MODEL WORLD BANK POLICY ON DISCLOSURE OF INFORMATION

PRODUCED BY THE GLOBAL TRANSPARENCY INITIATIVE

May 2009
Table of Contents

ACKNOWLEDGEMENTS .......................................................................................................................... III
1. INTRODUCTION ................................................................................................................................. 1
2. THE POLICY ........................................................................................................................................... 4
   a. Definitions ........................................................................................................................................ 4
   b. The Right to Information .................................................................................................................. 4
   c. Automatic Disclosure ...................................................................................................................... 5
   d. Open Meetings ............................................................................................................................... 8
   e. Processing of Requests ................................................................................................................... 8
   f. Constraints ....................................................................................................................................... 10
   g. Appeals ............................................................................................................................................ 12
   h. Promotional Measures ................................................................................................................... 13
3. REVIEW ............................................................................................................................................... 15

DOCUMENTS AND INFORMATION SUBJECT TO ROUTINE DISCLOSURE ................................................. 16
   A. Operational documents prepared by the Bank .............................................................................. 16
   B. Financial information ..................................................................................................................... 18
   C. Documents prepared by a member country that must be disclosed as a precondition
      for doing business with the Bank ................................................................................................. 18
   D. Other Information ......................................................................................................................... 19
Acknowledgements

The Model World Bank Policy on Disclosure of Information was prepared by the Global Transparency Initiative (GTI), a network of civil society organizations promoting openness at the international financial institutions (IFIs). The GTI brings together organizations from around the world which share an interest in IFI openness either because they focus on openness as an issue or because of their interest in IFI activities. The GTI engages in a wide range of activities to promote transparency at the IFIs (for more information see: www.ifitransparency.org).

The Model Policy was drafted by Toby Mendel, Senior Legal Advisor, ARTICLE 19, together with Bruce Jenkins of the Bank Information Center, Jennifer Kalafut of the International Accountability Project and Toby McIntosh of freedominfo.org.

Comments by a number of external reviewers strengthened the Policy. We would like to thank Juan Martín Carballo (Center for Human Rights and Environment, Argentina), Helen Darbishire (AccessInfo, Spain), Nadia Daar and Amy Ekdawi (Bank Information Center, US), Valeria Enriquez (Fundar, Mexico), Andrea M. Figari (Transparency International, Germany), David Hunter (Washington College of Law, American University, US), Nepomuceno Malaluan (Access to Information Initiative, Philippines), Anne Perrault (Center for International Environmental Law, US), Anna Rooke (Gender Action, US).

We welcome comments on or reactions to the Model Policy. Please contact Toby Mendel at: a19law@hfx.eastlink.ca, Bruce Jenkins at: bjenkins@bicusa.org, or: Toby McIntosh at tmcintosh@bna.com.
1. Introduction

The World Bank recognizes that transparency and accountability are fundamentally important to the development process and central to achieving the mission of the Bank to alleviate poverty. The Bank acknowledges that the right to access information held by public bodies is now widely recognised as a fundamental human right, as well as a cornerstone of effective governance and development. As a global public body, the Bank accepts that it is bound to respect this human right and is committed to the maximum possible degree of openness.

The Bank’s commitment to openness is also driven by a desire to foster public ownership, partnership and participation in World Bank operations from a wide range of stakeholders. Transparency is essential to building and maintaining public dialogue and increasing public awareness about the Bank’s development role and mission. Openness promotes engagement with stakeholders which, in turn, improves the design and implementation of projects and policies, strengthening development outcomes. It facilitates public oversight of Bank-supported operations, which assists in exposing potential wrongdoing and corruption. Oversight also plays a corrective function, enhancing the possibility that problems will be identified early on, and addressed before harm is done. Transparency thus decreases the likelihood that Bank operations will result in adverse social and environmental impacts.

This Policy on the Disclosure of Information responds to the Bank’s overarching mission of sustainable poverty reduction. The Bank recognizes that lack of opportunity, voice and representation contribute to impoverishment. This Policy furthers the Bank’s empowerment objective by providing tools to address barriers often faced by disadvantaged communities and individuals in accessing information, including as a result of gender, and socioeconomic and rural-urban differences.

This Policy on the Disclosure of Information represents a clear break with past Bank information disclosure policies inasmuch as it is based on a true presumption of disclosure. As such, instead of providing a ‘positive’ list of documents which will be made available, this Policy creates a presumption that all recorded information held by the Bank – regardless of the form in which it is recorded, when it was created or who provided it – is subject to disclosure.

