

# **TOWARD GREATER TRANSPARENCY – RETHINKING THE WORLD BANK’S DISCLOSURE POLICY**

## **Summary**

The World Bank is proposing a major shift in its approach to disclosing information: to move from spelling out what documents we disclose (a positive list) to disclosing any information that is not on a list of exceptions. The new approach would be more consistent with our expressed presumption in favor of disclosure.

The new approach would rest on four principles.

### **Principle 1. Maximum access to information**

We recognize the fundamental importance of transparency and accountability in the development process. Accordingly, our disclosure policy would give public access to all information in our possession, subject only to a limited set of exceptions. The policy would recognize that certain categories of information need not remain classified for an indefinite period, and would provide clear timelines for releasing certain kinds of information.

### **Principle 2. A clear list of exceptions, easier to interpret and implement**

We would deny access to information only when there is a compelling reason for confidentiality. Examples include personal information about staff, sensitive information that member countries and third parties give to us with the express understanding that such information would not be disclosed, and information subject to attorney-client privilege. We would also reserve the right not to disclose information if we determine that such disclosure is likely to cause serious harm to the interests of the Bank, a member country, a staff member, or third parties—such harm outweighing the benefits of disclosure.

### **Principle 3. Clear procedures for processing requests for information**

In implementing the proposed approach, we would routinely post as much information as possible on our external website. We would adopt clear and cost-effective procedures for processing requests for information, including defined timelines for decision-making and responding to requests. Any fees charged for collating or reproducing information would be fair and reasonable.

### **Principle 4. The right to appeal**

We recognize the right of requesters to an administrative appeals process if they believe that we have unreasonably denied them access to information that should be publicly available under our disclosure policy. An appeals panel would be headed by senior management staff with full authority to interpret the policy and confirm or reverse the

decision to deny access (except for classified Board documents, whose disclosure is the prerogative of the Board).

**What are the main differences between the new approach and our existing policy?**

- Under the existing policy, we spell out the types of documents we disclose; under the proposed approach, we would make all documents publicly available except those on a limited list of exceptions.
- We would disclose more types of information than under the existing policy, and much of the information would be freely available on the Bank’s external website. Examples of this additional information are Quarterly Management Reports, Country Portfolio and Performance Reviews, Implementation Status and Results reports (excluding staff comments), mission aide-mémoire, and minutes of Concept Review and Decision meetings.
- The new approach would rely on a rigorous classification of documents as they are created by our staff or received from member countries or third parties—“Public,” “For Official Use Only,” “Confidential,” and “Strictly Confidential.” When we receive information from external parties with the explicit understanding that it not be disclosed, we would continue to be legally and morally obligated to respect that understanding.
- We would declassify certain Bank documents, including most Board documents, upon completion of our deliberative processes or after defined periods of time.
- Some information that we do not currently disclose because it was created or received under the existing or previous disclosure policies would be declassified and made available after defined timelines. A far as possible this declassification would conform to the types of documents and timelines we are considering under the new approach.
- We would introduce an administrative appeals mechanism.
- Bank operational staff at all levels would be trained in the classification of documents and related procedures to improve our services and service standards in making our information as widely available as reasonably possible.

This new approach is consistent with our business model, which recognizes that transparency is critical for enhancing governance, accountability, and development effectiveness. A sound, open policy on the disclosure of information is fundamental to fulfilling our many roles. Our intention is to strike the right balance between maximum disclosure and our legitimate concerns to protect certain types of confidential information.