

THE DISCLOSURE OF INFORMATION POLICY OF THE INTEGRITY VICE PRESIDENCY

This statement sets out the policy of the Integrity Vice Presidency (INT) of the World Bank Group on public access to information in INT's possession. This policy supersedes INT's 3 June, 2004 "External Communications Strategy Related to Investigations and Sanctioning of Fraud and Corruption in World Bank-Financed Projects" and takes effect February, 2011.

I. INTRODUCTION

1. Consistent with the World Bank's (WB)¹ Policy on Access to Information, INT recognizes that transparency and accountability are of fundamental importance to the development process, and to achieving the World Bank Group's (WBG's) mission to alleviate poverty. Transparency is essential to building and maintaining public dialogue, and increasing public awareness about the WBG'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 WBG-supported operations during their preparation and implementation, which not only assists in exposing potential wrongdoing and corrupt behavior, but also enhances the possibility that problems will be identified and addressed early on.

2. INT also recognizes that a sound, practical disclosure of information policy is fundamental to fulfilling its role in preventing and detecting fraud and corruption in WBG-supported operations, and supporting the implementation of governance and anti-corruption efforts in member countries² for better results.

3. At the same time, the ability of INT to fulfill its unique mandate, of effectively investigating allegations of fraud and corruption relating to World Bank Group's operations and WBG staff, is largely dependent on INT's ability to reliably safeguard the integrity of the investigative and sanctions processes, and of the protected information and sources on which INT relies. INT, therefore, has an obligation to protect the confidentiality of certain information, and to safeguard the integrity of the investigative and sanctions processes. This policy endeavors to strike an appropriate balance between the need to grant the public maximum access to information in INT's possession, and INT's obligation to respect the confidentiality of all

¹ For the purposes of this policy statement, the term "World Bank" "WB" or "Bank" means the International Bank for Reconstruction and Development (IBRD) and the International Development Association (IDA); "World Bank Group" or "WBG" means the IBRD, IDA, the International Finance Corporation (IFC), the Multilateral Investment Guarantee Agency (MIGA), and the 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; (guarantees may include MIGA contracts of guarantee or PRG guarantees); "information" means documents of any type (for example, paper, electronic, photograph, film, sound recordings, videotapes) prepared or received by the WBG 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 WBG. 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.

² For the purposes of this paper, the terms "member country" or "client country" are used interchangeably.

relevant parties inside and outside the WBG, and to protect the integrity of its investigations and the sanctions process.

4. INT also recognizes the importance of translating information that it creates. INT documents are therefore translated into appropriate languages in accordance with the WB's translation framework.

5. **Guiding Principles.** This policy is based on the principles, underlying the WB's Access to Information Policy, adapted to reflect the unique mandate and functioning of INT, which rely on its ability to safeguard the integrity of the investigative and sanctions processes, and the confidentiality of protected information in its possession:

- (i) Maximizing access to information.
- (ii) Safeguarding the deliberative process, and the integrity of INT's investigations.
- (iii) Providing clear procedures for making information available, including a consistent process for redacting protected information.
- (iv) Recognizing requesters' right to an appeals process.

6. This policy statement is divided into three parts. Following this introduction, Part II sets out the core policy, and Part III sets out the implementation aspects of the policy.

II. THE POLICY

A. Information Disclosed by INT

7. **Disclosable INT Information.** Consistent with the principles of the Bank's Access to Information Policy, INT allows access to information in its possession relating to the results of its investigations, and information relating to its preventive work. To this end, and subject to the procedures for making information available, including a consistent process for redacting protected information, set forth in Part III below, INT discloses, as a matter of policy, the following types of information (the "Disclosable INT Information"):

- (i) **Redacted Final Investigation Reports (FIRs).** FIRs set out findings and recommendations at the conclusion of INT's external investigations, and may be followed by sanctions proceedings. FIRs are redacted in accordance with the redaction process set out below and the Redaction Protocol included as Annex II to this policy. Redacted FIRs are disclosed *after* they are shared with the relevant WBG operational unit, member country, and the Executive Directors, and, if they are followed by sanctions proceedings, after the conclusion of such proceedings.³

³ At the conclusion of the sanctions proceedings, the actual sanction (if any), together with the name of the sanctioned party, are made publicly available through a posting on the Bank's website www.worldbank.org/debarr. In addition, as approved by the Executive Directors on 28 October, 2010, starting in calendar year 2011, the underlying decision of the Sanctions Board, laying out the facts and legal basis for the sanction, will also be publicly disclosed, along with determinations of the Evaluation and Suspension Officer in cases that are not referred to the Sanctions Board.

