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**IFI Transparency Resource**

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EDITION 1.0

# A Comparative Analysis and Introduction to the IFI Transparency Resource

Opening the International  
Financial Institutions

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February 7, 2005



## Acknowledgements

This project is a joint production of the Bank Information Center (BIC) and *freedominfo.org* and has been developed in the context of the Global Transparency Initiative—a network of civil society organizations committed to strengthening public oversight of the International Financial Institutions (IFIs) by promoting greater access to information.

The project was conceived and designed by Graham Saul (BIC), Toby McIntosh (*freedominfo.org*), Abigail Parish (BIC/*freedominfo.org*) and Jennifer Kalafut (BIC). Bruce Jenkins (BIC) gave ongoing support in reviewing and analyzing the information contained in the IFI Transparency Resource and Thomas Blanton (*freedominfo.org*) provided indispensable leadership in helping to ensure that the project had the support and input it needed to arrive at its current iteration. Carlos Osorio and Maria Lorena Martinez (National Security Archive) dedicated hours of technical expertise regarding the construction of the database; and the website and CD-ROM would not have been realized without the ingenuity and skill of Herb Caudill (Caudill Website Design and Construction, Inc.).

Tremendous thanks are due to the individuals whose painstaking research and fact-checking make up the backbone of the Resource. The energy and dedication of Enoka Herat (BIC) and Khadija Zaheer has made this project possible.

We would also like to thank all of those individuals who contributed to thinking through the framework and rationale behind the Resource, and who reviewed proposed categories of information and various analytical reports: Manish Bapna (BIC), Toby Mendel (ARTICLE 19), Kay Treakle (Mott Foundation), Shannon Lawrence (Environmental Defense), Mishka Zaman (BIC), Jane Garrido (BIC), Sajit Gandhi (formerly with National Security Archive), Alex Wilks (formerly with Bretton Woods Project), Carol Welch (formerly with Friends of the Earth-US), Steve Herz (formerly with Friends of the Earth-US), David Hunter (American University), Hetty Kovach (formerly with Global Accountability Project), John Fitzgerald (Government Accountability Project), and members of the Global Transparency Initiative.

There were many members of the NGO community and staff of the international finance institutions who aided this project by reviewing tables of base-line data in the Resource: Nikki Reisch (BIC), Steve Herz (Friends of the Earth-US), Fabien Lefrancois (formerly with Bretton Woods Project), Petr Hlobil and Magda Stoczkiewicz (CEE Bankwatch Network), John Ferriter (InterAmerican Development Bank), Bart Edes (Asian Development Bank), Kristin Roesser (International Monetary Fund), Gregory F. Maggio and Yasmine Tayyab (formerly with International Finance Corporation), Evelyn Castro (World Bank Group), and Yvonne Berghorst (European Investment Bank).

There were countless others who helped answer many questions regarding IFI operations and directed us to more information, especially Daniel Bradlow (American University), Raul Herrera and Jorge Roldán (InterAmerican Investment Corporation), Vince McElhinny (formerly InterAction, IDB-Civil Society Initiative), Veronique Danforth and Ida Mori (World Bank Group), Warren A. Van Wicklin and numerous staff from various departments within the IFIs.

Finally, this endeavor would not have been possible without the generous support of the Ford Foundation, the Charles Stewart Mott Foundation, the Rockefeller Brothers Fund, the Grassroots Foundation, and the Stewart R. Mott Charitable Trust.

The IFI Transparency Resource is an ongoing and developing project. Any mistakes within it are the fault of the creators, and ours alone. We welcome your feedback.



# OPENING THE INTERNATIONAL FINANCIAL INSTITUTIONS

## A Comparative Analysis and Introduction to the IFI Transparency Resource

### Summary

Access to information is a critical factor in improving development effectiveness. It allows for informed participation by people who have a right to be involved in decisions that affect their lives. Access to information increases accountability and is recognized as a core principle of good governance. International Financial Institutions (IFIs) have responded to external demands for greater access to information by adopting disclosure policies. However, IFI disclosure practices continue to suffer from notable weaknesses, including: inoperable principles of disclosure; an absence of disclosure process guarantees for those seeking information; overly broad exceptions to disclosing information; closed board-level decision-making; non-disclosure of important information until decisions are finalized; and a lack of information during project implementation. The *IFI Transparency Resource*—an on-line and CD-ROM database of transparency standards at ten IFIs—allows the public to easily identify what is and is not disclosed by these institutions and to sharpen efforts to overcome limitations in access to information. There is clearly room for the institutions to “level-up” and harmonize their respective policies to a set of common, minimum, mandatory standards. As the IFIs reform their disclosure practices, they should tackle the weaknesses brought to light by the *Resource*. Strengthening a culture of institutional openness at the IFIs is consistent with public expectations for global governance in the 21<sup>st</sup> century.

**Strengthening a culture of institutional openness at the International Financial Institutions (IFIs) is consistent with public expectations for global governance in the 21<sup>st</sup> century.**

### 1. Introduction

Access to information lies at the heart of democratic governance. Without timely access to information, people cannot meaningfully participate in decisions that affect their lives. In development processes, access to information – and the participation and accountability it fosters—strengthens development effectiveness and increases local ownership and sustainability of outcomes. Access to information and institutional transparency are also recognized as core principles of good governance.

International Financial Institutions (IFIs) strongly influence the direction and quality of development decision-making by countries that depend on their resources. The potential of IFI lending and policy requirements to pro-

foundly reshape a borrowing country's economy and society places significant governance responsibilities back on the IFIs themselves. Often the IFIs focus on the transparency of the national implementing agencies or the private sector companies with which they cooperate. While the IFIs should continue to promote transparency in its public and private sector partners, they should also critically examine and improve their own openness standards and practices. Access to information at the IFIs is in of itself essential for good global governance.

How readily can members of the public access information from the IFIs, from the level of projects to the realm of decision-mak-

**The IFI Transparency Resource is available online at:**

**[ifitransparencyresource.org](http://ifitransparencyresource.org).**

ing at their boards of directors? How strongly do the IFIs follow good governance principles of transparency and public access to information in their own structures and operations?

To shine a light on these and other questions concerning IFI transparency, the Bank Information Center and *freedominfo.org* have compiled *The IFI Transparency Resource*, a searchable, on-line database ([www.ifitransparencyresource.org](http://www.ifitransparencyresource.org)) of the disclosure standards of ten international financial institutions. The Resource allows users to easily review what types of information these IFIs disclose, compare disclosure standards across institutions, and more broadly, to put forward a vision for transparency at the IFIs and inter-governmental organizations. This information tool has been developed for civil society, journalists, academics and the IFIs themselves to support openness at these powerful institutions and to promote higher standards in global governance.

This paper provides some background on the development of transparency standards at the IFIs, an introduction to the *IFI Transparency Resource*, and a set of observations derived from the Resource. The paper ends with a description of some challenges faced in further development of the Resource.

## 2. Development of IFI Transparency Standards

Historically, the IFIs operated largely in secret, with at best limited, ad hoc approaches to providing information to affect communities or the public at large. The World Bank first issued instructions to its staff on information disclosure in 1985 but it did not approve a formal Information Disclosure Policy until 1993. Several other IFIs quickly followed suit. The adoption of formal IFI disclosure policies established some predictability to access to information and created a floor from which standards could be raised (though large swaths of information were considered not suitable for disclosure).

