

## VII. COMMUNICATIONS AND OUTREACH

### ENHANCED COMMUNICATIONS FOR DETERRENCE AND PREVENTION

In 2005, the World Bank put in place its first formal communications policy for investigations and sanctions of fraud and corruption. This policy, approved and publicly disclosed by the Board of Executive Directors in July 2004, has made it possible to improve transparency about the final results of investigations. It enabled, first and foremost, publication of the first integrity report for FY 2004<sup>32</sup> and issuance of more detailed press statements about cases that resulted in sanctions. It also led to INT hiring a full-time, experienced communications professional. The overall purpose of the Bank's increased communications in this area is not only to raise awareness, but to change behavior—that is, to reduce the incidence of fraud and corruption and the behavior that tolerates or produces it (see Box 2).

INT's first Report on Investigations was posted on the Bank's web site in February 2005, and a press release was issued in all six official languages of the Bank. A press briefing was held and subsequent presentations were made to various audiences, including World Bank staff, business groups, and some European governments. The report was reprinted by the American Bar Association's Continuing Legal Education program and highlighted by other organizations as well.

Over the past two fiscal years, the World Bank has issued press releases about a number of debarment actions. The releases were translated into the relevant local languages, and many were translated into all six Bank languages. The Bank aims to provide even more translations of information about investigations and sanctions in the future, with the goal of reaching non-English-speaking audiences in member countries. Other press releases noted the actions of member governments on criminal referrals made by the World Bank, as well as the completion of a Cambodian study on reduction of fiduciary risks. In keeping with the new communications policy,

#### Box 2

### COMMUNICATIONS FOR DETERRENCE AND PREVENTION

To meet the need for more general deterrence and prevention, the World Bank has approved an affirmative approach to communications, carefully balanced with concern for legal safeguards. This approach is based on the core principle that the Bank will publish the sanctions and statistics that are the final results of fraud and corruption investigations in a timely, consistent, and fair fashion, balanced by the need to respect due process and not to compromise ongoing investigations and legal processes. Such publication and dissemination is an integral part of the antifraud and anticorruption effort.

Four objectives provide a test for whether sufficient information is being provided to allow the key target audiences to change their behavior. This would be information sufficient to:

- Warn potential wrongdoers that this kind of illicit activity is known to the Institution and that the Bank will follow-up if it is detected;
- Educate interested corporate or government officials and allow them to take specific actions to improve their systems;
- Alert and educate Bank staff and partners to potential patterns of behavior they need to report; and
- Alert potential victims (communities, citizens, civil society, businesspeople, staff) to risks and enable them to protect themselves.

32 "Annual Report on Investigations and Sanctions of Staff Misconduct and Fraud and Corruption in Bank-Financed Projects, Fiscal Year 2004," The World Bank Group, February 2005.

these press announcements were more detailed and timely than in the past and can be found on the INT website.

Effective internal communications is critical to the Bank's zero tolerance policy on staff involvement in fraud and corruption, as well as to deter misconduct such as sexual harassment. INT makes regular presentations in the Bank's Orientation Program for all new staff and consultants, and numerous presentations at regional department and country office meetings. In addition, it has publicized ways in which staff can report possible fraud and corruption. As a result, Bank staff and consultants provide over half of all the allegations received. It is notable that none of these staff have reported retaliation or threats of retaliation as a result of reporting their concerns directly to INT. The Department has also distributed several thousand brochures describing its role in the Bank. The Bank's intranet is also used to communicate personnel actions resulting from serious cases of staff misconduct, both to inform victims or those who have reported misconduct as well as to discourage those who might engage in similar conduct. Finally, INT meets with the Audit Committee of the Bank's Board of Executive Directors on a quarterly basis, in accordance with the Committee's oversight mandate.

## OUTREACH AND KNOWLEDGE MANAGEMENT

In addition to enhanced communications, the Bank continued its efforts to build awareness of institutional integrity activities and enhance deterrence through presentations, workshops, seminars, training, and other more in-depth training and education for

operational staff in Washington and country offices. Outreach on integrity activities is frequently paired with presentations on the World Bank's governance work, which is much more extensive in scope.

In fiscal 2005/2006, INT staff participated in several international conferences dealing with fraud and corruption issues and contributed to cross-cutting networks sharing knowledge and techniques (see Box 3). In addition, the Department greatly increased its outreach to member countries, business associations, and anticorruption experts and organizations.

Two core presentations were "Anatomy of Transnational Corruption" and the findings of the fiscal 2004 Annual Report. "Anatomy" is a description of the typology and mechanisms of international fraud and corruption and the Bank's efforts to investigate and sanction any wrongdoing. "Anatomy" was presented in fiscal 2005/2006 to a variety of audiences inside the World Bank, including the Board of Executive Directors, and to external audiences ranging from the U.K. Department for International Development to the Fletcher School of Law and Diplomacy at Tufts University.

In addition, INT staff provided briefings for country offices and awareness presentations while working in client countries, including on detecting fraud and corruption in procurement contracts, due diligence tools, and INT's mandate and activities.

Also in fiscal 2005/2006, INT contributed to numerous internal seminars and training programs, such as the Core Course on Governance and Anticorruption, which targets Bank country economists and others interested in governance issues.

## CREATING CROSS-CUTTING NETWORKS ON INVESTIGATIVE PRACTICES

SHaring its experience in fighting corruption—experience specific to institutional controls, investigations, and sanctions—has become an increasingly important part of the World Bank’s work as an institution. The Institutional Integrity Department and the Sanctions Committee Secretariat have participated in and indeed actively encouraged the development of networks to facilitate the sharing of information and investigative best practices, and discussions of common challenges. To this end, INT is a member of the secretariat that organizes the **Conference of International Investigators** which met three times during fiscal 2005/2006. It was hosted by Interpol in Lyon, France, in September 2004, by the Inter-American Development Bank in Washington, D.C., in June 2005, and by the European Bank for Reconstruction and Development in London, UK, in June 2006.

INT has also been a driving force in the meetings of the **Multilateral Development Bank Integrity Forum**, a small, informal discussion group. The Forum is a valuable platform for practical discussions of issues such as whistleblower protection, sanctioning procedures, broader definitions of misconduct, possibilities for cross-debarment, and shared use of databases to improve information sharing. The December 2005 Integrity Forum paved the way for the IFI Task Force announced in February 2006 (see Chapter 6).

INT represented the Bank at the **11th United Nations Congress on Crime Prevention and Criminal Justice** in April 2005 and at various side meetings timed to overlap with the Congress, the **International Group for Anticorruption Coordination (IGAC)**, and **Interpol’s Group of Experts on Corruption (IGEC)**. It is an active contributor to IGEC and IGAC, both of which generally meet biannually.

In addition, INT has been in discussions with business groups both in the United States and Europe. The Department participated in a number of events, including a workshop on business integrity at the **International Federation of Consulting Engineers (FIDIC)** conference in Fiscal 2005, the annual convention of the **American Society for Civil Engineers (ASCE)** in Fiscal 2005 and 2006, events organized by the **American Bar Association in the US and Europe**, the **OECD Working Group on Anticorruption**, and meetings with non-profit organizations such as **Transparency International (TI)** and **TRACE** throughout Fiscal Years 2005/2006.