

Commonwealth Human Rights Initiative

INFORMATION DISCLOSURE POLICIES OF INTERNATIONAL FINANCIAL INSTITUTIONS A COMPARISON (DRAFT VERSION)

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POLICY TITLE AND SOURCE

African Development Bank (AfDB)

The African Development Bank Group Policy on Disclosure of Information---October, 2005

Accessible at:

www.afdb.org/fileadmin/uploads/afdb/Documents/Policy-Documents/10000004-EN-THE-AFRICAN-DEVELOPMENT-BANK-GROUP-POLICY-ON-DISCLOSURE-OF-INFORMATION.PDF

(As on 1 September 2010)

Asian Development Bank (ADB)

The Public Communications Policy of the Asian Development Bank Disclosure and Exchange of Information Public Communications Policy Review 2010 CONSULTATION DRAFT---June 2010

Accessible at:

www.adb.org/Documents/Policies/public-communications-policy/pcp-consultation-draft01.pdf

(As on 1 September 2010)

European Investment Bank (EIB)

Public Disclosure Policy

Principles, Rules, and Procedures---17 July 2007

Accessible at:

www.eib.org/attachments/strategies/public_disclosure_policy_en.pdf

(As on 1 September 2010)

Inter-American Development Bank

Access to Information Policy Office of External Relations---April 26, 2010

Accessible at:

http://idbdocs.iadb.org/wsdocs/getdocument.aspx?docnum=35151856

(As on 1 September 2010)

International Finance Corporation (IFC)

International Finance Corporation's Policy on Disclosure of Information---April 30, 2006

Accessible at:

www.ifc.org/ifcext/enviro.nsf/attachmentsByTitle/pol_SocEnvSustainability2006/\$FILE/SustainabilityPolicy.pdf

(As on 1 September 2010)

World Bank (WB)

The World Bank Policy on Access to Information---July 1, 2010

Accessible at:

http://siteresources.worldbank.org/EXTINFODISCLOSURE/Resources/R2009-0259-2.pdf?&resourceurlname=R2009-0259-2.pdf

(As on 1 September 2010)

SCHEME OF DISCLOSURE

African Development Bank (AfDB)	3.2 The Bank Group's Policy on Disclosure of Information enjoins the Bank to disclose all documents on its operations and its activities unless there are compelling reasons not to do so.
Asian Development Bank (ADB) Public Communications Policy Review 2010 CONSULTATION DRAFT	III. ADB'S EXPERIENCE IN PUBLIC COMMUNICATIONS A. Overview of the Policy 7. Transparency is pivotal to accountability and the foundation of the Policy. The overall objective of the Policy is to enhance stakeholder's trust and ability to engage with ADB.
European Investment Bank (EIB)	 The Policy Policy objectives and legal framework 15. As an EU body, the EIB is committed to achieving the highest possible level of transparency in all its activities. 16. The EIB considers that as a public institution, openness and transparency on how it makes decisions, works and implements EU policies, strengthen its credibility and its accountability to Europe's citizens. 17. Openness and transparency also contribute to increasing the efficiency and sustainability of the Bank's operations, reducing the risks of corruption, and enhancing staff relations with external stakeholders.

Inter-American	1. Objectives and Scope
Development Bank	1.1 The Bank reaffirms its commitment to transparency in all aspects of its operations as a means of aligning itself with international best practice, especially among the countries of Latin America and the Caribbean, and as a matter of enhancing its accountability and development effectiveness. Through implementation of this policy the Bank seeks to demonstrate its transparent use of public funds, and by deepening its engagement with stakeholders, to improve the quality of its operations and knowledge and capacity-building activities.
International Finance Corporation (IFC)	IFC believes that transparency and accountability are fundamental to fulfilling its development mandate and to strengthening public trust in IFC and its clients. This Policy reaffirms and reflects IFC's commitment to enhance transparency about its activities and promote good governance.
World Bank (WB)	1. The World Bank ¹ recognizes that transparency and accountability are of fundamental importance to the development process and to achieving its mission to alleviate poverty. Transparency is essential to building and maintaining public dialogue and increasing public awareness about the Bank's development role and mission. It is also critical for enhancing good governance, accountability, and development effectiveness. Openness promotes engagement with stakeholders, which, in turn, improves the design and implementation of projects and policies, and strengthens development outcomes NOTE 1 For the purposes of this policy statement, the term "World Bank" or "Bank" means the International Bank for Reconstruction and Development (IBRD) and the International Development Association (IDA); "World Bank Group" means the IBRD, IDA, International Finance Corporation (IFC), Multilateral Investment Guarantee Agency (MIGA), and International Centre for Settlement of Investment Disputes (ICSID); "loans" may include IDA credits and grants, grants made out of the Bank's net income and administrative budget, and trust fund grants; "borrowers" includes credit and grant recipients, and guarantors; "information" means documents of any type (for example, paper, electronic, photograph, film, sound recordings, videotapes) prepared or received by the Bank in the course of its official business; and "third party" means any individual, group of individuals, organization, or other entity that provides information to the Bank. The terms "disclose," "provide access," and

PROACTIVE DISCLOSURE THROUGH WEBSITES

African Development Bank (AfDB)	4. SPECIFIC INFORMATION AVAILABLE FROM THE BANK GROUP A. Operational Information C. Summary of Progress and Status of Project Implementation D. Documents of the Operations Evaluation Department E. Information on Procurement of Goods and Services F. Bank Financial Information G. Economics and Research H. Administration I. Legal Information
Asian Development Bank (ADB) Public Communications Policy Review 2010 CONSULTATION DRAFT	B. Procedures for Accessing Information 1. Proactive Disclosure 161. The ADB website will serve as the primary vehicle to proactively disclose information and documents as required in the Policy. Other means of proactive disclosure of information and documents (for example, information to support a consultation process) will be used by ADB, borrowers and clients, depending on the intended recipient or audience as well as the intended purpose for disclosing the information. VI. THE STRATEGY 2. Information Pertaining to ADB's Operations a. Country and Regional Programming

- i. Country Partnership Strategy and Regional Cooperation Strategy Knowledge Products
- ii. Country Partnership Strategy and Regional Cooperation Strategy
- b. Policies, Strategies, and Operational Procedures
- c. Projects
- d. Other Information Pertaining to Strategies and Programs, and Projects

3. Other Information

- a. Performance-Based Allocation of Asian Development Fund Resources
- b. Economic Data and Research
- c. Administrative and Other Information
- d. Financial Information
- e. Employment Information
- f. Information Produced under ADB's Accountability Mechanism¹⁶
- g. Information Related to Asian Development Fund Negotiations
- h. Other Documents Presented to the Board of Directors

VII. IMPLEMENTATION ARRANGEMENTS

3. Department of External Relations

c. Public Communications Policy Handbooks

NOTE 16 ADB. 2003. Review of the Inspection Function: Establishment of a New ADB Accountability Mechanism. Manila.

European Investment Bank (EIB)

Dissemination and disclosure of information Information on policies, strategies, and the decision-making process

Statutory and other key documents

- Policies and strategies
- Transparency, Governance and Corporate Responsibility
- Sustainable Development

Decision-making process

- Codes of Conduct
- Other documents
- Public consultation on policies

Information related to lending operations

Routine dissemination

- Project cycle related publications
- Project List (Pipeline)
- Project Summaries
- Global loans
- Evaluation Reports
- Topical Project Briefs
- Press releases

Routine dissemination

- 79. Bank's Corporate Operational Plan.
- 80. The EIB is required to follow the law in the markets in which its securities are offered. A common requirement in the jurisdictions in which the EIB operates is non-discrimination in

the disclosure of information on financial actions that would provide someone with an unfair competitive advantage in trading. In general the EIB will seek to ensure that information on such matters will be released simultaneously through appropriate approved regulatory channels as well as on its website. Routine information on EIB borrowing activities is also made available by financial intermediaries.

Website

110. The EIB Website is the main platform for disseminating information to the public on the Bank's role and activities. It is a key authoritative source of information on the Bank.

111. All documentation published by the EIB is either posted or listed on its website.

114. EIB's website is also accessible through the portal site of the European Union server (www.europa.eu.int) and is included in numerous public websites dealing with EU affairs, as well as in the main internet search engines.

Inter-American Development Bank

5. Simultaneous Disclosure and Country Disclosure Requirements

5.1 Simultaneous disclosure of certain Board documents at the time of distribution to Board of Executive Directors. Information sent by Management to the Board of Executive Directors for information and classified as "Public" under the Bank's new information security classification system (see Section 6 of this policy) will be disclosed at the time it is distributed to the Board.

Included among documents distributed to the Board by Management for consideration are draft Country Strategies, Sector Strategies, Operational Policies and Loan Proposals and Technical Cooperation Plans of Operation (the latter only involving resources of more than \$1.5 million). Country Strategies are first considered by the Board's Programming Committee and the Operational Policies and Sector Strategies by the Policy and Evaluation Committee. Loan Proposals and Technical Cooperation Plans of Operation are approved by the Committee of the Whole without having been considered previously by any committee.