A number of factors converged to impel the IFIs to expand access to information in the early and mid-1990s. Several controversial development projects had attracted international attention and highlighted the need for greater transparency. Civil society and IFI shareholder pressure caused several IFIs to partially expand the openness of their operations. International norms of access to information were also being strengthened by various international agreements, such as the 1992 Rio Declaration on Environment and Development. Development research-

ers also were finding that greater access to information improved the quality of participation and development effectiveness. Further, civil society organizations in many borrowing countries were actively advocating for greater access to information at the national level, as exhibited in the rapid growth of national freedom of information laws.

Since the initial IFI disclosure reforms of the mid-1990s, we have since witnessed a second generation of disclosure policies at a number of IFIs. The World Bank's 2000-2001 disclosure policy spawned the review of disclosure standards at the European Bank for Reconstruction and Development (2002-2003), the Inter-American Development Bank (2003-2004), and the Asian Development Bank (2003 to present). With each policy review, the IFIs establish new minimum, mandatory standards of disclosure.

In spite of these changes, the IFIs continue to exhibit uneven disclosure standards, many of which fall far short of principles of good governance. Across the board, IFIs continue to deny public access to critical information—information that by right should be in the public domain and access to which would allow civil society actors to make more informed decisions about IFI operations, policies, and processes. These shortcomings of IFI transparency will be discussed in the following sections.

## 3. The IFI Transparency Resource

The *IFI Transparency Resource* deconstructs the operations of ten IFIs into thirteen broad categories (governing bodies, policies and strategies, the lending cycle, etc.) which in turn are further broken down into almost 250 indicators of transparency. Comparing ten IFIs across 250 transparency indicators has produced the most comprehensive baseline analysis of access to information at the IFIs. Located online at [www.ifitransparencyresource.org](http://www.ifitransparencyresource.org) and available on CD-ROM, the Resource contains a large, searchable database on the transparency of IFI operations and projects as well as a large selection of related resources, including IFI disclosure policies, civil society reports, useful websites, and more.

The IFI Transparency Resource project began in August 2002, with two primary objectives: (i) to identify what information is produced and disclosed by the IFIs and (ii) to develop recommended IFI transparency standards. Meeting these objectives would allow users to cut through the confusion often associated with IFI disclosure poli-

cies, identify “best transparency practices” among the IFIs and inform the debate around transparency principles and accountability.

BIC and *freedominfo.org* chose to focus on ten multilateral financial institutions that operate in both the public and private sectors. For purposes of the Resource, the public and private lending arms of the same institution have been treated separately given widely divergent transparency standards. The Resource contains data on the following IFIs:

1. World Bank<sup>1</sup>: International Bank for Reconstruction and Development (IBRD)/International Development Association (IDA)
2. International Finance Corporation (IFC)
3. Multilateral Investment Guarantee Agency (MIGA)
4. Inter-American Development Bank (IDB)
5. Inter-American Investment Corporation (IIC)
6. Asian Development Bank (ADB)
7. African Development Bank (AfDB)
8. European Bank for Reconstruction and Development (EBRD)
9. European Investment Bank (EIB)
10. International Monetary Fund (IMF)

Measuring transparency at the IFIs is a complicated task. To facilitate this undertaking, BIC and *freedominfo.org* chose to disaggregate the operations of IFIs into thirteen broad categories. These categories represent: (i) general operations; (ii) decision-making processes; and, (iii) accessibility of IFI information. (see Table 1.)

Category 1, General Institutional Information, exam-

ines disclosure of such items as organizational charts, budgets and staff contact information. Categories 2–8 examine IFI transparency through each step in the formulation of strategies and policies and in project lending cycles. For instance, each of these categories contains indicators that consider the transparency of draft and final draft information. These indicators help assess the ability of the public to effectively participate in decision-making processes at the IFIs. Categories 9–13 measure IFI standards for cataloguing and disseminating information in a timely manner and appropriate language. Many of these categories (including translation, archives and websites) deserve greater attention and will be expanded in the coming months

In order to compile the data in each of these categories, researchers at BIC and *freedominfo.org* reviewed over one-hundred different policies at the IFIs. Typically, these included policies on disclosure, safeguard policies and business procedures. Researchers also conducted interviews with IFI representatives and provided each IFI with the full range of institutional data collected for review at least once prior to the release of the IFI Transparency Resource website.

It is important to note that the data in the Resource represents IFI disclosure standards as mandated in their policies and procedures. The data does not, in all cases, represent disclosure practices on the ground.<sup>2</sup>

The *IFI Transparency Resource* is constantly evolving as data collection is refined and sections are updated in line with IFI revisions of their policies. Furthermore, several areas of the Resource—such as the sections on institutional budgets, the lending cycle of financial intermediaries and anti-corruption information—require further attention and development.

**Table 1. Organization of Categories in the IFI Transparency Resource**

<b>General operations</b>	<b>Decision-making processes</b>	<b>Accessibility of information</b>
1. General Institutional Information	2. Governing Bodies	9. Disclosure policies and process guarantees
	3. Institution-wide policy and strategy formulation	10. Translations
	4. Institution-wide evaluations and audits	11. Archives
	5. Country policy and strategy formulation	12. Public information centers
	6. The lending cycle	13. Websites
	7. The lending cycle for financial intermediaries	
	8. Accountability mechanisms	

## 4. Comparative Analysis of IFI Transparency

The following observations provide an overview of transparency standards at ten international financial institutions covered by the IFI Transparency Resource. Based upon the data contained in the Resource, the observations are organized into three sections: (a) general observations; (b) category overviews, and; (c) institution-specific observations.

### A. General Observations

**Over the past twelve years, all the IFIs examined in the Resource have replaced ad hoc approaches to information disclosure with formal, written policies that establish a range of standards for the release of information to the public.** The policies have introduced some measure of predictability in public access to information, though significant gaps remain. IFI disclosure policies have typically included more standards on access to information in project design and preparation phases than on other areas of IFI operations and governance.

**The stated guiding principle behind a typical IFI disclosure policy is a presumption of disclosure in the absence of a compelling reason not to disclose.<sup>3</sup> In practice, this presumption of disclosure is largely meaningless.** While such a presumption is a laudable and important principle, IFI disclosure policies operate conversely: there is a presumption against disclosure in absence of a specific requirement to disclose. Typical IFI disclosure policies consist of an affirmative list of documents that either must be disclosed or are disclosed at the discretion of certain actors. Documents that fall outside such lists are assumed non-disclosable except in outstanding circumstances. Exceptions do occur, but the default position tends to be that documents that are not specifically covered in the policy will remain confidential unless management seeks the Board's permission to disclose. The actual stated presumption of disclosure is only applied to the identified documents. However the typical disclosure policy limits this presumption even further by applying overly broad "exceptions" (for example, the World Bank's policy states that information will not be disclosed if it might "adversely affect relations between the Bank and a member country.")<sup>4</sup>

**The IFIs disclosure policies typically do not include the range of disclosure process guarantees that are commonly found at the national level, further constraining any presumption of disclosure.**

Whereas domestic freedom of information legislation is subject to interpretation and enforcement by the judiciary of a given country, IFIs do not provide independent appeals mechanisms for people who feel they have been wrongly denied access to information.<sup>5</sup> Although most of the IFIs have investigation mechanisms to monitor policy compliance, the mandates and/or procedures of these bodies are generally not geared for providing timely opinions on the public's interest in disclosure. These mechanisms are not specifically tasked with the responsibility of balancing the need for confidentiality with the "public interest" in transparency.