This Policy envisages two main, and one subsidiary, means of accessing information in practice. First, the Bank is committed to making a wide range of information of public interest available automatically, on a proactive basis. Second, the Bank will provide information in response to requests. Finally, meetings are important occasions for the exchange of information and thus fall within the scope of the right to information.

The information subject to automatic disclosure under this Policy is disclosed on a routine basis, as soon as it is available. Routine disclosure is important to ensure that essential information on the Bank’s structure, governance and operations is available.
Automatic disclosure also serves another important goal, namely to facilitate participation in Bank decision-making by external stakeholders. Timely disclosure of draft documents helps ensure that people and communities affected by World Bank operations are able to participate effectively in decisions that impact on their lives. Public access to information during decision-making processes also provides an opportunity for experts, civil society, private sector actors and other stakeholders to offer valuable input into the development of World Bank policies and operations.

For local populations to participate effectively in decision-making processes, information must be made available in appropriate forms – not everyone has access to the Internet – and languages. The Bank is committed to ensuring that relevant information reaches its intended audiences at the global, national and local levels. Diverse dissemination tools are important to ensure that information reaches project-affected communities and individuals in remote areas where the Bank operates.

Individuals also have the right to make a request for any information held by the Bank. This ensures that the scope of disclosure is not defined by Bank staff, but by requests from persons outside the Bank. Clear procedural rules (for example on how to make requests, timelines for responding to requests and the notice to be provided where access is refused) are defined by the Policy to ensure that request-driven disclosure works in practice.

The Bank is committed to being as transparent as possible but it is universally recognized that not all information it holds should be disclosed publicly. This may be the case, for example, for personal information the Bank holds on its staff, legally privileged information held by Bank lawyers, or commercially sensitive information provided to the Bank as part of the tendering process. This Policy therefore establishes a system of constraints to protect legitimately confidential information.

Consistent with the Bank’s commitment to maximum openness, the system of constraints has three key characteristics. First, the interests protected by confidentiality – such as privacy and commercial competitiveness – are described as narrowly as possible. Second, the constraints only apply when disclosure of the information in question, at the time of a request, would cause harm to a protected interest. Third, even where harm is likely to result, the information will still be disclosed where this is in the overall public interest (i.e. the constraints may be overridden in the public interest).

The Bank endeavors at all times to implement the Policy fairly and properly. At the same time, it is recognized that there may be times when external stakeholders do not believe the Policy is being applied as it should be. The Policy therefore establishes a system for resolving these disagreements, a system of appeals. It provides, first, for an internal complaint to a high-level management body, the Disclosure Complaints Committee. This provides an opportunity for resolving disputes internally and for providing high-level and authoritative guidance as to the application of the Policy.

The Policy also provides for appeals to be forwarded to the Inspection Panel, an
independent body that reports to the Board of Executive Directors of the Bank. The Inspection Panel was originally established to investigate potential policy violations or failures to respect Bank policies in the design, implementation and monitoring of projects. In this Policy, the Inspection Panel has been given the additional function of providing expedited, independent reviews of refusals to disclose information.

Finally, the Bank recognizes that proper implementation of this Policy will require more than the formal commitments set out in the Policy itself. A range of promotional measures are required to realize the aim of the Policy, namely maximum transparency. These include, among other things, tracking and reporting on requests, providing training to staff, undertaking wider public awareness-raising efforts, and, where appropriate, imposing sanctions on staff who willfully obstruct access to information.
2. The Policy

a. Definitions

1. In this Policy, unless the context requires otherwise:
   a. ‘Anyone’ or ‘person’ means any natural person or a legal person recognized under the law of a State or recognized territory.
   b. ‘Held by’ the Bank means information which is drawn up, received, held by or accessible to the Bank, regardless of who produced it.
   c. ‘Information’ means all recorded information, regardless of the form in which it is held (for example, a physical document, electronically, on video and so on), when it was produced or its official status, and includes a specific record.
   d. ‘Official language’ means any language which is an official language of a member State of the World Bank.
   f. ‘Publicly available’ means information that has been made available by the Bank on an automatic basis, including on its website (i.e. in addition to any other form of dissemination provided for in this Policy).
   g. ‘Record’ means a discreet entity in which information is stored, such as a document, electronic file, email, videotape, database and so on.
   h. ‘World Bank’ or ‘Bank’ means the International Bank for Reconstruction and Development (IBRD) and the International Development Association (IDA).

b. The Right to Information

The right to information

2. The Bank recognizes and endorses the right to access information held by public bodies as a fundamental and legally binding human right. It also recognizes that the World Bank is a public body and is, therefore, bound to respect the right to information. This Policy gives effect to the right to access information. In particular, everyone has a right to access all information held by the Bank (i.e. there is a presumption of disclosure), subject only to the system of constraints set out in Section 2(f) of this Policy.