	Operational Policies and Sector Strategies will be disclosed at the time of their distribution to the respective committee of the Board. Other information sent by Management to the Board of Executive Directors for consideration and that is classified as other than "Public" will not be disclosed until the Board has completed consideration.
International Finance Corporation (IFC)	Section III. INFORMATION MADE AVAILABLE BY IFC A. GENERAL PRINCIPLES
	7. Information referred to in this Policy as being "publicly available" or "routinely" disclosed by IFC is posted on IFC's Web site (www.ifc.org).
	8. IFC makes available information concerning its activities, the overall development and other impacts of its activities, and its contribution to development. The information IFC makes available in accordance with these principles can be categorized as:
	(a) institutional information about IFC; and
	(b) information regarding activities supported by IFC.
	C. INVESTMENT-RELATED INFORMATION
	11. IFC's Investment Cycle.
	13. Social and Environmental Information.
	14. Summary of Proposed Investment.
	D. TECHNICAL ASSISTANCE AND ADVISORY SERVICES
	E. HISTORICAL INFORMATION
	F. INSTITUTIONAL INFORMATION
	22. Corporate Governance Information.
	23. IFC Strategies, Budget and Policies

	22. Proactive Disclosure. The Bank routinely discloses a wide range of documents, through its external website – www.worldbank.org – as soon as the documents are finalized after key process milestones. Under this Policy, the Bank significantly increases the amount of information it makes available to the public, particularly information related to projects under implementation and to the actions of the Board of Executive Directors.
	A. Accessing Information
World Bank (WB)	IV. Implementation Aspects of the Policy
	31. Information that IFC routinely discloses pursuant to this Policy, such as the SPI for a particular proposed investment or IFC's Annual Report (including IFC's annual audited financial statements), is publicly available on IFC's Web site. IFC also discloses information by other appropriate means, depending on the nature of the information and the intended recipients.
	30. General information about IFC and its activities may be obtained online at IFC's Web site, www.ifc.org.
	29. General Staff Information.
	28. Fraud and Corruption Reports.
	27. CAO Reports.
	26. IEG-IFC Products.
	25. Development Effectiveness Reporting.
	24. Financial Information.

CONTACT POINT

African Development Bank (AfDB)

3.3 (iii) Public access to information on all Bank Group activities will be through the Public Information Centre, field offices and the Bank's website, with the latter being the main medium of access for documents.

7. PUBLIC INFORMATION CENTRE

7.1 The Bank Group's Public Information Centre ("PIC") is the reference point for persons seeking information on its operations and activities, as well as a focal point of all information activities of the Bank Group. The PIC started its operations on 1 January, 1998. The PIC will continue to bear overall responsibility for the release of documents and information to the general public, their pricing as necessary, and for the maintenance of records thereof. It is located at the Bank' Group's Headquarters in Abidjan, Cote D'Ivoire which is currently at the Temporary Relocation Site in Tunis, Tunisia, and will serve the public of member states. The public will also be able to access information on the Bank Group's operations and activities through the field offices which will coordinate their activities in providing information to the public with the PIC. In addition, all information and documents which will be available to the public through the PIC and the field offices, will be posted on the Bank's website and will also be available via Internet. It is expected that the Bank Website Improvement Project to be undertaken by the Bank will update the Bank website to enable ease access to Bank documents by the public. The Communications Unit of the Bank Group has primary responsibility for providing information to the public and is responsible for the operations of the PIC.

Asian Development Bank (ADB)

Public Communications Policy Review 2010

CONSULTATION DRAFT

VII. IMPLEMENTATION ARRANGEMENTS

A. Roles and Responsibilities

5. Public Disclosure Advisory Committee

158. The Public Disclosure Advisory Committee shall interpret, monitor, and review the disclosure requirements of the Policy. The PDAC will be composed of the Managing Director General (serving as chair), the Principal Director of DER, the Secretary, and the General Counsel, and will report directly to the President. It will convene as needed to review requests for information that have been denied by other ADB departments or offices.

B. Procedures for Accessing Information

2. Requests for Information

162. Requests for information and documents must be received in writing (e-mail, mail, Internet feedback form, or fax). Requests may be directed to the InfoUnit, to the concerned resident mission or representative office, or to an operational department.

5. Complaints

167. If a requester believes that a request has been unreasonably denied, or that the Policy has been interpreted improperly, the requester may submit a complaint in writing to the Public Disclosure Advisory Committee, Asian Development Bank, 6 ADB Avenue, Mandaluyong City, 1550 Metro Manila, Philippines, or by e-mail to pdac@adb.org, or by fax to +63 2 636 2649.

VII. IMPLEMENTATION ARRANGEMENTS

5. Public Disclosure Advisory Committee

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	General Counsel, and will report directly to the President. It will convene as needed to review requests for information that have been denied by other ADB departments or offices.
European Investment Bank (EIB)	Applications 86. Applications for access can be made in any written form or orally. They should be addressed to the EIB's Communication Department or the info@eib.org. They can also be addressed to the Bank's External Offices, which will then forward them to the Communication Department at the Headquarters in Luxembourg. InfoDesk 115. The InfoDesk (info@eib.org) can be addressed for all requests for information and documents or any other enquiry concerning the EIB's role and activities. The InfoDesk
Inter-American	team can also be reached by telephone – see contact details below. No relevant information available in the disclosure policy.
International Finance Corporation (IFC)	30 As IFC is part of the World Bank Group, information about IFC that is identified as being "publicly available" may also be obtained through the World Bank InfoShop. The InfoShop is located at 701 18th Street, N.W., Washington D.C., 20433 USA., and may be accessed online at http://worldbank.org/infoshop. This information is also available through public area computers available at the Public Information Centers (PICs), which are situated around the world in World Bank member countries. A list of the PICs is available on the InfoShop Web site.
	32. Information that is not readily available from IFC's Web site, the InfoShop, or the PICs may also be requested in writing (by e-mail, mail, or fax) from IFC.12 Information may be requested by contacting the Corporate Relations Unit of IFC through the Web site at www.ifc.org/contacts and the e-mail addresses provided therein, by telephone at +1 (202)

476-3800, by fax at +1 (202) 974-4384, or by mail at 2121 Pennsylvania Avenue, N.W., Washington, D.C., 20433, USA. IFC's Corporate Relations Unit serves as a contact point for persons seeking to obtain documents that are not routinely disclosed by IFC on its Web site. Information routinely disclosed by IFC as described in this Policy may also be requested from the relevant IFC department, with a copy of the request to the Corporate Relations Unit. World Bank (WB) 24. *Information on Request.* Information that is disclosable under this policy and is not on the Bank's external website is available on request (subject to paragraph 26). Such requests may be submitted in writing by electronic means, mail, or fax. Requests should indicate, with reasonable specificity, the information that is being sought, to enable the Bank to locate the information within a reasonable period of time. If a particular document is required, it should be identified precisely, preferably by date and title. Electronic submissions should be directed through the World Bank website: www.worldbank.org/wbaccess. Requests may also be made in person at the InfoShop in Washington, DC, or the Public Information Centers located in member countries. E. Access to Information Committee 35. To facilitate the implementation of this Policy, the Bank has created the Access to Information Committee (Al Committee), an administrative body that reports to Bank Management. The AI Committee advises Management on the application of this Policy to complex issues, reviews proposals to disclose information that is on the list of exceptions.²⁶ receives and rules on appeals under this policy statement, 27 establishes service fees and service standards, and issues guidelines to staff on policy implementation. The Al Committee has the authority to interpret this Policy in line with the Policy's guiding principles, and to uphold or reverse prior decisions to deny access, with the exception of decisions made by the Bank's Board. NOTE 26 See Part II, Section B, of this policy statement for details on the Bank's prerogative to disclose restricted information under exceptional circumstances. NOTE 27 See Part IV, Section F, of this policy statement on the provisions relating to appeals.

TIMELINES FOR PROCESSING REQUESTS

African Development Bank (AfDB)	No relevant information available in the disclosure policy.
Asian Development	3. Time Limits for Responses to Requests for Current Information
Bank (ADB) Public Communications	165. ADB shall acknowledge receipt of a request within 5 working days. ADB shall notify the requester as soon as a decision has been made, and, in any event, no later than 30 calendar days after receiving the request.
Policy Review 2010	5. Complaints
CONSULTATION DRAFT	167. If a requester believes that a request has been unreasonably denied, or that the Policy has been interpreted improperly, the requester may submit a complaint in writing to the Public Disclosure Advisory Committee, Asian Development Bank, 6 ADB Avenue, Mandaluyong City, 1550 Metro Manila, Philippines, or by e-mail to pdac@adb.org, or by fax to +63 2 636 2649. The PDAC shall acknowledge receipt of a request within 5 working days and will convene as soon as possible to consider complaints. In considering denials of requested information, the PDAC will consider the Policy's exceptions to making information available, as well as the public's interest in disclosure of the requested information. The PDAC shall notify the requester of its decision in writing, giving its reasons, as soon as a decision has been made and, in any event, no later than 30 calendar days after receiving the request. A list of all such requests, the nature of each request and the decision taken in each case shall be posted on the ADB website on a rolling basis, updated no later than 2 weeks after a request or decision has been made.
European Investment	The processing of applications
Bank (EIB)	88. Requests are normally processed by the EIB's Infodesk and are replied to without delay and in any event no later than 15 working days following receipt.