- (ii) ***Redacted Detailed Implementation Review Reports (DIRs).*** INT undertakes broad-based detailed implementation reviews (DIRs) of integrity risks in WBG-financed projects, and of measures designed to prevent them. DIRs are redacted in accordance with the redaction process set out below, and the Redaction Protocol included as Annex II to this policy. Redacted DIRs are disclosed *after* they are shared with the relevant WBG operational unit, member country, donors and co-financiers, where relevant, and the Executive Directors.
- (iii) ***INT's Annual Report.*** INT prepares an Annual Report, describing overall results of its investigative, sanctions, and preventive and risk mitigation efforts during the year. The Annual Report is distributed to the Executive Directors, discussed with the Audit Committee, and is then disclosed to the public.
- (iv) ***Reports and Other Information Generated as Part of INT's Preventive Efforts, including:***
 - a. ***Thematic Reviews.*** INT conducts reviews and analyses of systemic integrity risks in particular sectors and countries, designed to highlight the nature and prevalence of such risks.
 - b. ***Lessons Learned Publications.*** INT periodically consolidates lessons learned from its investigations to inform and educate stakeholders inside and outside the WBG on integrity risks identified and measures to prevent and mitigate such risks.
 - c. ***Preventive Tools.*** INT prepares guidelines, toolkits, handbooks, questionnaires, and other practical materials designed to help different stakeholders better identify, prevent, and mitigate integrity risks. Examples of such tools include the *Fraud and Corruption Handbook* and the *Most Common Red Flags in Procurement*.
 - d. ***Training and Capacity-Building Materials.*** INT engages in outreach, training, and capacity-building efforts, designed to enhance the ability of operational staff within the WBG, member-country counterparts, contractors, Civil Society Organizations, and other stakeholders inside and outside the WBG to better detect, report on, prevent, and mitigate integrity risks in development activities.
- (v) ***Policy Papers.*** Consistent with the Access to Information Policy, INT discloses policy papers it prepares from time to time for discussion with the Executive Directors.

8. ***Safeguarding the Deliberative Process and the Integrity of INT's Investigations.*** While striving for transparency and maximizing access to information relating to its investigative results and its preventive products, INT must ensure that it can reliably protect the confidentiality of the investigative and deliberative processes, including the information involved in such processes, that lead to these decisions, results, agreements, and outcomes. Protection of these processes, and the information relating to them, is essential, in order to enable INT to discharge its investigative

mandate and protect the integrity of investigations and other due diligence work aimed at detecting, investigating, and sanctioning all forms of misconduct as defined in the World Bank Sanctions Procedures.⁴ The *Procedures for Disclosing INT Information, including a Consistent Process for Redacting Protected Information*, set forth in paragraphs 10-13 below, are designed to ensure timely disclosure of Disclosable INT Information, while reliably safeguarding protected information, the disclosure of which could cause harm to specific parties or interests, and otherwise undermine or impede the integrity of the investigative or sanctions process.

III. IMPLEMENTATION ASPECTS OF THE POLICY

A. Accessing Information

9. ***Proactive Disclosure.*** In keeping with its disclosure policy, upon completion of the review and redaction process described below, INT will disclose all types of Disclosable INT Information, set forth in paragraph 7 (i-v) of this policy, through its external website – www.worldbank.org/integrity – as soon as the documents are finalized, in accordance with the relevant process (including redaction, where appropriate).

10. ***A Consistent Process for Redacting Protected Information from Disclosable Documents.*** Given the uniqueness of INT’s mandate and functioning, INT’s disclosure procedures must ensure that it can reliably safeguard the confidentiality of protected information and its sources, the disclosure of which could compromise the integrity of INT’s investigations or jeopardize the security of INT or other WBG staff or third parties. To this end, and based on INT’s experience with information disclosure over the past several years, this policy sets forth a consistent process for ensuring that protected information, the disclosure of which could cause harm to specific parties or interests, is redacted from the documents and information ultimately disclosed by INT. Such process enables INT to redact from the documents and information it discloses, confidential and sensitive information that falls within one or more of the following categories of “protected” information:

- (i) Information that falls within the “Exceptions” set out in paragraphs 8-17 of the World Bank’s Access to Information Policy, and replicated in Annex I to this policy.
- (ii) Information the disclosure of which could cause reputational or commercial injury, or pose undue liability, reputational and/or immunities risk to the WBG or its staff.
- (iii) Information the disclosure of which is restricted under the IFC or MIGA policies.

