

# Bank Policy:

## Access to Information

**Bank Access to Information Policy Designation**  
Public

**Catalogue Number**  
EXC4.01-POL.01

**Issued and Effective**  
July 1, 2015

**Content**  
Policy governing public accessibility of information in the Bank's possession.

**Applicable to**  
The World Bank

**Issuer**  
The President

**Sponsor**  
Vice President, External and Corporate Relations (except for purposes of interpretation under section III.B.7 of this Policy)



## SECTION I – PURPOSE AND APPLICATION

1. This Policy governs the public accessibility of information in the Bank's possession. This document reflects revisions approved by the Board on April 3, 2013, and June 30, 2015, and supersedes the *World Bank Policy on Access to Information, July 1, 2013*.
2. This Policy applies to the Bank.

## SECTION II – DEFINITIONS

As used in this Policy, the following terms have the meanings set forth below:

1. **AI:** access to information.
2. **AI Committee:** Access to Information Committee established by the Policy.
3. **AMS:** Administrative Manual Statement of the World Bank Group.
4. **Appeals Board:** Appeals Board established by the Policy.
5. **Archives Unit:** the archives unit of the World Bank Group.
6. **Articles of Agreement of IBRD:** the charter that governs IBRD.
7. **Articles of Agreement of IDA:** the charter that governs IDA.
8. **Attorney-Client Privilege:** the exception set forth in section III.B.2(d) of this Policy.
9. **Bank:** see definition for World Bank.
10. **Board:** the board of Executive Directors of IBRD and IDA.
11. **Board Committee:** a committee of the Board.
12. **Board of Governors:** the body with which all powers of the Bank are vested, pursuant to the respective Articles of Agreement of IBRD and of IDA.
13. **Board of Governors Documents:** documents that are specifically prepared by staff for (a) discussion or consideration (decision) by the Board of Governors, (b) discussion by the Board of Governors committees, task forces, working groups and other bodies created under the auspices of the committee or of the Board of Governors, or (c) information for the Board of Governors or the Board of Governors committees, task forces, working groups and other bodies created under their auspices.

14. **Board of Governors Documents and Records:** collectively, the Board of Governors Documents and the Board of Governors Records.
15. **Board of Governors Records:** records of the discussions of the Board of Governors or of the Board of Governors committees, task forces, working groups and other bodies created under the auspices of the committee or of the Board of Governors, such as summary proceedings, statements and speeches of Governors and World Bank management, verbatim transcripts and minutes.
16. **Board Papers:** documents that are specifically prepared by staff for (a) discussion or consideration (decision) by the Board, (b) discussion by a Board Committee, or (c) information to the Board or a Board Committee.
17. **Board Records:** records of Board or Board Committee discussions such as verbatim transcripts, minutes, statements of Executive Directors, Chairman's Summings-up, Summaries of Discussions and Chair Summaries.
18. **Borrowers:** borrowers of Bank financing and, for the purpose of this Policy, the term includes credit and grant recipients and guarantors of such Bank financing.
19. **CAS:** see definition for Country Assistance Strategy.
20. **CAS Completion Report:** completion report prepared near the end of a CAS cycle.
21. **CAS Progress Report:** progress report of a CAS.
22. **Chair Summaries:** single category of Board Records that replace Chairman's Summings-up and Summaries of Discussions beginning July 1, 2013.
23. **Chairman's Concluding Remarks:** written statements, prepared until June 30, 2010, that reflected discussions by the Board on major issues concerning matters such as country assistance strategies, transitional support strategies, and interim strategy notes.
24. **Chairman's Summings-up or Summings-up:** brief statement that summarizes the conclusions of the chair of the Board, or of the Committee of the Whole, concerning policy, strategy and other important topical issues discussed by the Board or the Committee of the Whole.
25. **Code of Conduct for Board Officials:** the code of conduct adopted by the Board for IBRD, IFC, IDA and MIGA for Board Officials (as the term is defined in the document) to set forth principles and ethical standards for Board officials in connection with, or having bearing on, their status and responsibilities to these organizations.
26. **Committee of the Whole:** a Board committee made up of all Executive Directors, and whose role is to make recommendations or exchange views on matters of interest to the Board.

