible for subsequent reappointment within the World Bank Group.

## Mitigation Measures

11. In response to the conflict of interest, the Supervising Manager will identify what, if any, mitigation measure is required to address the risks. Depending on the specifics of the case, mitigation measures may include recusal from engagement in the evaluation, or reduced involvement subject to specific terms and conditions.

12. Recusal would be required in the following situations:

- Evaluation of a specific project, program, policy, or activity where the IEG staff member or consultant (or close relative<sup>2</sup>) has had substantial involvement;
- Evaluation involving a specific unit where the IEG staff member or consultant (or close relative) has worked, or had significant decision making, financial, approval responsibility, or had a financial stake or personal influence; and
- Evaluation involving a specific unit where there is a significant possibility for future employment of the IEG staff member or consultant (or close relative).

13. Reduced involvement may be appropriate in some cases, such as the following:

- Evaluation of a specific project, program, policy, or activity where the IEG staff member or consultant (or close relative) did not have substantial involvement, but nonetheless had some engagement, influence, or in-depth knowledge that might prompt others to raise questions about the objectivity or impartiality of the evaluation;
- Evaluation involving multiple projects, programs, policies, or activities where the IEG staff member or consultant (or close relative) had substantial involvement in a few of the specific areas to be evaluated; and
- Evaluation involving a specific unit where the IEG staff member or consultant (or close relative) had earlier applied for a position.

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<sup>2</sup> The definition of “close relative” follows WBG guidelines and can be found on the [EBC website](#).

14. IEG staff members or consultants who are recused will play no role in the preparation, review, or approval of the evaluation for which they were recused. However, they may be interviewed as a source of information as part of the data collection phase of the evaluation, like any other stakeholder, as long as their engagement does not exert – or give the perception or appearance of – influence over the evaluation or the evaluation team. IEG managers who are recused will formally delegate their managerial accountabilities to another manager; they may continue to be routinely copied on the processing steps related to the evaluation, in order to monitor the status of delivery of the evaluation.

15. When reduced involvement has been agreed as the appropriate mitigation measure, IEG staff members or consultants are expected to follow the exact terms and conditions that were specified. If the conflict of interest situation changes, or further discussion is needed to clarify some elements of the earlier agreed guidance, IEG staff members and consultants are expected to follow up with Supervising Manager as needed.

## **Monitoring and Disclosure**

16. The Supervising Manager will provide a brief write up of every conflict of interest situation raised by IEG staff members, consultants, and external stakeholders, and the agreed response, to the DGE Front Office, which will maintain the information in a database. Aggregated data will be reviewed on a quarterly basis by the IEG management team, and disclosed annually in the Annual Report, as part of IEG's commitment for openness and transparency in evaluation.