	93. Where, on account of the complexity of the issue(s) raised, a reply cannot be provided within the prescribed time limit, staff shall inform the correspondent without delay and no later than 10 working days following receipt. The acknowledgment shall indicate the name of the department and the member of staff preparing the reply.
	94. A reply to a complex request is provided no later than 30 working days following receipt.
Inter-American Development Bank	Principle 3: Simple and broad access to information. The IDB will employ all practical means to facilitate access to information. Guidelines for maximizing access to information will include clear and cost-effective procedures and timelines for processing requests and will be based on use of a system for classifying information according to its accessibility over time.
International Finance Corporation (IFC)	Section IV: ACCESS TO INFORMATION 36. IFC endeavors to respond to requests within thirty calendar days of receipt of a written request for information, unless additional time is required because of the scope or complexity of the information requested. If additional time is necessary, IFC will contact the requester and explain the reasons for the delay and, if possible, will provide an estimated time frame for its response.
World Bank (WB)	25. <i>Timelines for Responding to Requests.</i> The Bank acknowledges receipt of written requests for information within 5 working days, and endeavors to provide a more comprehensive response within 20 working days. Additional time may be needed in special circumstances, including, for example, those involving complex or voluminous requests, or requests requiring review by or consultations with internal Bank units, external parties, the Access to Information Committee, or the Board.

FEES

African Development Bank (AfDB)	The PIC will continue to bear overall responsibility for the release of documents and information to the general public, their pricing as necessary, and for the maintenance of records thereof.
	7.2 To the extent possible, the operating costs of the PIC will be recovered through paid subscription and the collection of reasonable fees from the users ² .
	NOTE 2: For the purpose of this Policy, it should be understood that reasonable user fees would be established in accordance with the principle that reduced charges will be applied when the documents are provided to not-for-profit organizations and gratis when documents are provided to entities located in a regional member country to which the relevant information relates.
Asian Development Bank (ADB)	No relevant information available in the disclosure policy.
Public Communications Policy Review 2010	
CONSULTATION DRAFT	
European Investment	The processing of applications
Bank (EIB)	98. An applicant may be charged a fee to cover the costs arising from the making available of document(s) requested.
Inter-American Development Bank	Principle 3: Simple and broad access to information. The IDB will employ all practical means to facilitate access to information. Guidelines for maximizing access to information will include clear and cost-effective procedures and timelines for processing requests and will be based on use of a system for classifying information according to its accessibility over time.

International Finance Corporation (IFC)	33 There may be a standard charge for hard-copy documents or for documents on CD-ROM, other than an SPI or an ESRS.
World Bank (WB)	27. Service Fees. Most operational information is routinely posted on the Bank's external website, and is available for download free of charge. For any request for information that is not routinely posted, the Bank may charge reasonable fees for providing digital or hard copies, particularly for requests that are complex or time consuming. Publications, some specialized databases, and other knowledge products (including subscription-based services) may be purchased through the Bank's Office of the Publisher. The full text of books published by the Office of the Publisher may be viewed and downloaded free of charge on the World Bank website or viewed on Google Books. The core statistical databases may be accessed free of charge on the World Bank website.

EXEMPTIONS TO DISCLOSURE

African Development	5. INFORMATION THAT WILL NOT BE DISCLOSED
Bank (AfDB)	5.2 Records of internal deliberative processes.
	5.3 Privileged information.
	5.4 Internal financial information which may affect the Bank Group's activities in capital and financial markets or to which such markets may be sensitive
	5.5 Information dealing entirely with internal administration or operating systems which has no direct effect outside the institution, or internal documents written by staff to their colleagues, supervisors or subordinates.
	5.6 The Bank' Group's Staff Employment's personal information
	5.7 Information related to procurement processes.
	5.8 Analysis of country creditworthiness and credit ratings, aide memoirs and supervision reports will not be publicly available. Documents exchanged with various international organizations, bilateral aid agencies, and private commercial banks and institutions on matters of common interest which are related to the decision-making processes of the Bank Group and such entities are not publicly available. Financial, business or proprietary information of private entities received by the Bank Group in the analysis or negotiation of loans unless permission is given by those private entities to release such information.
	5.9 In addition, 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 Group, its partners, a member country, or Bank staff.
Asian Development	4. Exceptions to Presumed Disclosure
Bank (ADB)	a. Current Information

Public Communications Policy Review 2010

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- 1. Internal information that, if disclosed, would or would be likely to compromise the integrity of ADB's deliberative and decision-making process by inhibiting the candid exchange of ideas and communications.
- 2. Information exchanged, prepared for, or derived from the deliberative and decision making process between ADB and its members and other entities with which ADB cooperates that, if disclosed, would or would be likely to compromise the integrity of the deliberative and decision-making process between and among ADB and its members and other entities with which ADB cooperates.
- 3. Information obtained in confidence from a government or international organization that, if disclosed, would or would be likely to materially prejudice ADB's relations with that party or another member country.
- 4. Individual staff employment records.
- 5. Estimates of ADB future borrowings, financial forecasts, data on individual investment decisions for ADB's treasury operations, and credit assessments.
- 6. Analysis of country creditworthiness and credit ratings.
- 7. Proceedings of the Board of Directors, ¹⁸ with the exception of meeting minutes . . . and chair's summaries.
- 8. Confidential business information, or information (including proprietary information) provided to ADB by a party or parties which, if disclosed, would or would be likely to materially prejudice the commercial or financial interest, and/or competitive position of the party or parties concerned.
- 9. Information related to procurement processes.
- 10. Information that, if disclosed, would or would be likely to endanger the life, health, safety or security of any individual or ADB assets.
- 11. Information that, if disclosed, would or would be likely to materially prejudice the administration of justice.

- 12. Information subject to the attorney-client privilege, or whose disclosure might prejudice an investigation.
- 13. The source of a corruption allegation except when expressly permitted by the source.
- 14. Audit reports prepared by the Office of the Auditor General and ADB's external auditor.
- 15. Information that if disclosed would or would be likely to materially prejudice the defense or national security of a member.
- 16. Financial information that if disclosed would or would be likely to materially prejudice the ability of a member country government to manage its economy.
- 17. Information that if disclosed would, or would have the potential to, violate applicable law, including copyright law.
- 137. Any information produced before the Policy's effective date (1 September 2005) but which is not yet historical, shall be disclosed on request, at ADB discretion, subject to Policy exceptions set out in paragraph 136.

b. Historical Information

- 138. ADB shall make historical information available on request, subject to the following exceptions.
 - 1. Information subject to attorney—client privilege, or that if disclosed might prejudice an investigation.
 - 2. Information provided to ADB in confidence.
 - 3. The source of a corruption allegation except when expressly permitted by the source.
 - 4. Names of those having been investigated under the Anticorruption Policy.
 - 5. Information that if disclosed would or would be likely to materially prejudice the defense or national security of a member.
 - 6. Information that if disclosed would, or would have the potential to, violate applicable

law, including copyright law.

- 7. Individual staff employment records.
- 8. Financial information that, if disclosed, would or would be likely to materially prejudice the ability of a member country government to manage its economy.
- 9. Information that, if disclosed, would or would be likely to materially prejudice the administration of justice.

NOTE 18 ADB produces transcripts for each formal Board meeting. These are retained in ADB's archives.

European Investment Bank (EIB)

Policy considerations

Constraints

- 27. Information typically forming part of the Bank's confidential relationship with its business partners.
- 29. The "Proposal from the Management Committee to the Board of Directors" for financing a project is not released before approval by the Board of Directors.
- 30. Certain private sector projects are not published before Board approval and, in some cases, not before loan signature to protect justified commercial interests.
- 31. Constraints also cover information on allocations made by local banks to support investment by their own customers under global loan arrangements with the EIB.
- 32. With respect to borrowing operations, publicity is restricted for private issuance for confidentiality reasons. The Bank discloses certain aggregate information on investor and secondary market activity. Confidential information relating to individual investors or banks will not be disclosed.
- 33. Some third-party documents.
- 34. Documents, which contain opinions for internal use as part of deliberations and preliminary consultations, such as the Appraisal Authorisation, the request for an opinion of

the European Commission or EU Member States, and the proposal to negotiate the operation, are not disclosed. This also applies to the minutes of the Management Committee or Boards of Directors and Governors. 35. If only parts of a requested document are covered by any of the constraints above, information from the remaining parts shall be released. 36. The constraints shall only apply for the period during which protection is justified on the basis of the content of the document. The exceptions may apply for a maximum period of 30 years. In the case of documents covered by the exceptions relating to privacy or commercial interests, the exceptions may, if necessary, continue to apply after this period. Inter-American Annex I **Development Bank** List of Information Not to be Disclosed a. Personal information. b. Legal, disciplinary or investigative matters c. Communications involving Executive Directors. d. Safety and security. e. Information provided in confidence; intellectual property; and business/financial information. f. Corporate administrative information. g. Deliberative information. h. Certain financial information. i. Country-specific information. j. Information relating to non-sovereign guaranteed operations.

