

## World Bank Disclosure Policy Review – Summary of Feedback from Public Consultations

Feedback	Bank Response
<b>1. General Approach</b>	
<b>1. A major step forward – but details are important</b>	
<ul style="list-style-type: none"> <li>The proposed approach—to move away from a policy that spells out what can be disclosed to one under which the Bank would disclose any information that is not on a list of “exceptions”—is a major step in the right direction.</li> </ul>	<p>We are happy about the tremendous support we received from a wide variety of stakeholders for the proposed paradigm shift—now presented in the Policy Paper for Board consideration (expected on November 17).</p>
<ul style="list-style-type: none"> <li>The four underlying principles are appropriate and are commonly found in national freedom of information regimes.</li> </ul>	<p>The proposed policy is based on the four principles outlined in the Approach Paper, and an additional principle on safeguarding the deliberative process.</p>
<ul style="list-style-type: none"> <li>While the proposed approach and the underlying principles are good, “the devil is in the detail.”</li> </ul>	<p>We have made a careful attempt to reflect the five principles in the proposed policy while striking an appropriate balance between the need to allow the public maximum access to information in the Bank’s possession and the Bank’s obligation to respect the confidentiality of information pertaining to its clients, shareholders, employees, and other parties.</p>
<ul style="list-style-type: none"> <li>Is a “paradigm shift” necessary? Why not simply extend the existing “positive list?”</li> </ul>	<p>For more than 15 years, we have made incremental changes to the positive list and, as a result, the Bank discloses a lot of information today. Yet, the reliance on a list has limited our ability to share information in a timely and cost effective manner. Moreover, the existence of a “positive list” is fundamentally</p>

	inconsistent with our presumption to disclose, and with our advice to clients.
<ul style="list-style-type: none"> <li>The Bank should provide a positive list of information that it would routinely disclose.</li> </ul>	Examples of information that we would routinely post on our website are provided in Annex A of the Policy Paper. We will expand this list over time.
<ul style="list-style-type: none"> <li>The Bank should disclose a list of all its documents, indicating those that are classified as “public” and those that are restricted, and why.</li> </ul>	Preparing an inventory of all Bank documents is a resource-intensive and time-consuming exercise. Initiating this work at this time would put a tremendous strain on our limited resources, especially given the intensive work required to facilitate the transition to the new policy. We prefer to focus on this exercise after we have transitioned to the new policy, and have worked through the “teething problems” of implementation.
<ul style="list-style-type: none"> <li>The Approach Paper lacked a clear articulation as to why access to information is critical for development effectiveness. The policy should underscore how increased disclosure will contribute to reducing poverty.</li> </ul>	The Policy Paper enunciates the crucial links between access to information, development effectiveness, and poverty reduction.
<b>2. Balance stakeholder interests</b>	
<ul style="list-style-type: none"> <li>The Disclosure Policy should sufficiently reflect governments’ perspectives on information disclosure.</li> </ul>	The proposal takes into account the concerns raised by several client countries about protecting confidential country information (including deliberations between the Bank and member countries).
<ul style="list-style-type: none"> <li>As a public inter-governmental organization, the Bank should view its disclosure policy as a service to the public interest. Access to Bank information should be integral to the Bank’s mission to reduce poverty and its responsibility to assist member countries in the pursuit of social inclusion and justice. The Bank should not be motivated exclusively by its own interests or those of its member governments.</li> </ul>	In developing the proposed policy, we have striven to balance many interests while focusing on how enhanced disclosure would contribute to increased transparency, accountability, and development effectiveness. We believe that disclosure of more information <i>per se</i> is not an end in itself, but a useful means to the Bank’s mission of reducing poverty. Accordingly, the proposed policy recognizes the importance of closer links between information disclosure and increased participation, partnerships, and knowledge dissemination.
<b>3. Access to information is a human right</b>	
<ul style="list-style-type: none"> <li>Access to information in the possession of public bodies is a</li> </ul>	We have taken note of the provisions under Article 19 of the <i>Universal</i>