Information held by third parties

3. To give full effect to the presumption of disclosure, the Bank includes, from the date of adoption of this Policy, clauses in the contracts it concludes to ensure that, subject only to reasonable operational constraints, it can access the information created or obtained pursuant to those contracts, by the parties to those contracts. This includes access to key documents held by borrowing governments or direct service providers created or obtained pursuant to a contract with the Bank.
Databases
4. The Bank ensures that, from the date of adoption of this Policy, all databases it creates or that are created pursuant to a contract with the Bank are designed with software which enables different categories of data to be extracted from the database, subject only to reasonable technical constraints.

c. Automatic Disclosure

Routine disclosure
5. The Bank routinely discloses a wide range of information, including information that is potentially in the public interest. Routine disclosure is driven by a commitment to foster public ownership, partnership and participation in Bank operations from a wide range of stakeholders. Information subject to routine disclosure is made publicly available on the Bank’s website and through other channels (as elaborated below). The documents in the Appendix are all subject to routine disclosure, as well as information in the following categories:

a. Information about the structure of the World Bank including its basic legal framework and organizational structure, contact information for staff, directors and governors, and information on meetings and decision-making processes.
b. Organizational procedures, rules and directives.
c. Institutional policies, strategies and guidelines.
d. Detailed budgetary and financial information.
e. Country-specific analyses and strategies.
f. Detailed information on lending, grant, credit and guarantee operations, throughout project or program cycles (identification, preparation, approval, implementation and evaluation).
g. Evaluations, audits and other information regarding the effectiveness of the Bank in meeting its objectives.
h. Information pertaining to the health, safety, security, environmental and other social implications of Bank operations, including information relating to the implementation of the Bank’s social and environmental obligations, particularly where these operations pose a risk of harm.
i. Information that has been released pursuant to a request and where further interest in that information may be expected.

6. Documents subject to routine disclosure are made publicly available as soon as possible.

7. The Bank makes publicly available a regularly updated register of all significant records it holds, containing brief and general information about the contents of the record, its location and whether or not it is publicly available.

Access to decision-making
8. At a minimum, a standard notice and public comment period is provided for the
following decision-making processes:
  a. Organizational procedures, rules and directives.
  b. Institutional policies and strategies.
  c. Country strategies.
  d. Lending, grant, credit and guarantee operations.
  e. Institutional and project-level evaluations and audits.

9. For the development of policies and strategies of significant public interest, including institutional policies and country strategies, a consultation plan and concept paper are disclosed for public comment. Prior evaluations of the policy or strategy and any other information pertinent to the development of the policy or strategy that is available to the Bank is also made publicly available. During consultations at least one draft policy or strategy is disclosed. Public comments on the policy or strategy, along with Bank responses to those comments, are also disclosed.

10. In the case of lending, grant, credit and guarantee operations, project information is disclosed before Project Concept Review and throughout the project cycle, and environmental and social review documents for projects with potentially significant social and environmental impacts are disclosed at least 120 days before project approval. In addition, the Bank follows the detailed consultation and information sharing requirements contained in World Bank Operational Policies, including OP/BP 4.01 Environmental Assessments, OP/BP 4.12 Involuntary Resettlement, and OP/BP 4.20 Indigenous Peoples.

Timely disclosure for decision-making

11. In all cases, documents sent to the Board of Directors for discussion or approval are made publicly available when they are sent to the Board. Where public consultation is envisaged, documents are made publicly available sufficiently in advance of the decision to allow for the public adequately to consider and formulate responses.

Facilitating access to decision-making

12. Advance announcements of the Bank’s intentions to initiate a decision-making process are disclosed, as well as information on how and when the decisions will be made.

Form of Dissemination

13. The Bank utilizes a wide range of dissemination mechanisms to disclose information to the public in an accessible form, including in gender and culturally sensitive forms. All automatically disclosed information is disseminated, at a minimum, through the Bank’s website. Information relevant to local or affected communities is made available in a form and manner which they can access in practice. Information provided via the Bank’s website is available in different formats, including in a text only format, to accommodate varying qualities of Internet access, and in a format that does not require particular proprietary software to access.