International Finance Corporation (IFC)

A. GENERAL PRINCIPLES

- 9. There is a presumption in favor of disclosure with respect to the information described in paragraph 8 above, absent a compelling reason not to disclose such information. In determining whether any particular information is to be made available by IFC as a routine matter or upon request, IFC first considers whether such information falls within the scope of paragraph 8 and, if so, then determines whether there is any compelling reason not to disclose all or any part of such information. In making its determination, IFC takes into account the general considerations described below (which are not exhaustive):
- (a) Public financial, business, proprietary or other non-public information provided to IFC by its clients or other third parties. Legal documentation or relating to negotiations between IFC and its client relating to a project.
- (b) Documents, memoranda, or other communications exchanged with member countries, with other organizations and agencies, or with or between members of IFC's Board of Directors (or the advisers and staff of IFC's Board members), where these relate to the exchange of ideas between these groups, or to the deliberative or decision-making process of IFC, its member countries, its Board of Directors or other organizations, agencies or entities with whom IFC cooperates.
- (c) IFC does not disclose decision-making processes and related internal documents.
- (d) IFC may delay the disclosure of certain information that it would otherwise make publicly available because of market conditions or timing requirements.
- (e) IFC may decline to disclose any documents or records that are subject to attorneyclient privilege or other applicable legal privileges.
- (f) IFC does not disclose information if such disclosure would violate applicable law (such as restrictions imposed by securities or banking laws) or would contravene its Articles of Agreement.
- (g) IFC may decline to disclose information if such disclosure might prejudice an

investigation or any legal or regulatory proceedings, or subject IFC to an undue risk of litigation. (h) Individual staff records and personal medical information, as well as proceedings of internal appeal mechanisms, are not disclosed outside the World Bank Group, except to the extent permitted by the Staff Rules. (i) IFC does not disclose information relating to arrangements for preserving the safety and security of individuals working with, or for, IFC or to arrangements related to its corporate records and information systems. World Bank (WB) A. The Exceptions 8. Personal staff member information. 9. Communications of Executive Directors' Offices. 10. Ethics Committee. 11. Attorney-Client Privilege. 12. Security and Safety. (a) Information whose disclosure would compromise the security of Bank staff and their families, contractors, other individuals, and Bank assets. (b) Information about logistical and transport arrangements related to the Bank's shipments of its assets and documents and the shipment of staff's personal effects. (c) Information whose disclosure is likely to endanger the life, health, or safety of any individual, or the environment. 13. Information Restricted Under Separate Disclosure Regimes and Other Investigative Information. 14. Information Provided by Member Countries or Third Parties in Confidence.

- 15. Corporate Administrative Matters.
- 16. Deliberative Information.
- 17. Financial Information.

C. Bank's Prerogative to Restrict Access

19. The Bank also reserves the right not to disclose, under exceptional circumstances, information that it would normally disclose if it determines that such disclosure is likely to cause harm that outweighs the benefits of disclosure.

D. Electronic Mail

(c) The Bank does not provide access to e-mail that resides outside its records management system.

PUBLIC INTEREST OVERRIDE

African Development Bank (AfDB)	No relevant information available in the disclosure policy.
Asian Development Bank (ADB) Public Communications Policy Review 2010 CONSULTATION DRAFT	4. Exceptions to Presumed Disclosure
	136. if ADB determines that the public interest in disclosing the information significantly outweighs the harm that may be caused by such disclosure, or if a member country concerned requests it to do so in accordance with its own laws. ¹⁹
	139. ADB may disclose information listed in paragraph 136 (1) and (2) and paragraph 138, if ADB determines that the public interest in disclosing the information outweighs the harm that may be caused by such disclosure, or if a member country concerned requests it to do so in accordance with its own laws. ADB may also disclose any other information listed in paragraph 136, if ADB determines that the public interest in disclosing the information significantly outweighs the harm that may be caused by such disclosure, or if a member country concerned requests it to do so in accordance with its own laws. NOTE 19 For example, if a request for information reveals a serious public safety or environmental risk.
European Investment Bank (EIB)	Policy considerations Constraints 25. Access shall be refused where disclosure would undermine the protection of: • the public interest; • privacy and the integrity of the individual. 26. Unless there is an overriding public interest, access to information will also be refused where disclosure would undermine the protection of: • court proceedings and legal advice;

	·
	 the purpose of inspections, investigations and audits;
	 commercial interests of a natural or legal person, including intellectual property⁶; and/or seriously undermine:
	 the integrity of the Bank's internal decision-making process.
	The Bank may also refuse access if disclosing the information would undermine the protection of the environment to which the information relates, such as the reproduction sites of rare species.
	NOTE 6 The term "commercial interests" covers confidentiality agreements concluded by the Bank with its counterparts.
Inter-American Development Bank	8. Overrides
	8.1 As described in Principle 2, the Bank may decide to provide access to certain specified types of information normally subject to one of the policy's exceptions, in extraordinary circumstances, -if it determines that the benefit to be derived from doing so would outweigh the potential harm that application of the policy might otherwise entail, and so long as the Bank is not legally or otherwise obligated to non-disclosure and has not been provided information with the understanding that it will not be disclosed, as in the case of most information relating to non-sovereign guaranteed operations ² .
	NOTE 2 Use of the "positive" override would be restricted to information contained in Annex I of this policy, under sections F, G and H, the headings on Corporate administrative information, Deliberative information and Financial information, respectively.
International Finance	Section III. INFORMATION MADE AVAILABLE BY IFC
Corporation (IFC)	B. EXCEPTIONAL CIRCUMSTANCES
	10. In exceptional circumstances, IFC reserves the right to disclose information that it would ordinarily not release to third parties. IFC may exercise this right if, in connection with a project in which IFC has invested, IFC's senior management determines that the disclosure of certain nonpublic information would be likely to avert imminent and serious harm to public health or safety, and/or imminent and significant adverse impacts on the environment. Any such disclosure by IFC would be on the most restricted basis necessary

	to achieve the purpose of the disclosure, such as notice to the appropriate regulatory authorities. If the non-public information has been provided by or relates to an IFC client, IFC would make such disclosure only after informing the client of IFC's concerns and considering the client's plans to address and mitigate the potential harm involved.
World Bank (WB)	B. Bank's Prerogative to Disclose Restricted Information
	18. The Bank reserves the right to disclose, under exceptional circumstances, certain corporate administrative information (paragraph 15), deliberative information (paragraph 16), and financial information (paragraph 17 (a), (b), and (c)) that is restricted under the exceptions, if the Bank determines that the overall benefits of such disclosure outweigh the potential harm to the interest(s) protected by the exception(s).

APPEAL AGAINST NON-DISCLOSURE

African Development Bank (AfDB)	4.54 The Staff Appeals Committee issues an annual report summarizing cases examined and reported on for each year which may be made available on request. The proceedings of the Appeals Committee are in camera.
Asian Development Bank (ADB)	B. Procedures for Accessing Information 5. Complaints
Public Communications Policy Review 2010	167. If a requester believes that a request has been unreasonably denied, or that the Policy has been interpreted improperly, the requester may submit a complaint in writing to the Public Disclosure Advisory Committee, Asian Development Bank, 6 ADB Avenue, Mandaluyong City, 1550 Metro Manila, Philippines, or by e-mail to pdac@adb.org, or by fax to +63 2 636 2649. The PDAC shall acknowledge receipt of a request within 5 working days and will convene as soon as possible to consider complaints. In considering denials of requested information, the PDAC will consider the Policy's exceptions to making information available, as well as the public's interest in disclosure of the requested information. The PDAC shall notify the requester of its decision in writing, giving its reasons, as soon as a decision has been made and, in any event, no later than 30 calendar days after receiving the request. A list of all such requests, the nature of each request and the decision taken in each case shall be posted on the ADB website on a rolling basis, updated no later than 2 weeks after a request or decision has been made.
CONSULTATION DRAFT	
European Investment Bank (EIB)	Confirmatory applications 101. In the event of a total or partial refusal, or failure by the Bank to reply to a request within the prescribed time limit, the applicant may, within 15 working days of receiving the Bank's reply, make a confirmatory application.

102. The Bank shall handle a confirmatory application as soon as possible and in any event no later than 15 working days following receipt. In exceptional cases, for example in the event of an application relating to a very complex document or question, the time limit may be extended by another 15 working days, provided that the applicant is notified in advance and that reasons are given.

<u>Appeal</u>

103. In the event of a total or partial refusal following a confirmatory application, the Bank shall inform the applicant of the remedies open to him or her, namely making a complaint as described below in the chapter on "Provisions for appeal".

104. The provisions for appeal also apply if the Bank fails to reply within the prescribed time limits or if a person considers that a reply is unsatisfactory.

Provisions for appeal

105. Members of the public who feel that a request for information was not dealt with by EIB staff according to the standards and procedures formally adopted by the Bank may lodge a formal appeal with the EIB's Secretary General. Appeals must be made in writing, within 20 working days of the date of the correspondence, which is the subject of the complaint. The Bank will acknowledge the receipt of the appeal without delay and the Secretary General's reply will be provided no later than 20 working days following receipt of the appeal.

