

# **The World Bank Policy on Access to Information**

**July 1, 2010**

## **World Bank Policy on Access to Information**

*This statement sets out the policy of the World Bank on public access to information in its possession. This Policy supersedes the World Bank Policy on Disclosure of Information, and takes effect on July 1, 2010.*

### **I. Introduction**

1. The World Bank<sup>1</sup> 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. It facilitates public oversight of Bank-supported operations during their preparation and implementation, which not only assists in exposing potential wrongdoing and corruption, but also enhances the possibility that problems will be identified and addressed early on.

2. As the Bank has long recognized, a sound, open access to information policy is fundamental to fulfilling its many roles.

- As a development finance institution, the Bank strives to be transparent about its projects and programs (particularly with groups affected by its operations), to share its global knowledge and lessons of experience with the widest possible audience, and to enhance the quality of its operations by engaging with a broad range of stakeholders.
- As an intergovernmental organization owned by countries, the Bank is accountable for public money, and has an obligation to be responsive to the questions and concerns of its shareholders.

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<sup>1</sup> 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 "make publicly available" (and their variants) are used interchangeably in this policy statement. This Policy may be revised from time to time.

- As a borrower, the Bank has established that meaningful disclosure of information helps attract purchasers to its securities.
- As an employer, the Bank seeks to provide its employees with all the information they need to perform their duties.

3. At the same time, the Bank has an obligation to protect the confidentiality of certain information. This Policy endeavors to strike an appropriate balance between the need to grant the public maximum access to information in the Bank's possession, and the Bank's obligation to respect the confidentiality of its clients, shareholders, employees, and other parties.

4. The Bank also recognizes the importance of translating information that it creates. The Bank's approach to translations is set out in the Bank's [Translation Framework](#), and the Bank translates documents into appropriate languages in accordance with that framework.

5. ***Guiding Principles.*** 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.
- Recognizing requesters' right to an appeals process.

This policy statement is divided into four parts. Following this introduction, Part II sets out the core policy, Part III sets out how the Bank handles information relating to member countries and other parties, and Part IV sets out the implementation aspects of the Policy.

## **II. The Policy**

6. The Bank allows access to any information in its possession that is not on a list of exceptions (set out in Part II, Section A, of this policy statement). In addition, over time the Bank declassifies and makes publicly available certain information that falls under the exceptions (as set out in Part IV, Section C, of this policy statement). 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 Part II, Sections B and C, of this policy statement).

## A. The Exceptions

7. 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 paragraphs 8-17.<sup>2</sup>

8. ***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.<sup>3</sup>

- (a) Personal information, including personal staff records, medical information, and personal communications (including e-mail) 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.
- (b) Information relating to staff appointment and selection processes.
- (c) Information relating to proceedings of the Bank's internal conflict resolution mechanisms.
- (d) Information relating to investigations of allegations of staff misconduct and personal conflicts of interest.

9. ***Communications of Executive Directors' Offices.*** The Bank does not provide access to:

- (a) Communications within and between individual Executive Directors' offices.
- (b) Communications between individual Executive Directors' offices and the member country or countries they represent.
- (c) Communications between individual Executive Directors' offices and third parties.

10. ***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).

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<sup>2</sup> In this policy statement, the information that falls under the exceptions is also referred to as "restricted information."

<sup>3</sup> The "Staff Rules" refer to rules set out in the Staff Manual, Section 2, which discusses the Bank's general obligations related to staff.

11. ***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.

12. ***Security and Safety.*** The Bank does not provide access to:

- (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.*** The Bank does not provide access to information whose disclosure is restricted under the separate disclosure regimes of (a) the Independent Evaluation Group (IEG),<sup>4</sup> the Inspection Panel (IP),<sup>5</sup> the Integrity Vice Presidency (INT),<sup>6</sup> and the Bank's sanctions process.<sup>7</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.

14. ***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>8</sup>

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<sup>4</sup> See [IEG's disclosure policy statement](#).

<sup>5</sup> See Resolution No. IBRD 93-10, No. IDA 93-6, September 1993 (the 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 at the [Inspection Panel](#) website.

<sup>6</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>7</sup> This includes information whose disclosure is restricted under the *Sanctions Board Statute* and the *Sanctions Procedures*.

