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# Assessing World Bank Openness: A Transparency Scorecard



Global Transparency Initiative  
Transparency Charter

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The **Global Transparency Initiative** (GTI) is a network of civil society organisations promoting openness in the International Financial Institutions (IFIs), such as the World Bank, the IMF, the European Investment Bank and regional development banks. The GTI believes the people have a right to information from public institutions and a right to participate in the development policies and projects that affect their lives.

The Transparency Scorecard was prepared for the launch of the GTI Transparency Charter for International Financial Institutions. It was developed by the **Bank Information Center** (BIC), an independent, non-profit, non-governmental organization that advocates for the protection of rights, participation, transparency, and public accountability in the governance and operations of the World Bank, regional development banks, and IMF. BIC is a member of the GTI.

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# Assessing World Bank Openness: A Transparency Scorecard

*The Transparency Scorecard is based on the principles outlined in the Transparency Charter for International Financial Institutions (IFI) and the baseline research available in the IFI Transparency Resource.<sup>1</sup>*

## How open is the World Bank?

How open are the World Bank and its private sector lending arms – the International Finance Corporation (IFC) and Multilateral Investment Guarantee Agency (MIGA)? Compared to 15 years ago, the World Bank Group (WBG) discloses significantly more information about its operations. The adoption of disclosure policies at each branch of the Group provides guidelines for the disclosure of basic institutional, country and project-specific information. Furthermore, long-standing debates around the social and environmental impacts of WBG-financed operations have led to greater disclosure at the project level. Even more broadly, challenges to the secrecy surrounding the governance of international financial institutions (IFIs) have forced the Bank Group to routinely provide more access to institutional information and decision-making processes. However, civil society groups continue to highlight persistent problems regarding access to information thereby questioning whether the WBG’s improvements have gone far enough.

In an effort to advance the debate around access to information, the Global Transparency Initiative (GTI), a network of civil society organizations promoting openness at public international bodies, has developed a Transparency Charter for International Financial Institutions. The Charter lists nine “openness” principles for IFIs which are based on the right of individuals and groups to access information from public bodies and the responsibilities of the IFIs to uphold that right.

The Charter principles suggest several criteria against which to evaluate WBG disclosure standards. First, it is important to examine the types of information the WBG makes publicly available and whether this information provides access to decision-making. In this vein, criteria such as giving advance notice, disclosing draft information, and opening meetings to the public are essential to ensuring that intended beneficiaries of development funds can influence how funds are used and monitor whether they are meeting development objectives. Second, examining the World Bank Group’s disclosure systems is important for determining whether those systems (a) uphold the presumption of information disclosure barring a legitimate reason for confidentiality; (b) establish process guarantees for information requests so the public can, for example, anticipate when a reply will be provided; and (c) allow for an appeals process in the case of requests that have been unreasonably denied. Finally, it is necessary to consider how the

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<sup>1</sup> See the Transparency Charter for IFIs at [www.ifitransparency.org](http://www.ifitransparency.org) and the IFI Transparency Resource at [www.ifitransparencyresource.org](http://www.ifitransparencyresource.org).

right to information is protected, through evaluating rules for the protection of whistleblowers, requirements for regular review of transparency standards, and procedures for the active promotion of openness—internally through corporate incentive programs and externally through dissemination and translation strategies.

A critical analysis of these issues suggests that the World Bank Group continues to use an overly complex, regulatory approach to disclosure, while failing to establish systems that would more fully realize the public’s right to know. The WBG disclosure policies are focused on publicly releasing select documents, while all other information remains confidential unless specifically approved for disclosure. This contradicts the presumption of disclosure, a rhetorical commitment made in WBG disclosure policies.

Transparency is a dynamic topic and the debate around openness standards has advanced significantly in the past several years. At the national level, more than 60 countries have adopted freedom of information legislation. In the private sector, voluntary reporting principles are increasingly becoming the norm. In the context of development, access to information has gained recognition as a critical factor for improving development effectiveness that both boosts informed stakeholder participation and enhances accountability of decision-makers. To fully harness the benefits of transparency, the World Bank Group needs a paradigm shift. It must move away from interpreting disclosure as a limited set of procedural obligations to more fully embracing transparency in all of its operations. In this way, disclosure of information becomes an effective tool for the public, civil society organizations, and international institutions to help improve development outcomes.