27. **Communications of Governors and/or Executive Directors' Offices:** the exception set forth in section III.B.2(b) of this Policy.
28. **Confidential:** the definition for this term as set forth in AMS 6.21A, *Information Classification and Control Policy*.
29. **Corporate Administrative Matters:** the exception set forth in section III.B.2(h) of this Policy.
30. **Country Assistance Strategy:** country assistance strategy that provides the framework for Bank assistance to a given country over a period of time.
31. **Country Portfolio Performance Review** or **CPPR:** reviews prepared pursuant to OP/BP 13.16, *Country Portfolio Performance Reviews*.
32. **CPIA:** Country Policy and Institutional Assessment.
33. **CPPR:** See definition for Country Portfolio Performance Review.
34. **Deliberative Information:** the exception set forth in section III.B.2(i) of this Policy.
35. **Development Policy Financing** or **DPF:** development policy financing (formerly referred to as "Development Policy Operations" or "DPO") as the term is defined in OP 8.60, *Development Policy Financing*.
36. **Development Policy Operations** or **DPO:** see definition for Development Policy Financing.
37. **Directive/Procedure:** *Bank Directive/Procedure: Access to Information*, July 1, 2015, Catalogue No. ECR4.01-DIR.01.
38. **DPF:** see definition for Development Policy Financing.
39. **DPO:** see definition for Development Policy Operations.
40. **Economic and Sector Work:** work that provides the basis for the Bank's diagnosis of a given country's development prospects.
41. **Ethics Committee:** the committee, established pursuant the Code of Conduct for Board Officials, that considers matters relating to the interpretation or application of that document; and for the purposes of this Policy, the term also means the exception set forth in section III.B.2(c) of this Policy.
42. **Executive Directors:** persons elected or appointed as executive directors of the World Bank to be responsible for the conduct of the general operations of the Bank and exercise all the powers delegated to them by the Board of Governors pursuant to the respective Articles of Agreement of IBRD and of IDA.
43. **Factual Technical Documents:** documents that underpin project preparation.

44. **Financial Information:** the exception set forth in section III.B.2(j) of this Policy.
45. **Financial Sector Assessment Program** or **FSAP:** a joint program of the Fund and World Bank that provides a comprehensive framework through which assessors and authorities in participating countries can identify financial system vulnerabilities and develop appropriate policy responses.
46. **FSAP:** see definition for Financial Sector Assessment Program.
47. **Fund:** International Monetary Fund.
48. **General Counsel:** World Bank Group General Counsel.
49. **Green Sheets:** reports to the Board from Board Committees.
50. **Governors:** the governors of the Board of Governors.
51. **Heavily Indebted Poor Country (HIPC) Initiative:** initiative aimed at reducing the external debt stock of heavily indebted poor countries to sustainable levels.
52. **HIPC:** see definition for Heavily Indebted Poor Country.
53. **IAD:** Internal Audit vice presidency of the World Bank Group.
54. **ICSID:** International Centre for Settlement of Investment Disputes.
55. **IBRD:** International Bank for Reconstruction and Development.
56. **ICR:** see definition for Implementation Completion and Results Report.
57. **IDA:** International Development Association.
58. **IEG:** Independent Evaluation Group.
59. **IFC:** International Finance Corporation.
60. **IMF:** International Monetary Fund.
61. **Implementation Completion and Results Report** or **ICR:** report that assesses an operation upon completion.
62. **Information:** documents of any type (e.g., paper, electronic, photograph, film, sound recordings, videotapes) prepared or received by the Bank in the course of its official business.
63. **Information Provided by Member Countries or Third Parties in Confidence:** the exception set forth in section III.B.2(g) of this Policy.

64. **Information Restricted Under Separate Disclosure Regimes and Other Investigative Information:** the exception set forth in section III.B.2(f) of this Policy.
65. **Inspection Panel:** the panel established pursuant to Resolution IBRD 93–10 and Resolution IDA 93–6, dated September 22, 1993.
66. **INT:** Integrity vice presidency of the World Bank.
67. **Integrated Safeguards Data Sheet:** document setting forth a project's basic information, and identifies key issues under the Bank's safeguards policies, including environmental and social issues, and provides relevant information concerning their management in the proposed operation.
68. **Interim Strategy Note:** document prepared for countries that are in transition from conflict or political crisis, countries going through an unusually uncertain period, and countries where the Bank is reengaging after a prolonged hiatus.
69. **IP:** Inspection Panel.
70. **Joint Staff Advisory Notes on PSRP:** document prepared by IDA and Fund staff as feedback to the country and to the Boards of the World Bank and the Fund on priority areas for strengthening the poverty reduction strategy and its implementation.
71. **Letter of Development Policy:** a borrower's document setting forth the program of actions, objectives and policies to be supported by a DPF.
72. **Loans:** World Bank loans, which for the purpose of this Policy may include IDA credits and grants, grants made out of the Bank's net income and administrative budget, and trust fund grants.
73. **Loan Agreement:** an agreement between the Bank and a borrower providing for a Loan.
74. **Managing Director:** a managing director of the World Bank
75. **Memoranda of the President or MOP:** the President's memoranda to the Board.
76. **MIGA:** Multilateral Investment Guarantee Agency.
77. **Monthly Loan and Credit Statement:** monthly statements of all Bank loans and credits.
78. **Monthly Operational Summary** or **MOS:** monthly report on the status of each lending operation under preparation for Bank financing.
79. **MOP:** see definition for Memoranda of the President.