Procedures for appeal

For EU citizens or any natural or legal person residing or having its registered office in a EU Member State:

Confirmatory application \rightarrow Secretary General \rightarrow European Ombudsman Court of Justice of the EC, in accordance with the relevant provisions of the EC Treaty.

For non-EU citizens residing outside the EU or a legal person with no established office in the EU:

	Confirmatory application \rightarrow Secretary General \rightarrow European Ombudsman /Inspector General Court of Justice of the EC, in accordance with the relevant provisions of the EC Treaty.
Inter-American Development Bank	Principle 4: Explanations of decisions and right to review. 9. Review Mechanism
	9.2 Requests for reviews regarding denials of access to information may be of two types: i) an allegation that the Bank has violated the policy in denying or restricting access to information or ii) a request for an override of the exceptions that would preclude its disclosure, because the benefit to be derived from disclosure would outweigh the potential harm. Decisions of the interdepartmental Access to information Committee on requests of the second type are final and not eligible for the second stage review by the external panel.
	9.3 Alleged violations of the policy related to Bank operations may also be addressed under the ICIM. In order to bring an allegation of violation of the policy to the ICIM, a complainant must reasonably assert that harm has occurred or can be expected to occur as a consequence of the Bank not having complied with the policy, and must meet the remaining eligibility criteria of the ICIM. Presentation of an allegation of a violation of the policy before the ICIM would require that the requester had resorted first to Management, and met the Mechanism's eligibility requirements. The establishment of the external panel under this policy would in no way preclude the right of persons alleging violations of this policy to submit requests to the ICIM, nor of the ICIM to take up such cases.
International Finance Corporation (IFC)	37. If a requester believes that a request for information from IFC has been unreasonably denied, or that this Policy has been interpreted incorrectly, a complaint may be submitted to IFC's Disclosure Policy Advisor, who reports directly to IFC's Executive Vice President. The Disclosure Policy Advisor will review the complaint and endeavor to respond to the requester within thirty calendar days of receipt of the complaint, unless additional time is required because of the scope or complexity of the complaint. The Disclosure Policy

Advisor will advise the requester and IFC of his/her conclusions in writing and will explain the reasons for such conclusions. The Disclosure Policy Advisor's review will focus on whether the requested information falls within the scope of paragraph 8 of this Policy and, if so, whether IFC has a reasonable basis for determining that there is a compelling reason not to disclose such information pursuant to paragraph 9. The Disclosure Policy Advisor's authority does not extend to paragraph 10, the application of which is solely within IFC senior management's discretion, nor to complaints from people affected by IFC-financed projects and who receive consideration by the CAO as described in paragraph 27. In conducting his/her review, the Disclosure Policy Advisor may, if he/she deems it necessary or appropriate, consult with third parties including IFC's client.

World Bank (WB)

F. Appeals

- 36. A requester who is denied access to information by the Bank may file an appeal if:
- (a) the requester is able to establish a *prima facie* case that the Bank has violated this Policy by improperly or unreasonably restricting access to information that it would normally disclose under the Policy; or
- (b) the requester is able to make a public interest case to override the Policy exceptions that restrict the information requested (limited to those exceptions set out in paragraph 15 (Corporate Administrative Matters), paragraph 16 (Deliberative Information), and paragraph 17 (a), (b), and (c) (relating to certain Financial Information) of this policy statement). The remedy available to a requester who prevails on appeal is limited to receiving the information requested.
- 37. **Appealing the Initial Denial—Access to Information Committee.** Appeals of a Bank decision to deny access are first considered by the Bank's AI Committee.²⁸ For appeals that assert a public interest case to override a Policy exception,²⁹ the decision of the AI Committee is final. The AI Committee may decide to refer a particular issue to the relevant Managing Director for his/her recommendation, which the AI Committee takes into account in its decision.³⁰ Appeals to the AI Committee must be filed, in writing, within 60 calendar days of the Bank's initial decision to deny access to the requested information. The AI

Committee makes its best efforts to reach a decision on appeals within 45 working days of receiving an appeal (delays are communicated in writing to the requester).

- 38. *Appealing the AI Committee's Denial—Appeals Board.* The Bank has established an independent Appeals Board31 to consider appeals alleging that the Bank violated this Policy by restricting access to information that it would normally disclose under the Policy, ³² if the AI Committee upholds the initial decision to deny access; the Appeals Board does not consider appeals concerning requests to override the Policy's exceptions. ³³ The Appeals Board has the authority to uphold or reverse the relevant decisions of the AI Committee, and the Appeals Board's decisions in such instances are final. Appeals to the Appeals Board must be filed, in writing, within 60 calendar days after the AI Committee's decision to uphold the Bank's initial decision to deny access. The Appeals Board makes its best efforts to consider all appeals that are received within a reasonable time period before the next scheduled Appeals Board session.
- 39. **Submitting an Appeal.** All appeals must be submitted in writing to the Access to Information Secretariat within 60 calendar days of the decisions to deny access. Appeals received beyond the 60-day period for filing an appeal with the AI Committee (first stage of appeal) and the Appeals Board (second stage of appeal) are deemed out of time and are not considered. Appeals may be submitted electronically through the Bank's website at www.worldbank.org/wbaccess. Appeals also may be set out in a brief letter and sent by mail to Access to Information Secretariat, World Bank, 1818 H Street, NW, Washington, DC, 20433. Appeals should be addressed to either the AI Committee (first stage of appeal) or the Appeals Board (second stage of appeal for those appeals alleging that the Bank violated the Policy by improperly or unreasonably restricting access). All appeals must contain the following:
- (a) the original case number, provided in the Bank's response to the request for information:
- (b) a description of the information originally requested; and
- (c) an explanatory statement that sets out the facts and the grounds which support the requester's claim that (i) the Bank violated this Policy by improperly or inappropriately

restricting access to the information requested; or (ii) for public interest reasons, an override of the Policy's exceptions is justified.

40. **Notification of Decision.** Requesters are notified if the appeal is dismissed: (a) for failure to file within the required time; (b) for failure to provide sufficient information that would reasonably support the appeal; or (c) for appealing a matter that the AI Committee or Appeals Board does not have authority to consider. After the AI Committee or the Appeals Board reaches its decision concerning the appeal, the requester is notified of the decision. If the AI Committee or Appeals Board upholds the initial decision to deny access to the information requested, the notice specifies the reasons. If the AI Committee or Appeals Board reverses the decision to deny access, the requester is notified of the decision and of the process for making the information available to the requester.

NOTE 28 Because the AI Committee has no authority over decisions by the Board, appeals of Board decisions are automatically dismissed.

NOTE 29 See paragraph 36 (b).

NOTE 30 This may include instances when the AI Committee has provided direct input in the initial decision to deny access.

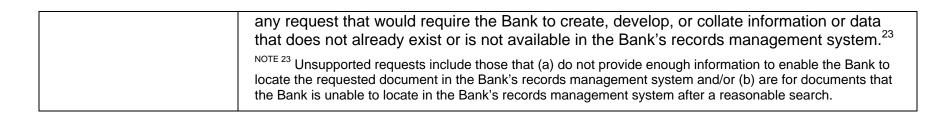
NOTE 31 The Appeals Board established under this Policy comprises three outside experts on access to information matters. Panel members are nominated by the President of the World Bank and endorsed by the Bank's Board of Executive Directors.

NOTE 32 See paragraph 36 (a).

NOTE 33 See paragraph 36 (b).

DEALING WITH FRIVOLOUS REQUESTS

African Development Bank (AfDB)	No relevant information available in the disclosure policy.
Asian Development Bank (ADB)	2. Requests for Information 164 blanket requests for access to historical information will not be accepted.
Public	4. Exceptions to Presumed Disclosure
Communications Policy Review 2010	135. ADB shall not be required to comply with, or respond to, repeated or unreasonable requests for information on the same subject from the same person, organization, or group
CONSULTATION DRAFT	if ADB has provided such information after the previous request or has given reasons why it cannot provide the information.
European Investment Bank (EIB)	The processing of applications 100. The Bank retains the possibility of refusing to follow up an application that is manifestly unreasonable.
Inter-American Development Bank	No relevant information available in the disclosure policy.
International Finance Corporation (IFC)	33. Requests for information must identify the specific information requested; blanket requests for information will not be accepted.
World Bank (WB)	26. <i>Unreasonable or Unsupported Requests.</i> The Bank reserves the right to refuse unreasonable or unsupported requests, including multiple requests, blanket requests, and