<sup>8</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. This includes information, data, reports and analysis (including holdings, positions and performance information), deliberations, and any other work product generated as a result of or in response to the confidential information received from a member country or third party. Documents prepared by the Bank as a fee-based service (including related legal agreements) are made available to the public only after the country (or other third-party) authority concerned has granted its written consent to disclose (see paragraph 20(e)). Material held by the Bank in which other parties

15. **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.<sup>9</sup>

16. **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>10</sup>

- (a) Information (including e-mail, notes, letters, memoranda, draft reports, or other documents) prepared for, or exchanged during the course of, its deliberations with member countries or other entities with which the Bank cooperates.<sup>11</sup>
- (b) 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 deliberations:
  - (i) Verbatim transcripts of Board meetings and Board Committee meetings, and the Memoranda of the President that accompany Board papers.
  - (ii) Statements of Executive Directors and staff in the context of Board meetings or Board Committee meetings.

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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 footnote 11.

<sup>9</sup> Corporate administrative matters include the pension and other retirement benefit plans of the World Bank Group, which are governed by the Pension Finance Committee and the Pension Benefit Administration Committee.

<sup>10</sup> Certain deliberative information is eligible for declassification and disclosure over time, as indicated in Part IV, Section C, of this policy statement.

<sup>11</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 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.

- (iii) Reports to the Board from its Committees (Green Sheets) if subsequent Board discussion is expected.<sup>12</sup>
  - (iv) Communications and memoranda originating in Executive Directors' offices relating to Board or Board Committee proceedings.
  - (v) Miscellaneous memoranda or informal notes distributed to the full Board or to a Board Committee.<sup>13</sup>
- (c) 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).
  - (d) Audit reports prepared by the Internal Audit Vice Presidency, except its finalized Annual and Quarterly Activity Reports.

17. **Financial Information.** The Bank does not provide access to the following financial information:<sup>14</sup>

- (a) 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>15</sup> generated by or for the Bank's treasury operations for the World Bank Group entities and other parties.
- (b) 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.
- (c) 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.<sup>16</sup>

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<sup>12</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>13</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.

<sup>14</sup> Certain financial information is eligible for declassification and disclosure over time, as indicated in Part IV, Section C, of this policy statement.

<sup>15</sup> This includes holdings, positions, and performance information for World Bank Group entities and other parties.

<sup>16</sup> For example, the Bank does not disclose the monetary value of payments to, and names of, consultants. However, the Bank routinely discloses monthly statements of loans and credits, and individual loan, credit, and trust fund documents such as financing, loan, development credit, development grant, and project agreements; guarantee agreements; administration agreements; and grant or trust fund

- (d) Banking or billing information of World Bank Group entities, member countries, clients, donors, recipients, or vendors, including consultants.

## **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). In exercising this prerogative:

- (a) The disclosure of Board papers or Board records<sup>17</sup> classified as "Confidential" or "Strictly Confidential" requires Board approval.
- (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 Access to Information Committee (see Part IV, Section E, of this policy statement).

## **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. This prerogative may be exercised only by:

- (a) The Board, with respect to Board records;
- (b) The vice president concerned, with respect to Board papers; and
- (c) The director concerned, with respect to other information.

## **III. Information Relating to Member Countries and Other Parties**

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agreements. Moreover, the Bank makes publicly available the borrowers' audited annual financial statements for investment lending operations for which the invitation to negotiate is issued on or after July 1, 2010 (see OP/BP 10.02, *Financial Management*).

<sup>17</sup> For the purposes of this policy statement, "Board papers" refers to 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 of the Board or a Board Committee. For the purposes of this policy statement, "Board records" refers to records of Board or Board Committee discussions such as verbatim transcripts, minutes, statements of Executive Directors, Chairman's Summings-up, and Summaries of Discussions. Not all of these documents are prepared following every Board meeting.

20. The Bank takes the following approach to disclosing information related to member countries/borrowers:

- (a) ***Country-specific operational documents prepared by the Bank that are routinely discussed with the member country/borrower*** (for example, Country Assistance Strategies, Project Appraisal Documents, economic and sector work reports). Before finalizing the document, the Bank requests the country/borrower concerned to identify whether the document contains any confidential information relating to the country/borrower, or information whose disclosure may adversely affect relations between the Bank and the country. The Bank, as it considers appropriate, makes adjustments to the document to address the matters of concern to the country/borrower. The aide-mémoire of operational missions may be made publicly available if both the Bank and the country/borrower agree.
- (b) ***Country-specific documents prepared by the Bank that are not routinely discussed with the country*** (such as research and knowledge products). The Bank director concerned may consult the country concerned if the director believes that the document contains confidential information relating to the country, or information whose disclosure may adversely affect relations between the Bank and the country. The Bank, as it considers appropriate, makes adjustments to the document to address the matters of concern to the country.
- (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.<sup>18</sup>
- (d) ***Other documents prepared by member countries/borrowers that are in the Bank's possession.*** Countries often give the Bank a document or information that does not fall into one of the above categories (for example, on a country's macroeconomic context, governance issues, or sector- or institution-specific analyses). If the country/borrower has assigned an information classification that restricts public access, the Bank does not disclose the material without obtaining the country's/borrower's written consent; normally the Bank refers requests for such information to the country/borrower authorities. If the

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<sup>18</sup> 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*).

country/borrower has not assigned an information classification to the material, and if, to the Bank’s knowledge, the information has not already been made publicly available by the country/borrower, the recipient Bank unit considers the information to be deliberative<sup>19</sup> and classifies it in accordance with AMS 6.21A, *Information Classification and Control Policy*.