80. **MOS:** see definition for Monthly Operational Summary.
81. **Note on Cancelled Operations:** a note prepared for an operation that fails to become effective or is cancelled before significant implementation is initiated.
82. **Official Use Only:** the definition set forth in AMS 6.21A, *Information Classification and Control Policy*, for this term.
83. **OP/BP:** Operational policy and Bank procedure for Bank operations.
84. **Personal Information:** the exception set forth in section III.B.2(a) of this Policy.
85. **Policy:** *Bank Policy: Access to Information*, July 1, 2015, Catalogue No. EXC4.01-POL.01.
86. **PowerPoint:** a Microsoft slide-based presentation program.
87. **Poverty Reduction Strategy Paper** or **PRSP:** paper setting forth the framework for poverty reduction in a country.
88. **President:** President of the World Bank Group.
89. **Principles of Staff Employment:** the general conditions and terms of employment set out in the Staff Manual.
90. **Procurement Plan:** borrower's procurement plan prepared in accordance with the *Guidelines: Procurement of Goods, Works, and Non-Consulting Services under IBRD Loans and IDA Credits & Grants by World Bank Borrowers*.
91. **Program Document:** document that describes a DPF and sets forth the Bank's appraisal and assessment of the feasibility of, and justification for, the program to be supported by the Bank.
92. **Project:** the project described in a Loan Agreement, for which the Loan is extended.
93. **Project Appraisal Document:** document that describes a project and sets forth the Bank's appraisal and assessment of the feasibility of, and justification for, the project.
94. **PRSP:** see definition for Poverty Reduction Strategy Paper.
95. **QAG:** Quality Assurance Group.
96. **Resolution:** resolution of the Board.
97. **Restricted information:** information that falls under one or more of the exceptions set forth in this Policy and information to which the World Bank's prerogative to restrict has been applied.

98. **Sanctions Board:** the World Bank Group Sanctions Board.
99. **Sanctions Board Statute:** the statute governing the Sanctions Board.
100. **Sanctions Board Procedures:** the World Bank procedures to be followed in cases involving sanctionable practices as defined in the procedures.
101. **Security and Safety:** the exception set forth in section III.B.2(e) of this Policy.
102. **Sector Strategy Paper** or **SSP:** paper which reviews the Bank's experience in a given sector and sets forth the Bank's strategy for future work in the sector.
103. **SOPE:** see definition for Status of Projects in Execution.
104. **SSP:** see definition for Sector Strategy Paper.
105. **Staff Appraisal Report:** document that preceded the Project Appraisal Document.
106. **Staff Manual:** the manual that sets forth the Principles of Staff Employment and Staff Rules for World Bank staff.
107. **Staff Rules:** the rules set forth in the Staff Manual.
108. **Status of Projects in Execution** or **SOPE:** annual report to the Board on the implementation status of projects in execution.
109. **Strictly Confidential:** the definition for this term as set forth in AMS 6.21A, *Information Classification and Control Policy*.
110. **Summary of Discussion:** a summary of discussion concerning certain items discussed at a meeting of the Board that does not attribute the views of individual Executive Directors.
111. **Third party:** any individual, group of individuals, organization, or other entity that provides information to the Bank.
112. **Tranche Release Document:** document prepared for each tranche of a multi-tranche DPF that reports on the status of the program being supported under the DPF.
113. **Treasury:** the Treasury vice presidency of the World Bank.
114. **UCS:** use of country systems.
115. **WBG:** see definition for World Bank Group.
116. **World Bank** or **Bank:** collectively IBRD and IDA.
117. **World Bank Group** or **WBG:** collectively IBRD, IDA, IFC, ICSID and MIGA.





## SECTION III – SCOPE

### A. GUIDING PRINCIPLES

1. This Policy is based on five principles:
  - Maximizing access to information;
  - Setting out a clear list of exceptions;
  - Safeguarding the deliberative process;
  - Providing clear procedures for making information available; and
  - Recognizing requesters' right to an appeals process.