<p>basic human right. The Bank, like the UN, should recognize this right explicitly. Without such recognition, the policy could be seen as falling short on the Bank’s stated presumption of disclosure.</p>	<p><i>Declaration of Human Rights.</i> In developing the proposed policy, we have endeavored to strike an appropriate balance between the principles underlying the Declaration and the Bank’s obligation to respect the confidentiality of information pertaining to its clients, shareholders, employees, and other parties.</p>
<p><b>2. The Exceptions</b></p>	
<p><b>4. The exceptions are too broad</b></p>	
<ul style="list-style-type: none"> <li>The proposed exceptions are too broad and not based on an assessment of potential harm to well-defined interests. [this comment was made primarily by CSOs].</li> </ul>	<p>We have tried to reflect more clearly the “harm principle” in the proposed exceptions. We have also tried to present the exceptions in terms of the types of information rather than categories of documents that would not be disclosed.</p>
<ul style="list-style-type: none"> <li>The Bank should not restrict entire classes of documents; instead of restricting a document in its entirety, exceptions should apply only to specific information contained in documents, which may then be redacted, and the rest of the document disclosed.</li> </ul>	<p>While we appreciate the CSO view in principle, it is not practical for the Bank (for economy and efficiency reasons) to review each document to establish whether the information contained in the document would cause harm if disclosed. Therefore, we have applied the harm principle up front to determine the classes of documents for which disclosure is likely to cause harm to a defined interest.</p> <p>The Bank minimizes the need to redact information in documents that it routinely discloses by addressing confidential or sensitive information before finalizing the document.</p>
<ul style="list-style-type: none"> <li>The Bank should disclose all operational information given the potentially broad impacts on populations, as well as all research documents.</li> </ul>	<p>Under the proposed policy, the Bank would disclose substantially more operational information including information pertaining to projects under implementation.</p>
<p><b>5. The exceptions strike the right balance</b></p>	
<ul style="list-style-type: none"> <li>The proposed exceptions strike an appropriate balance between the need for transparency and the need to protect confidential or sensitive information [this position</li> </ul>	<p>We are happy that most country authorities who commented on the Approach Paper supported the proposed balance between disclosure and the need to protect certain information.</p>

was expressed primarily by representatives of country authorities].	
<b>6. More deliberative information should be disclosed</b>	
<ul style="list-style-type: none"> <li>The proposal to deny access to all deliberative information is not consistent with a true presumption to disclose.</li> </ul>	An underlying principle of the proposed policy is to protect the deliberative process (and the vibrancy of debate both internally and with the Bank’s clients and other partners) while disclosing the decisions, outcomes, and results of the process at key process milestones. Management will advise staff on what would be regarded as “decisions, outcomes, or results” (which would be disclosed) and what would be regarded as truly deliberative (which would not be disclosed). Accordingly, the public will have access to much more information than is available under the existing policy, including information on projects under implementation, Board papers, and records of Board proceedings.
<ul style="list-style-type: none"> <li>Exceptions should be based on “proof of harm”; deliberative information should be disclosed if it is not harmful to a well-defined interest.</li> </ul>	It would be extremely difficult and impractical to review each document to establish whether it contains deliberative information that would cause harm to a well-defined interest. Therefore, what we have proposed is to apply the harm principle up front to define the classes of deliberative documents for which disclosure is likely to compromise the integrity of the deliberative process.
<ul style="list-style-type: none"> <li>Public access to deliberative information is essential for ensuring that the communities affected by, or potential beneficiaries of, Bank-supported projects can provide inputs to the Bank’s decision-making processes.</li> </ul>	In accordance with Principle 3, the proposed policy would protect the deliberative process while disclosing the decisions, outcomes, or results of deliberations at key process milestones—key inputs to the Bank’s consultation process with potential beneficiaries and affected communities.
<b>7. Drafts of key documents should be disclosed</b>	
<ul style="list-style-type: none"> <li>The Bank should consider disclosing draft versions of key documents before finalization (e.g., CAS, project documents), to enable communities and CSOs to provide feedback and follow-up with government authorities. Otherwise there is a risk that policies and potential</li> </ul>	The Bank frequently engages in consultations with the communities likely to be affected by Bank-supported operations. Under the proposed policy, project beneficiaries, affected parties, and other interested stakeholders would have access to a broad range of information (including drafts for consultation purposes) that would enable them to engage in an informed dialogue with the Bank and

