

**STRENGTHENING WORLD BANK GROUP
ENGAGEMENT ON GOVERNANCE AND ANTICORRUPTION
CONSULTATION FEEDBACK**



YEMEN

(JANUARY 14-15, 2007)

Participants: See attached list

Feedback consisted of: (1) a set of extensive discussions with around 25 senior government officials, including the Ministers of Planning and International Cooperation, Finance, Civil Service and Insurance and Justice; (2) a workshop with more than 35 representatives from parliament, civil society, academia, and professional associations; (3) a two hour meeting with members of the donor community; and (4) an afternoon discussion with selected members of the print media. A list of Yemeni and donor participants is attached. On behalf of the Bank, the participants included the Country Manager Mustapha Rouis (MNCYE); Robert Beschel, Arun Arya and Charles Adwan (MNSD); and Samra Shaibani (MNAEX).

The meeting with senior government officials was moderated by H.E. Abdul Karim Al-Arhabi, Minister of Planning and International Cooperation. The meeting with the donor community was moderated by Mustapha Rouis. Charles Adwan served as the rapporteur for both sessions. An external moderator, Dr. A. Karim Thabet, was used for the session with parliamentarians and civil society and the media session. An external rapporteur, Dr. Khaled Al-Hariri, served as rapporteur for sessions three and four with parliamentarians and civil society and with the media.

How did the process fit into ongoing country dialogue?

The discussions were fully consistent with the Bank's extensive and evolving country dialogue on governance issues. The Bank has been working closely with the Government of Yemen (GoY) to implement a host of important reforms in areas such as public financial management and civil service reform. The principal vehicles for these discussions have been the Civil Service Modernization Project (CSMP), a \$30 million investment loan that began in 2000 and is scheduled to close in 2007 and the Procurement reform Trust Fund. The CSMP project marks an ambitious effort to take forward needed reforms in areas ranging from establishing a computerized financial management information system to a biometric human resource database for public employees to reforming and reengineering a number of selected line departments. In 2005, discussions went forward with a consortium of donors, including the Bank, DFID and the Netherlands, for developing an action plan for public financial management reform.

In 2006, the GoY—working in close consultation with donors—adopted a National Reform Agenda focusing largely on governance issues. The 2006 CAS for Yemen deals extensively with issues of governance and public management reform, and governance related actions will form a major part of an upcoming \$50 million Development Policy Loan in FY07. The Bank has also been active in supporting analytic work on issues of governance and public management, including a CPAR in 2004.

Recently, with the support of DFID, we have recruited a full-time governance advisor in Sana'a to provide support on this agenda.

What were the key issues/themes raised by participants?

The participants raised a number of important themes for both the Bank's broader Governance and Anticorruption (GAC) paper and for Yemen as a whole. Perhaps the most important is their concern that the policy will be applied selectively in only the poorest and most heavily aid dependent countries. Richer countries with access to alternative sources of capital will be able to distance themselves from the Bank if they find its policies and conditionalities too onerous, so Bank staff will be reluctant to apply the GAC policy stringently and thereby risk compromising the Bank's relationship with them. In their view, the Bank will be less constrained with poorer countries, which will ultimately have little choice but to comply or risk losing Bank funds.

The quality of indicators was a topic of considerable discussion. The GoY, in particular, is concerned that the use of such indicators in the past had not fully or accurately reflected recent developments within Yemen, including new reform initiatives. There was a consensus among many participants that the GoY needs to do a better job in understanding and tracking governance indicators and in marketing its accomplishments. On its part, the Bank needs to do more in resolving some of the conceptual and methodological concerns surrounding its indicators and in ensuring fairness and objectivity in their application.

There was general agreement among all participants that the Bank's strategy is an important and welcome document. They also agreed that the Bank needed to address issues of governance and anticorruption as a part of Yemen's broader development agenda; the Bank should not disengage from countries struggling with these issues. Other points of consensus include that there is a rich agenda of governance reforms, including public financial management, civil service reform, anticorruption and legal and judicial reform, where the Bank should support the Government; the Bank should broaden its engagement to incorporate other constituencies beyond government, including parliament, civil society and the media; and that improved donor coordination on governance is an important and worthwhile objective.

The design of Bank projects was held up to considerable scrutiny, with many participants arguing that the Bank needs to do more to ensure effective implementation. There were discussions regarding the extent to which the Bank is adequately supporting the good governance agenda, with questions being raised as to whether adequate resources were being devoted to it.