## **WBG standards and the GTI’s Transparency Charter**

In order to assess how the World Bank (IBRD/IDA), IFC and MIGA are meeting the openness principles provided in the Transparency Charter, the GTI has developed the Transparency Scorecard. The Scorecard reflects research based on the *IFI Transparency Resource*—an online database of over 200 indicators of transparency for IFIs—and dissects each Charter principle into a set of openness indicators. For each indicator, the Bank, IFC and MIGA are graded “acceptable,” “needs improvement,” or “unacceptable.”

### **Principle 1: The Right of Access**

The World Bank Group has taken the first step towards recognizing the right to information through the establishment and ongoing development of disclosure policies. While the policies of the Bank, IFC and MIGA each state a presumption in favor of disclosure, typically known as a principle of maximum disclosure, this principle is not implemented in practice. Instead, the policies are, in effect, publication schemes which provide a list of information that will be disclosed, while all other information is kept confidential. In this way, the scope of the disclosure policies is limited. Typically, transparency rules apply only to the types of information listed in the policies while other information held by the institution is not subject to disclosure even if there is no legitimate reason for confidentiality.

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### **Principle 2: Automatic Disclosure**

The WBG allows for the routine disclosure of a number of documents. Basic information about each branch of the institution is generally publicly accessible from the internet. A notable discrepancy is the lack of public access to WBG contact information—an area where the Bank Group has taken a step backwards in recent years. While financial information is available across the WBG, access to budgetary information at IFC and MIGA is missing. Most World Bank and IFC institutional policies, strategies and guidelines can be found on their websites. Less information is available about the institutions' operations at the country and investment level. Generally, there is limited information disclosed regarding projects under implementation at the Bank, IFC and MIGA and some upstream country analyses conducted by the World Bank are kept confidential. In recent years, the WBG has disclosed more information on evaluations and performance audits. However, the restructuring of the evaluation units in 2006 has caused confusion as to what they produce and publicly disclose.

### **Principle 3: Access to Decision-Making**

While the WBG routinely discloses a range of information, much of this does not facilitate public access to decision-making around the design, development and monitoring of core operations. In WBG-sponsored activities, such as the development of institutional policies and country strategies or identification, design, and assessment of projects, the public should be able to anticipate upcoming processes and have a complete understanding of the consultation plans, benchmarks, and key decision dates. In addition, it is critically important for successive versions of draft documents to be disclosed in order to afford the public an opportunity to provide input into policy, strategy or project development. Open decision-making systems also help the public understand how their input is being considered and how their views are discussed or represented at decision-making meetings.

In general, the Bank provides greater advance notice and access to draft information than either the IFC or MIGA. MIGA, notably, provides practically no public access to decision-making. Access to information on Board of Directors' meetings is increasing. Agendas and minutes of Board meetings are largely available (although MIGA has not yet formally required disclosure of this information). However, full transcripts and prepared written statements from Executive Directors remain confidential and the meetings remain closed to the public. Finally, under the access to decision-making principle, the IFI's have a responsibility to widely disseminate information for use in participation processes (e.g., draft documents) through culturally appropriate means and in appropriate languages. For projects with significant impacts, the WBG is required to provide social and environmental information in an accessible form and in the language of local communities. The WBG also has strategies for improving its public information centers and the broader translation of documents, but it is unclear what parts of these strategies have been implemented and what they have achieved.

### **Principle 4: Right to Request Information**

Historically, the WBG and other IFIs have focused their transparency rules on making a series of specific documents publicly available on their websites. However, they have not developed robust rules on whether or how the public can access information that is not automatically disclosed through the internet or public information centers. In its last disclosure policy review, the IFC began to address this issue by clearly indicating where requests for information can be

sent and in what time frame the requestor can expect a response. In addition, the IFC states that it will attempt to respond to requests in relevant languages.

