

## **TOWARD GREATER TRANSPARENCY: RETHINKING THE BANK'S DISCLOSURE POLICY**

### **Consultation Plan**

1. The World Bank has launched a comprehensive review of its disclosure policy. As part of this review, Management has prepared an Approach Paper, *Toward Greater Transparency: Rethinking the Bank's Disclosure Policy*, which discusses the limitations of the existing policy, establishes guiding principles for revising the policy, proposes key elements of a revised policy, and raises issues for further discussion. The paper proposes a major shift in the Bank's approach to disclosure, from a policy that spells out what documents the Bank discloses (a "positive list") to one under which the Bank would disclose any information that is not on a list of exceptions—a policy that would be more consistent with the Bank's expressed presumption in favor of disclosure.

2. ***Two-Step Process.*** The Bank would consult with a variety of stakeholders in two stages: first, preliminary consultations with member country authorities, and then with the broader public. In addition, the Bank would hold internal consultations so that all staff would have an opportunity to comment on the proposed approach. The main objective of the consultations is to inform all stakeholders about the proposed changes and to invite their comments and suggestions.

- ***Preliminary Consultations with Country Authorities.*** The Bank would first share the Approach Paper with member country authorities to ensure that they are informed about the proposal and to seek their views on the move to a broader consultation process. In countries where the Bank has a program, the country director would share the paper with the appropriate country authorities. In countries where the Bank does not have a program, Management would seek the assistance of the Executive Directors' offices to share the paper with their country authorities concerned. This step is expected to commence in mid-February 2009 and take up to two weeks.
- ***Public Consultations.*** Upon completing preliminary consultations with member country authorities, Management would seek comments from a wide range of constituencies: member country authorities, citizens, civil society organizations, private sector and academia, international organizations and donor agencies, international civil society groups, and other stakeholders. We plan to ask the Global Transparency Initiative (GTI)<sup>1</sup> to provide inputs to assist the Bank in identifying and consulting with civil society organizations in member countries. The public consultations would begin in March 2009.

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<sup>1</sup> GTI is a network of civil society organizations promoting openness in international financial institutions.

## A. Action Plan for Public Consultations

3. The public consultations would allow stakeholders to provide inputs through the cycle of policy development, from the early stages of drafting through consideration by the Board. The consultation process would comprise the following main steps: (a) notification, (b) electronic comments and live consultations, (c) feedback to stakeholders, and (d) a period to review the revised draft. Proposed actions during each step are listed below.

4. **Notification.** The Bank would widely announce its intention to revise the policy, using a dedicated website, country offices, civil society networks, and local media in member countries.

- The dedicated website would allow for consultations with a wide range of stakeholders, allowing them to view and download the Approach Paper and related material, provide comments, and monitor the consultation process. Visitors to the site would also be able to sign up to be notified when significant updates are posted on the site.
- The Bank would post the following on the dedicated website: (a) the draft Approach Paper (in English and the six international languages specified in the Bank's Translation Framework)<sup>2</sup>, (b) other resources to facilitate the consultations, and (c) details of the review process.

5. **Electronic Comments and Live Consultations.** The Bank will use a combination of web-based consultations, live consultations, and one or two international fora in donor countries to reach the widest possible audience.

- **Web-based consultations.** For time and resource reasons, the primary vehicle for global stakeholder inputs will be a web-based platform through which any individuals or organizations with reasonable Internet access can participate in the consultations. Electronic comments could be submitted via a form on the website or by e-mail.
- **Live consultations.** A series of consultative meetings will be held in about 30 borrower countries and some donor countries. A wide range of stakeholders—country authorities, citizens, civil society organizations, business, academia, and media—will be invited to participate in these meetings. In addition, a series of videoconferences will bring together various stakeholder groups within and across Regions. Meetings in borrower countries will be led by the country offices with support from EXT and OPCS staff in Washington, and the videoconferences will be led by OPCS and EXT with technical support through the GDLN network as needed.

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<sup>2</sup> They are Arabic, Chinese, French, Portuguese, Russian, and Spanish.

- ***International fora.*** In partnership with GTI, the Bank will organize one or two international fora, in Washington and in other donor countries (to be determined later). International NGOs, representatives of other multilateral development banks, and other experts on information disclosure and transparency issues will be invited to these events. The forum in Washington is expected to coincide with the Spring Meetings of the IMF and the Bank.

The Bank will post session summaries for all live consultations. The electronic comment period (including in-country meetings) is expected to take 8 weeks.

6. ***Feedback to Stakeholders.*** At the end of the comment period, the Bank will synthesize the comments received during consultations and post a summary of how Management proposes to address the key issues raised. The Bank will send electronic notices to all participants who provided comments via the web or through e-mail, informing them that the summary has been posted.

7. ***Review of the Revised Draft.*** Following the external consultations, Management will revise the paper—hereafter the Policy Review Paper—and translate it into the six international languages. The paper will be posted on the external website for a period of four weeks to give stakeholders an opportunity to assess how their inputs were considered. At the end of this four week period, the Executive Directors are expected to consider the proposed revision to the policy.

## **B. Communication Tools**

9. The consultations would use a suite of communication tools: (a) to make the Approach Paper and other resource material available to as many stakeholders as possible, (b) to enable Country Directors and other Bank staff in country offices to lead in-country consultations in a coherent and cost-effective manner, and (c) to ensure that the feedback from consultations is reported as accurately and uniformly as possible. Specific tools and resources would include the following:

- A global consultation website ([www.worldbank.org/disclosure](http://www.worldbank.org/disclosure)) that would be promoted on the Bank’s homepage and through other means.
- A PowerPoint presentation of the guiding principles and key elements of the proposed policy and discussion questions that would be posted on the website.
- A multimedia presentation on the importance of transparency from the perspective of the Bank, civil society, and member governments (forthcoming).
- An “easy read” summary of the paper that would be posted on the website (in English and the other six languages specified above).
- A template containing the discussion questions.

- An electronic feedback form that would be posted on the web to solicit electronic comments.
- A “Questions and Answers” guide to the Approach Paper.

### **C. Discussion Questions**

10. In soliciting comment from a wide variety of stakeholders, the Bank would ask them to consider questions such as the following:

- (i) Do you support the proposal to depart from the existing “positive list” approach to a more open policy under which the public can obtain all information in the Bank’s possession other than what is on a list of exceptions?
- (ii) Do the proposed exceptions adequately reflect the areas in which there is a compelling reason for confidentiality?
- (iii) Do the proposed exceptions strike the right balance between the need for transparency and the need to protect confidential information relating to member countries and third parties?
- (iv) With respect to timelines for declassifying information:
  - a. Do you support a uniform 20-year timeline to declassify most historical documents as is the norm at many international organizations?
  - b. Alternatively, should certain documents be declassified earlier than 20 years, for example, after 5 or 10 years?
  - c. If so, what are the types of documents that could be declassified at those intervals?
- (v) Do you support the proposal to add project audits and annual audited project financial statements prepared by borrowers to the list of documents that borrowers are required to disclose?
- (vi) Are there other documents prepared by member countries, related to World Bank-supported operations, that countries should be required to disclose?
- (vii) Are there disclosure issues you feel this proposal does not address?