Finally, a number of participants within Government, parliament, civil society, the press, and donor community all emphasized that Yemen was entering a critical phase in its struggle against corruption. The creation of the new anticorruption agency, and particularly the selection of its board of overseers and staff (which should happen within the next couple of months), will be a very important signal regarding the Government's intentions in this area. The key question will be whether individuals are chosen with a reputation for integrity and capability. Similarly, the adoption of a new procurement law—in its final stage of preparation—and its application through the restructuring of the High Tender Board will be seen as another important signal of the Government's commitment to improve governance and fight corruption.

Note About the MENA Consultations:

1. In all countries in the MENA region, joint consultations were held involving parliamentarians, members of civil society, business associations and trade unions. It is therefore difficult to disaggregate the views of these distinct constituencies. In cases where observations clearly reflected the views of one group or another, we have broken them down separately. In other cases, they have been listed collectively under the “civil society” category.
2. Most consultations followed a standardized format, in which a brief 10-15 minute Powerpoint presentation was made by Bank staff that drew upon the key slides prepared by Central EXT and laid out the major aspects of the strategy. The discussions with various groups typically consisted of two sessions. The first session focused on Questions 1-3 in terms of the overall governance environment within a particular country. The more general questions provided by EXT were utilized in discussions with parliamentarians, civil society and the media, whereas discussions with government officials involved a more detailed and focused dialogue over their specific reform agenda. (In all of these countries, the Bank has been closely engaged in supporting a host of governance and public management reforms.) The second session then focused on the five Board-mandated questions to be addressed. After the initial presentation, Bank staff sought to refrain from subsequent interventions to maximize the time available for participant discussion. The only exceptions were: (1) instances where staff were asked to respond to specific questions; and (2) areas where there was a danger that, by not intervening, the quality of the discussions could be compromised by extensive reference to false and/or misleading information.
3. In two of the three countries (Egypt and Yemen), external facilitators and rapporteurs were used for sessions with civil society, parliamentarians and the media. In Morocco, the Country Manager, Ferid Belhaj, moderated the discussions. To ensure confidentiality, no external moderators or rapporteurs were present for any of the consultations with government.
4. Finally, in the interest of conserving space, we have deleted blank boxes from the matrix below where specific comments and/or feedback was not forthcoming during the consultations.

Respondent Type	Consultation Reply
1. Top governance challenges in country	
[Government]	<ul style="list-style-type: none"> • Significant changes are needed in the justice sector and among the security agencies. The Higher Judicial Council should be separated from the President’s Office, which will help with the separation of powers. The share of resources going to the military and security services should be reduced. • Capacity for public financial management needs to be strengthened at all levels of government. Many problems that the Commission on Audit (COCA) encounters are related to weak PFM practices (particularly internal audit and financial planning) elsewhere in government. • Wages and salaries are low throughout the public sector, which can contribute to corruption. • Legislation and regulations that are crafted in ambiguous ways or open to differing interpretations can also lead to problems with corruption. Also, by-laws and regulations are not always consistent with underlying legislation. Even when the quality of legal drafting is good, many laws are not implemented in their entirety. • There is a lack of awareness and education among the public as to what constitutes corruption and what types of behavior are inappropriate, particularly with regard to nepotism. • Mechanisms for accountability are weak or underdeveloped, including both internal and external audit. Many COCA reports, for example, can be delayed by as much as two years, making it difficult to draw firm conclusions. • Press freedom needs to be enhanced, as increased transparency will be key to winning the broader struggle against corruption. • Social safety nets need to be enlarged and expanded.
[Legislature]	<ul style="list-style-type: none"> • There is no real separation among legislative, judicial and executive power. The present divisions are superficial and decorative. Some parliamentarians complained that at times members are not allowed to express their opinions by the Speaker. Often, the government “ignores resolutions by the parliament” and the parliament does not effectively carry out its regulatory, monitoring and control functions. • The prevailing mentality within government institutions and among influential individuals does not respect laws and regulations. • Government institutions lack appropriate mechanisms to support effective anticorruption actions. Some high ranking

