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December 14, 2022

**Statement by Mr. Jennings, Mr. O'Brolchain, and Ms. Ahmed on Implementation Plan  
in Response to IMF Executive Board and Management Endorsed Recommendations of  
the 2022 Institutional Safeguards Review  
(Preliminary)  
Executive Board Meeting  
December 16, 2022**

We thank the Task Force and Board Steering Group for the informative implementation plan in response to the recommendations of the 2022 Institutional Safeguards Review. We recall the context in which this review was launched. We also express our gratitude to the various staff working groups, the Staff Association, and Management in contributing to this plan. Ensuring the highest standards of institutional governance and data and analytical integrity is paramount to the Fund's ability to deliver its mandate and its capacity to serve its member countries in an effective, even-handed, and impartial manner. **To this end, we broadly support the proposed elements of the implementation plan as laid out under the four key themes.**

**We welcome the proposed actions to further strengthen data and analytical integrity, including the initiatives to share best practices and clarify the terms of staff engagement with the Offices of Executive Directors (OED).** A balanced approach recognizing the dual role Executive Directors (ED) play will be important in clarifying the terms of engagement and protecting against undue influence. At the same time, it is important that the engagement not be constrained, as a healthy dialogue between OEDs, staff, and Management is crucial in supporting well-informed decision making. While documenting best practices through the development of guidance notes is a step in the right direction, it will be equally important to develop a robust communications and training strategy to build awareness and maximize take-up. Training for both new and existing OED staff is important in this context. *We note reference to the communications events in the Annex but would welcome further details and staff comments on whether a training strategy has also been contemplated.* We strongly agree with the need for mechanisms to address or resolve instances of undue influence, however they arise, and look forward to seeing options in this regard.

**We support the proposals to strengthen the ethical framework applicable to Management and the Board, facilitate greater transparency, and enhance the dispute resolution mechanism for OED employees.** The review of the Board Code of Conduct will be particularly important in setting a tone from the top. We agree with staff's assessment that certain recommendations (i.e., OED access to the formal Dispute Resolution System (DRS) and whether the secretary of the Ethics Committee should be an external lawyer in cases where there is a conflict of interest) require further consultation and that the recommendation related to the ethics committee composition should not be pursued given insufficient support in the benchmarking exercise. We commend the strong engagement of staff to date in developing this implementation plan and are encouraged to see that this will continue through future townhalls and other events to support cultural change. We acknowledge the Board's responsibility to model and visibly champion ethical values and behaviors in both formal events, where possible, and in daily interactions to set a tone from the top.

**We broadly support the policy initiatives addressing retaliation, the development of a whistleblower policy, increasing accessibility to the DRS, and transparency and access to information.** Fostering greater trust and increasing transparency of the DRS, as well as the Ethics and Integrity Offices are essential in reassuring staff that they are protected against adverse actions and in creating a safe workplace. Staff's assessment for recommendations where there is insufficient support, need for modification, or further consultation seems reasonable. We positively note that policy changes will be complemented by awareness-raising activities and communications products, as these will be critical to maximizing take-up.

**We are strongly supportive of strengthening the DRS, as well as the Ethics and Integrity Offices and related processes, including addressing delays and inefficiencies.** We agree with staff that improved processes are essential to foster staff trust and confidence in the system and protect staff's voice. Staff's assessment for recommendations where there is insufficient support, need for modification, or further consultation seems reasonable.

**On process, we welcome the proposed monitoring efforts, including the use of staff surveys.** We look forward to the interim implementation update for end-CY2023 and subsequent Office of Internal Audit (OIA) progress reports. Routine monitoring and reporting, including to the Executive Board, will be important to ensure the actions are contributing to positive improvements and fostering accountability. We positively note that staff surveys will be used to monitor staff sentiment around trust and speak-up culture within the organization, as staff's voice is critical to this work.

Finally, on resourcing, while we would have liked to see more specific cost details in the matrix, **we urge staff and management to involve the Board in any decisions which might require significant resources so we can take informed decision on whether and how to proceed.**