11. ***Redaction and Review of FIRs Prior to Disclosure.*** FIRs set out findings and recommendations at the conclusion of INT’s external investigations, and may be followed by sanctions proceedings. Once finalized, INT redacts confidential and sensitive information contained in FIRs in accordance with the Redaction Protocol set out as Annex II to this policy. Redaction requires a flexible methodology to remove confidential or sensitive information that

⁴ *Sanctions Reform: Phase III* (AC2010-0047), dated 12 May, 2010.

falls within one or more of the categories of protected information set forth in paragraph 10 above, while preserving the meaning of the underlying document. The redaction prior to publication is carried out by the INT staff responsible for the FIR in question, pursuant to INT's Internal Guidelines Regarding Referral and Redaction Report Preparation. Upon completion of the redaction, the Redacted FIR is submitted to the relevant WBG Legal Department for review and clearance. Redacted FIRs are then shared with the relevant WBG operational unit, member country, donors and co-financiers, where relevant, and the Executive Directors as follows:

- (i) ***Notice to the Executive Director Concerned.*** The Executive Director responsible for the member country concerned is informed of the WBG's intention to transmit a Redacted FIR to the member country and receives a copy of the Redacted FIR.
- (ii) ***Review of Redacted FIR by the Member Country.*** The Redacted FIR is transmitted to the affected member country for a 30-day comment period, which may be extended for a reasonable period at the member country's written request. In transmitting the redacted FIR, the WBG informs the member country concerned that:
 - a. Following the member country's review of the FIR, WBG management intends to make the Redacted FIR available to the Executive Directors and any donors and co-financiers, where relevant;⁵
 - b. the Redacted FIR will be disclosed to the public either after its circulation to the Executive Directors, or, if it is followed by sanctions proceedings, upon conclusion of such proceedings; and
 - c. the member country may provide comments on the Redacted FIR, and request that the WBG share such comments with any or all recipients of the Redacted FIR (including the Executive Directors, the donors and co-financiers, where relevant, and/or the public).
- (iii) ***Circulation to the Executive Directors and Sharing with the Donors and Co-financiers.*** Following the member country's review, the Redacted FIR, together with any comments from the member country, is transmitted to the donors and co-financiers,⁶ where relevant, and circulated to the Executive Directors for information.

12. ***Disclosure of Redacted FIRs.*** Redacted FIRs that are not followed by sanctions proceedings are disclosed following the member country's review and their circulation to the Executive Directors. To ensure the integrity of the sanctions proceedings, the disclosure of Redacted FIRs that are followed by the sanctions proceedings does not take place until after the conclusion of such proceedings.

⁵ If a donor or co-financier is not able to respect a confidentiality agreement (e.g. because national laws mandate a referral to certain authorities), then the report will not be made available to that donor or co-financier until such time as the WBG makes the report available to the public.

⁶ Subject to conditions set out in footnote 6 above.

13. **Process for Disclosure of Redacted DIRs.** INT undertakes broad-based implementation reviews of integrity risks in WBG-supported projects, and assessments of measures designed to prevent them. At the conclusion of such detailed implementation reviews, INT prepares a DIR report (which is shared prior to its finalization with management of the relevant WBG entity for comment). Once finalized, the DIR undergoes the same redaction and review process as FIRs (as described in paragraphs 11-12 above). A Redacted DIR is disclosed following its review by the member country concerned and its circulation to the Executive Directors.⁷

14. **Information on Request.** If information that is disclosable under this policy has not been posted on INT's external website, requests for such information may be submitted to the Senior Communications Officer of INT in writing by electronic means, mail, or fax. To enable INT to respond to such requests in a timely manner, such requests should indicate, with reasonable specificity, the information that is being sought, including details relating to the documents being requested (e.g., date, title, etc.). In responding to such requests, INT will follow the time, reasonableness, and fee standards set out in the Access to Information Policy. To this end, INT will endeavor to acknowledge requests within 5 business days of receipt and will respond within 20 business days to requests that do not require a review or consultation with other WBG units, external parties, or the Executive Directors. INT also reserves the right to refuse unreasonable or unsupported requests (such as multiple or blanket requests or requests for information or data that do not already exist).

15. **Service Fees.** Most of INT's disclosable information is posted on INT's external website, www.worldbank.org/integrity, and is available for download free of charge. In accordance with the Access to Information Policy, for any request for information that is not posted, INT may charge reasonable fees for providing digital or hard copies, particularly for requests that are complex or time-consuming.