- (e) ***Documents prepared by the Bank for a fee (“fee-based services”).*** The Bank makes such documents (including related legal agreements) available to the public only after the country (or other third-party) authority concerned has granted its written consent to disclose.

21. ***Documents Prepared Jointly with Partners.*** The Bank makes available to the public the final documents that it prepares jointly with partners after reaching agreement on such disclosure with the partner concerned.<sup>20</sup>

#### **IV. Implementation Aspects of the Policy**

##### **A. Accessing Information**

22. ***Proactive Disclosure.*** The Bank routinely discloses a wide range of documents, through its external website – [www.worldbank.org](http://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.

23. ***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. 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 paragraph 33 of this policy statement.

- (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>21</sup>

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<sup>19</sup> If the Bank determines that the information was given by a member country or third party in confidence, the information is restricted under paragraph 14 of this policy statement and classified accordingly.

<sup>20</sup> Before initiating such work, Bank staff explain the Bank’s Access to Information Policy to the potential partner and obtain the potential partner’s agreement to the disclosure of the joint product. Documents prepared jointly with partners are not subject to public access if they include, or are based on, information that is restricted under Part II, Sections A and C, of this policy statement. For the purposes of this provision, other World Bank Group (WBG) entities are treated as partners; documents prepared jointly with WBG entities may be made publicly available if such disclosure is consistent with their disclosure policies.

- (ii) Minutes of Board Committee meetings.
  - (iii) Summings-up of Board meetings and Committee of the Whole meetings.
  - (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 normally posted at the end of the Board's deliberative process, once they are finalized. However, the following Board papers whose preparation may 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>22</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.

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](http://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.

25. **Timelines for Responding to Requests.** The Bank acknowledges receipt of written requests for information within 5 working days, and endeavors to provide a more

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<sup>21</sup> Board minutes created after April 1, 2005, are already publicly available. For Board minutes created before April 1, 2005, see paragraph 33.

<sup>22</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.

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.

26. ***Unreasonable or Unsupported Requests.*** The Bank reserves the right to refuse unreasonable or unsupported requests, including multiple requests, blanket requests, and any request that would require the Bank to create, develop, or collate information or data that does not already exist or is not available in the Bank’s records management system.<sup>23</sup> The Bank normally communicates its decision to refuse an unreasonable or unsupported request within the time period set out in paragraph 25 of this policy statement.

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.

## **B. Classification**

28. Bank documents are assigned one of the following four classifications: “Public,” “Official Use Only,” “Confidential,” or “Strictly Confidential.”

29. ***Information the Bank Creates.*** In accordance with AMS 10.11, *Management of Records*, 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;

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<sup>23</sup> Unsupported requests include those that (a) do not provide enough information to enable the Bank to locate the requested document in the Bank’s records management system and/or (b) are for documents that the Bank is unable to locate in the Bank’s records management system after a reasonable search.

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;<sup>24</sup> the recipient Bank unit classifies it in accordance with AMS 6.21A, *Information Classification and Control Policy*.

### 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,<sup>25</sup> 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.

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<sup>24</sup> See footnote 11.

<sup>25</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. 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.

- 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.

**D. Electronic Mail**

34. 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 paragraphs 8 (a) and 16 (a) and (b) of this policy statement).

#### **E. Access to Information Committee**

35. To facilitate the implementation of this Policy, the Bank has created the Access to Information Committee (AI 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,<sup>26</sup> receives and rules on appeals under this policy statement,<sup>27</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.

#### **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

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<sup>26</sup> See Part II, Section B, of this policy statement for details on the Bank's prerogative to disclose restricted information under exceptional circumstances.

<sup>27</sup> See Part IV, Section F, of this policy statement on the provisions relating to appeals.

(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.<sup>28</sup> For appeals that assert a public interest case to override a Policy exception,<sup>29</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>30</sup> 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 Board<sup>31</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>32</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>33</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.

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](http://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

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<sup>28</sup> Because the AI Committee has no authority over decisions by the Board, appeals of Board decisions are automatically dismissed.

<sup>29</sup> See paragraph 36 (b).

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

<sup>31</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>32</sup> See paragraph 36 (a).

<sup>33</sup> See paragraph 36 (b).

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.

**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