SECURITY CLASSIFICATION POLICY

African Development Bank (AfDB)	6. EFFECTIVENESS AND REPORTING
	6.1 Documents produced after the coming into force of this revised policy will be released in accordance with this policy. Specific permission of member governments or any directly affected co-financing institutions is required before the release of documents which were obtained under promise of confidentiality. Documents which were heretofore public will continue as such. Documents produced after approval of this revised policy shall be prepared in accordance with the expectation of release indicated by this revised policy.
Asian Development Bank (ADB)	No relevant information available in the disclosure policy.
Public Communications Policy Review 2010	
CONSULTATION DRAFT	
European Investment Bank (EIB)	No relevant information available in the disclosure policy.
Inter-American Development Bank	6. Classification
	6.1 This policy will include use of a new information security classification system, which would require designation of all information produced by the Bank at the time of its creation as either "Public" or belonging to one or more non-public classification levels. The application of any classification other than "public" may only occur as a consequence of the

	information in question being subject to non-disclosure according to one of the policy's exceptions. 6.2 EXR is responsible for designing and implementing by the date on which the policy takes effect, guidelines for the application of the system in general and for assisting and training the authors/owners of specific information in its use. Planning for the adoption of the new system is being managed by a working group chaired by EXR that includes the Records Management Section (ACP/REC), Information Technology Department, Office of the Secretary, the Legal Department, and the Knowledge and Learning Sector (KNL), with other Bank units to be added as needed. All information newly produced by the Bank as of the effective date of this policy will be required to bear a classification label. All information produced by the Bank not already in the public domain as of the date the new policy is adopted will also be required to be classified. All information received by the Bank from clients and other parties outside the Bank will also be classified.
International Finance Corporation (IFC)	No relevant information available in the disclosure policy.
World Bank (WB)	D. Electronic Mail
	(b) E-mails that are filed in the Bank's records management system but classified as "Official Use Only," "Confidential," or "Strictly Confidential" are not publicly available unless the information content of the e-mail becomes eligible for declassification and disclosure over time.
	B. Classification
	28. Bank documents are assigned one of the following four classifications: "Public," "Official Use Only," "Confidential," or "Strictly Confidential."
	29. <i>Information the Bank Creates.</i> In accordance with AMS 10.11, <i>Management of Records,</i> the Bank requires the originators of documents prepared in the course of the Bank's official business to file such documents in the Bank's records management system.

Much of the information created by the Bank is available to the public and is classified as "Public." Information that falls under the exceptions, and documents containing such information, are classified as "Official Use Only," "Confidential," or "Strictly Confidential" in accordance with AMS 6.21A, *Information Classification and Control Policy*. Draft papers are treated as deliberative documents.

30. *Information the Bank Receives.* The Bank also requires that member countries or third parties assign appropriate information classifications to information that they provide to the Bank. If the Bank receives information in confidence from a member country or a third party, the recipient Bank unit ensures that such information is (a) appropriately classified in accordance with the provider's expectation, using the Bank's information classification levels, and (b) filed in the Bank's records management system; the Bank does not disclose such information without the written consent of the country or the third party concerned. If a member country or third party fails to assign an information classification and if, to the Bank's knowledge, the information has not already been made publicly available by the member country or third party, the Bank considers the information to be, as relevant, deliberative information or information provided in confidence;²⁴ the recipient Bank unit classifies it in accordance with AMS 6.21A, *Information Classification and Control Policy*.

NOTE 24 See footnote 11. (11 This includes financial sector stress tests, the aide-mémoire following Bank-Fund financial sector assessments under the Financial Sector Assessment Program (FSAP), the report following the Bank's assessment of government debt management capacity, other technical advisory reports requested by member countries from World Bank Treasury, deliberations relating to IDA replenishments, IDA country allocations, and deliberations with donors relating to trust funds. If a member country or a third party has not classified the information given to the Bank and, to the Bank's knowledge, the member country or third party concerned has not made the information public, then such information is considered to be deliberative under paragraph 16 of this policy statement, and is classified by the recipient Bank unit in accordance with AMS 6.21A, *Information Classification and Control Policy*, as indicated in paragraphs 20 (d) and 30 of this policy statement. If the Bank believes that such information was given by the member country or third party (explicitly or implicitly) in confidence, the information is classified accordingly and restricted from disclosure pursuant to paragraph 14 of this policy statement.)

DECLASSIFICATION POLICY

African Development Bank (AfDB)	6. EFFECTIVENESS AND REPORTING
	6.1 Documents produced after the coming into force of this revised policy will be released in accordance with this policy. Specific permission of member governments or any directly affected co-financing institutions is required before the release of documents which were obtained under promise of confidentiality. Documents which were heretofore public will continue as such. Documents produced after approval of this revised policy shall be prepared in accordance with the expectation of release indicated by this revised policy.
Asian Development Bank (ADB)	No relevant information available in the disclosure policy.
Public Communications Policy Review 2010	
CONSULTATION DRAFT	
European Investment Bank (EIB)	EIB historical archives 124. The EIB is establishing a document declassification policy. Documents of historic value will be gradually released from the Bank's archives and made available to the interested public. The Bank's historical archives are kept, together with those of other EU institutions and bodies, in the University Institute in Florence.

Inter-American Development Bank	7. Declassification and Archives
	7.1 The Bank recognizes that the classification of information as non-public under the exceptions listed in Section 4 of this policy may change over time, thus the implementation of this policy will also include a system for declassification to be developed by Management and disclosed prior to the policy's effective date.
	7.2 The classification level assigned to information/documents will determine the schedule for disclosure, including the declassification of records under a three-tierd timeline after five, ten or 20 years. Information classified under the strictest confidentiality standard of the classification system will not be disclosed even after 20 years. Requests for information created before the effective date of this policy and not available on the Bank's external website will be reviewed by the Bank on the basis of the procedures for classification and declassification referred to herein and their corresponding timelines.
International Finance Corporation (IFC)	No relevant information available in the disclosure policy.
World Bank (WB)	C. Declassification
	31. The Bank declassifies and discloses—routinely on the Bank's external website, and in response to requests—certain types of restricted information (including information prepared under earlier disclosure policies of the Bank) as their sensitivity diminishes over time. Some restricted information is not eligible for declassification.
	32. Information Not Eligible for Declassification. The information that is restricted from disclosure under the exceptions set out in paragraphs 8-15 and 17 (d) of this policy statement (i.e., Personal Information; Communications of Executive Directors' Offices; Ethics Committee; Attorney-Client Privilege; Security and Safety; Information Restricted Under Separate Disclosure Regimes and Other Investigative Information; Information Provided by Member Countries or Third Parties in Confidence; Corporate Administrative

Matters; and banking or billing information of World Bank Group entities, member countries, clients, donors, recipients, or vendors, including consultants) and the financial and deliberative information that contains or relates to such information, is not declassified or made publicly available.

33. *Information Eligible for Declassification.* The following documents are declassified and made publicly available 5, 10, or 20 years after the date on the document, ²⁵ provided that they do not contain or refer to information that is not eligible for declassification as set out in paragraph 32 of this policy statement:

After 5 years

- Board minutes prepared before April 1, 2005, other than those of Executive Sessions and Restricted Executive Sessions.
- Minutes of Board Committee meetings prepared before July 1, 2010, other than those of Executive Sessions and Restricted Executive Sessions.
- Chairman's Concluding Remarks and Summings-up of Board meetings prepared before January 1, 2002.
- Summings-up of Committee of the Whole Meetings prepared before July 1, 2010.
- Summaries of Discussion (relating to Board meetings) prepared before July 1, 2010.
- Annual Reports of Board Committees prepared before July 1, 2010.
- Board papers that were prepared before July 1, 2010, and are classified "Official Use Only."
- Final documents listed in the Annex of this policy statement that were prepared before July 1, 2010, and classified as "Official Use Only." (Draft documents and other deliberative documents, although classified as "Official Use Only," are considered to be deliberative information and are declassified only after 20 years.)

After 10 years

- Verbatim transcripts of Board meetings and Board Committee meetings.
- Statements of Executive Directors and staff in the context of Board meetings or Board Committee meetings.
- Reports to the Board from its Committees (Green Sheets).
- Miscellaneous memoranda or informal notes distributed to the full Board or to a Board Committee.

After 20 years

- Minutes of Executive Sessions and Restricted Executive Sessions of the Board and its Committees.
- Communications and memoranda originating in Executive Directors' offices relating to Board or Board Committee proceedings.
- Board papers that are classified as "Confidential" or "Strictly Confidential."
- Memoranda of the President that accompany Board papers.
- Final documents listed in the Annex of this policy statement that were prepared before July 1, 2010, and classified as "Confidential" or "Strictly Confidential."
- Financial information restricted under paragraphs 17 (a), (b), and (c), unless the information pertains to the exceptions set out in paragraphs 8-15 or 17(d), of this policy statement.
- Other documents in the possession of the Bank's Archives Unit, unless the documents pertain to the exceptions set out in paragraphs 8-15 or 17(d) of this policy statement, including any deliberative or financial information containing or referring to those exceptions.

In applying these declassification schedules, the relevant date for unpublished documents is the date when the document was created; the relevant date for published documents is the date of publication. The declassification schedules set forth in this section must be read holistically to ensure that the document concerned is declassified appropriately. For example, although an "Official Use Only" Board paper may be declassified after 5 years, Memoranda of the President (which may also be classified as "Official Use Only" Board papers) are declassified only after 20 years.