Public Information Centers
14. The Bank has at least one Public Information Center (PIC) in every borrowing member country and, where resources permit, several PICs across the country. Anyone may access PICs during working hours, and for free. Each PIC has a walk-in facility and at least one public computer terminal equipped with accessible modern recording devices (CD writer, pen drive) and connected to the Internet. Facilities are also available for photocopying and printing Bank documents, free of charge.

15. The Bank has a PIC Strategy to provide guidance to staff on the effective dissemination of information, including to people and communities which face barriers in accessing information, such as women, rural populations and indigenous peoples. The PIC Strategy will be updated periodically, at least every three years.

Support from PIC staff
16. PIC staff receive periodic training on information disclosure practices and assisting the public in accessing Bank information. PIC staff develop annual country-specific dissemination and outreach plans for country- and project-specific information, targeting individuals with varying levels of literacy, as appropriate in the local context. These plans identify a range of dissemination methods including radio and television, print media, community training and workshops. PIC staff foster the production of documents in local languages, and develop and maintain websites in local languages.

Information Kiosks
17. The Bank ensures that Information Kiosks are established at every significant Bank project area to provide the local population with project-specific information, in an appropriate form and language, and free of charge. Information Kiosks will be opened as soon as possible – and not later than 30 days after the Project Concept is approved – and will remain open until project completion.

Translation
18. The Bank makes publicly available a range of information in different languages based on what is appropriate for the target audience or audiences, and ensures that translated information is accessible and disseminated in a timely manner. This includes:
   a. Documents of wide interest relating to the Bank’s general operations (such as annual reports and Bank-wide policies and strategies) are translated and disclosed in “international” languages (including Arabic, Chinese, English, French, Portuguese, Spanish and Russian).
   b. Country strategies are translated into the country’s official language(s).
   c. For lending, credit, grant and guarantee operations, the Bank ensures:
      i. at a minimum, project information documents and brief summaries of all documents relating to the operation are translated into languages understood by affected people;
      ii. material from environmental assessments for Category A and B projects is made available in a language that is understandable to affected people and groups being consulted; and
iii. any required Resettlement Instruments or Indigenous Peoples Plans are made available in a language understandable to the displaced or affected people and local organizations.

d. The Bank provides translations of Bank documents relating to Bank-supported operations in response to requests on a case-by-case basis, taking into consideration the status of requesters (for example, whether they are affected by the operation) and the availability of translated material relevant to the operation.

e. The provisions above also apply to website design features, navigational menus and related technologies.

19. The Bank has a Translation Strategy to provide further guidance on what documents to translate into which languages beyond the commitments set out in the preceding paragraph. The Translation Strategy will be updated periodically, at least every three years.

Making technical information accessible

20. The Bank ensures that technical or statistical information which is publicly available is accompanied by sufficient explanation, as well as appropriate background or contextual materials, so that non-experts can understand it.

d. Open Meetings

21. All formal meetings of bodies with decision-making powers, such as meetings of the Board of Executive Directors, are open for attendance by members of the public and are webcast. To facilitate attendance, notice is provided at least two weeks in advance of the meeting, indicating the time and place of the meeting, as well as the topics to be discussed.

22. Meetings may be closed to protect one of the legitimate interests defined by the constraints in Section 2(f) of this policy, but any decision to close a meeting is taken at a public session, and reasons for closure are provided.

23. Information about a meeting, even a closed meeting, is made publicly available as soon as possible after the meeting by disseminating summaries, minutes and transcripts.

e. Processing of Requests

Requests for information

24. Anyone may make a request for information from the Bank. A request may be made in writing, including by delivering the request in person, or via regular mail, fax or electronically. A request may be delivered to any official or to any office of the Bank, and the Bank has a dedicated email address for electronic requests for information. A request may be made in any official language. There is no prescribed form for making a
request, but a request must, at a minimum, be sufficiently precise to enable Bank officials to locate that information and include an address for delivery of the information (which may be an email or any other type of address).

**Urgent requests**

25. Requesters may specify in a request for information why the request should be processed on an urgent basis, for example by indicating that an urgent response is needed to prevent harm or to promote participation.