**IFI disclosure policies reflect a substantial deference to private corporations and a limited willingness to acknowledge people's right to know about the private sector activities of public institutions.** Most international financial institutions lend to both sovereign governments and private companies and apply different standards of disclosure depending on whether they are financing the public or private sector. In general, IFIs release less information related to private-sector projects, for instance, none of the IFIs disclose a private sector project board report which contains the most detailed information on a project. Furthermore, the institutions disclose less evaluative information about private lending operations. The IFIs also tend to define "business confidentiality" as anything that businesses deem to be confidential, rather than placing the burden of proof on businesses to justify non-disclosure in the face of strong public interest.

**Citizens of member countries have few if any means of knowing the positions expressed by their governments at the IFIs.** Executive Directors, who are appointed by member governments to sit on the boards of the various IFIs, conduct their meetings behind closed doors. Statements of individual Executive Directors are not routinely disclosed. Minutes, transcripts or detailed summaries are generally not available (only the IDB has committed to the disclosure of Board minutes). Short summaries of a limited range of board discussions at some of the institutions are available, but these summaries do not provide a detailed overview of the issues raised by Executive Directors. Even less is known about the important activities of IFI board sub-committees (again, only the IDB requires some public reporting from such committees). The "boards of governors," which usually meet only once per year and typically are comprised of Ministers of Finance from member countries, tend to be more transparent than the more active boards

of directors (meeting agendas and governors' prepared statements are typically disclosed).

**None of the IFIs has coherent guidelines or procedures for systematic public consultation and the disclosure of information during the development or review of policies or strategies.** As a result, the transparency of policy and strategy formulation and review processes within the IFIs is determined on an ad hoc basis, usually depending on the amount of external pressure brought to bear on the institutions in relation to a particular policy review. Some IFIs have begun to release sector specific draft policies and strategy papers.

**IFI disclosure policies are generally geared towards informing people of decisions that have already been made, rather than giving people the information that they need to participate in decision-making.** There are notable exceptions to this rule, but in general the IFIs fail to share detailed information early in the deliberative process and are more comfortable distributing outcomes of decisions rather than working drafts. The failure of IFIs to systematically release draft "country strategies"—often referred to as the IFI's "business plan" for a borrowing country—is a glaring example (only the AfDB requires the release of draft country strategies, with the World Bank allowing disclosure in some cases). An important exception concerns the assessment of potential environmental and some social impacts of IFI financed projects; here all IFIs, with the exception of the EIB, require the release of early, draft information when engaged in potentially high-impact projects.

**The IFIs do not disclose substantive information during project implementation.** Little information, if any, is disclosed after project approval for both private and public sector activities of the IFIs. The World Bank and IDB both disclose short updates on the "status of projects in execution" but these updates are minimal and do not report on how identified development objectives are being met or how social and environmental impacts are being mitigated through project implementation. The World Bank's disclosure policy does provide for the possible release of documents during the implementation of a structural or sectoral adjustment program.

**In general, the IFIs do not have procedures or policies governing the dissemination and the translation of information.** IFIs typically distribute information through Public Information Centers (PICs) and websites. Many IFIs have information centers in borrowing countries that should serve as dissemination points,

particularly to communities without other means of accessing information (e.g., internet). However, the World Bank is the only IFI to develop a strategy to address the objectives and operations of its PICs. This strategy, for instance, outlines the minimum facilities that should be available (e.g., staff knowledgeable of Bank disclosure requirements and a public computer terminal with access to World Bank external website).

All IFIs covered by the Resource have websites that contain a breadth of information. In general, any information that is publicly available from the IFIs is placed on the institution's website. However, IFI websites may not be accessible to all stakeholders and only the AfDB is in the process of improving a text-only option for its website (for those stakeholders with low-speed internet access).

Most IFIs translate general institutional information (such as Annual Reports) into a number of international languages. Further, most IFIs require the provision of social and environmental project documents in local languages. However, only the World Bank has begun to outline a framework on the systematic translation of documents, and has provided some information on how to request the translation of documents. Importantly, the lack of a systematic approach to translation inhibits broad stakeholder engagement in IFI operations at the country and local levels.

## **B. Category Overviews**

The IFI Transparency Resource is organized into 13 categories of indicators (as described above). Initial observations comparing the transparency standards of the IFIs in each of these categories follow.

### **1. General Institutional Information**

**General institutional information at the IFIs is disclosed at a generally consistent level across the institutions, including both public and private lending arms.** Every institution covered in this study releases some form of statutes and by-laws that explain the establishment and the mandate of the IFI. Furthermore, every institution discloses an organizational chart describing its structure. This information is easily located on the IFIs' web sites.

The most notable difference in the disclosure of general institutional information concerns staff directories. Neither the European Investment Bank (EIB) nor the International Monetary Fund (IMF) releases a hard-copy

directory with staff names and contact information. Furthermore, while the Multilateral Investment Guarantee Agency (MIGA), Asian Development Bank (ADB) and the European Bank for Reconstruction and Development (EBRD) may release a directory, the directories primarily refer to management (in the case of MIGA) or are limited to the contact information for headquarters' staff (with regards to EBRD).

## 2. Governing Bodies

**The governing bodies of the IFIs are almost completely closed to public scrutiny.** Only very basic information, such as the appointment procedures of the boards and the names of governors and executive directors, are disclosed by all the institutions covered by the Resource. IFIs that go beyond releasing a simple list of board members include the African Development Bank (AfDB), which makes public the addresses and telephone numbers of its Board of Governors. Also, the World Bank, IFC, MIGA, EIB, IDB, and IIC all release contact information for their executive directors. The meetings of the boards of executive directors are not open to the public or journalists. Transcripts, summaries, or minutes (with the exception of the IDB) of Board meetings are kept secret. Furthermore, only the IDB, World Bank and African Development Bank make a commitment to disclose monthly agendas that highlight the topics of some upcoming Board discussions.

Board sub-committees, which play a major role in decision-making at the IFIs, are even less transparent than the full boards of the institution. None of the IFIs proactively disclose a full list of names, members, or descriptions of the subcommittees of the boards of executive directors (with the exception of the ADB which discloses some information on its four main committees). The IDB is notably more transparent than other institutions with regards to its Board committees; reports to the full board from the chairs of the board committees regarding certain policy or strategies discussions are publicly disclosed. The majority of information captured in the IFI Transparency Resource on sub-committees came from face-to-face meetings with IFI staff.