### B. THE POLICY

1. The Bank allows access to any information in its possession that is not on a list of exceptions (set forth in section III.B.2 of this Policy). In addition, over time the Bank declassifies and makes publicly available certain information that falls under the exceptions (as explained in section III.B.6 of this Policy).<sup>1</sup> Notwithstanding the broad intent of this Policy, the Bank reserves the right, under exceptional circumstances, to disclose certain information covered by the list of exceptions, or to restrict access to information that it normally discloses (as explained in section IV of this Policy).

2. **The Exceptions.** The Bank does not provide access to information whose disclosure could cause harm to specific parties or interests. Accordingly, the Bank does not provide access to documents that contain or refer to the information listed in subparagraphs (a) through (j) below.

(a) **Personal Information.** The Bank's Principles of Staff Employment require the Bank to establish and maintain appropriate safeguards to respect the personal privacy of staff members and protect the confidentiality of personal information about them. Accordingly, the Bank does not provide access to the following information, except to the extent expressly permitted by the Staff Rules:

- i. Personal information, including personal staff records, medical information, and personal communications (including e-mail)<sup>2</sup> of the following individuals and their families: Executive Directors, their alternates, and their senior advisers; the President of the Bank; other Bank officials; and Bank staff.

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<sup>1</sup> For the purpose of this Policy, the terms "disclose," "provide access," and "make publicly available" (and their variants) are used interchangeably.

<sup>2</sup> See Policy at section III.B.5(c).

- ii. Information relating to staff appointment and selection processes.
  - iii. Information relating to proceedings of the Bank's internal conflict resolution mechanisms.
  - iv. Information relating to investigations of allegations of staff misconduct and personal conflicts of interest.
- (b) **Communications of Governors and/or Executive Directors' Offices.** The Bank does not provide access to:
- i. Communications within and between individual Governors and/or Executive Directors' offices.
  - ii. Communications between individual Governors and/or Executive Directors' offices and the member country or countries they represent.
  - iii. Communications between individual Governors and/or Executive Directors' offices and third parties.
- (c) **Ethics Committee.** The Bank does not provide access to proceedings of the Ethics Committee for Board officials (unless the Executive Directors initiate a decision to disclose such information).
- (d) **Attorney-Client Privilege.** The Bank does not provide access to information subject to attorney-client privilege, including, among other things, communications provided and/or received by the General Counsel, in-house Bank counsel, and other legal advisors.
- (e) **Security and Safety.** The Bank does not provide access to:
- i. Information whose disclosure would compromise the security of Bank staff and their families, contractors, other individuals, and Bank assets.
  - ii. 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.
  - iii. Information whose disclosure is likely to endanger the life, health, or safety of any individual, or the environment.
- (f) **Information Restricted Under Separate Disclosure Regimes and Other Investigative Information.** The Bank does not provide access to information whose disclosure is restricted under the separate disclosure regimes of IEG,<sup>3</sup>

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<sup>3</sup> See [Access to Information Policy for the Independent Evaluation Group](#).

IP,<sup>4</sup> INT,<sup>5</sup> and the Bank's sanctions process.<sup>6</sup> The Bank also does not provide access to any other information that would prejudice an investigation that is not addressed under such separate disclosure regimes.

- (g) **Information Provided by Member Countries or Third Parties in Confidence.** The Bank has an obligation to protect information that it receives in confidence. Thus, the Bank does not provide access to information provided to it by a member country or a third party on the understanding of confidentiality, without the express permission of that member country or third party.<sup>7</sup>
- (h) **Corporate Administrative Matters.** The Bank does not provide access to information relating to the Bank's corporate administrative matters, including, but not limited to, corporate expenses, procurement, real estate, and other activities.
- (i) **Deliberative Information.** The Bank, like any institution or group, needs space to consider and debate, away from public scrutiny. It generally operates by consensus, and it needs room to develop that consensus. During the process it seeks, and takes into account, the input of many stakeholders; but it must preserve the integrity of its deliberative processes by facilitating and safeguarding the free and candid exchange of ideas. Therefore, while the Bank makes publicly available the decisions, results, and agreements that result from its deliberative processes, it does not provide access to the following information:<sup>8</sup>
- i. Information (including e-mail, notes, letters, memoranda, draft reports, or other documents) prepared for, or exchanged during the course of,

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<sup>4</sup> See Resolution No. IBRD 93-10, No. IDA 93-6, September 1993 (Resolution) establishing the Inspection Panel, and subsequent clarifications to the Resolution (i.e., *Review of the Resolution Establishing the Inspection Panel: 1996 Clarification of Certain Aspects of the Inspection Panel*; and *1999 Clarification of the Board's Second Review of the Inspection Panel*), all available on the [Inspection Panel](#) website.