Nonetheless, while the IFC has begun to make progress in this area, the World Bank Group as a whole must put in place a number of process guarantees to ensure that the right to request information is completely realized. Among other things, the WBG should provide assistance to requestors who may not fully understand all WBG operations and need help formulating their requests. The Bank has begun to produce a document register which lists all information produced by the institution but, currently, the register is neither easy to find on the website nor is it complete. Furthermore, the Bank does not clearly indicate where requests for information can be sent and neither the Bank nor MIGA specify maximum timelines in which requestors will receive a response. None of the arms of the WBG have committed to disclose documents in their entirety or to note and justify redactions. Each of the institutions charge fees for hard (paper) copies of some information. Fee waivers are possible and include the provision of information free of charge to those in WBG borrowing countries. Lastly, none of the institutions guarantee that information will be sent to the requestor in the form requested.

### **Principle 5: Limited Exceptions**

Disclosure “exceptions” are the means by which an institution can keep information confidential. Exceptions should be narrowly-drawn, so as not to apply to any and all information, and should clearly state the possible harm that may result if the information was disclosed. To date, the disclosure exceptions included in the Bank, IFC and MIGA policies are overly broad and not based on a test of harm. (One exception in MIGA disclosure policy is more narrowly drawn however, taken together with other exceptions, the set is very broad.) Without stricter exceptions, disclosure systems cannot effectively operate; vague provisions allow the institution to decide on a discretionary basis which information should be disclosed and which must be kept confidential. By including a waiver of confidentiality in the case that information would likely prevent harm to public health or safety or avert serious damage to the environment or community, the IFC alone has made some progress on its approach to exceptions. Unfortunately, only senior management is empowered to identify and act upon these exceptional circumstances. Allowing the public to propose waivers of confidentiality when in the public interest, and authorizing an independent body to decide on the outcome, would be a preferable alternative.

### **Principle 6: Appeals**

Anyone who believes that an IFI has wrongly denied their request for information should have the right to have the matter reviewed by an independent and authoritative body. While the WBG and other multilateral development banks have established semi-independent accountability mechanisms, these entities are often not appropriate venues to review disclosure policy appeals. The World Bank’s Inspection Panel sets a high threshold for inspection and the inspection itself is a long and arduous process. The structure and scope of the Compliance Advisor/Ombudsman (CAO) office of the IFC and MIGA make it more suited to disclosure policy appeals, but it is unclear how appeals to this office would function in practice. Although the concept of disclosure policy appeals is relatively new for the IFIs, in 2006 the IFC (along with the Asian Development Bank in 2005) established an internal, administrative appeals process. The Disclosure Policy Advisor, who reports directly to IFC’s Executive Vice President, will receive and review complaints from the public if “a requester believes that a request for information from IFC has

been unreasonably denied, or that this Policy has been interpreted incorrectly.” This is an important and positive first step for the IFC. The other branches of the World Bank group should follow the IFC’s lead.

### **Principle 7: Whistleblower Protections**

Disclosures by whistleblowers, or those acting in good faith to expose wrongdoings, should be protected and individuals should be fully confident that their actions towards greater openness of the institution will not put them in jeopardy. This section of the Scorecard is based on the Government Accountability Project’s ([www.whistleblower.org](http://www.whistleblower.org)) detailed index of the WBG’s whistleblower protections. Although the Bank Group has some positive features of its whistleblower policy including appropriate burden of proof standards and relief for whistleblowers, there are still several important shortcomings. For instance, the scope of the policy is limited to staff (the WBG’s numerous consultants are not covered); there is no truly independent forum for adjudication; and there is no record of the institution’s actions to correct and prevent future wrongdoings exposed through whistleblower disclosure.

### **Principle 8: Promotion of Freedom of Information**

The promotion of freedom of information relates to the WBG’s commitment to prioritizing implementation of its disclosure policy and emphasizing openness in all its activities. It is difficult to adequately measure to what extent the Bank Group is promoting access to information. It is not clear if and when the WBG conducts staff trainings on the disclosure policy and there is no information on how proper implementation of openness principles and rules form part of the staff incentive or evaluation procedures. Furthermore, it is unclear whether sanctions exist for the purposeful violation of the disclosure policy. Finally, while a records management system exists at each arm of the WBG, only the IFC has clearly indicated that it will track and report on the disclosure of and requests for information.