Respondent Type	Consultation Reply
	<p>officials either lack a proper understanding of corruption and the forms that it takes or are themselves involved in corrupt activities. According to one parliamentarian, Government allows generic discussions of “corruption” but does not allow any linking of corruption to specific corrupt persons. The official media and press only accuse the opposition of corruption.</p> <ul style="list-style-type: none"> • Issues of broader civil service reform, and in particular the need for enhanced meritocracy within government, are fundamental and will require more sustained attention to implement.
[Representatives from Civil Society]	<ul style="list-style-type: none"> • Several participants focused on the notion that in Yemen the major issue is political corruption, which enhances the present widespread administrative, economic and financial corruption in all sectors. Petty corruption is also a concern, but one that should be manageable by improving government systems and more proactively weeding out civil servants who engage in it. • One participant stated that the judiciary is not honest and the judicial system is infiltrated by the security forces. • There are no job descriptions of the civil service posts, no criteria for the selection of personnel, no transparent process of announcing jobs to allow for competition on the vacant posts. Hence selection is based on political, tribal, interest groups or other under-nationalistic affiliations. For instance, a participant quoted that “official reports mention that at present only 16% of the civil service employees are university graduates.” • The center of all decision making is at the presidential palace, which acts as a major obstacle facing any intended anticorruption action. It also forms a constraint to real delegation of authority and decentralization. • The ruling politicians conceive that they own the country and its resources and they are not simply there to govern. Thus they consider the opposition political societies and civil society organizations as foes and not as partners. • Annual reports of the Central Organization for Control and Audit (COCA) demonstrate the magnitude of corruption. The government takes no action against those who are reported as embezzlers of public funds, particularly if they are influential. • Government institutions lack capacity in the management of natural, human and financial resources. Low wages do not provide adequate incentive to qualified personnel. At the same time, low wages encourage employees to engage in corrupt behavior. • Freedom of the individual is absent and the freedom of the non official press is very limited <p>Women and the youth are excluded from the decision making process.</p>

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[Private sector]	<ul style="list-style-type: none"> The private sector emphasized that weakness in educational system outputs does not support the entry of qualified personnel in management and accounting into the labor market. Yemen’s investment environment is repulsive rather than attractive to investors. Some tribal, military and political groups make the transaction cost of new investment too high.
[Media]	<ul style="list-style-type: none"> The main challenge facing Yemen, according to one participant, is poverty which leads individuals to make use of their positions in the administration to become corrupt. Another disagreed, noting that corruption has not been eradicated in the countries of the Persian Gulf even though civil service salaries are much higher. Tax and custom duties evasion and cheating in the tendering of projects are major challenges. They cost Yemen US\$1 billion annually. The GoY pays only lip service and rhetoric concerning governance and anticorruption. The last donors meeting in London resulted in some pressure upon the Government led to issues some legislation on corruption. However, the reform agenda is still not taken seriously. The Government is unable to manage resources effectively or to successfully prosecute corrupt individuals—particularly those with close ties to the ruling party, who are often above the law. The Government lacks practical anticorruption programs. Corruption is rife in certain tenders, and also in the Social Fund and Social Protection Fund.
[Donor Community]	<ul style="list-style-type: none"> Some donors expressed concern that Yemen’s current administrative system is so tolerant of corruption that those who opposed it were either eased out or sidelined. It is unclear whether adequate political will exists to change. Others expressed concern that a “culture of corruption” was developing not just within government, but within society as a whole, that would make any effort to eradicate corruption particularly problematic. The justice system within Yemen is in particular need of reform.
2. Promising areas of governance and anticorruption reform and potential obstacles	
[Government]	<ul style="list-style-type: none"> Yemen’s national agenda has a heavy emphasis upon governance reform, which is essential in ensuring that scarce developmental resources are allocated to their highest and best use. The GoY has taken a number of important steps recently to advance good governance and combat corruption. The Government has signed the United Nations Convention Against Corruption (UNCAC) and ratified it in 2005. It has