## 3. Institution-wide Policy and Strategy Formulation

**While the IFIs have begun to make more policies and strategies publicly available after finalization, they do not have clear procedures regarding the transparency of policy and strategy reviews and**

**development processes.** The AfDB, EBRD, IDB and World Bank have begun to require the disclosure of some draft policies and strategies for public review before board approval. However, this requirement normally only applies to specified policies and strategies, rather than the full gamut of policy and strategy papers produced by the institutions. For example, the EBRD will disclose draft *Sectoral Policies* “in the spirit of its willingness to listen and be receptive to comment” for a period of 45 calendar days<sup>6</sup> and the World Bank will disclose for public review and comment the draft *Concept Note, Consultation Plan* and draft document for *Sector Strategy Papers*.

The IFIs are not required to disclose final drafts of a policy or strategy prior to board approval. Furthermore, most of the institutions do not release full records of board discussions regarding the review of a policy. The World Bank and AfDB will sometimes disclose *Chairman's Concluding Remarks* or the *Chairman's Summing Up*, which is a brief description of the board discussion pertaining to a given policy. The IDB discloses minutes for all of its board meetings.

The EBRD, World Bank, IDB and AfDB are slightly ahead of other IFIs in regards to the transparency of their policy review or development process, with the IIC and MIGA falling clearly behind. None of these institutions require announcements of intent to review or develop a policy (the IDB will sometimes release such a notice); nor are they required to release the procedures and timeline for policy reviews or draft policies. Additionally, while most of the IFIs publish, to varying degrees of detail, a board work program, calendar or monthly agenda that may list the upcoming board discussion on a policy or strategy, the EIB and ADB provide no information on the planned board discussions.

## 4. Institution-wide Evaluations and Audits (+ Research)

**In general, the IFIs disclose several types of final evaluations that consider broad institutional performance.** Almost every IFI discloses some form of a portfolio performance review that contains a general evaluation of the institutions' lending operations. In some cases, these broad performance reviews are contained in an institution's annual report. Furthermore, most IFIs disclose final sector and thematic evaluations along with regional or country evaluations. The most noticeable difference in the transparency standards of evaluations and audits is between the public and private sector operations of these institutions. For example, the IFC, IIC and MIGA do not disclose the most detailed country and

regional evaluations. In fact, many of the evaluation documents disclosed by the IFC, like the *Operations and Evaluations Group Findings*, are summaries or abstracts of more detailed papers and are prepared specifically for public consumption. These three institutions also do not disclose annual reports of their evaluation units, while every other IFI contained in this study does. The Operations Evaluation Unit (OEU) of MIGA is the most non-transparent evaluations department researched in the IFI Transparency Resource. The OEU does not disclose any information on the internet.

As is the case in many areas of operations and policy development at the IFIs, draft evaluations and audits, including preparatory documents such as desk reviews and field reports from consultations, are not released. Only the IMF will in some instances release draft reports from its Independent Evaluation Office. Finally, commissioned independent research, including research into development trends, a theme or sector, or sometimes country analyses, are almost always disclosed by the IFIs.

## 5. Country-Specific Analysis and Strategy Papers

The IFIs conduct various forms of country analyses and evaluations, which help inform the lending strategies, or country strategies, for each borrowing member. **The majority of IFIs disclose final economic reports or analyses for a given country. But, as is the case with institution-wide policies and strategies, the development or review of country-specific analyses and strategy papers is largely not transparent, without formal guidelines for public consultations and only sporadic release of draft documents.**

Most of the IFIs produce country strategies to guide their lending portfolio in a given country (exceptions include IIC, MIGA, and the EIB). The development of country strategies at the IFIs suffer from a lack of public transparency, with the **African Development Bank and, to a certain degree, the World Bank, as significant exceptions.** The AfDB requires the disclosure of draft *Country Strategy Papers* “50 days prior to formal Board discussion”<sup>7</sup> and the World Bank allows disclosure of discussion papers on the *Country Assistance Strategy* at the discretion of the borrowing country. None of the IFIs publish the external comments received during the development of a given country strategy, except for the World Bank, which discloses them on a country-by-country basis. Additionally, none of the IFIs provide information on the Board discussion and approval of the strategies,

except for the World Bank and African Development Bank, which produce a one-page summary, and the IDB, which discloses the minutes of all board meetings.

The majority of the IFIs that develop country strategies disclose them upon board approval, including the ADB, AfDB, EBRD, and the IDB. All of the institutions, however, reserve the right to exclude confidential material from the strategies. In the case of the World Bank, final strategies are disclosed for IDA borrowing countries while those of IBRD borrowers are disclosed only at the request of the borrowing country. The World Bank and ADB require the disclosure of progress reports on the implementation of their respective country strategies. The AfDB, EBRD, and IMF do not disclose progress reports or evaluations on the implementation of their country strategies.

## 6. The Lending Cycle

**One of the most notable failures in IFI disclosure policies is the inability of citizens to obtain valuable information during project preparation.** While the majority of the IFIs provide some summary information about projects in preparation, neither the EIB nor MIGA systematically disclose a list nor description of projects in the pipeline. However, the most detailed information on projects, contained in staff reports to the board, is not disclosed by any IFI until after project approval, if at all. Staff reports include such documents as the draft Project Appraisal Document at the World Bank and the draft Public Sector Board Report in the case of the EBRD. Similarly, background feasibility and technical studies are difficult to obtain during project preparation. Only selected studies related to safeguard policies (e.g. environmental studies, indigenous peoples plans, and involuntary resettlement plans) are generally available during project preparation.

**The AfDB and ADB currently boast the highest requirement for the disclosure of social and environmental information.** Each institution requires that this information be disclosed at least 120 days prior to project approval for both public and private sector lending. The remaining IFIs maintain lower standards for private sector disclosure.<sup>8</sup>

**Project implementation and supervision is arguably the most secretive phase of the project development cycle.** After project approval, the public is able to find little information concerning projects in implementation. This is a major weakness in IFI disclosure practices for it is during implementation that the most

extensive monitoring and public feedback is required. The World Bank annually discloses a report entitled “Status of Projects Under Implementation” which provides a one-paragraph summary on the status of all active projects. The IDB develops and discloses a similar report, entitled “Annual Report of Projects in Execution.” Neither provides adequate information on issues that may be at play in project implementation. Annual supervision reports and mid-term reviews are almost never disclosed (with the exception of Tranche Release Documents for World Bank Adjustment Operations which are disclosed at the discretion of borrowing countries). The ADB, AfDB, IDB and World Bank all disclose project completion reports developed by staff, however, only in the case of the ADB, EIB and World Bank are final evaluations (which are developed after the completion of a project) released to the public.

## 7. The Lending Cycle (Financial Intermediaries)

[This section is forthcoming.]

## 8. Accountability Mechanisms

Quasi-independent bodies to promote compliance with operational policies and improve overall accountability have been recently established in several IFIs. People claiming harm caused by IFI projects or violations of IFI policies can bring grievances and seek remedies to these bodies. The AfDB, IIC, and IMF do not have such accountability mechanisms. The EIB’s accountability mechanism is not yet covered in this report. Therefore, this section focuses on a comparison of the accountability mechanisms of the ADB, EBRD, IDB, the World Bank’s Inspection Panel, and the Compliance Advisor Ombudsman of the IFC and MIGA.