### **Principle 9: Regular Review**

Transparency is a rapidly evolving concept. Therefore, the more openness becomes the norm, more public disclosure is expected. At the WBG, only the IFC commits to continually “monitor and report” on the implementation and effectiveness of its disclosure policy. Also, while the Bank has reviewed and evaluated its original disclosure policy at least once and MIGA is scheduled to conduct a policy review in 2006, neither makes firm commitments to do so on a regular basis. It is only the IFC that has pledged to conduct a comprehensive review within 5 years.

## **What can the Bank do?**

The Transparency Scorecard provides the WBG with a checklist of issues that should be addressed in order to improve its openness. Among other things, next steps for the Bank, IFC and MIGA should include:

- 1. Assessing implementation:** Conduct a comprehensive and participatory evaluation of disclosure policy implementation and progress made in implementing the Strategy for Strengthening Public Information Centers and the Translation Framework.

- 2. Enhancing external accountability for disclosure decision:** Immediately address the areas of the disclosure policies that constrain the WBG's ability to fulfill its responsibilities regarding the public's right to know. Specifically, this would include reviewing the list of exceptions to disclosure; developing process guarantees for a request-driven disclosure system; and establishing both an administrative and independent appeals processes across the Bank Group to help ensure disclosure accountability.
- 3. Improving internal procedures to protect and promote openness:** Ensure that whistleblower rules are fully comprehensive and that internal incentive and sanction structures promote disclosure policy compliance.

The World Bank Group has come a long way towards openness in the last 15 years. However, when comparing its transparency standards against the principles in the GTI's Transparency Charter for IFIs, it is evident how much further it must go. The Bank should re-examine its approach to disclosure and address issues of persistent secrecy throughout its operations. At local, national and international levels, through the public and private sectors, the right to access information is expanding. It is now time to focus on applying these standards to the IFIs so that the public can claim its right to know.

# Transparency Scorecard World Bank Group



## Principle 1. The Right of Access

	WB	IFC	MIGA
Disclosure Policy	✓	✓	✓
Maximum disclosure	~	~	~
Comprehensive scope	✗	✗	✗

## Principle 2. Automatic Disclosure

	WB	IFC	MIGA
Basic institutional information	✓	✓	✓
Directory of contact information	✗	✗	✗
Financial and budgetary information	✓	~	~
Institutional policies, strategies and procedures	✓	✓	~
Country analyses and strategies	~	~	NA
Project and program information	✓	~	✗
Institutional performance audits and evaluations	✓	~	✗

## Principle 3. Access to Decision-Making

	WB	IFC	MIGA
Advance notice	~	✗	✗
Timely access to iterative project and program documents throughout the operational cycle	~	~	✗
Agendas and minutes of Board meetings	✓	✓	✗
Transcripts of Board meetings	✗	✗	✗
Open Board meetings	✗	✗	✗
Dissemination and translation strategy	~	~	~

## Principle 4. Right to request information

	WB	IFC	MIGA
Clarity on how to submit a request for information	~	✓	✓
Document register	~	✗	✗
Prescribed timelines	✗	~	✗
Obligation to disclose whole documents, justifying any redactions	✗	✗	✗
Appropriate fees, possibility of fee waiver	~	~	~
Rules on the right to specify the form of receipt and language of information	✗	~	✗

## Principle 5. Limited Exceptions

	WB	IFC	MIGA
Narrowly drawn exceptions to disclosure	✗	✗	✗
Harm-based exceptions	✗	✗	✗
Public interest override	✗	~	✗

## Principle 6. Appeals

	WB	IFC	MIGA
Administrative appeals	✗	✓	✗
Independent appeals	✗	✗	✗
Appeals disposed of in a timely fashion	NA	NA	NA
Enforcement of recommendations	NA	NA	NA

## Principle 7. Whistleblower Protections

	WB	IFC	MIGA
Broad coverage of policy	~	~	~
Independent adjudication forum	✗	✗	✗
Fair burden of proof rules	~	~	~
Comprehensive relief, including reinstatement	~	~	~
Corrective action	✗	✗	✗

## Principle 8. Promotion of Freedom of Information

	WB	IFC	MIGA
IFI staff training on access to information rules	~	~	✗
Access to information as part of the corporate incentive structures and staff evaluation procedures	✗	✗	✗
Requests tracking and records management	~	✓	~
Individual sanctions for willful obstruction of access to information	✗	✗	✗

