

AIC Decision on appeal #99

**CASE NUMBER AI9209
NUMERICAL VALUES FOR THE DATA HEAT MAP 2020-2023**

(Decision dated December 18, 2024)

Summary of Decision

- As part of its due diligence on appeals, the Access to Information Committee (“AIC”) seeks the relevant business unit’s views on the requested information in light of the appeal. In this case, after consultations with the relevant business units, the AIC found that:
 - (a) the requested information is public and has been referred to as such in the Bank’s response;
 - (b) additional information referred to in the appeal is also public, namely the bar with download options for 2022 and 2023. The AIC recognizes that such bar was inadvertently omitted for 2022 and 2023 but has since been added to the Heat Map webpage for years 2022 and 2023;
 - (c) there has been no denial of access to information. For this reason, appeals are ineligible for consideration; and
 - (d) pursuant to the Bank’s Policy on Access to Information, as amended (“AI Policy”), appeals must be filed “*within 60 calendar days of the Bank’s initial decision to deny access to the requested information*” (See AI Policy, at Section III.B.8(b)(i), emphasis added). The appeal was electronically filed 78 calendar days after the Bank’s response.
- ***Violation of Policy.*** Based on the above, the appeal is dismissed in its entirety for
 - (a) appealing a matter that the AIC has no authority to consider and, alternatively,
 - (b) untimeliness.

The Decision

Facts

1. On June 4, 2024, the World Bank (“Bank”) received a public access request (“Request”) seeking access to, in relevant part:

(...)

I request the numerical values for all the cells used to create the Heat Map, 2020-2023 inclusive.

Put another way, I am asking for the spreadsheets that underpin the Heat Maps for four years. (...) (“Requested Information”)

2. On June 10, 2024, the Bank consulted the responsible business unit to identify and locate the Requested Information. The responsible business unit replied on the same date noting, in relevant part, that “the heatmap scores (colors) are not based on “numerical values” (...) but on an assessment that is transparently disclosed and fully available on the website by scrolling over the relevant indicator/country/year”.

3. On August 19, 2024, the Bank provided the following response to the requester:

In response to your Request Number S2406-5319; Case Number AI9209, we are pleased to provide you with the following:

The Debt Reporting Heat Map is based on assigning scores of 1-4 to nine dimensions of debt transparency as follows (also indicated at the bottom of the heatmap):

1. Insufficient – red
2. Limited – orange
3. Partial – yellow
4. Full – green

There are no additional numerical inputs to the heatmap.

The methodology of the heatmap (esp. Table 1) explains how scores are assigned to each dimension of debt transparency. The explanation for assigning a score to a dimension in a particular country, as well as the link to relevant Government documents underpinning the assessment, appear when you hover a cursor over a specific cell.

For example: consider the dimension of “Data accessibility”. The methodology notes that to receive a score of 4 (Full, or green), public debt statistics need to be available in a single document. Take the country of Mozambique – the public debt report, available at the Government website referenced in the heatmap, contains all the required information. Mozambique is therefore assigned a score of 4, reflected by the green cell.

The relevant Government documents underpinning the assessments are public and can be accessed via URLs that appear on screen when you hover your cursor over a specific cell. Please note that the websites linked to URLs do not belong to the World Bank.

Your request is now complete and will be closed in the system. Should you require further information, kindly submit a new access to information request. (...)

4. On September 17, 2024, the requester emailed the text of the appeal to a Bank staff asking the Bank staff to “forward it”.

5. On October 9, Bank staff had a call with the requester to discuss his submission of an appeal by email. The requester asked for the electronic link to appeal.
6. On October 11, 2024, the Bank sent the electronic link to appeal to the requester.
7. On November 5, 2024, the Bank electronically received an appeal challenging the Bank's response alleging a "violation of policy" ground to appeal. The appeal states, in relevant part:

(...)

At the bottom of the heat maps for the years 2020 and 2021, there is a bar and on the right side a "download form at" option. If you click on that, the Data download option is initially grayed out, but interestingly, if you click anywhere on the Heat Map and then "unclick" that same spot, the Data option becomes a true option. Once you hit download "data" you get a new window that gives you the option of downloading a summary or "full data," which you can download as an Excel file.

And there's another way. On the same bar, for 2020 and 2021, it's possible to hit "crosstab" and get an Excel spreadsheet.