<sup>5</sup> This includes information gathered, received, or generated by INT in connection with or related to inquiries, investigations, audits, or any other types of INT reviews, programs, products, or outputs, as well as any other information gathered, received, or generated by INT on a confidential basis.

<sup>6</sup> This includes information whose disclosure is restricted under the *Sanctions Board Statute* and the *Sanctions Procedures*.

<sup>7</sup> When a member country or a third party provides financial, business, proprietary, or other non-public information to the Bank with the understanding that it will not be disclosed, the Bank treats the information accordingly. Material held by the Bank in which other parties hold the copyright may be made available for review, but copying or distributing such material is limited to respect the rights of the copyright holder. See also relevant discussion in section III.B.3 of the Directive/Procedure.

<sup>8</sup> Certain deliberative information is eligible for declassification and disclosure over time, as indicated in section III.B.6 of this Policy.

its deliberations with member countries or other entities with which the Bank cooperates.<sup>9</sup>

- ii. Information (including e-mail, notes, letters, memoranda, draft reports or other documents) prepared for, or exchanged during the course of, its own internal deliberations, including the following documents pertaining to Board of Governors and Board deliberations:
  - (A) Verbatim transcripts of meetings of the Boards of Governors and their committees, task forces, working groups and other bodies created under their auspices.
  - (B) Verbatim transcripts of Board meetings and Board Committee meetings, and the Memoranda of the President that accompany Board Papers.
  - (C) Statements of Executive Directors and staff in the context of Board meetings or Board Committee meetings.
  - (D) Reports to the Board from its Committees (Green Sheets) if subsequent Board discussion is expected.<sup>10</sup>
  - (E) Communications and memoranda originating in Executive Directors' offices relating to Board or Board Committee proceedings.
  - (F) Miscellaneous memoranda or informal notes distributed to the full Board or to a Board Committee.<sup>11</sup>
- iii. Statistics prepared, or analyses carried out, solely to inform the Bank's internal decision-making processes (such as analyses of country creditworthiness, credit ratings, and risk, the write-ups underpinning the Country Policy and Institutional Assessment (CPIA) for IBRD and IDA borrowers, and the CPIA ratings for IBRD borrowers).

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<sup>9</sup> 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 Treasury, deliberations relating to IDA replenishments, IDA country allocations, and deliberations with donors relating to trust funds.

<sup>10</sup> However, if no subsequent Board meeting is expected, the Bank makes publicly available reports to the Board from its Committees, with deliberative information removed (summary portion of the Green Sheet).

<sup>11</sup> This is a heterogeneous group of documents that includes information notes, technical briefing papers, PowerPoint presentations that supplement Board Papers, presentations to Board Committees, and administrative papers (such as meeting notices) that are not used as a basis for consultation or decision but are used solely for information or administrative purposes.

- iv. Audit reports prepared by IAD, except its finalized annual and quarterly activity reports.
- (j) **Financial Information.** The Bank does not provide access to the following financial information:<sup>12</sup>
  - i. Estimates of future borrowings by IBRD, contributions by individual donors to IDA, financial forecasts and credit assessments, and data on investment, hedging, borrowing, and cash management transactions<sup>13</sup> generated by or for the Bank's treasury operations for the World Bank Group entities and other parties.
  - ii. Documents, analysis, correspondence, or other information used or produced to execute financial and budgetary transactions, or to support the preparation of internal and external financial reports.
  - iii. Details of individual transactions under loans and trust funds, information regarding amounts overdue from borrowers, or actions taken before any loans are placed in nonaccrual status.
  - iv. Banking or billing information of World Bank Group entities, member countries, clients, donors, recipients, or vendors, including consultants.

3. **Board of Governors Proceedings.** Board of Governors Documents and Records relating to or arising from meetings held jointly with the IMF may be made publicly available if and when the IMF provides its written approval to disclose. The following Board of Governors Documents and Records that are routinely available from the Bank are posted on the Bank's external website:<sup>14</sup>

- (a) Reports of the Executive Directors recommending decisions to the Boards of Governors on such matters as capital increases and replenishments are posted on the Bank's external website at the end of the Boards of Governors' deliberative process.
- (b) Resolutions adopted by the Boards of Governors at the Annual Meetings or through a vote by mail.
- (c) Statements of the Governors and of the President during the Annual Meetings.

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<sup>12</sup> Certain financial information is eligible for declassification and disclosure over time, as indicated in section III.B.6 this Policy.

<sup>13</sup> This includes holdings, positions, and performance information for World Bank Group entities and other parties.