**Form of access**

26. Requesters may also specify on a request for information the form in which they would like to receive the information, for example by inspecting a record containing the information, by obtaining a copy, either physical or electronic, of a record containing the information, by getting a transcript of a sound or visual recording of a record, and so on. The Bank will provide the information in the form requested unless this would:
   a. Be detrimental to the preservation of the record containing the information.
   b. Cause an exceptional disruption of regular work of the Bank.
   c. Represent a breach of copyright not held by the Bank.

27. When information is not provided in the form requested, it is provided in the available form which is most appropriate, taking into account the address for delivery of the information.

**Assistance**

28. Where a person is unable for whatever reason to prepare a written request, the Bank provides all reasonable assistance to record in written form an oral request. Where a request fails to specify the information sought in sufficient detail, the Bank provides all reasonable assistance to help clarify the request. Where a person is unable to make a request in an official language, the Bank makes all reasonable efforts to process that request in another language.

**Confirmation of receipt of a request**

29. Upon receipt of a request for information, the Bank provides the requester with confirmation of such receipt within 5 working days, indicating the date of the request and the name of the official receiving the request. The confirmation is provided in the appropriate format for delivery to the address provided by the requester (for example by email, by fax, by regular mail and so on).

**Timelines for responding to requests**

30. The Bank responds to requests for information as soon as possible and in any event within fifteen working days of receipt of the request. The Bank makes a particular effort to process urgent requests quickly and, in any case, processes such requests within five working days. For purposes of this paragraph, urgent requests are requests which relate to urgent human rights issues, or requests which reasonably appear to be urgent, including because of the potential for harm to locally affected people, taking into account
any representations to this effect made by the requester pursuant to paragraph 25. In exceptional cases, where the processing of a request requires extensive consultation with different Bank officials or third parties, or searching through a large number of records, the Bank may extend the deadline for responding to a request for a further ten working days to an absolute maximum of twenty-five working days. In these cases, the Bank notifies the requester, giving reasons, before the end of the initial fifteen working days of its intention to extend the timeline.

**Fees**

31. Information is provided to requesters free of charge. However, a copying fee, which will not exceed the lower of the actual cost or a copying rate set centrally by the Director of the InfoShop, may be charged for copying in excess of 100 pages.

32. In no case are fees charged for requests for information from project-affected persons or for requests for country information from citizens or residents of that country. Fees are also not charged for requests for information which is subject to automatic disclosure, or which are in the public interest, including where the information is sought with a view to contributing to better public understanding of the operations or activities of the Bank.

33. Where the form of receipt of the information stipulated by a requester imposes a particular burden on the Bank, for example because it requires transcription of many pages of material, the Bank may offer the requester a choice of receiving the information for free in another format or of paying reasonable costs for receiving it in the form stipulated.

**Notice in case a request is refused**

34. Where a request for information is refused, in whole or in part, the Bank provides notice of this to the requester. Such notice specifies the precise provision of this Policy relied upon to justify the refusal, as well as the right of the requester to lodge an internal complaint and then an appeal to the Inspection Panel.

**f. Constraints**

35. The Bank is committed to openness in all of its activities while, at the same time, it recognises that in some cases overriding interests require it to refuse to make certain information publicly available or to provide it upon request. The Bank refuses to disclose information only in accordance with the provisions of this Section of the Policy.

**Personal information**

36. The Bank may refuse to disclose information where to do so would involve the unreasonable disclosure of personal information about a natural person, including a member of staff. This will not apply where:

   a. The person has consented to the release of the information.
   b. The person has been dead for more than twenty years.
c. The information relates to the job description, position or functions of an employee or official of the Bank, or individual working for or with the Bank.

d. Notice has been provided to the person concerned under paragraph 45 of the request and that person has not objected to its disclosure.

Legally privileged information

37. The Bank may refuse to disclose information which is privileged from production in legal proceedings (i.e. because it is covered by attorney client privilege), unless the person entitled to the privilege has waived it.

Confidential third party information

38. The Bank may refuse to disclose information provided in confidence by a third party where:

   a. To disclose the information would, or would be likely to, cause serious prejudice to the trade, industrial, commercial or financial interests of a party other than the requester.

   b. To disclose the information would, or would be likely to, prejudice the future supply of similar information from a similar source, and the Bank has a significant and legitimate interest in the continued supply of such information.

39. The constraint set out in paragraph 38 does not apply where notice has been provided to the third party under paragraph 45 of an intention to disclose the information and that third party has not objected to its disclosure.