B. Classification

16. Consistent with paragraph 28 of the Access to Information Policy, INT documents are assigned one of the following four classifications: "Public," "Official Use Only," "Confidential," or "Strictly Confidential."

17. **Information INT Creates.** In accordance with AMS 10.11, *Management of Records*, the Bank requires the originators of documents prepared in the course of INT's official business, to file such documents in INT's records management system. Some of the information created by INT is available to the public in accordance with this policy and is classified as "Public" prior to its disclosure. Information that falls under one or more categories of protected INT information under paragraph 10 of this policy, and documents containing such information, are restricted and 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, and are, therefore, restricted.

⁷ Since DIRs are not normally followed by sanctions proceedings, they are disclosed following their review by the member country concerned and their circulation to the Executive Directors.

18. **Information INT Receives.** INT also requires that member countries or third parties assign appropriate information classifications to information that they provide to INT. If INT receives information in confidence from a member country or a third party, INT 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 INT's records management system; INT 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 INT's knowledge, the information has not already been made publicly available by the member country or third party, INT considers the information to be as relevant, deliberative information or information provided in confidence;⁸ INT classifies it in accordance with AMS 6.21A, *Information Classification and Control Policy*.

C. Declassification

19. In light of the specificity of INT's mandate and the resulting sensitivity of INT's information, INT information restricted under this policy is not eligible for declassification and subsequent disclosure.

D. Disclosure Committee for INT Information

20. **The Disclosure Committee for INT Information (DCI).** To facilitate the implementation of its disclosure policy, INT has created the Disclosure Committee for INT Information (DCI). The DCI is chaired by the Managing Director overseeing the implementation of the WBG's Governance and Anti-Corruption strategy and is composed of the WB General Counsel; the Vice President, OPCS; the Vice President, EXT; and the Vice President of the WBG operational unit concerned, including the General Counsel of IFC or MIGA, where relevant, and an outside expert, appointed from time-to-time by management for a term not exceeding 2 years each, with knowledge and experience of investigating and litigation functions; including, in particular, the treatment of information in the possession of such investigative bodies. The DCI advises on the application of this policy to complex issues, and receives and rules on appeals under this policy statement,⁹ and establishes service fees and service standards. The DCI 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 Executive Directors.¹⁰

E. Appeals

21. **The DCI to Consider Final Appeals.** A requester who is denied access to information by INT may file an appeal, if the requester is able to establish, to the satisfaction of the DCI, a

⁸ If a member country or a third party has not classified the information given to INT and, to INT's knowledge, the member country or third party concerned has not made the information public, then such information is considered to be deliberative under this policy, and is classified by INT in accordance with AMS 6.21A, *Information Classification and Control Policy*, as indicated in paragraphs 17-19 of this policy statement. If INT 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.

⁹ See paragraphs 21-23 of this policy statement on the provisions relating to appeals.

¹⁰ The DCI would function as a stand-alone committee for the purpose of resolving appeals to INT's separate disclosure policy. Decisions of the DCI are not subject to the jurisdiction of either the Bank's Access to Information Committee or the Appeals Board, established under the Access to Information Policy.

prima facie case that INT failed to comply with this policy, by improperly or unreasonably restricting access to Disclosable INT Information. The DCI will have the authority to uphold or reverse the relevant decisions of INT, and its decisions in such instances will be final. The remedy available to a requester who prevails on appeal to DCI is limited to receiving the information requested. Appeals will be limited to an alleged breach of the INT Disclosure Policy in failing to disclose a document or information that falls within one or more categories of Disclosable INT Information, set forth in paragraph 7 above; it will not enable a requester to question or override decisions made as part of the review and redaction process relating to the Disclosable INT Information.

22. ***Submitting an Appeal.*** All appeals must be submitted in writing to the Disclosure Committee for INT Information within 60 calendar days of the decisions to deny access. Appeals received beyond the 60-day period for filing an appeal with the DCI would be deemed out of time and would not be considered. Appeals may be submitted electronically through INT's website at <http://www.worldbank.org/integrity>. Appeals also may be set out in a brief letter and sent by mail to The Integrity Vice Presidency, The World Bank, 1818 H Street, NW, Washington, DC, 20433. All appeals must contain the following:

- (i) The original case number, provided in INT's response to the request for information;
- (ii) a description of the information originally requested; and
- (iii) an explanatory statement that sets out the facts and the grounds which support the requester's claim that INT violated its Disclosure Policy by improperly or inappropriately restricting access to the information requested that, in the opinion of the requester, falls within one or more categories of the Disclosable INT Information, set forth in paragraph 7 of INT's Disclosure Policy.