<sup>14</sup> Board of Governors Documents and Records, as defined in section II of this Policy, are not all prepared following every Board of Governors meeting.

- (d) Summary Proceedings of the Annual Meetings of the Boards of Governors.
- (e) Agendas of the meetings of the Joint Ministerial Committee of the Boards of Governors of the Bank and the IMF on the Transfer of Real Resources to Developing Countries (known as the Development Committee); communiques and announcements issued by the Development Committee; statements and declarations submitted by Development Committee members during the meetings of the Development Committee; and reports, papers, notes and other documents prepared by Bank staff for the meetings of the Development Committee.
- (f) Statements Submitted to the Meeting of the Development Committee.

4. **Board Proceedings.** Board Papers and Board Records that are routinely available from the Bank are posted on the Bank's external website at specific Board milestones.<sup>15</sup> Some Board discussions may deal with issues that fall under the exceptions of the policy. In such cases, the related Board Records are classified as *Confidential* and *Strictly Confidential* and are not disclosed unless they become eligible for declassification under the declassification schedule provided under section III.B.5 of this Policy. Board Records of a Board meeting or Board Committee meeting initially held as a regular session but subsequently converted into an executive session or a restricted executive session are considered (as applicable) to be Board Records of a meeting of an executive session or a restricted executive session, as converted, in their entirety.

- (a) The following Board Records *prepared on or after July 1, 2010*, are posted at the end of the Board's deliberative process:
  - i. Minutes of Board meetings.<sup>16</sup>
  - ii. Minutes of Board Committee meetings.
  - iii. Summings-up of Board meetings and Committee of the Whole meetings.<sup>17</sup>
  - iv. Summaries of Discussion (related to Board meetings).
  - v. Reports to the Board from its Committees (Green Sheets) with deliberative information removed (summary portion of the Green Sheets), if a subsequent Board discussion is not expected.
  - vi. Annual reports of Board Committees.
- (b) Board Papers distributed for discussion or consideration (decision) by the Board are posted at the end of the Board's deliberative process, once they are finalized. However, the following Board Papers whose preparation may

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<sup>15</sup> Board Records, as defined in section II of this Policy, are not all prepared following every Board meeting.

<sup>16</sup> Board minutes created after April 1, 2005, are already publicly available. For Board minutes created before April 1, 2005, see section III.B.6(b) of this Policy.

<sup>17</sup> Beginning July 1, 2013, Chairman's Summings-up and Summaries of Discussions are replaced by a single category of Board Records called Chair Summaries.

have involved consultations with affected parties, civil society groups, and other stakeholders are posted before the Board discussion:

- i. Operational policy papers and sector strategy papers that are prepared following a public consultation process, if the Executive Directors have already reviewed a draft version of the paper.<sup>18</sup>
- ii. Country assistance strategy papers, project appraisal documents, and program documents, if the member country consents to such early disclosure.

(c) Board Papers distributed for discussion by a Board committee are posted at the end of the committee's deliberation if a subsequent Board discussion is not anticipated.

(d) Board Papers distributed to the Executive Directors for information are posted upon distribution.

5. **Electronic Mail.** E-mail, which has become the Bank's predominant medium of communication, is treated as follows:

(a) E-mails that contain or convey decisions or outcomes and that are filed in the Bank's records management system and classified as *Public* are publicly available.

(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.

(c) The Bank does not provide access to e-mail that resides outside its records management system (including e-mail that does not pertain to official matters and e-mail containing personal information or communications of Bank staff and other officials; see also sections III.B.2(a)i, and III.B.2(i)i and ii of this Policy).

6. **Declassification.** 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.

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<sup>18</sup> If a draft version has not been previously reviewed by the Executive Directors, the paper is still made available to the public at least two weeks before the Board discussion if the Board approves such early disclosure.



- (a) **Information Not Eligible for Declassification.** The information that is restricted from disclosure under the exceptions of *Personal Information, Communications of Governors and/or 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 Financial Information* (as it relates to 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, and/or information for which the IMF has not provided its written approval to disclose pursuant to section III.B.3 of this Policy, is not declassified or made publicly available.<sup>19</sup>
- (b) **Information Eligible for Declassification.** The following documents are declassified and made publicly available 5, 10, or 20 years after the date on the document,<sup>20</sup> *provided that they do not contain or refer to information that is not eligible for declassification as set out in paragraph 6(a) of this section*<sup>21</sup>.

i. **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 that were prepared before July 1, 2010, and classified as *Official Use Only*. (Draft

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<sup>19</sup> See Policy at sections III.B.2(a) through (h), and (j) iv.