<p>mistakes would become embedded before stakeholder consultations and participation by affected populations. Timely access to information strengthens stakeholder participation and ownership, as well as helps integrate stakeholders into development decision making.</p>	<p>country authorities during such consultations.</p>
<p><b>8. The Bank should disclose more information on implementation</b></p>	
<ul style="list-style-type: none"> <li>The Bank should disclose project documents, including progress reports, ISRs, and Aide Memoire, during implementation, as well as a list of project documents, to help ensure that governments are held accountable for expenditures of public resources, and to address possible corruption issues.</li> </ul>	<p>Under the proposed policy, much more information relating to projects under implementation will be disclosed than under the existing policy. The Policy Paper proposes to disclose the non-deliberative portion of the Bank's supervision reports (ISRs), Aide Memoire (when the Bank and the Borrower agree to such disclosure), and reports pertaining to country portfolio performance reviews (CPPR), which are conducted jointly by the Bank and borrowers. The Policy Paper also proposes that borrowers be required to disclose the audited annual financial statements for projects.</p>
<ul style="list-style-type: none"> <li>Borrower governments should disclose annual project financial statements, which would encourage dissemination of public financial information and accountability more generally. If the audited statements pose sensitivity, the Bank should disclose the opinion of both the auditor and owner of the accounts.</li> </ul>	
<p><b>9. E-mail should not be on the list of exceptions</b></p>	
<ul style="list-style-type: none"> <li>Exceptions should be based on information content rather than modes of communication.</li> </ul>	<p>We agree. E-mail is no longer presented as a specific category of information. All types of information may be communicated by e-mail. The Policy Paper clarifies how the information content in official e-mail would be classified under the new policy.</p>
<p><b>10. Corporate procurement information should be disclosed</b></p>	
<ul style="list-style-type: none"> <li>It is not clear why the proposal excluded the disclosure of</li> </ul>	<p>Under the new policy, a first priority would be to provide maximum access to</p>

<p>corporate procurement information.</p>	<p>information pertaining to our operations. However, as we have done since 1985, we will continue to review the policy and the potential for expanding its scope; subsequent reviews would address this issue. In the meantime, Principle 2 would allow the Bank to consider disclosure, under exceptional circumstances, of corporate procurement information if the Bank determines that the overall benefits of such disclosure outweigh the potential harm to the interest protected by the exception.</p>
<p><b>11. Countries and third parties should not have veto power</b></p>	
<ul style="list-style-type: none"> <li>The policy should apply to all information in the Bank’s possession regardless of who “owns” the information or from where it originates.</li> </ul>	<p>The nature of the Bank’s business (as a development agency, a Bank, an honest broker, a knowledge institution, etc.) and its special relationship with its clients (who are also its shareholders) makes it inappropriate to disclose all information in the Bank’s possession regardless of ownership. The Bank is privileged to receive certain confidential and sensitive information from its clients, the disclosure of which could damage the trust they have in the Bank and hinder the future flow of similar information. With incomplete or inaccurate information, the Bank would not be able to serve the best interest of its clients when preparing, for example, Country Assistance Strategies, projects, or programs, or when offering policy advice. Thus, respecting information provided on the basis of confidentiality is important to ensure the continued flow of such information and to maintain cooperation with its sources. Moreover, the Bank also has a legal obligation to protect information (including proprietary information) provided in confidence. Information obtained by the Bank on the basis of confidentiality cannot be released without the prior approval of the party which provided the information.</p>
<ul style="list-style-type: none"> <li>The proposal implies that there is information that “belongs” to a country. This will grant countries a veto authority over the Bank’s disclosure decisions.</li> </ul>	<p>The Policy Paper (in Annex B) highlights how the new policy would apply to different types of documents containing country information, including documents prepared by the Bank that it would routinely disclose, documents prepared by countries that the countries are required to disclose, documents prepared by countries that would be disclosed only if the country consents, and documents prepared by the Bank at the request of a country for a fee, that it would disclose only if the country consents. Therefore, explicit country consent would be</p>

