



21 February 2008

President Robert Zoellick  
The World Bank  
1818 H Street, NW  
Washington, DC 20433

Re: Review of the World Bank's Information Disclosure Policy

Dear President Zoellick:

The Global Transparency Initiative (GTI) welcomes the World Bank's intention to review its Policy on Disclosure of Information (Disclosure Policy) and its commitment to improved transparency. The Disclosure Policy is a foundational instrument that not only demonstrates the Bank's commitment to transparency and accountability but also defines and facilitates external stakeholder understanding and engagement with the institution.

The World Bank's Disclosure Policy currently lacks many of the elements necessary to ensure the full exercise of the public's right to know in accordance with international standards. The right to access information held by public bodies, including inter-governmental organisations like the World Bank, is a fundamental and legally-binding human right, grounded in the right to "seek, receive and impart information and ideas", guaranteed under international law.<sup>1</sup> We very much hope that the forthcoming review will address these problems and demonstrate the World Bank's leadership in transparency among international financial institutions.

The GTI's *Transparency Charter for International Financial Institutions* identifies nine core principles that, if adopted, would bring the Bank in line with prevailing international standards and fundamentally improve the Bank's openness. We enclose a copy of the Charter with this letter, which has been shared earlier with many World Bank staff members.

Together with the Charter, we provide a number of process suggestions for the revision of the Disclosure Policy, given that the World Bank does not have standard procedures by which it engages stakeholders on policy and strategy revision processes. The Disclosure Policy review should, by definition, be characterized by precedent-setting levels of transparency and external stakeholder involvement. We believe these suggestions will improve the Bank's ability to collect needed and constructive input for the policy revision.

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<sup>1</sup> This right is guaranteed in Article 19 of the *Universal Declaration of Human Rights*, UN General Assembly Resolution 217A(III), 10 December 1948, widely viewed as legally binding as customary international law. It is also guaranteed at Article 19 of the *International Covenant on Civil and Political Rights*, adopted and opened for signature, ratification and accession by UN General Assembly Resolution 2200A (XXI), 16 December 1966, entered into force 3 January 1976.

We look forward to the forthcoming announcement of the Bank's Disclosure Policy revision plan as well as to engaging with the Bank on the strengthening of its transparency framework.

Sincerely, on behalf of the GTI,

A handwritten signature in black ink, appearing to read 'Chad', followed by a long horizontal line.

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cc: Mr. Jeffrey Gutman, Vice-President, Operations Policy and Country Services  
Mr. Marwan Muashar, Senior Vice-President, External Affairs  
Peter Harrold, Operations Policy and Country Services  
John Garrison, CSO Team, External Affairs



## **Process Suggestions for the Revision of World Bank Policy on Disclosure of Information**

The World Bank's Policy on Disclosure of Information is critical to defining and facilitating civil society interaction with the Bank. The revision process for this policy should, by definition, be characterized by precedent-setting levels of transparency and external stakeholder involvement, incorporating and building upon the best practices pursued in other policy revision processes conducted by the World Bank and other International Financial Institutions.

We believe that the adoption of the following recommendations will lay the foundation for meaningful civil society participation in the upcoming review.

### **1. Notification**

- Widely announce intention to revise the Disclosure Policy utilizing World Bank's External Affairs Department, Country Offices, as well as civil society networks and local media.
- Provide details of policy revision process and consultations and links to a dedicated website to be utilized for the entire review process.
- Provide adequate time frame to canvass input and to engage stakeholders. Given experiences with other significant IFI policy review processes, a minimum of nine months will likely be required.

### **2. Translations and Resource Materials**

- Provide translations of the draft revised policy and resource materials at a minimum in the major languages of the World Bank Group.
- Post resource material for the review on dedicated website, including background document explaining proposed changes to the policy, current disclosure policy, implementation reviews of current policy, draft revised policy, etc.
- As part of the background materials, the Bank should provide a list of all types of documents (both disclosed and restricted) that the Bank produces so stakeholders understand the universe of Bank documents. For civil society organizations, a clear guide to the Bank's documents related to the identification, design, appraisal, approval, supervision, and evaluation of Bank operations would be an important resource.

### **3. Electronic Comment and Regional Consultations**

- Provide portal for web-based comments on draft policy that is open to all readers (unless commentator opts out).
- Conduct regional and sub-regional consultations on the draft policy. Bank staff and civil society networks could provide feedback on the desire for consultations in regions. Resources should be provided to support civil society participation from groups in borrowing countries.

- Collaborate with expert facilitators or local organizations not tied to the Bank for the design and conduct of consultations. Ensure that design of consultations promotes active stakeholder participation through timely provision of translated materials, third-party facilitation, professional interpretation services, appropriate time allocation for stakeholder comment and discussion, and comprehensive minute taking and feedback.
- Records of consultations should be posted on the policy review website.

#### **4. Feedback**

- Synthesize input received and post a matrix indicating how input has been considered in development of a revised draft.

#### **5. Comment Period on Revised Draft**

- Post a revised draft for a brief electronic comment period (minimum of 30 days) that so stakeholders can evaluate how prior input was considered and to provide further comment. (It should be noted that disclosure of a revised policy draft for public comment is established procedure at the Asian Development Bank and the International Finance Corporation posted revised drafts of their disclosure policy and performance standards for 60 days of public comment during the revision of those policies.)

#### **6. Policy Approval**

- Disclose final draft policy at the same time that it is distributed to the Board to provide stakeholders an opportunity to understand how their final input was used and to raise any final concerns with their country representatives. (It should be noted that simultaneous disclosure of draft policies to the Board and public had been proposed in the World Bank's "Policy on Disclosure of Information– Additional Issues" paper of 2005).
- Provide Executive Directors both a summary and a complete copy of the comments received during the consultations, including a matrix of key recommendations and Bank responses, together with final draft policy.

We hope that the above recommendations will help the World Bank to design and implement a thorough and participatory review process of its disclosure policy. We look forward to discussing these recommendations with you in the near future.