The World Bank and ADB lead the IFIs in terms of the transparency of accountability mechanism processes. These mechanisms disclose the roster of investigators or panel members, recommendations of the mechanism regarding the eligibility of a request, the terms of reference for an investigation, and the final report. The IDB’s Independent Investigation Mechanism (IIM) is perhaps the most inaccessible. Information generated by the IIM or over the course of an investigation is difficult to find despite required disclosure. On the internet, no information about the IIM is linked to the IDB’s home page, and finding webpages on the IIM require extensive searching.

Finally, only the ADB and CAO of the IFC and MIGA develop and disclose monitoring reports assessing the

progress made on recommendations. None of the other IFI accountability mechanisms conducts monitoring after approval of the final inspection report.

## 9. Disclosure Policies and Process Guarantees

**All of the institutions covered in this study have information disclosure policies that provide a degree of predictability on what will and will not be publicly disclosed by the IFIs.** The standards set forth in these policies are a significant focus of the IFI Transparency Resource and are elaborated throughout these observations.

While some IFIs provide certain process guarantees for handling requests for information, **no IFI covered by the Resource provides the full range of guarantees that are commonly present at the domestic level**, such as clear instructions on how to request information, formal replies to information requests, time-bound information request processing, and procedures for appealing a decision to deny disclosure.

Discrepancies exist across the IFIs regarding process guarantees. For example, only the ADB and EIB guarantee written replies and maintain prescribed timelines for handling information requests. The EIB is the only IFI covered by the Resource that does not publicly provide at least a minimal catalogue of available documents. The AfDB, EBRD and IMF are the only three that do not release information on how to request information. None of the IFIs have an articulated appeals procedure for appealing denials of information, with the exception of the EIB, which refers complainants to the European Union Ombudsman. However, as previously noted, the CAO, the accountability mechanism of the IFC, is better suited than many other investigation mechanisms to receive and act on disclosure appeals in a timely manner.

Each IFI disclosure policy contains a list of “constraints” or “exceptions” to disclosure. These lists are often so broadly construed that almost all the information produced by an IFI could be categorized as exempt material. For example, the World Bank’s disclosure policy states that the “public availability of some information may be precluded on an ad hoc basis when, because of its content, wording, or timing, disclosure would be detrimental to the interests of the Bank, a member country, or Bank staff.”<sup>9</sup> A more appropriate regime of exceptions, while not listing particular documents that are confidential, would be more narrowly drawn and specific.

## 10. Translation

**None of the IFIs have an institution-wide, binding translation policy.** While many of the IFIs provide information in languages other than English, none of the IFIs has an institutional procedure governing what information will be translated into which languages on a systematic basis. The World Bank is the only institution that has begun to approach this issue through the development of a Translation Framework.<sup>10</sup> Although the Framework paper is not binding, it outlines guidelines for the Bank on which types of information could be translated into international, national and local languages.

The AfDB states that its working languages are English, French and, if possible, African languages. There is no evidence, however, that documents on the AfDB's website have been translated into African languages. The IDB states that its working languages are Spanish and English. It is clear that many IFIs translate information on an *ad hoc* basis; however, none provides clear information on how to request the translation of a document.

Finally, it should be noted that some IFIs do require translation, into appropriate local languages, of environmental and social documentation for particular lending operations. Similarly, some IFI country specific papers are translated on an *ad hoc* basis.

## 11. Archives

**Many of the IFIs have adopted statements declaring that “confidential documents” may be declassified after a given time period.** The ADB, in many ways, has the least ambiguous of these statements, which affirms, “Unless otherwise determined by the head of that department or office, documents classified ‘For Official Use Only’ will be automatically declassified on a date five years after the date of classification.”

Both the World Bank and IMF have archive policies that make certain information public after five years and all other historical information available after twenty years. The World Bank is notable in its disclosure of historical information because it has a separate “Archives Catalogue,” independent from the index of publications.

The EIB's position on archives is stricter than the previously mentioned institutions, stating that most materials will be protected for thirty years. The IIC and IFC state as a matter of policy that their archives will be absolutely inviolable. The EBRD and MIGA do not disclose any information related to the accessibility of archival information.

## 12. Public Information Centers

**Although several of the IFIs have Public Information Centers (PICs), the level of their usefulness is debatable.** Of those that do have public information centers (the World Bank, IFC, IDB and AfDB), only the PICs of the World Bank (and IFC) have guidelines for the provision of materials or resources for public use, such as computers with internet and photocopiers. Furthermore, only the World Bank requires training of bank personnel who staff PICs, which is important to ensure effective in-country information dissemination.

The ADB does not have public information centers. However, the ADB does have “Resident Missions” in some borrowing countries that may or may not act like Public Information Centers. Nevertheless, these offices do not have the specific mandate to assist the public in accessing ADB documents and disseminating ADB information. The EBRD, EIB, and IMF also do not have a form of public information center, nor do they provide guidelines on where to go for specific information.

## 13. Web sites

The web sites of the IFIs vary in degrees of sophistication from institution to institution (e.g. option of viewing a text-only site, completeness of site maps, and development of site search engine). The World Bank has the greatest breadth and depth of material available on its web site, including the translation of general institutional information into Spanish, French, Russian, Arabic, Chinese, Hindi, Japanese, Portuguese, Romanian, Telugu, Turkish, and Vietnamese. The AfDB has its entire web site available in both English and French. Likewise the IDB and IIC's websites are in both English and Spanish. The rest of the IFIs' web sites are primarily in English with some portions of the sites translated into different languages. All of the IFIs, except for the AfDB, IIC and MIGA, have a search engine for their site and all except for the IIC provide a site map.

### C. Institution-specific Observations

**No single IFI clearly distinguishes itself as being the most open across all the transparency categories in the IFI Transparency Resource.** Generally, the World Bank stands out as the institution with the highest disclosure standards. The regional development banks often just meet or fall short of the standards set by the World Bank. However, there are several key areas where regional development banks are more transparent, such as disclosure of draft country strategies (AfDB),

disclosure of board minutes (IDB), and a summary of the environmental status and effective application of project environmental requirement during project implementation (EBRD).

**Several institutions emerged as significantly less transparent than others in the Resource.** The private sector lending arms consistently exhibit lower transparency standards than public sector IFIs. MIGA and the IIC were by far the least transparent institutions, with the IFC only slightly better. The AfDB, for both its public and private operations, also falls at the lower end of disclosure standards.

**The EIB has recently adopted a new policy on disclosure of information, which is conceptually different than the other institutions.** Rather than articulate a list of documents that will be disclosed and generally keep other documents confidential, the EIB has outlined a set of transparency principles and a number of disclosure limitations. If people feel that they have been wrongly denied information they can appeal to the European Union Ombudsman. At this time, the public has not had much experience with the EIB's policy, so it is difficult to know how the institution's transparency will measure against other institutions. In practice, however, the EIB discloses less information about its projects than is the case at most of the other IFIs.

## 5. Conclusion

Over the past 15 years IFIs, in general, have responded to wide-ranging demands for greater access to information. With the adoption of formal disclosure policies, IFIs shifted from an arbitrary approach to the release of information to one characterized by greater predictability.