	required only with respect to a limited set of documents.
<ul style="list-style-type: none"> <li>The relationship between the Bank and the member states—who decides, when, and how to disclose—needs to be spelled out. Otherwise there is a risk that the Bank and the country can hide behind each other to avoid disclosure.</li> </ul>	<p>The Bank is committed to disclosing information in accordance with its policy. The Policy Paper articulates when the Bank would routinely disclose information, when it would consult countries, when it would require a country’s explicit consent to disclose information, and how the Bank would address confidential or sensitive country information. By providing greater clarity on the respective roles of the Bank and the member country in the disclosure authorization process, the proposed policy would make it easier for the public to obtain information pertaining to the Bank’s activities.</p>
<ul style="list-style-type: none"> <li>Requesters should not be sent back and forth between the Bank and country authorities.</li> </ul>	
<ul style="list-style-type: none"> <li>Documents resulting from “fee-based services” must be disclosed.</li> </ul>	<p>When the Bank carries out a study for a fee (whether it is for a member government, or for another institution), the Bank is in effect acting as a “consultant.” The services the Bank provides for a fee are owned by the parties that commissioned the services. The Bank may disclose the material commissioned after obtaining the express permission of the owner.</p>
<p><b>12. Confidential country and third party information must be protected</b></p>	
<ul style="list-style-type: none"> <li>The availability of more information towards greater transparency is welcome, provided the Bank respects the confidentiality of certain information provided to the Bank by member governments and third parties.</li> </ul>	<p>The proposed policy has exceptions that would protect information provided in confidence by member countries and third parties. Such information will not be disclosed without the express permission of the country or the third party. When the Bank receives such information, it would be classified as “Confidential” or “Strictly Confidential,” and would not be subject to routine declassification without the express permission of the country or third party concerned, even after 20 years. In addition, before finalizing documents prepared by the Bank that are routinely discussed with the country, the Bank would continue to ask the country authority concerned to identify confidential or sensitive information in the document and addresses the country’s concerns as appropriate.</p>

<ul style="list-style-type: none"> <li>Information that could hurt the national security of countries should be protected.</li> </ul>	<p>We agree. As stated above, when we receive such information, it would be classified and would not be available to the public.</p>
<ul style="list-style-type: none"> <li>Deliberative information between the Bank and member countries should be protected.</li> </ul>	<p>In accordance with Principle 3 of the proposed policy, information that is part of the deliberative process between the Bank and a member country would be protected.</p>
<p><b>13. The basis for document classification should be clear</b></p>	
<ul style="list-style-type: none"> <li>What would be the basis for classifying documents? Rather than restricting documents in their entirety, the Bank must provide clear guidelines on the <i>information content</i> that can be classified as confidential.</li> </ul>	<p>If a document contains information that falls under the exceptions, that document would be classified as “Official Use Only,” “Confidential,” or “Strictly Confidential,” depending on the sensitivity of the information content, and depending on who would have access. If a document does not contain information that falls under the exceptions, it would be classified as “Public.” Detailed guidelines on document classification would be issued by the Bank’s Office of Information Security (OIS) in due course (the existing document classification framework is being revised by OIS).</p>
<ul style="list-style-type: none"> <li>“Sensitive” and “confidential” information should be defined more clearly.</li> </ul>	
<p><b>14. Board proceedings should be open</b></p>	
<ul style="list-style-type: none"> <li>The absence of a proposal (in the Approach Paper) on Board records is disappointing.</li> </ul>	<p>The Policy Paper contains a proposal to disclose certain Board records (including Summaries of Discussion) at the end of the Board’s deliberations, and to declassify and disclose most of the remaining Board records (including verbatim transcripts and statements of individual Executive Directors) according to defined timelines.</p>
<ul style="list-style-type: none"> <li>The Bank should disclose details of Board discussions.</li> </ul>	
<ul style="list-style-type: none"> <li>Board meetings should be open to the public with some provision to close some sessions.</li> </ul>	<p>Because the Board makes decisions primarily through consensus rather than by vote, it is important that the Executive Directors have the space to engage in a frank dialogue, expressing their views, while remaining open to compromise in order to reach consensus at the end of the deliberative process. Consistent with Principle 3, we want to protect the integrity of this process. If the meetings were open to the public, and/or if the view of each Executive Director is immediately known to the public, it may put undue pressure on Executive Directors and could also politicize the Bank’s decision-making process. Some Executive Directors</p>