Respondent Type	Consultation Reply
	<p>recently passed legislation establishing an independent anticorruption agency. Work is underway preparing new procurement legislation.</p> <ul style="list-style-type: none"> • In the Justice sector, the GoY is currently investing heavily in training and capacity building, particularly for female judges. Training of senior judges on new legislation is going forward. A number of corrupt judges have been fired or transferred. • Information technology is also being applied to basic administrative procedures and practices, such as the use of e-tendering in procurement. The Ministry of Finance is implementing a Financial Management Information System and the IMF's GFMS 2001 standard for budget classification. • Greater support is needed for PFM issues.
[Representatives from Civil Society]	<ul style="list-style-type: none"> • <i>Budget Allocations.</i> Efforts should be made to reduce expenditure on military and security and increase allocations for education and health services. • <i>Support Monitoring, Auditing and Control Institutions.</i> Interventions are needed to enhance transparency in all government institutions, particularly with regard to financial transparency. Capacity building is needed for parliamentarians, auditors, and civil society organizations. Access to information by such institutions is paramount for combating corruption. • <i>Support the Development of a National Strategy for Governance and Anticorruption (NSGAC).</i> The participants underscored the need for a comprehensive (NSGAC), whose drafting should be supported by Bank specialists in close collaboration with the civil society organization and political parties • <i>Enhance the Empowerment of Women.</i> Strengthen the participation of women in political life. Socioeconomic and human resource development is necessary particularly in rural areas, and must be enhanced through integrated programs designed and implemented in collaboration with civil society organizations. • <i>Design and Implement Measures to Eliminate Money Laundering.</i> The mechanism should focus on banking operations and exchange corporations, the drug trade, and arms trade. These illegal transactions contribute to corruption. • <i>Education.</i> The education system is very weak. Outputs do not match the needs of the labor market. Reform is urgently needed in the education system to attain a host of development objectives. • <i>Support for Establishing a Parallel Entity to the Recently Formed "Anticorruption Authority".</i> The recent law on anticorruption passed by Parliament establishes an Anticorruption Authority. The choice of staff to oversee and work in this agency will be very important. There should also be a parallel independent entity on anticorruption. Such an entity must be

Respondent Type	Consultation Reply
	supported in terms of access to information, protection and immunity.
[Private sector]	In helping to combat corruption in the private sector, improvements in auditing and control are required.
[Media]	Within Yemen, more transparency, freedom of the press and freedom of expression are needed to help take the struggle against corruption forward.
[Donor Community]	<ul style="list-style-type: none"> • The overall timing is ripe for progress on this issue. The recent presidential elections were fought on the issue of anticorruption, and the new law has the President’s blessing. • Issues of civil service reform will be absolutely essential for Yemen’s future governance reform agenda, including reducing red tape and streamlining and rationalizing the size of the public sector, even though the latter will be politically difficult. • The selection of the overseers for the new anticorruption agency will offer a critical test of the Government’s intentions in this area. This process will unfold over the next 1-2 months, and it needs to be conducted in a way that is fair, open and transparent. • The GoY’s 2005 reform agenda is a very important document and represents a great leap forward, although without immediate impact. It encapsulates a large number of important reforms that are worthy of donor support, although donors will need to be selective in light of funding and capacity constraints.
3. How the Bank should engage where governance is weak, and circumstances under which to disengage	
[Government]	<ul style="list-style-type: none"> • The Bank strategy should focus less upon disengaging from countries where governance is weak than increasing the amount of resources available for governance and public management reform in countries where institutions are underdeveloped yet the Government is committed to reform. Otherwise, these countries will be locked in a vicious cycle of poverty, poor governance and rampant corruption. • Within Yemen, poverty is the root cause of many governance problems and challenges. Poor countries that are heavily aid dependent are likely to bear the brunt of this strategy, since others who have access to alternative sources of capital will go elsewhere if they disagree with Bank policies or conditionalities. Countries that struggle with issues of governance because they are poor or at earlier stages in their institutional development should not be unduly punished by the strategy.

Respondent Type	Consultation Reply
[Legislature]	The Bank should not disengage with countries that are struggling with corruption, but should use conditionality in its lending to leverage positive change.
[Representatives from Civil Society]	<ul style="list-style-type: none"> • The Bank’s paper focuses too extensively upon issues of governance and corruption in its projects. The Bank should be proactive in engaging the Government on issues of corruption as a part of its overall development agenda. • A few participants questioned the Bank’s objectivity in pursuing the anticorruption agenda, noting that the Bank was only concerned about corruption when it involved countries pursuing a path towards private sector led growth. The Bank is not supportive of mixed or socialist economies. • Bank conditionalities should be utilized to strengthen the independence of both COCA and the judiciary.
[Media]	The Bank should focus on poverty alleviation as its core mandate. It should not withdraw from countries where corruption is a fundamental concern. An analogy would be a doctor refusing to treat patients who were too sick. The Bank needs to be patient and flexible.
[Donor Community]	A number of donors, such as DFID, supported the strategy. However, they also believe that poverty reduction is key to the Bank’s mandate, and we need to find ways to remain engaged even when the overall environment is weak and difficult to operate in.
4. How to ensure fair and consistent treatment across countries	
[Government]	<ul style="list-style-type: none"> • The topic of ensuring impartial evaluation is of particular concern to Yemen. How can we ensure neutral and unbiased assessment, based on the most accurate and up to date information? A number of recent governance assessments of Yemen have been based upon inaccurate and antiquated information, and they have not reflected the latest generation of reforms.
[Media]	The Bank must be clear about the conditions surrounding its support.
5. How to strengthen the Bank’s work with champions of reform outside the executive branch of government – parliament, judiciary, civil society, media and the private sector	
[Government]	<ul style="list-style-type: none"> • The GoY welcomes Bank efforts to expand its engagement to incorporate other interlocutors beyond the