<sup>20</sup> 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.

<sup>21</sup> With respect to the Board Records of a Board meeting or a Board Committee meeting that are listed in this section, as indicated in section III.B.4 of this Policy, if the meeting was initially held as a regular session but subsequently converted into an executive session or a restricted executive session, the related Board Records are considered (as applicable) to be Board Records of a meeting of an executive session or a restricted executive session, as converted, in their entirety.

documents and other deliberative documents, although classified as *Official Use Only*, are considered to be deliberative information and are declassified only after 20 years.)

ii. **After 10 years**

- Verbatim transcripts of regular sessions of Board meetings and Board Committee meetings.
- Verbatim transcripts of meetings held as regular sessions of the Boards of Governors and of the Board of Governors Committees, task forces, working groups and other bodies created under their auspices.
- Statements of individual Executive Directors and staff in the context of regular sessions 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.

iii. **After 20 years**

- Verbatim transcripts of executive sessions and restricted executive sessions of Board meetings and Board Committee meetings.
- Verbatim transcripts of meetings held as executive sessions or restricted executive sessions of the Boards of Governors and of the Board of Governors Committees, task forces, working groups and other bodies created under their auspices.
- Verbatim transcripts of meetings of the Development Committee.
- Statements of individual Executive Directors and staff in the context of executive sessions and restricted executive sessions of Board meetings and Board Committee meetings.
- 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 that were prepared before July 1, 2010, and classified as *Confidential* or *Strictly Confidential*.
- Financial information restricted under section III.B.2(j) i, ii, and iii of this Policy, unless the information pertains to the exceptions set forth in sections III.B.2(a) through (h) or III.B.2(j) iv of this Policy.
- Other documents in the possession of the Bank's Archives Unit, unless the documents pertain to the exceptions set forth in sections

III.B.2(a) through (h) or III.B.2(j) iv of this Policy, including any deliberative or financial information containing or referring to those exceptions.

7. **Access to Information Committee.** To facilitate the AI Policy's implementation, the AI Committee is an administrative body that reports to Bank management and advises management on the application of this Policy to complex issues, reviews proposals to disclose information that is on the list of exceptions,<sup>22</sup> receives and rules on appeals under this Policy,<sup>23</sup> establishes service fees and service standards, and issues guidelines to staff on policy implementation. The AI 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.

8. **Appeals.**

(a) A requester who is denied access to information by the Bank may file an appeal if:

- i. 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*
- ii. 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 sections III.B.2(h) (*Corporate Administrative Matters*), III.B.2(i) (*Deliberative Information*), and III.B.2(j) i, ii and iii (relating to certain *Financial Information*) of this Policy).

(b) The two stage appeals mechanism consists of the following:

- i. ***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.<sup>24</sup> For appeals that assert a public interest case to override a Policy exception,<sup>25</sup> 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.<sup>26</sup> Appeals to the AI Committee must be filed, in writing, within 60 calendar days of the Bank's initial decision

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<sup>22</sup> See section IV.1 of this Policy for details on the Bank's prerogative to disclose restricted information under exceptional circumstances.

<sup>23</sup> See section III.B.8 of this Policy on the provisions relating to appeals.

<sup>24</sup> Because the AI Committee has no authority over decisions by the Board, appeals of Board decisions are automatically dismissed.

<sup>25</sup> See section III.B.8(a) ii of this Policy.

<sup>26</sup> This may include instances when the AI Committee has provided direct input in the initial decision to deny access.

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).

- ii. **Appealing the AI Committee's Denial—Appeals Board.** The Bank has established an independent Appeals Board<sup>27</sup> to consider appeals alleging that the Bank violated this Policy by restricting access to information that it would normally disclose under the Policy,<sup>28</sup> 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.<sup>29</sup> 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.

- (c) The remedy available to a requester who prevails on appeal is limited to receiving the information requested.

#### SECTION IV – EXCEPTIONS

1. **Bank's Prerogative to Disclose Restricted Information.** The Bank reserves the right to disclose, under exceptional circumstances, certain corporate administrative information,<sup>30</sup> deliberative information,<sup>31</sup> and financial information<sup>32</sup> 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). In exercising this prerogative:

- (a) The disclosure of Board of Governors Documents and Records and of Board Papers or Board Records classified as *Confidential* or *Strictly Confidential*, requires Board approval.

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<sup>27</sup> 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.

<sup>28</sup> See section III.B.8(a) i of this Policy.

<sup>29</sup> See section III.B.8(a) ii of this Policy.

<sup>30</sup> See section III.B.2(h) of this Policy.