Health and safety

40. The Bank may refuse to disclose information where to do so would, or would be likely to, endanger the life, health or safety of any individual, or the environment.

Commercial interests of the Bank

41. The Bank may refuse to disclose information where to do so would, or would be likely to, cause serious prejudice to the legitimate commercial or financial interests of the Bank.

Policy formulation and investigations

42. The Bank may refuse to disclose information where to do so would, or would be likely to:

   a. Seriously frustrate the success of a policy, by premature disclosure of that policy.

   b. Significantly undermine the deliberative process within the Bank by inhibiting the free and frank provision of advice or exchange of views.

   c. Significantly undermine the effectiveness of a testing or auditing procedure used by the Bank.

   d. Cause serious prejudice to an ongoing investigation by the Bank.
43. The constraints set out in paragraph 42 do not apply to facts, analyses of facts, technical data or statistical information. The constraints set out in paragraph 42(a) and (b) do not apply once the policy has been adopted.

**Information provided by other States**
44. The Bank may refuse to disclose information provided to it in confidence by a State or another international organisation, where to communicate it would, or would be likely to, seriously prejudice relations with that State or other international organisation, on an objective standard, or endanger the future flow of information from that State or other international organisation. This constraint does not apply where notice has been provided under paragraph 45 of an intention to disclose the information and the State or other international organisation has not objected to its disclosure. It also does not apply where the information in question would be subject to disclosure under a national access to information law.

**Third party notice**
45. Where a request for information relates to information provided to the Bank in confidence by a third party, the Bank will give written notice to that third party of the request and will give the third party eight days within which to object to disclosure of the information and to provide reasons as to why the information should not be disclosed. Where a third party objects to the disclosure of the information, the Bank will take this into account, among other things, when deciding whether or not to disclose the information.

**Public interest override**
46. Notwithstanding any provision in this Section of the Policy, the Bank does not refuse to disclose information unless the harm to the interest protected by that provision outweighs the overall public interest in disclosure.

**Severability**
47. If requested information is stored in a record that contains some information which falls within the scope of the constraints in this Section of the Policy, that information will be removed from the record, to the extent that this is reasonably possible, and the rest of the record will be disclosed to the requester.

**Historical time limits**
48. The constraints set out in paragraphs 40, 41, 42 and 44 do not apply to information which has been held by the Bank for more than 10 years.

**g. Appeals**

**Internal complaints**
49. Any requester who believes that this Policy has not been applied properly has the right to submit an internal complaint to the Disclosure Complaints Committee. Where a complaint relates to a specific request, it shall be made within 45 days of the conclusion
of the normal processing of that request. A complaint may be made in any way in which a request may be made, as set out in paragraph 24. The Disclosure Complaints Committee is chaired by the Managing Director for Networks and also includes the Vice President, EXT, the Corporate Secretary, the General Counsel, and a Regional Vice President (on a rotational basis). The Disclosure Complaints Committee comes to a decision within 15 working days of receipt of a complaint, and informs the requester, concerned Bank staff and the public of that decision. The Disclosure Complaints Committee has all necessary powers to redress failures to apply this Policy, including by ordering the concerned Bank staff to release information.

Independent appeal
50. Any requester who is not satisfied with a decision of the Disclosure Complaints Committee may, within 45 days of receiving a decision (or of the deadline in the previous paragraph within which the Disclosure Complaints Committee should have provided a decision), appeal that decision to the World Bank Inspection Panel. An appeal may be made in any way in which a request may be made, as set out in paragraph 24. No charges are levied for the processing of appeals. The Inspection Panel is authorized by this Policy to enquire into any information appeal and, in doing so, has all the powers to investigate that it possesses under Resolution No. 93-10, which established it. The Chairperson or designated member of the Inspection Panel comes to a decision on any appeal under this paragraph within 30 working days and informs the Board of Executive Directors, the requester, the concerned Bank staff, the Disclosure Complaints Committee and the public of that decision. The Inspection Panel may recommend any measures it deems necessary to redress failures to apply this Policy, including that the concerned Bank staff be required to release information.

51. The Board of Executive Directors commits to implement recommendations by the Inspection Panel pursuant to the preceding paragraph.