Respondent Type	Consultation Reply
	Government, particularly those who have information about how projects are being implemented on the ground. In addition to central government, the Bank should engage with regional and local governments in helping to combat corruption.
[Legislature]	<ul style="list-style-type: none"> • The Bank needs to strengthen Parliament’s capacity to oversee and audit government expenditure. • The Bank also needs to work proactively with civil society groups and not focus simply on Government, lest it be perceived as siding with those who are corrupt against the broader wishes of the people.
[Representatives from Civil Society]	<ul style="list-style-type: none"> • The Bank should strengthen and expand its work with civil society, and broaden its dialogue with the private sector and political parties as partners in addition to government. • The Bank needs to help build capacity within civil society organizations to monitor progress on the ground. • The ruling party has rejected the concept of community participation in government projects, which could have been a valuable tool to increase transparency, reduce corruption and enhance sustainability at the local level. • The GAC consultations are taking place only in Sana’a, and do not reflect regional differences and variations throughout the country.
[Media]	The Bank should engage with other constituencies, including civil society and the media, in helping to combat corruption.
[Donor Community]	There was a consensus upon the importance of moving beyond traditional “supply side approaches” to improved governance and public management towards focusing upon the “demand side” as well.
6. How to mitigate fiduciary risk in Bank operations?	
[Legislature]	<ul style="list-style-type: none"> • The Bank often doesn’t follow up carefully in the implementation of its loans. More robust monitoring is necessary.
[Representatives from Civil Society]	<ul style="list-style-type: none"> • The Bank should design its projects and programs on a demand driven basis involving the target communities in the process as partners. • Participants remarked that a number of WB funded projects do not meet the needs of local communities and their design needs to be improved. Most of the funds go for vehicles, buildings and foreign specialists, and the sub-components are often over-designed and too expensive. Technical assistance and training outputs are measured in

Respondent Type	Consultation Reply
	<p>terms of quantity rather than quality. For example, in one project it was mentioned that 200 Yemenis were trained in English, but in fact the training was inadequate and those who went through the program had only rudimentary English language skills.</p>
[Media]	<ul style="list-style-type: none"> • Bank programs should be designed in a manner that protects their implementation from corruption. The Bank should be an example to the Government and other donors in this area. • The Bank should develop control mechanisms to prevent corruption and the diversion of expenditure rural areas. For example, the Bank could help bring civil society and NGOs into project management—particularly with regard to monitoring progress in remote areas.
7. The Bank’s role vis-à-vis other donors in supporting governance reform	
[Legislature]	<ul style="list-style-type: none"> • The Bank needs to work closely with other donors to ensure that they send consistent signals to the Government. They should collaborate in bringing in international standards in monitoring and evaluation.
[Representatives from Civil Society]	<p>Donor coordination will be very important for this agenda. Donors need to use conditionalities to send consistent signals to the Government about the need for reform.</p>
[Donor Community]	<ul style="list-style-type: none"> • The donor community uniformly welcomed greater Bank engagement on issues of governance and anticorruption. The agenda is a rich one, and close coordination will be important. Donors need to speak with one voice. The Bank has an important role to play in helping to coordinate this agenda within the donor community here in Yemen. • Coordination should follow on areas of mutual comparative advantage. For example, it is clear that the Bank is prohibited by its Articles of Agreement of working on political issues, such as campaign finance reform or political party development. But many bilateral donors can work on these issues. • Issues of prioritization and sequencing will be essential in Yemen. The key reforms are a small group stretched thinly over a number of critical issues. Under such circumstances, the prioritization and sequencing of reforms will be very important. • At a minimum, donors should avoid practices that actually harm the GoY. These include pulling talented Yemenis out of Government departments to staff project implementation units; paying exorbitant salaries to such staff; not following up proactively to ensure that they pay taxes, etc. The donor community needs to set a strong example. • Many of the most pronounced problems with corruption involve Yemeni resources. Donor efforts need to be