<sup>31</sup> See section III.B.2(i) of this Policy.

<sup>32</sup> See section III.B.2(j) i, ii and iii of this Policy.

- (b) The disclosure of information provided to the Bank by a member country or a third party in confidence requires the written consent of the member country or the third party concerned.
- (c) The disclosure of other restricted information requires the approval of the Bank's AI Committee.

2. **Bank's Prerogative to Restrict Access.** Except for verbatim transcripts of meetings (a) of the Boards of Governors, (b) of the Board of Governors Committees, task forces, working groups and other bodies created under their auspices, and (c) of the Development Committee, 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. This prerogative may be exercised only by:

- (a) The Board, with respect to Board Records. In the case of verbatim transcripts and statements of individual Executive Directors and staff, prepared on or after July 1, 2013, the Bank's prerogative to restrict access to such Board Records will only be effective up to a maximum of 20 years after the date of the document;
- (b) The vice president concerned, with respect to Board Papers; and
- (c) The director concerned, with respect to other information.

#### SECTION V – WAIVER

- 1. Provisions of this Policy may be waived by the Board.

#### SECTION VI – EFFECTIVE DATE

- 1. This Policy is effective as of July 1, 2015.

#### SECTION VII – ISSUER

- 1. This Policy is issued by the President.

#### SECTION VIII – SPONSOR

- 1. The Sponsor of this Policy is the Vice President, External and Corporate Relations.

#### SECTION IX – RELATED DOCUMENTS

1. Bank Directive/Procedure: Access to Information, July 1, 2015, Catalogue No. ECR4.01-DIR.01.
2. Interpretations of the Bank Policy: Access to Information Policy, issued by the AI Committee. See <http://go.worldbank.org/ZU1HZL0060>.
3. *World Bank Access to Information – Staff Handbook*. See <http://go.worldbank.org/5VDOZRRFK0>.
4. *Access to Information – Disclosure of Documents in LEG’s Possession that are Created After July 1, 2010*.
5. *World Bank Policy on Access to Information: Guidance for Staff on Handling Procurement Information*. See [http://intresources.worldbank.org/INTPROCUREMENT/Resources/Access\\_to\\_Information\\_Procurement\\_\(updated\\_May2012\).pdf](http://intresources.worldbank.org/INTPROCUREMENT/Resources/Access_to_Information_Procurement_(updated_May2012).pdf).
6. *World Bank Policy on Access to Information: Guidance for Financial Management Staff*. See <http://intresources.worldbank.org/INTRANETFINANCIALMGMT/Resources/275850-1277472907120/FMAIGuidance24JUN2010JULY14.pdf>.
7. *Access to Information: Disclosure of Documents related to Carbon Finance that are Created after July 1, 2010*. See <http://intranet.worldbank.org/WBSITE/INTRANET/OPERATIONS/INFODISCLOSURE/0,,contentMDK:23400220~pagePK:64864633~piPK:64864621~theSitePK:5033531,00.html>.
8. AMS 6.21A, *Information Classification and Control Policy*. See <http://go.worldbank.org/8SBSLGMLD0>.
9. *Classification Handbook for Restricted Information*. See <http://go.worldbank.org/8SBSLGMLD0>.
10. *Toward Greater Transparency Through Access to Information – The World Bank’s Disclosure Policy*, December 10, 2009 (R2009-0259/2; IDA/R2009-0273/2).
11. *Access to Information Policy – Implementation Issues Related to Board Records and Papers*, June 20, 2011 (COGAM 2011-0010/1).
12. *World Bank Policy on Access to Information – Experience in the First 18 months of Implementation*, October 18, 2012 (COGAM2012-0011/2).
13. *World Bank Policy on Access to Information – Proposed Modification*, March 25, 2013 (R2013-0051; IDA/R2013-0072).
14. *World Bank Policy on Access to Information*, June 27, 2013 (SecM2013-0301; IDA/SecM2013-0401).
15. *World Bank Policy on Access to Information – Proposed Modification*, June 24, 2015 (R2015-0129; IDA/R2015-0191).

Questions regarding this Policy should be addressed to the Sponsor.

## ANNEX

**Declassification Schedule for Certain Historical Documents prepared before July 1, 2010.** Pursuant to section III.B.6(b) of this Policy, 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:

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

The 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 section III.B.6(a) of the Policy).

(a) **Operational documents prepared by the Bank**

- Country Assistance Strategies (CASs)
- 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 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 Operations (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 SSPs, draft concept notes and consultation plan for an SSP
  - All other operational policy and strategy papers
  - Numerical 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