	represent a number of countries, which may have different positions on various issues. Such Executive Directors would find it more difficult to engage in a constructive discussion if the meetings were open to the public and/or if their views are immediately disclosed.
<ul style="list-style-type: none"> <li>The proposal to routinely declassify and disclose all “Official Use Only” Board papers is a good one. But the proposal to include “Confidential” or “Strictly Confidential” Board papers as an exception might result in an abuse of this provision to hide information.</li> </ul>	The proposal no longer lists “Confidential” or “Strictly Confidential” Board papers as a specific exception. Under the new policy, there is a presumption that most Board papers would be disclosed. While a Board paper may be classified as “confidential” or “strictly confidential” when it contains information that falls under the exceptions, the Bank would take steps to minimize the number of restricted Board papers.
<ul style="list-style-type: none"> <li>Disclosure of Board papers should not be based on a security classification.</li> </ul>	
<ul style="list-style-type: none"> <li>Who decides what will be classified as “Confidential or Strictly Confidential?”</li> </ul>	The decision to restrict a Board paper would require authorization from the Vice President concerned. The Corporate Secretariat would track the number of restricted Board papers and report the numbers to senior Management at regular intervals.
<b>15. Some Board papers should be disclosed before the Board discussion</b>	
<ul style="list-style-type: none"> <li>The Bank should disclose draft documents during policy and lending formulation, as well as the final Board papers before the Board makes decisions. Thereby the public can contribute to the decision-making process and review how their prior comments have been taken into account.</li> </ul>	The Policy Paper proposes to routinely disclose certain Board papers (i.e., operational policy papers and sector strategy papers) before the Board discussion. It also proposes to disclose Project Appraisal Documents (for Investment Lending), Program Documents (for Development Policy Lending), and Country Assistance strategies before the Board discussion, if the country consents to such early disclosure.
<b>16. Treatment of the INT, IP, and sanctions proceedings is not consistent with the new approach</b>	
<ul style="list-style-type: none"> <li>The proposal implies a blanket presumption against the</li> </ul>	The Policy Paper no longer implies a blanket presumption against the disclosure of

<p>disclosure of information relating to the Integrity Vice Presidency (INT), the Inspection Panel (IP), and the Bank’s Sanctions Process.</p>	<p>such information. Instead, the Policy Paper acknowledges that there are groups and processes within the Bank that operate under separate disclosure regimes and that the Bank would not disclose information that is restricted under these separate regimes.</p>
<p><b>17. The “public interest override” is too narrow</b></p>	
<ul style="list-style-type: none"> <li>The proposed conditions for the application of the override are too limiting. In overriding the exceptions, the Bank should compare the relative pros and cons of disclosure.</li> </ul>	<p>The Policy Paper proposes a broader override provision pursuant to which the Bank would compare the relative pros and cons of disclosure: that the “Bank reserves the right to disclose, under exceptional circumstances, certain information that falls under the exceptions, if it determines that overall benefits of such disclosure outweigh the potential harm to the interest(s) protected by the exception(s).”</p>
<ul style="list-style-type: none"> <li>A proposed condition for applying the override is when disclosure is in the “interests of the Bank and the development community.” This is too narrow. What does the Bank mean by the “development community”? What happens when the Bank’s interest is different from the public’s interest?</li> </ul>	
<ul style="list-style-type: none"> <li>A proposed condition for applying the override is when “nondisclosure is likely to cause serious harm to the interest of the Bank, a member country, Bank staff or other individuals.” What is meant by the “interest of a member country”? Is it the interest of the citizens or the government?</li> </ul>	
<p><b>3. Declassification of Information</b></p>	
<p><b>18. Twenty years is too long</b></p>	
<ul style="list-style-type: none"> <li>The Bank should adopt different timelines for declassifying different types of restricted information. A uniform</li> </ul>	<p>The Policy Paper proposes a three-tier declassification structure under which certain restricted information would be declassified and disclosed after 5 years,</p>