Respondent Type	Consultation Reply
	<p>geared to ensuring broader financial accountability across the board and not just focus on our own projects.</p> <ul style="list-style-type: none"> • Is there scope for more joint analysis on the part of donors? Very little analytic work, for example, has been done in identifying the costs of corruption and the sectors where it is most prevalent.
8. How to monitor progress in governance and anticorruption at the country level	
[Government]	<ul style="list-style-type: none"> • To avoid the danger that the use of indicators will be politicized, they should be established and monitored separately from decisions regarding aid allocation and project funding. The use of such indicators needs to be adjusted to a country's unique historical context, circumstances and overall development trajectory; they should not be applied mechanistically. • The Bank needs to more thoroughly check the accuracy of information that it utilizes in compiling its indicators. • The GoY needs to be more proactive in marketing the reforms it has taken. One step towards this end will be the preparation of a paper on recent reforms in the Justice sector. • There was agreement that the GoY also needs to upgrade its capacity in monitoring and evaluating governance improvements, including how indicators are utilized by donor organizations. For example, there is currently only one staff within the Ministry of Planning tracking how CPIA indicators are prepared and utilized. In light of the resources involved, more management and staff attention should be devoted to this exercise.
[Representatives from Civil Society]	<ul style="list-style-type: none"> • The Bank should assist in developing indicators for good governance in areas such as: (1) judicial independence; (2) compliance with the law; (3) transparency and accountability; (4) government efficiency; and (5) control of corruption. • The Bank should assist in evaluating development plans in terms of the real social and economic conditions and the potential success of implementation
[Media]	<p>The Bank needs to be clear regarding the criteria surrounding lending decisions, and when it would elect to draw back from engagement.</p>
[Donor Community]	<p>More work need to be done in strengthening the GoY's capacity to monitor progress at all levels, including both global governance indicators and those involving strategic and operational performance at the agency level. The GoY needs help in gathering, analyzing and monitoring data.</p>

Respondent Type	Consultation Reply
9. Areas for improvement in GAC strategy and country-level support	
[Government]	<ul style="list-style-type: none"> • The Bank needs to be more actively engaged in strengthening core public management within Yemen, including modern management practices, strategic planning and internal audit and control. • The Bank also needs to be closely engaged in supporting the creation of the new independent anticorruption agency. • When it comes to concrete recommendations, the Bank’s strategy is often vague in detailing how it will help countries interested in reform to translate their achievements to concrete progress on the ground. • There are a number of areas within Government where significant progress is being made. The Bank needs to support and build upon these centers of excellence. • Is the Bank going to devote adequate resources to implementing the strategy, particularly in countries that are confronting significant challenges, such as Yemen?
[Legislature]	<ul style="list-style-type: none"> • The Bank needs to be more engaged in strengthening the independence of the judiciary. <p>The Bank should support the drafting of revised guidelines for the Tax Department.</p>
[Representatives from Civil Society]	<ul style="list-style-type: none"> • The Bank needs to support high-quality analytic work on where corruption exists in Yemen and how it can best be combated. • The Bank needs to insist upon the reform of COCA. The Bank should also more closely review COCA reports, particularly those addressing ministries, departments and sectors where the Bank is active. • The Bank should support reforms in the electoral system • The Bank should support civil service reform. • The Bank should carefully scrutinize the Government budget, particularly in the areas of health and education.
[Private sector]	<p>The Bank should work with the Government to help develop an appropriate taxation system to encourage investment.</p>
[Media]	<ul style="list-style-type: none"> • The Bank needs to clearly understand the broader institutional and societal roots of corruption in Yemen. • The Bank should facilitate access to information concerning its global policies, studies and programs.
[Donor]	<ul style="list-style-type: none"> • For some reason, the website listing blacklisted firms is not accessible externally.

Respondent Type	Consultation Reply
[Community]	<ul style="list-style-type: none"> How is the Bank going to staff up in meeting the requirements of this strategy? Are 50 investigators in the Department of Institutional Integrity enough? Are additional resources going to be reallocated to support stronger programming and supervision in this area?
10. Other key issues	
[Government]	Several government officials noted their preference for having the Ministry of Planning be the nodal ministry to monitor and evaluate progress on the anticorruption agenda.