Since the early 1980s, IFIs have deepened their involvement in the restructuring of borrowing country's economic and social sectors. Conditioning IFI disbursements to changes in a country's banking, health, education, energy, transportation, or judicial sector has significantly raised the bar on IFI accountability regarding how such critical decisions are derived and implemented. Accountability—a core principle of good governance—depends on open decision-making processes that can be examined and judged. Furthermore, as the IFIs have become more integrally involved in influencing public

choices, the IFIs also more often directly collide with the rights of people to participate in decisions that affect their lives.

The observations derived from the *IFI Transparency Resource*, however, indicate that a number of systemic hurdles remain before IFIs fulfill the degree of accountability incumbent on their power and influence. These hurdles—with some variation across the institutions—include:

- Inoperable principles—such as the presumption of disclosure—that should underpin disclosure practices
- Absence of disclosure process guarantees commonly found at the domestic level
- Overly broad sets of exceptions to disclosure and excessive deference to private sector self-determination of confidentiality
- Closed, inaccessible governance processes and board-level decision-making
- Non-disclosure of critical information until decisions are finalized
- Lack of information during project implementation

While all the IFIs covered by the Resource exhibit common weaknesses in access to information, significant differences arise. For example, the AfDB mandates early disclosure of draft country strategies while others do not. The IDB has a more transparent Board of Directors but lags behind other institutions in many critical respects. The World Bank falls behind on country strategy disclosure and board transparency, but leads in many other areas, including dissemination and translation. There is clearly room for the institutions to “level-up” and harmonize their respective policies to a set of common, minimum, mandatory standards.

The establishment of more comprehensive disclosure policies—and consistent practices—that address the weaknesses identified here and by other observers would significantly increase the transparency and accountability of the IFIs as a whole. As the IFIs continue to confront external demands for greater access to information, each should be considering ways in which it can set new transparency standards and improve a culture of institutional openness.

**(Endnotes)**

- 1) In this paper the term “World Bank” applies to the public lending arms of the World Bank Group: IBRD and IDA. IFC and MIGA, though institutions of the World Bank Group, are treated separately.
- 2) For more information on this and other outstanding issues, see Annex 1: *Methodological Challenges and Future Directions*.
- 3) The European Investment Bank, the International Monetary Fund (IMF) and the Inter-American Investment Corporation (IIC) have not articulated a presumption of disclosure.
- 4) *Policy on Disclosure of Information*. World Bank, 2002; paragraph 90.
- 5) The European Investment Bank (EIB) does make specific reference to the right of individuals to appeal to the European Union Ombudsman, though to date there is little experience in the efficacy of this arrangement. Furthermore, while other institutions do have semi-independent inspection bodies, only the IFC’s Compliance Advisor Ombudsman (CAO) seems to be adequately structured to play this role.
- 6) *Public Information Policy*. European Bank for Reconstruction and Development, July 2003; p.4.
- 7) *Policy on Disclosure of Information*. African Development Bank, March 2004; paragraph 4.3.
- 8) While the World Bank does not have a specified time requirement for the advanced disclosure of environmental and social information, in practice, World Bank environmental assessment reports are often disclosed at least 120 days before board approval of a project.
- 9) *Policy on Disclosure of Information*. World Bank, 2002; paragraph 90.
- 10) In August 2003, the World Bank Group approved *A Document Translation Framework* that outlines how the Group will begin to approach the issue of translation but does not make any binding recommendations or requirements.

FOR FURTHER INFORMATION CONTACT *Jennifer Kalafut, IFI Policy Program, Bank Information Center* ([jkalafut@bicusa.org](mailto:jkalafut@bicusa.org)).

**About Bank Information Center:** The Bank Information Center (BIC) partners with civil society actors in developing and transition countries to influence the World Bank and other international financial institutions (IFIs) to promote social and economic justice and ecological sustainability. BIC is an independent, non-profit, non-governmental organization that advocates for the protection of rights, informed participation, transparency, and public accountability in the governance and operations of the World Bank, regional development banks, and the IMF.

BIC’s Transparency Program seeks to: (i) influence IFI disclosure policies; (ii) facilitate coordinated action among concerned organizations worldwide, and; (iii) produce research and analysis that helps civil society organizations (CSOs), journalists, academics and government officials access information about IFI operations. More information on BIC can be found at [www.bicusa.org](http://www.bicusa.org).

**About *freedominfo.org*:** *freedominfo.org* is a one-stop internet portal that describes best practices, consolidates lessons learned, explains campaign strategies and tactics, and links the efforts of freedom of information advocates around the world. The website contains crucial information on freedom of information laws and how they were drafted and implemented, including how various provisions have worked in practice.

*freedominfo.org* includes IFTI Watch, a site devoted to transparency news about International Financial and Trade Institutions. In addition to writing about new developments such as proposed disclosure policies, IFTI Watch publishes stories about transparency developments involving particular projects or country strategies. Since June 2002, IFTI Watch has published dozens of articles. More information can be found at [www.freedominfo.org](http://www.freedominfo.org).

Bank Information Center  
733 15<sup>th</sup> Street NW, Suite 1126  
Washington, D.C. 20005  
phone: 202-737-7752 • fax: 202-737-1155  
email: [info@bicusa.org](mailto:info@bicusa.org)  
website: <http://www.bicusa.org>

*freedominfo.org*  
Suite 701, Gelman Library,  
The George Washington University  
2130 H Street, NW, Washington, D.C. 20037  
email: [email@freedominfo.org](mailto:email@freedominfo.org)  
website: <http://www.freedominfo.org>

## Annex 1:

### The IFI Transparency Resource: Methodological Challenges and Future Directions

February 7, 2005

The *IFI Transparency Resource* (the Resource) is a work in progress. Edition 1, released on February 7, 2005, is the first version available on the web and in CD-ROM form.

We expect the Resource to evolve as the transparency standards of the institutions change and as we grapple with expanding areas of the research. We hope to produce and distribute additional CD-ROM versions of the Resource roughly every eighteen months. The internet version of the Database will be updated on a regular basis.

The topics outlined below highlight many of the outstanding issues that need to be addressed as the development of the Resource continues. The first set of issues outlines broader and continual challenges in updating the Resource and in producing a second edition of the CD-ROM. The second set of issues outlines more concrete tasks that will be addressed as we further our research over the next 18 months.

#### 1. Overarching Challenges

**How to balance a ‘literal interpretation’ of transparency requirements with what is actual practice on the ground?** The information provided in the Resource reflects the disclosure and transparency requirements mandated in the policies and strategies of the International Financial Institutions. The information does not consistently reflect: (1) ad hoc practices that may take place on a country-by-country basis or (2) the degree to which the institutions fulfill their obligations under the disclosure policies and strategies. For instance, information provided in the Resource indicates that the Asian Development Bank does not have Public Information Centers (PICs). However, the ADB does have “Resident Missions” in some borrowing countries that may or may not act like Public Information Centers. Nevertheless, given the lack of a specific mandate to assist the public in accessing ADB information, we have indicated in the Database that the ADB does not have PICs (while noting the existence of Resident Missions).