The spreadsheets contain no colors. Rather, the cells indicate how the countries scored, although not in a 1-4 format.

These findings suggest that that the requested numerical values actually exist.

Curiously, the paths to see the numbers described above are not available for the years 2022 and 2023. However, it does not seem possible that the data doesn't exist for these years, both because we can see it for the two previous years and because it would not be possible to generate country colors without it. (...)

8. On November 7, 2024, the AIC, through the AIC Secretariat, consulted the responsible business unit to seek its views on the Requested Information in light of the appeal. As a result, by November 19, 2024, the relevant business unit informed the AIC that:
 - (a) there are no numerical values or analyses that underly the colors on the Domestic Debt Securities Heat Map ([Heat Map](#)) for 2020 through 2023. There are no calculations that generate the categorical data represented by colors in the heatmap; instead, each data point (represented by a country-indicator-color combination) is based on an assessment by staff based on the documents linked to in the table. Scores are categorical and colors can be mapped 1-1 to numbers with the information available on the Heat Map webpage. The colors can be converted to numerical values as per the legend in the Heat Map. Because of the one-to-one mapping between colors and numerical values and the absence of any calculations to arrive at the categorical data point, there is no additional information that could be provided beyond what is already published;

- (b) there is no spreadsheet that contains any information additional to what is already made public on the website; and
- (c) the bar with download options was inadvertently omitted for 2022 and 2023. Such bar has since been added to the Heat Map webpage for years 2022 and 2023.

Preliminary Matters

Eligibility to appeal

9. Pursuant to the Bank’s Policy on Access to Information (“[AI Policy](#)”), a requester who is *denied* access to information by the Bank may file an appeal (*see* AI Policy, at Section III.B.8.(a), emphasis added). Requesters whose access to information has been *denied* by the Bank may file an appeal on a “violation of policy” basis if able to establish a *prima facie* case that the Bank has violated the AI Policy by improperly or unreasonably *restricting* access to information that it would normally disclose under the AI Policy (*see* AI Policy, at Section III.B.8.(a).i, emphasis added). When there is a denial of access to information, appeals must be filed within 60 calendar days of the Bank’s initial decision to deny access to information (*see* AI Policy, at Section III.B.8.(b)(i)). Additionally, pursuant to the Bank Directive Access to Information (“[Directive](#)”), if “a request is denied, the requester will be provided with an electronic link to submit an appeal challenging the Bank’s denial of access to information” (*see* Directive, at Section III.B.1).

10. The AIC found that:

- (a) the underlying data for the scores in the Heat Map and the [methodology](#) for reaching the scores on the Heat Map are public. Such information has been referred to the requester as part of the Bank’s response;¹
- (b) there are no “numerical values” or “numerical analysis” underlying the Heat Map;
- (c) the requester mentions the bar with a “download form at” option only as part of the appeal. There is no mention of such bar on the Request, much less any indication on the Request that the bar for 2022 and 2023 was of interest and being requested. The Request on the record makes no reference to such bar;
- (d) the bar with a "download form at" option for 2022 and 2023 was inadvertently omitted. This has since been corrected and added to the Heat Map webpage for years [2022](#) and [2023](#);
- (e) all information underlying the Heat Map is public;
- (f) the Bank’s denial of access to information is a pre-requisite to file an appeal. The record shows no denial of access in this case;

¹ The methodology provided in the Bank’s response dates October 2022. The website for the Heat Map also provides access to the final version of the [methodology](#).

- (g) the electronic link to appeal is automatically generated and provided to requesters when there is a denial of access to information. Such electronic link to appeal is essential for the Bank's management, monitoring, and reporting of appeals;
- (h) the electronic link to appeal in this case was not automatically generated because there was no denial of access to information on the record;
- (i) the Bank manually generated the electronic link to appeal in this case on an exceptional basis upon a request of the requester; and
- (j) the appeal in this case was filed electronically 78 days after the Bank's initial response, i.e., 18 days after the 60-day deadline to file appeals.

Decision

11. Based on the above, the AIC dismisses the appeal in its entirety for (a) appealing a matter that the AIC has no authority to consider (see [Bank Directive Access to Information](#), at Section III.D.1(a)(i) and (iii)) and, alternatively, (b) untimeliness.