ANNEX

DECLASSIFICATION SCHEDULE FOR CERTAIN HISTORICAL DOCUMENTS CREATED BEFORE JULY 1, 2010

Pursuant to paragraph 33 of the policy statement, the final documents listed in this Annex—if they were created before July 1, 2010 and were not already made public pursuant to earlier disclosure policies of the World Bank—are eligible for declassification according to the following schedule:

- (a) 5 years after the date of a document classified as "Official Use Only," and
- (b) 20 years after the date of a document classified as "Confidential," or "Strictly Confidential."

These documents are eligible for declassification if they do not contain or refer to information that fall under an exception that is not eligible for declassification (see paragraph 32 of the policy statement).

A. Operational documents prepared by the Bank

- Country Assistance Strategies (CAS)
- CAS Progress Reports
- Interim Strategy Notes
- CAS Completion Reports (included as an annex to the follow-on CAS)
- Public Information Notice for a CAS
- Joint Staff Advisory Notes on Poverty Reduction Strategy Papers (PRSPs)

- Country financing parameters (including the analyses that underpin their preparation)
- Economic and Sector Work and Non-Lending Technical Assistance reports
- Factual Technical Documents that underpin project preparation
- Project Appraisal Documents (previously Staff Appraisal Reports)
- Project Papers
- Program Documents for Development Policy Operation (DPOs)
- Supplemental Financing Documents (DPOs)
- Tranche Release Documents (DPOs)
- Integrated Safeguards Data Sheets
- Country Assessment Reports on the Use of Country Systems (UCS)
- Project Assessments for UCS pilot countries
- Implementation Completion and Results Reports (ICR)
- Note on Cancelled Operations (NCO) (previously Project Completion Note)
- Monthly Loan and Credit Statements
- Monthly Operational Summary of the lending pipeline (MOS)
- Status of Projects in Execution (SOPE)
- Country Portfolio Performance Reviews (CPPRs)
- Sector Strategy Papers (SSPs), Draft Sector Strategy Papers, Draft Concept Notes and Consultation Plan for an SSP
- All other operational policy and strategy papers
- Numerical Country Policy and Institutional Assessment (CPIA) Ratings for countries eligible for IDA financing

- Numerical IDA Country Performance Ratings (derived from CPIA ratings)
- Funding proposals for activities financed through Bank-administered trust funds
- Preliminary, decision-point, and completion-point documents prepared under the Heavily Indebted Poor Country (HIPC) Initiative
- QAG synthesis

B. Financial information

- Annual Budget Document
- C. Documents prepared by a member country
- Poverty Reduction Strategy Papers
- Letters of Development Policy
- Procurement Plans and updates

D. Board proceedings

• Executive Directors' Work Program

MINIMUM DISCLOSURE OBLIGATION OF MEMBER COUNTRIES AND OTHER PARTIES

African Development Bank (AfDB)

B. Environmental and Social Assessments

Environmental Impact Assessment (EIA) and Environmental Analysis

4.24 Environmental and Social Impact Assessments (ESIAs) are prepared by the borrower for Category 1 projects with potentially substantial environmental and social impacts. Local populations shall be informed of the results of the ESIA and their opinions about proposed recommendations solicited.

4.25 Before the Bank Group proceeds to an appraisal mission for Category 1 projects, available ESIA studies shall be released in the borrowing country project area at some public place accessible to potential beneficiaries, affected group and local CSOs. Once the ESIA is released in the borrowing country and submitted officially to the Bank Group, it will be made available to the public through the PIC, website and the field offices where such offices are in place. If the borrower objects to the broader release of the ESIA outside the borrowing country, staff will not continue with the processing of the project. For Category 4 projects involving Financial Intermediaries (FI), the FI shall ensure that the sub-projects that require ESIAs undergo the same information disclosure process as Category 1 projects funded by the Bank Group.

Executive Summaries of ESIA

4.26 Summaries of Environmental and Social Impact Assessments of Category 1 projects, which are prepared by Bank Group staff with the consent of the borrower and include the staff's conclusions and recommendations regarding environmental impacts and preventive or mitigatory measures, will be made available to the public in the borrowing country, through the PIC, field offices and Bank's website.

4.27 Environmental information will be released according to the Bank Group's existing applicable timetables for such releases; i.e. one hundred and twenty (120) days prior to presentation to the Boards.

Environmental and Social Management Plan

4.28 For Category 2 projects, where potential environmental impacts are minor, easily mitigated, indirect, and/or predictable, an Environmental and Social Management Plan (ESMP), has to be prepared and incorporated in the loan documents. A summary of the ESMP is released to the public through the PIC at least 30 days prior to Board presentation. Sector and Country departments will address any public inquiry related to the information released by the Bank, with the assistance of the Sustainable Development Unit. The communications between the Bank Group and the public shall be documented and kept on file by the Sector and Country Departments.

4.29 For any project that involves a significant number of people (200 or more persons) who would need to be displaced with a loss of assets, or access to assets or reduction in their livelihood, the Bank will require the borrower to prepare a Full Resettlement Plan (FRP). The FRP is released as a supplementary document to the ESIA summary. For any project involving the resettlement of less than 200 persons, an abbreviated resettlement plan is released together with the EMSP made available in the PIC, field offices and posted on the Bank Group's website for public review and comment.

Asian Development Bank (ADB)

Public Communications Policy Review 2010 CONSULTATION

2. Information Pertaining to ADB's Operations

c. Projects

iv. Information for Affected People

84. To facilitate dialogue with affected people and other individuals and organizations, including women and other vulnerable groups, information about a sovereign or nonsovereign project under preparation (including social and environmental issues) shall

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be made available to affected people in a timely manner, in an accessible place, and in a form and language(s) understandable to affected people. ADB shall work closely with the borrower or client to ensure information is provided and feedback on the proposed project design is sought, and that a focal point is designated for regular contact with affected people. This should start early in project preparation, so that the views of affected people can be adequately considered in project design, and continue at each stage of project preparation, processing, and implementation. ADB shall ensure that the project's or program's design allows for stakeholder feedback during implementation. ADB shall ensure that relevant information about major changes to project scope is also shared with affected people.

85. To support the requirements in paragraph 84, developing member country governments and ADB may jointly develop communications plans for certain projects, particularly those likely to generate a high level of public interest. Such plans could, for example, recommend how to engage in dialogue with affected people, broaden public access to information on economic and legal reforms, help governments and clients involve affected people in the design and implementation of ADB-assisted activities, and increase involvement of grassroots and civil society organizations in the development process.

86. ADB's environmental and social safeguard requirements on information disclosure to affected people are the same for sovereign and nonsovereign projects.

v. Project Safeguard Documents

(i) Environment

- 87. In accordance with the requirements under the Safeguard Policy Statement, ADB shall post on its website the following documents submitted by the borrower or client:
 - (i) a draft environmental impact assessment (EIA) report for a category A project, at least 120 days before Board consideration;
 - (ii) a draft environmental assessment and review framework (EARF) before appraisal,

where applicable;

- (iii) the final EIA or initial environmental examination (IEE), upon submission to ADB by the borrower/client:
- (iv) a new or updated EIA or IEE and a corrective action plan prepared during project implementation, if any, upon submission to ADB by the borrower/client;
- (v) the environmental monitoring reports, upon submission to ADB by the borrower/client.
- 88. The borrower/client shall provide relevant environmental information, including information from the documents in paragraph 87, in a timely manner, in an accessible place and in a form and language(s) understandable to affected people and other stakeholders.⁸

(ii) Resettlement

- 89. In accordance with the requirements under the Safeguard Policy Statement, ADB shall post on its website the following documents submitted by the borrower or client:
 - (i) a draft resettlement plan and/or resettlement framework endorsed by the borrower/client before project appraisal;
 - (ii) the final resettlement plan endorsed by the borrower/client after the census of affected persons has been completed;
 - (iii) a new or updated resettlement plan, and a corrective action plan prepared during project implementation, if any, upon submission to ADB by the borrower/client; and
 - (iv) the resettlement monitoring reports, upon submission to ADB by the borrower/client.
- 90. The borrower/client shall provide relevant resettlement information, including information from the documents in paragraph 89 in a timely manner, in an accessible place and in a form and language(s) understandable to affected persons and other stakeholders (see footnote 8).

(iii) Indigenous Peoples

- 91. In accordance with the requirements under the Safeguard Policy Statement, ADB shall post on its website the following documents submitted by the borrower or client:
 - (i) a draft indigenous peoples plan (IPP) and/or indigenous peoples planning framework, including the social impact assessment, endorsed by the borrower/client, before appraisal;
 - (ii) the final IPP upon submission to ADB by the borrower/client;
 - (iii) a new or updated IPP and a corrective action plan prepared during implementation, if any, upon submission to ADB by the borrower/client; and
 - (iv) indigenous peoples monitoring reports submitted by the borrower/client, upon submission to ADB by the borrower/client.
- 92. The borrower/client shall provide to the affected indigenous peoples relevant information, including information from the documents in paragraph 91 in a timely manner, in an accessible place and in a form and language(s) understandable to the affected indigenous peoples and other stakeholders (see footnote 8).

vi. Country Safeguard Systems

- 93. In accordance with the requirements under the Safeguard Policy Statement, ADB shall make publicly available:
 - (i) for public comment, the draft equivalence and acceptability assessments at the national, subnational, sector, or agency level, upon completion;
 - (ii) the final equivalence and acceptability assessment reports upon completion; and
 - (iii) updated assessments to reflect changes in country safeguard systems, if any, upon completion.