## Principle 9. Regular Review

	WB	IFC	MIGA
Periodic disclosure policy reviews	~	✓	~
Annual review of disclosure policy implementation and effectiveness	✗	✓	✗

# Transparency Scorecard

## World Bank Group



### Legend

Scores are based on research available in the IFI Transparency Resource (IFITR) ( <a href="http://www.ifitransparencyresource.org">www.ifitransparencyresource.org</a> ). For a complete list of relevant IFITR reference indicators, please see Annex 1.	✓	~	✗
	<b>Acceptable.</b> The institution has adequate transparency policy in place.	<b>Needs Improvement.</b> The institution's policies provide for partial disclosure or disclosure on an occasional basis.	<b>Unacceptable.</b> The institution does not have policy requirements that meet the transparency indicator.

## Principle 1. Right of Access

*The right to access information is a fundamental human right which applies to, among other things, information held by international financial institutions, regardless of who produced the document and whether the information relates to a public or private actor.*

	World Bank	IFC	MIGA
<b>Disclosure policy</b> <i>Transparency rules are established and articulated in a binding institutional policy</i>	✓	✓	✓
	The Bank established a disclosure policy in 1994.	IFC established a disclosure policy in 1997.	MIGA established a disclosure policy in 1999.
<b>Maximum disclosure</b> <i>Disclosure rules are based on a presumption of access subject to limited exceptions</i>	~	~	~
	The Bank's policy states a "presumption in favor of disclosure" and includes a list of constraints. However, the presumption is not implemented in practice.	The IFC's policy states a "presumption in favor of disclosure" and includes a list of exceptions. However, the presumption is not implemented in practice.	MIGA's policy states a "presumption in favor of disclosure" and includes a list of exceptions. However, the presumption is not implemented in practice.
<b>Comprehensive scope</b> <i>Disclosure rules apply to all information held by the institution</i>	✗	✗	✗
	Disclosure rules only apply to information specifically mentioned in the disclosure policy.	Disclosure rules only apply to "institutional information" and "information regarding activities supported by IFC."	Disclosure rules only apply to information specifically mentioned in the disclosure policy.

## Principle 2. Automatic Disclosure

*International financial institutions should automatically disclose and broadly disseminate, for free, a wide range of information about their structures, finances, policies and procedures, decision-making processes, and country and project work.*

	World Bank	IFC	MIGA
<b>Basic institutional information</b> <i>Founding documents including the statutes and by-laws of the institution, and basic information on the organizational structure</i>	✓	✓	✓
	Legal documentation including the Bank's Articles of Agreement and by-laws can be found on the Bank's website along with an organizational chart.	Legal documentation including IFC's Articles of Agreement and by-laws can be found on the IFC's website along with an organizational chart.	Legal documentation including the Convention establishing MIGA, MIGA's by-laws and an organizational chart can be found on or ordered from MIGA's website.
<b>Directory of contact information</b> <i>Detailed contact information (including title, phone, fax, email and mailing address) for the various departments and staff that make up the institution, including the various country offices located outside of the institution's headquarters</i>	✗	✗	✗
	The disclosure policy states that the staff directory is publicly available, but the Bank stopped disclosing a public version in 2006. The Bank provides an inconsistent degree of contact information for departments and staff throughout its website. The bank identifies area and thematic experts on its website but guides the public to Media Relations for contact.	There is no policy requirement to disclose staff contact information and no directory is publicly available. IFC lists names of senior management on its website and in its annual report.	There is no policy requirement to disclose staff contact information and no directory is publicly available. MIGA provides contact information for a small number of department heads on its website and gives names of the senior management team without contact information.