Recommendations for reform
52. Where the Inspection Panel is of the view that structural measures are needed to promote better compliance with this Policy, it may make a report to this effect to the Board of Executive Directors of the Bank, along with its recommendations for reform. Any such report will be released publicly at the same time it is submitted to the Board of Directors.

h. Promotional Measures
53. The Bank is committed to taking the necessary measures to give full effect to its obligation to respect the right to information and it devotes the necessary resources, both financial and human, to achieve this. Among other things, the Bank has appointed a senior officer with responsibility for making sure that proper implementation measures are put in place and for monitoring and reporting publicly on implementation of the Policy.
Tracking requests

54. The Bank has in place a system for tracking requests, along with a central database of information about all requests for information. This database contains, in relation to all requests, among other things, when they were made, which unit of the Bank received them, what category of information was requested, where relevant, what country/project/loan they related to, the manner in which they were lodged (electronically, by mail, orally), how long it took to respond, any fees charged, any refusals to provide information and the specific constraint(s) relied upon to justify that refusal, and any complaints or appeals filed and the outcome of those complaints or appeals. The database itself is publicly available.

Annual reporting

55. The Bank produces an Annual Report each year on progress made in implementing this Policy. The Annual Report, among others, contains information about the extent of routine disclosure, measures taken to ensure access to decision-making and its processing of requests. The Annual Report is publicly available.

Sanctions

56. The Bank has a system of sanctions for staff who wilfully undermine the proper implementation of this Policy, including by obstructing access to information, by destroying records without authority, or by interfering in the work of others who are attempting to implement the Policy.

Recording information

57. The Bank has a protocol on what sorts of information will be recorded in permanent form (such as when minutes of meetings need to be kept) and what documents will be retained. This protocol is publicly available.

Other measures

58. The Bank undertakes the following additional actions to promote this Policy:
   a. Providing targeted training, and building elements into other training activities, on the right to information and how to implement this Policy.
   b. Incorporating performance in implementing this Policy into general corporate incentive structures and appraisal systems.
   c. Undertaking a range of measures to raise awareness among the general public – particularly individuals in project affected areas, and poor and rural populations, women, and indigenous peoples – about their right to information and how it may be exercised, including through the publication and wide dissemination of an accessible guide to using this Policy.
   d. Reviewing and improving on a continuous basis its record management systems.

Consultations on implementation

59. The Bank will undertake annual consultations with a range of stakeholders to identify problem areas in the implementation of this Policy, with a view to improving
implementation efforts.

3. Review

The Bank will conduct a formal review of this Policy after three years. This review will be conducted in a transparent and consultative fashion, and in a manner that ensures broad feedback from a range of interested stakeholders, and particularly from project affected communities.
APPENDIX

Documents and Information Subject to Routine Disclosure

A. Operational documents prepared by the Bank

Country Strategy and Related Information
- Country Portfolio Performance Reviews (CPPR)
- Country Assistance Strategies (CAS), Draft CAS, Draft Concept Notes and Consultation Plan for a CAS
- CAS Progress Reports (CASPR)
- Interim Strategy Notes (ISN)
- Country Assistance Evaluations (CAEs)
- CAS Completion Reports (included as an annex to the follow-on CAS)
- Public Information Notice for a CAS (CAS-PIN)
- Chairman’s Concluding Remarks on the discussion of a CAS
- Country Economic Memoranda
- Joint Staff Advisory Notes on Poverty Reduction Strategy Papers (PRSPs)
- PRSP Annual Progress Reports
- PRSPs Status Reports
- Chairman’s Summing-up on the discussion of a PRSP
- Country Financing Parameters (CFP)
- Analyses that underpin the preparation of Country Financing Parameters
- Transitional Support Strategies

Economic and Sector Work
- Economic and Sector Work (ESW) reports (gray cover reports)
- Economic and Sector Work (ESW) reports (non-gray cover reports)
- Financial Sector Assessments (FSA)
- Technical Notes and Detailed Assessments of Compliance with Standards and Codes
- AAA Products (to be identified during consultations)