23. ***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 DCI does not have authority to consider. After the DCI reaches its decision concerning the appeal, the requester is notified of the decision. If the DCI upholds the initial decision to deny access to the information requested, the notice specifies the reasons. If the DCI 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.

Annex I

Exceptions to the WB's Access to Information Policy (referred to in Paragraph 10 (i) to INT's Disclosure Policy)

Consistent with paragraph 10 (i) of INT's Disclosure Policy, prior to disclosure, the following categories of protected information are redacted from the Disclosable INT Information:

- **[8]¹ 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.²
 - (i) 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.
 - (ii) Information relating to staff appointment and selection processes.
 - (iii) Information relating to proceedings of the Bank's internal conflict resolution mechanisms.
 - (iv) 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:
 - (i) Communications within and between individual Executive Directors' offices.
 - (ii) Communications between individual Executive Directors' offices and the member country or countries they represent.
 - (iii) 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).

¹ For ease of reference, the Access to Information paragraph numbering is used for the relevant exceptions that are incorporated from the Access to Information Policy and set out in this Annex I to INT's Disclosure Policy.

² 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:
 - (i) Information whose disclosure would compromise the security of Bank staff and their families, contractors, other individuals, and Bank assets.
 - (ii) 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.
 - (iii) 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),³ the Inspection Panel (IP),⁴ the Integrity Vice Presidency (INT),⁵ and the WBG's sanctions process.⁶ 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.⁷

³ See IEG's disclosure policy statement.

⁴ 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.

⁵ 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.

⁶ This includes information whose disclosure is restricted under the *Sanctions Board Statute and the Sanctions Procedures*.

⁷ When a member country or a third party provides financial, business, proprietary, or other non-public information to INT with the understanding that it will not be disclosed, INT 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 WBG units 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) of the Access to Information Policy]. Material held by INT in which other parties 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.

- **[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.⁸
- **[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:
 - (i) 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.⁹
 - (ii) 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:
 - a. Verbatim transcripts of Board meetings and Board Committee meetings, and the Memoranda of the President that accompany Board papers.
 - b. Statements of Executive Directors and staff in the context of Board meetings or Board Committee meetings.
 - c. Reports to the Board from its Committees (Green Sheets) if subsequent Board discussion is expected.¹⁰

⁸ 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.

⁹ 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 the 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 the Access to Information Policy. 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 8 of this policy statement.

¹⁰ 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).

- d. Communications and memoranda originating in Executive Directors' offices relating to Board or Board Committee proceedings.
 - e. Miscellaneous memoranda or informal notes distributed to the full Board or to a Board Committee.¹¹
- (iii) 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).
 - (iv) 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:
 - (i) 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 transactions¹² generated by or for the Bank's treasury operations for the World Bank Group entities and other parties.
 - (ii) 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.
 - (iii) 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.¹³
 - (iv) Banking or billing information of World Bank Group entities, member countries, clients, donors, recipients, or vendors, including consultants.

¹¹ 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.

¹² This includes holdings, positions, and performance information for World Bank Group entities and other parties.

¹³ 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 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 1 July, 2010 (see OP/BP 10.02, *Financial Management*).

Annex II

Redaction Protocol

Prior to release of a final FIR or DIR, INT prepares a redacted report. INT will redact from its products information that falls under one or more categories of protected INT information under paragraph 10 of INT's Disclosure Policy, including:

- (i) Deliberative Information (including internal deliberations, recommendations and matters relating to internal control matters of the WBG);
- (ii) Information that could reasonably be expected to disclose the identity of a confidential source that furnished information on a confidential basis (including Voluntary Disclosure Program (VDP) participants);
- (iii) Information that would disclose investigative techniques, if such disclosure could reasonably be expected to risk circumvention of the law or WBG procedure by subjects of the investigation;
- (iv) Information that could reasonably be expected to endanger the life or physical safety of any individual;
- (v) Trade secrets and commercial or financial information that are privileged or confidential;
- (vi) Information that will be necessary to protect the investigative activity of a member government;
- (vii) Information regarding personnel information of WBG staff members restricted from disclosure under Bank Group Staff Rules;
- (viii) Information that is otherwise privileged or the subject of ongoing sanctions proceedings;
- (ix) Information, the disclosure of which could result in significant legal risk; and
- (x) Information that is otherwise restricted from disclosure by WB Access to Information Policy, or the respective disclosure policies of the IFC or MIGA.