In other cases, we may be overly generous in our re-

flection of IFI disclosure requirements by not drawing attention to failures in policy compliance. For instance, we state that periodic updates on proposed projects (Indicator 6.C.i.) are disclosed by the World Bank in the form of updated Project Information Documents (PIDs). However, a report released by Bank Information Center in mid-2003 (Implementation of the World Bank’s Disclosure Policy: An External Review) found that the PID is not consistently updated for every Bank project under preparation. Over time, we hope to better reflect nuances in the information contained in the Resource.

#### Revisions to IFI Disclosure Policies require continual updating of the IFI Transparency Resource.

The IFIs are continually revising their disclosure policies. As these reviews progress, the information contained in the Resource becomes out-dated. For instance, the Asian Development Bank is in the final stages of revising its information disclosure policy. The requirements outlined in the ADB’s draft Public Communications Policy, December 2004, are not contained in the current version of the IFI Transparency Resource. Furthermore, the IFC and the World Bank are currently revising their information disclosure standards. The online Resource will be updated to such reflect changes. We are able to produce CD-ROM versions of the website at any time and welcome requests for intermittent versions.

#### 2. Ongoing Work

**Small discrepancies in data are expected.** The Database measures the transparency standards of ten international financial institutions across almost 250 indicators. Ultimately, there are around 2500 discrete entries in the Database, and this volume of data allows for oversights and mistakes. The following tasks are ongoing to correct any data mis-entries:

- Internal reviews of research data – BIC is in the process of reviewing each entry for each institution researched in the Resource. Through these reviews, we are correcting data entered improperly into various fields of the Resource, including checking the web links provided to ensure that they are still active and we are looking for factual inconsistencies in the information provided.
- External reviews of research data – In addition to reviewing the data internally, BIC has sent data to individuals in the IFIs and in other civil society organizations to check for factual mistakes that may have occurred in researching disclosure and transparency standards at the IFIs. These external reviews are ongoing.

**Some categories in the Resource need to be fleshed-out.** Although almost all of the categories included in the Resource could be expanded to better reflect the breadth of information that could be collected, some categories, in particular, are lacking. The following categories and indicators need to be expanded or fleshed-out to better represent the scope of information included in each:

- Indicator 1.v. Budget
- Indicator 1.vi. Financial Statements
- Category 7. FI Lending Cycle
- Category 8. Accountability Mechanisms
- Category 9. Disclosure Policies and Process Guarantees
- Category 10. Translation
- Category 11. Archives

**Some Aspects of IFI operations are not reflected in the Resource and could be included.** The Resource includes 13 broad categories of information. While these categories reflect the most comprehensive collection of IFI transparency standards currently available, they are not exhaustive. Some other possible areas to be explored as the Resource develops are: transparency of Trust Funds; transparency in the Procurement process, and transparency in the replenishment processes of the various institutions.

**Some planned written products related to the Resource have yet to be produced.** We will eventually include a variety of written products, analyses and reports that are not yet posted on the web or on the CD-ROM.

In regards to specific background pieces related to the Resource, we will be developing:

- Research Methodology: This piece will explain the conceptualization and building of the Database. It will describe the process through which we chose indicators and organized categories and give explanations to

why these were chosen and organized in their current form.

- Indicator Definitions and Recommended Transparency Standards: This piece is partially completed and is included, in its current form, as part of the Resource. Over the next 18 months, we plan to finish developing definitions and recommendations for every Category, Section and Indicator in the Database.

In regards to other Resource analyses, we will be developing:

- Detailed Findings from each Category: For each of the thirteen categories in the database, we will develop a short introduction. These introductions, among other things, will describe the recommended transparency standards for the category and any sections it may contain. They will also make general observations about which IFIs are ahead or behind the others based on the research contained in the Database.
- Detailed Indicatory Analyses: These reports will be produced continually through the development of the second edition of the Resource. They will compare the transparency standards of the IFIs across a single indicator or group of indicators.
- Detailed Institutional Analyses: These reports will analyze the transparency standards of one institution. They will grade the institution on its disclosure requirements and provide recommendations for how the institution can improve its transparency standards and practices.

**We are continuously adding to the Other Resources tab of the website and the CD-ROM.** Over the course of the next year, we will be expanding the scope of materials included in this section. More reports and analyses developed by other civil society organizations that focus on transparency at the IFIs, as well as comments submitted to the IFIs during policy reviews or other processes will be available from this section of the Resource. Furthermore, we plan to include links to websites of relevant organizations and an extensive bibliography of IFI transparency materials.

## Annex 2: IFI Transparency Resource – List of Indicators

### 1. General Institutional Information

#### A. General Institutional Information

- 1.A.i. Institution statutes and by-laws
- 1.A.ii. Organizational Structure
- 1.A.iii. Staff Directory
- 1.A.iv. Organizational Procedures
- 1.A.v. Budget
- 1.A.vi. Financial Statements
- 1.A.vii. Annual Reports

### 2. Governing Bodies

#### 2.A. Board of Governors

- 2.A.i. Organizational structure and procedures
- 2.A.ii. Meetings open to public
- 2.A.iii. Transcripts of board meetings
- 2.A.iv. Summaries of board meetings
- 2.A.v. Minutes of board meetings
- 2.A.vi. Agenda
- 2.A.vii. Prepared statements of individual board members
- 2.A.viii. Materials prepared for the board for use in decision-making
- 2.A.ix. Directory of contact information for Governors

#### 2.B. Board of Directors

- 2.B.i. Organizational structure and procedures
- 2.B.ii. Meetings open to public
- 2.B.iii. Transcripts of board meetings
- 2.B.iv. Summaries of board meetings
- 2.B.v. Minutes of board meetings
- 2.B.vi. Board work plan
- 2.B.vii. Monthly agenda
- 2.B.viii. Prepared statements of individual board members
- 2.B.ix. Materials prepared for the board for use in decision-making
- 2.B.x. Directory of contact information

#### 2.C. Subcommittees

- 2.C.i. Organizational structure and procedures
- 2.C.ii. Meetings open to public
- 2.C.iii. Transcripts of subcommittee meetings
- 2.C.iv. Summaries of subcommittee meetings
- 2.C.v. Minutes of subcommittee meetings
- 2.C.vi. Subcommittee work plan
- 2.C.vii. Monthly agenda
- 2.C.viii. Prepared statements of individual subcommittee members
- 2.C.ix. Materials prepared for the subcommittee for use in decision-making

### 3. Institution-wide Policy and Strategy Formulation

#### 3.A. Review of draft policy or strategy

- 3.A.i. Relevant background information to policy or strategy review
- 3.A.ii. Notice of intent to review policy or strategy and invitation to comment
- 3.A.iii. Procedures and timeline for review or development of policy or strategy
- 3.A.iv. External comments and record of consultations on initial stage of review

#### 3.B. Consultations on draft policy or strategy

- 3.B.i. Notice of disclosure of draft policy or strategy and invitation to comment
- 3.B.ii. Draft of policy or strategy
- 3.B.iii. External comments and record of consultations