Lending Documents and Related Information
- Initiating Memoranda
- Project Concept Note and Project Concept Document
- Minutes of Concept Review and Decision Meetings
- Project Information Documents (PID), and updated versions
- Program Information Documents (PID)
- List of Factual Technical Documents that underpin project preparation (included in the PID)
- Monthly Operational Summary of the lending pipeline (MOS)
- Beneficiary Assessments
• Project Appraisal Documents (PAD) and Draft Project Appraisal Document
• Project Papers (PP) and Draft Policy Papers
• Program Documents (PD) for Development Policy Lending (DPLs) and Draft PDs for DPLs
• Supplemental Financing Documents for DPLs
• Tranche Release Documents (TRD) for DPLs
• IMF-Bank Relations Annexes
• Status of Projects in Execution (SOPE) Report
• Integrated Safeguards Data Sheets (ISDS)
• Country Assessment Reports on the Use of Country Systems (UCS)
• Project Assessments for UCS pilot countries
• Credit/Loan and Project Agreements
• Guarantee Agreements
• Grant or Trust Fund Agreements
• Back to Office Reports (BTORs)
• Implementation Completion and Results Reports (ICR)
• Note on Cancelled Operations (NCO) (previously Project Completion Note)
• Monthly Loan and Credit Statements
• Implementation Status and Results Reports (ISRs) relating to projects under implementation
• Aide Memoires
• Project Performance Assessment Reports (PPARs)
• Impact Evaluation Reports (IERs)

Other
• Sector Strategy Papers (SSP), Draft Sector Strategy Papers, Draft Concept Notes and Consultation Plan for an SSP
• Chairman’s Concluding Remarks on the discussion of a SSP
• All other operational policy and strategy papers
• Country Policy and Institutional Assessments (CPIAs) (rationale)
• Numerical Country Policy and Institutional Assessment (CPIA) Ratings for countries eligible for IDA financing
• Numerical IDA Country Performance (ICP) Ratings (derived from CPIA ratings)
• Trust Fund Framework Agreements and Administrative Agreements
• Funding proposals for activities financed through Bank-administered trust fund
• Trust Funds Annual Report
• Preliminary, decision-point and completion-point documents prepared under the Heavily Indebted Poor Country (HIPC) Initiative
• The Chairman’s Summing-up on a HIPC discussion
• Sector and Thematic Evaluations, Draft Sector and Thematic Evaluations, and Management Response regarding Sector and Thematic Evaluations
• Chairman’s Concluding Remarks on the discussion of Sector and Thematic Evaluations
• QAG synthesis reports
• QAG Quality Assessments
• Annual Review of Development Effectiveness (ARDE)
• Annual Report on Operations Evaluation (AROE)
• Quarterly Management Reports

B. Financial information
• IBRD and IDA’s Annual Report
• Annual Information Statement
• Quarterly Condensed Financial Statements
• Annual Budget Document
• Bond Offering Documents
• Monthly Statements of Loans and Credits

C. Documents prepared by a member country that must be disclosed as a precondition for doing business with the Bank
• Poverty Reduction Strategy Papers (PRSP), Draft PRSPs, Draft Concept Notes and Consultation Plan for an PRSP, and Interim-PRSPs
• Letter of Development Policy (LDP) or Sector Policy
• Borrower Policy Statement
• Environmental Action Plans
• Environmental Assessment Reports and Draft Environmental Assessment Reports
• List of sub-projects (for financial intermediary operations or sector investment projects)
• Assessments of institutional mechanisms in place for conducting sub-project EA work (for financial intermediary operations or sector investment projects that are expected to have Category A sub-projects)
• EA reports for Category A sub-projects (under financial intermediary operations of Sector Investment Operations)
• Resettlement Plans and Draft Resettlement Plans
• Resettlement Policy Frameworks and Draft Resettlement Policy Frameworks
• Resettlement Process Frameworks and Draft Resettlement Process Frameworks
• Resettlement Plans for sub-projects under financial intermediary operations
• Indigenous Peoples’ Plans (IPPs) and Draft IPPS
• Indigenous Peoples’ Planning Frameworks and Draft IPP Frameworks
• IPPs for sub-projects involving Indigenous Peoples, and Draft IPPs for sub-projects involving Indigenous Peoples
• Social Assessments for projects and sub-projects involving indigenous peoples and Draft Social Assessments
• Procurement Plans and updates
• Project Implementation Plans
• Procurement Notices (consistent with the Bank’s Procurement Guidelines)
• Contract award information (consistent with the Bank’s Procurement Guidelines) including those subject to prior review by the Bank.
• Project audits
• Financial statements for Bank-financed projects.
D. Other Information

- The Board calendar
- Executive Directors’ Work Program
- Minutes, summaries and transcripts of Board meetings
- Chairman’s Concluding Remarks and Summings Up on discussions of CASs, SSPs, PRSPs, HIPC documents, and other policy, strategy and topical issues
- Staff directory, including contact information
- Staff Manual, Handbooks, Procedures and Guidelines