94. Disclosure related to acceptability assessments at the project level will follow the usual safeguard document disclosure process undertaken for project preparation and referred to in paragraphs 87 to 92 above.

NOTE 8 This information can be made available as brochures, leaflets, or booklets in local languages. For illiterate people, other suitable communications methods will be used.

6. Borrowers or Clients

160. For ADB projects, much of the responsibility for disclosing information will rest with the borrower or client. The borrower/client will work with staff from operational departments to provide focal points in project areas to dialogue with affected people about the project (paragraph 84). Project focal points may use the ADB website to access project and country related information and to disclose such information to interested parties, using locally and culturally appropriate delivery mechanisms.

European Investment Bank (EIB)

Environmental impact assessment of projects

The EIB's policy towards the formal process commonly known as "Environmental Impact Assessment" (EIA) is summarized in its Environmental Statement (2004). The Bank requires that all projects, irrespective of location, comply with the requirements (principles and practices) of the European Union's EIA Directive (85/337, amended by 97/11 and 2003/35), in terms of the requirements for and scope and form of a formal EIA.

The EIA Directive outlines which project categories shall require an EIA, which procedure shall be followed and the content of the assessment. Article 5(1) of the Directive requires the project promoter to provide information to the competent authority relating to the environmental impact of the project. The information is specified in Annex IV of the Directive and includes, among others, a Non-Technical Summary (NTS). According to Articles 6 and 9 of the Directive, it is the responsibility of the host country and its competent authorities to ensure that the "public concerned" are informed and consulted on the proposed project. The Bank's staff checks if these requirements have been fulfilled and

	their findings are summarized in their report to the EIB Board of Directors.
	For all projects for which an EIA is required, the Bank posts the NTS (or links to where it can be consulted) on the Project List. For projects outside the EU and the Accession and Candidate Countries the Environmental Impact Statement (EIS) is posted. The Bank reviews these documents to ensure that appropriate attention has been paid to likely environmental impacts, and that the proposed mitigation and compensation measures and the proposed environmental management plans associated with their implementation satisfy the requirements of the Bank.
	Through appropriate discussions with the promoter and other parties, and to ensure the project meets the EIB's environmental standards, the Bank promotes good EIA practice.
Inter-American Development Bank	5. Simultaneous Disclosure and Country Disclosure Requirements
	5.2 Borrower disclosure practice. The Environment and Safeguards Compliance Policy (GN-2208-20, paragraph 4.20) provides that "as part of the environmental assessment processappropriate information will be provided in location(s), format(s) and languages(s) to allow for affected parties to be meaningfully consulted." Management's annual reports to the Board on implementation of the Access to Information policy (see paragraph 11.1) will review the practices of borrowers with respect to the disclosure of environmental and social assessments related to Bank-financed projects.
International Finance Corporation (IFC)	C. INVESTMENT-RELATED INFORMATION
	12. In accordance with the Sustainability Policy and the Performance Standards, IFC requires its clients to engage with affected communities, including through the disclosure of information, in a manner commensurate with the risks and impacts their projects pose to such communities. Prior to presenting a project to IFC's Board of Directors (or other relevant internal authority) ⁴ for its consideration, IFC makes publicly available the information described in paragraphs 13 (Social and Environmental Information) and 14 (Summary of Proposed Investment) below. IFC publicly releases this information once it

has assured itself that the client can be expected to undertake the project in a manner consistent with the Performance Standards and that the client has undertaken its disclosure obligations and, where applicable, conducted an effective consultation process consistent with the Performance Standards.

- 13. **Social and Environmental Information**. IFC makes publicly available the following social and environmental information:
- (a) For each proposed investment (other than investments expected to have minimal or no social and environmental adverse impacts, or investments in financial intermediary (FI) projects⁵), IFC issues a brief summary of its review findings and recommendations: the Environmental and Social Review Summary (ESRS). The ESRS includes the rationale for IFC's categorization⁶ of a project, a description of the main social and environmental risks and impacts of the project, and the key measures identified to mitigate those risks and impacts, specifying any actions that will need to be implemented to undertake the project in a manner consistent with the Performance Standards and are accordingly included in the client's Action Plan.⁷ Along with the ESRS, IFC will make available electronic copies of, and where available, Web links to, any relevant social and environmental impact assessment documents prepared by or on behalf of the client, including the Action Plan. The ESRS is released no later than sixty days, in the case of Category A projects, and thirty days, in the case of Category B projects, prior to consideration of the proposed investment for approval by IFC's Board of Directors (or other relevant internal authority).
- (b) Before IFC releases the ESRS, the IFC client reviews its content to verify the factual accuracy of information relating to the client and the project.
- (c) After its initial disclosure to the public, social and environmental review information may be updated prior to consideration by IFC's Board of Directors (or other relevant internal authority) in order to reflect revised or additional information. Any such revised or additional information will be made publicly available. Such updating shall not restart the time periods referred to in paragraph 13(a) above, unless IFC determines that the previously disclosed ESRS would be materially deficient without the additional information.

NOTE 5 For investments in FI projects, the summary of any recommendation in relation to the social and environmental management system of the FI is found in the SPI, as described in paragraph 14(b)(xi)(Summary of Proposed Investment).

NOTE 6 As part of IFC's review of a project's expected social and environmental impacts, IFC assigns a social and environmental category (A, B, C, or FI) that is intended to reflect (i) the magnitude of impacts posed by the project and (ii) IFC's social and environmental disclosure requirements as specified in this Policy. Details of IFC's review and categorization process can be found in IFC's Sustainability Policy and the Environment and Social Review Procedure (ESRP), which is posted on IFC's Web site.

NOTE ⁷The Action Plan is a plan prepared by the client, which may range from a brief description of routine mitigation measures to a series of specific plans and (i) describes the actions necessary to implement the various sets of mitigation measures or corrective actions to be undertaken, (ii) prioritizes these actions, (iii) includes the time-line for their implementation, (iv) is disclosed to the affected communities, and (v) describes the schedule and mechanism for external reporting on the client's implementation of the Action Plan. More details about the Action Plan may be found in the Performance Standards.

World Bank (WB)

III. Information Relating to Member Countries and Other Parties

- 20. The Bank takes the following approach to disclosing information related to member countries/borrowers:
- (c) Documents prepared or commissioned by a member country/borrower that are made available to the public as a condition for doing business with the Bank. The country/borrower provides such documents to the Bank with the understanding that the Bank will make them available to the public.¹⁸

NOTE 18 Examples of such documents: (a) Poverty Reduction Strategy Papers (including Interim PRSPs and PRSP Annual Progress Reports); (b) Letters of Development Policy (see OP/BP 8.60, *Development Policy Lending*); (c) safeguards assessments and plans related to environment, resettlement, and indigenous peoples (see OP/BP 4.01, *Environmental Assessments*, OP/BP 4.10, *Indigenous Peoples*, and OP/BP 4.12 *Involuntary Resettlement*); (d) audited annual financial statements for projects (or, in exceptional cases, an abridged version thereof) for which the invitation to negotiate is issued on or after July 1, 2010 (see OP/BP 10.02, *Financial Management*); and (e) procurement plans (see *Guidelines: Procurement under IBRD Loans and IDA Credits*, and *Guidelines: Selection and Employment of Consultants by World Bank Borrowers*).

DURATION OF POLICY AND REVIEW

African Development Bank (AfDB)	6. EFFECTIVENESS AND REPORTING 6.2 Two years after the effectiveness of this revised policy, Management will submit a report to the Boards of Directors of its observations on the effectiveness of the Bank Group's Disclosure of Information Revised Policy and any recommended modifications.
Asian Development Bank (ADB) Public Communications Policy Review 2010 CONSULTATION DRAFT	 D. Review and Amendment 170. ADB may need to review and amend the provisions of the Policy to reflect experience in implementation, changes in ADB practice, the results of reviews of other ADB policies and strategies, and the evolving disclosure practices elsewhere. Flexibility will be needed to incorporate such changes periodically. Accordingly, ADB may revise or amend the Policy, as needed, following approval by the Board. 171. ADB shall conduct a comprehensive review after a period of time, not to exceed 5 years from the effective date of the Policy. The review will actively engage interested individuals and organizations.
European Investment Bank (EIB)	Accountability, implementation, and evaluation 40. Formal reviews of the disclosure policy will take place every three years. The EIB maintains a dedicated mailbox on its website (infopol@eib.org) to receive comments throughout the year.

Inter-American Development Bank	11. Report and review 11.1 EXR will present reports to the Board of Executive Directors on issues related to implementation of the new policy, along with any recommendations for changes, on an annual basis.
International Finance Corporation (IFC)	Section V. MONITORING AND REVIEW 38 In addition, after a period of time not to exceed five years from the effective date of this Policy, IFC will conduct an overall review of the implementation of this Policy and its ongoing effectiveness in meeting IFC's commitment to transparency and accountability.
World Bank (WB)	End of footnote on page 1 of disclosure policy states, "This Policy may be revised from time to time."