#### 3.C. Approval of policy or strategy

- 3.C.i. Final Draft of policy or strategy
- 3.C.ii. Management's Response to external comments on the draft policy or strategy
- 3.C.iii. Notification of board and board committee intent to discuss final draft of policy or strategy
- 3.C.iv. Record of board discussion
- 3.C.v. Final policy or strategy

#### 3.D. Implementation and Supervision

- 3.D.i. Reviews of on-going policy or strategy implementation

### 4. Institution-Wide Evaluations and Audits (+Research)

#### 4.A. Evaluations

- 4.A.i. Draft evaluations
- 4.A.ii. Portfolio performance reports
- 4.A.iii. Annual report of the evaluation unit
- 4.A.iv. Regional and country evaluations
- 4.A.v. Sector and thematic evaluations
- 4.A.vi. Policy and program evaluations
- 4.A.vii. Other evaluations documents
- 4.A.viii. Background material relevant to evaluations

#### 4.B. Research

- 4.B.i. Commissioned Independent Research

## 5. Country-Specific Analysis and Strategy Papers

### 5.A. Country Analysis

- 5.A.i. Economic Reports
- 5.A.ii. Sector-specific country analysis
- 5.A.iii. Country Portfolio evaluations
- 5.A.iv. Poverty Assessments
- 5.A.v. Other country-specific analysis

### 5.B. Country Strategies: Decision to review or develop country strategy

- 5.B.i. Institutional evaluation of previous country strategy
- 5.B.ii. Notice of intent to review country strategy and invitation to comment
- 5.B.iii. Procedures and timeline for strategy review
- 5.B.iv. External comments and record of consultations on initial stage of review

### 5.C. Review of draft Country Strategy

- 5.C.i. Notice of disclosure of draft country strategy and invitation to comment
- 5.C.ii. Draft country strategy
- 5.C.iii. External comments and record of consultations on draft country strategy

### 5.D. Approval of Country Strategy

- 5.D.i. Final draft of country strategy
- 5.D.ii. Notification of board and board committee intent to discuss country strategy
- 5.D.iii. Record of board discussion
- 5.D.iv. Final country strategy

### 5.E. Implementation and Supervision of Country Strategy

- 5.E.i. Country strategy progress reports

## 6. The Lending Cycle

### 6.A. General Description:

- 6.A.i. Social and environmental review procedures
- 6.A.ii. Description of lending cycle
- 6.A.iii. Mechanism for tracking project status

### 6.B. Project Identification

- 6.B.i. Announcement of project identification
- 6.B.ii. Initial assessment of potential social and environmental considerations
- 6.B.iii. Initial summary of proposed project

### 6.C. Project Preparation

- 6.C.i. Periodic updates on the proposed project
- 6.C.ii. Environmental Assessments: High Impact Category

- 6.C.iii. Environmental Assessments: Medium Impact Category
- 6.C.iv. Environmental Assessments: Low Impact Category
- 6.C.v. Indigenous peoples development plan
- 6.C.vi. Involuntary resettlement plan
- 6.C.vii. Background feasibility and technical studies and project preparation reports
- 6.C.viii. Draft staff report to the board

### 6.D. Project Approval

- 6.D.i. Staff report to the board
- 6.D.ii. Notification of the board's intent to consider a project
- 6.D.iii. Borrower policy statement
- 6.D.iv. Contract between borrower and institution
- 6.D.v. Record of board discussions of project
- 6.D.vi. Announcement of project approval

### 6.E. Project Implementation and Supervision

- 6.E.i. Project reviews and supervision reports

### 6.F. Project Completion and Evaluation

- 6.F.i. Final staff assessment of project
- 6.F.ii. Evaluation unit assessment or audit of project

## 7. The Financial Intermediaries Lending Cycle

(forthcoming)

## 8. Accountability Mechanisms

### 8.A. Accountability Mechanisms: General

- 8.A.i. Procedures of the Accountability Mechanism
- 8.A.ii. Selection of Inspection Panel Members and Roster of Investigators
- 8.A.iii. Website
- 8.A.iv. Annual Report of Accountability Mechanism

### 8.B. Accountability Mechanisms: Filing a Complaint

- 8.B.i. Information and procedures on How to File a Complaint
- 8.B.ii. Complaint
- 8.B.iii. Mechanism for tracking investigation and complaint status

### 8.C. Accountability Mechanisms: Appraisal and Acceptance

- 8.C.i. Initial eligibility assessment
- 8.C.ii. Board decision to proceed with full investigation
- 8.C.iii. Record of Board deliberations

**8.D. Accountability Mechanisms: Assessment of Complaint and Follow-up**

- 8.D.i. Initial report
- 8.D.ii. Complainant's response to the report
- 8.D.iii. Management's response to the report
- 8.D.iv. Final report
- 8.D.v. Final Board decision
- 8.D.vi. Monitoring reports

**8.E. Anti-corruption Units: General**

- 8.E.i. Procedures for filing a complaint and subsequent investigation of corruption
- 8.E.ii. Annual Report on anti-corruption unit activities
- 8.E.iii. List of ineligible or debarred firms

**8.F. Anti-corruption Units: Investigation of corruption**

- 8.F.i. Acknowledgement of on-going investigation
- 8.F.ii. Reporting of outcome of investigation
- 8.F.iii. Evaluation of institution, or management, performance in response to corruption issues and implementation of remedial measures

**8.G. Whistle-blower protection**

- 8.G.i. Whistle-blower standards

**9. Disclosure Policies and Process Guarantees****A. Disclosure Policies and Process Guarantees**

- 9.A.i. Disclosure policy
- 9.A.ii. Presumption of disclosure
- 9.A.iii. Narrowly drawn exceptions to disclosure
- 9.A.iv. Information on the process for requesting information
- 9.A.v. Guarantee of written replies
- 9.A.vi. Prescribed timetable for handling information requests
- 9.A.vii. Obligation to disclose whole documents
- 9.A.viii. Appropriate fees
- 9.A.ix. Rules on the right to specify the form of receipt of information
- 9.A.x. Disclosure policy compliance mechanism

**10. Translation****A. Translation**

- 10.A.i. Translation policy
- 10.A.ii. Requests for document translation

**11. Archives****A. Archives**

- 11.A.i. Archives policy
- 11.A.ii. Access to the archives
- 11.A.iii. Electronic database or catalog of all archived information

**12. Public Information Centers (PICs)****A. Public Information Centers (PICs)**

- 12.A.i. Does the institution have Public Information Centers?
- 12.A.ii. Does the institution have a Public Information Center Strategy?
- 12.A.iii. Are there requirements regarding the accessibility of Public Information Centers?
- 12.A.iv. Are there requirements regarding the quality of Public Information Centers facilities?
- 12.A.v. Is there a hardcopy list of all documents pertaining to the country available at the Public Information Centers?
- 12.A.vi. Is there a document glossary available?
- 12.A.vii. Does the institution have specific requirements regarding the quality of Public Information Center staff and training?
- 12.A.viii. Does the institution conduct trainings for all staff on information disclosure policies and practices?

**13. Websites****A. Websites**

- 13.A.i. Text-only website
- 13.A.ii. Translation of website
- 13.A.iii. Site Map or Index
- 13.A.iv. Search Engine
- 13.A.v. Searchable databases of all document