<p>twenty-year timeline is not appropriate.</p> <ul style="list-style-type: none"> <li>• Shorter timelines (for example, 5 years) would increase government accountability for allocation and use of Bank resources while in office.</li> <li>• Delays in disclosure with respect to projects would erode accountability because those (in member countries) who are responsible for possible harm may no longer be in a position to be held accountable.</li> <li>• A twenty-year timeline may be too long; at the same time, a five-year timeline may be too short.</li> </ul>	<p>others after 10 years, and others after 20 years. In determining how declassification timelines would apply to different types of information, we have considered how the passage of time would affect the sensitivity of the information content, and weighed the potential benefits against any harm that may be caused by disclosure. Annex E of the Policy Paper provides details of how the proposed timelines would apply to specific document types.</p>
<p><b>19. The policy should apply retroactively to existing records</b></p>	
<ul style="list-style-type: none"> <li>• The Approach Paper is unclear if the new policy would retroactively apply to the existing stock of undisclosed information.</li> </ul>	<p>The Policy Paper provides timelines on the disclosure of existing records in accordance with the proposed three-tier declassification structure.</p>
<p><b>4. The Appeals Mechanism</b></p>	
<p><b>20. There should be an independent appeals process</b></p>	
<ul style="list-style-type: none"> <li>• The Approach Paper proposes an appeals mechanism conducted by Management. This is not enough. Credibility of the appeals body is integral to its success. The appeals body should be fully independent and comprise external members who do not have any conflict of interest.</li> </ul>	<p>The Policy Paper proposes a two-stage appeals process: an administrative appeals mechanism under Management (that would serve as the first level of appeal), and a mechanism independent of Management (that would serve as the second level of appeal for certain types of appeal). The independent appeal process would be conducted by a panel of three outside experts.</p>
<ul style="list-style-type: none"> <li>• The procedures and service standards for the appeals process should be clarified.</li> </ul>	<p>The Policy Paper outlines the grounds for appeal and corporate arrangements for the appeals process. Detailed procedures and services standards would be</p>

	developed before the policy becomes effective.
<ul style="list-style-type: none"> <li>The reasons for denying an appeal should be provided to the appellant in writing.</li> </ul>	If the Bank denies an appeal in either the first or the second stage of the process, the appellant would be informed of the reasons for denial in writing.
<b>5. Implementation</b>	
<b>21. Need clear procedures to process requests</b>	
<ul style="list-style-type: none"> <li>The Disclosure Policy would benefit from a framework to receive and process requests for information, particularly where and how to submit requests, and language preferences, and describe the process for and reasons behind denials for requests. Requests should be acknowledged (e.g., within 3 days) and responded to (e.g., within 15 days) in a timely manner.</li> </ul>	The Policy Paper provides (in Annex F) detailed procedures for submission and processing of requests, including the authorization procedures and timelines for acknowledging and responding to requests. The paper also proposes to establish a high-level Disclosure Committee that would oversee and facilitate the implementation of the policy.
<b>22. Ensure effective monitoring and compliance</b>	
<ul style="list-style-type: none"> <li>There is a need to ensure compliance with the Policy from all parties. The Bank should monitor implementation by both staff and member countries, and consider establishing a sanctions procedure to discipline non-compliance.</li> </ul>	Under existing Operational Policies, the Bank already has remedies for non-disclosure of certain documents that countries are mandated to disclose under the Bank's disclosure policy. The Bank would continue to monitor implementation of the policy, including compliance, by both staff and member countries. To help monitor compliance, the Bank expects to institute an electronic system to track disclosure requests and decisions.
<ul style="list-style-type: none"> <li>A framework to periodically review the Policy is crucial, especially given the significant changes proposed to the Policy. The Bank should indicate its timeframe for an implementation review.</li> </ul>	As in the past, the Bank would continue to review the policy at regular intervals. A progress report to the Board is expected at the end of 2011.

<p><b>23. Adequate funding and capacity building keys to success</b></p>	
<ul style="list-style-type: none"> <li>• Efficient and effective implementation of the revised Disclosure Policy will require sufficient budgetary resources, including training of staff in the new principles and procedures. The revised Policy would benefit from more details on how it will be funded, including capacity building to strengthen the PICs and their reach beyond capital cities, as well as the IT required.</li> </ul>	<p>We are committed to provide the budgetary resources necessary for effective implementation of the policy. The Policy Paper provides an initial estimate of funding requirements. The paper also provides details on a number of measures that would be taken to support policy implementation, including document classification procedures, guidance and training (including guidelines on document translation), public information function and centers, and information systems. Management recognizes the need to strengthen capacity at the country level and in Washington to implement the new policy.</p>
<p><b>24. Proactive dissemination critical</b></p>	
<ul style="list-style-type: none"> <li>• The presumption of disclosure should mean that information is disclosed proactively. The Bank should take proactive measures to disseminate information to ensure that timely and relevant information is conveyed to people impacted by Bank-supported operations.</li> </ul>	<p>The Policy Paper recognizes that the disclosure of information <i>per se</i> is not sufficient. In the past, the Bank has adopted several measures to facilitate the dissemination of information available under the policy, for example, by launching a PIC upgrading program and by adopting a translation framework. Going forward, we would take additional proactive measures to ensure greater dissemination of relevant operational information (for example, through project-specific local information kiosks). Proactive information dissemination would be an essential component of the communication strategy for Bank operations. The Bank would also collaborate more closely with country authorities and CSOs to improve local outreach and enhance participation by affected communities.</p>
<ul style="list-style-type: none"> <li>• The disclosure of more information <i>per se</i> is not enough. The Bank and governments must disseminate information in a language and manner that the affected people understand.</li> </ul>	
<ul style="list-style-type: none"> <li>• Access to information is a basic human right and empowers people to participate in decisions that affect them. This issue is particularly critical and challenging for remote communities (digital divide, financial issues), ethnic minorities (language, literacy), and information access and utilization also varies by gender. The Policy should acknowledge and mitigate these access barriers.</li> </ul>	
<ul style="list-style-type: none"> <li>• Only a small percentage of people in some client countries have access to the external web. The Bank, country</li> </ul>	

<p>authorities, and the media should adopt proactive measures to convey information to such people.</p>	
<ul style="list-style-type: none"> <li>• The Bank and governments should adopt more innovative approaches (for example, even the use of live theatre and other cultural programs) to reaching out to people likely to be impacted by Bank-supported operations.</li> </ul>	
<ul style="list-style-type: none"> <li>• Proactive measures to disseminate information would facilitate better consultations, participation, and partnerships with affected communities—all contributing to development effectiveness.</li> </ul>	
<ul style="list-style-type: none"> <li>• Bank documents should be translated into more national and local languages to ensure the informed participation of affected people.</li> </ul>	<p>The Bank has a Translation Framework that provides guidance on what documents must be routinely translated and what may be translated—as good practice—into international, national, and/or local languages. To facilitate the implementation of the new Disclosure Policy, we will be providing additional guidance to staff on translations. We will review the experience with translations after one year of policy implementation to determine whether there is a need for a formal review of the Translation Framework.</p>
<ul style="list-style-type: none"> <li>• The Bank’s website should be revamped to improve its search ability and user-friendliness.</li> </ul>	<p>The Bank’s website is currently being improved to strengthen its search capability and to make it more user-friendly.</p>