	World Bank	IFC	MIGA
<b>Financial and budgetary information</b> <i>Detailed description of the financial position each fiscal year and estimates of all expenditures and outlays as well as information about the operational budgets of individual departments and units within the institution</i>	✓	~	~
	The disclosure policy provides for public access to annual audited financial statements, the annual report, and administrative budget. The bank releases a wide range of other financial information.	IFC disclosure policy provides for disclosure of annual audited financial statements, an annual report and quarterly financial statements. IFC policy requires the disclosure of the Budget and Business Plan, but it is not yet available online.	MIGA'S disclosure policy provides for disclosure of annual audited financial statements and an annual report. MIGA does not disclose a detailed operational budget.
<b>Institutional policies, strategies and procedures</b> <i>Overall plans that outline the general goals, overarching development objectives, administrative functioning, and the procedures by which all the operations of the institution are developed and implemented</i>	✓	✓	~
	The WB discloses its final policies and strategies, after their approval by the Board. In addition, the World Bank makes a wide range of guidelines, including its Staff Manual, available to the public.	IFC discloses all policies that are approved by IFC's Board of Directors "unless the Board decides that disclosure may have an adverse impact on the financial condition or business interests of IFC." It is unclear if other IFC procedures, staff manuals and guidelines are publicly available.	"MIGA produces booklets and reports describing its investment policies and procedures, which are periodically updated." However, only a few policy papers are available on MIGA's website, and it makes no mention of others.
<b>Country analyses and strategies</b> <i>Reports that examine a borrowing member country's economic status, lending portfolio, and various country-specific themes or issues; these can include poverty strategies, environmental strategies, and general country strategies</i>	~	~	NA
	The World Bank discloses most Country Assistance Strategies, in their final form, along with a number of other country studies. However, it does not disclose all country Economic and Social Work, Country Portfolio and Performance Reviews.	IFC discloses Country Assistance Strategies jointly prepared with the World Bank "in accordance with the World Bank's Policy on Disclosure of Information." It is unclear what other country documents are produced and available from IFC.	MIGA does not prepare country strategies or analyses.
<b>Project and program information</b> <i>Documents related to a specific lending, grant, investment or guarantee operation available on an anticipated basis throughout the project or program cycle including:</i> <ul style="list-style-type: none"> <li>▪ Project or program documents</li> <li>▪ Social and environmental documents</li> <li>▪ Supervision and monitoring reports</li> <li>▪ Completion and evaluation reports</li> </ul>	✓	~	✗
	The Bank releases a number of project documents including Project Information Documents and Environmental Assessments before project approval and Project Appraisal Document (PAD) or Program Document (PDs), Loan Agreements and Implementation Completion Reports after approval by the Board of Directors. In addition, the Bank produces a very brief summary of projects under implementation on an annual basis. The Bank does not disclose staff supervision and monitoring reports.	IFC discloses a brief project summary about each of its operations and social and environmental information about projects with adverse negative impacts. IFC does not disclose Project Board Reports or Loan Agreements. IFC requires the disclosure of an "Action Plan", annual reports on Action Plan implementation and some "ongoing" information to communities in the project area. IFC does not require client disclosure of Annual Monitoring Reports or completion and evaluation reports.	MIGA discloses little information about its guarantees. It publishes a quarterly report with brief summaries of projects insured by MIGA and requires clients to disclose environmental assessments. MIGA does not require the disclosure of detailed Board reports or contracts.
<b>Institutional performance audits and evaluations</b> <i>Assessments of the institutions' operations, impacts, and performance that are carried out by internal evaluation units</i>	✓	~	✗
	The WB Independent Evaluation Group (IEG) discloses a wide range of project, country, sector or thematic evaluations, including: the Annual Report on Operations Evaluations; Project Performance Assessment Reports (PPARs); Impact Evaluation Reports (IERs); and Country Assistance Evaluations.	IEG-IFC discloses sector, thematic and country evaluations, including Country Impact Reviews. However, key project evaluations such as Expanded Project Supervision Reports and Project Evaluation Summaries, and complete annual portfolio reviews, such as the Annual Review of Evaluations Findings, are not disclosed.	According to available research, there are no specific rules governing disclosure of IEG-MIGA products. IEG-MIGA makes "annual reports" available on its website, but complete evaluation reports are not available.

## Principle 3. Access to Decision-Making

*International financial institutions should disseminate information which facilitates informed participation in decision-making in a timely fashion, including draft documents, and in a manner that ensures that those affected and interested stakeholders can effectively access and understand it; they should also establish a presumption of public access to key meetings.*

	World Bank	IFC	MIGA
<p><b>Advance notice</b> This includes access to, among other things: timelines for the development of policies and strategies, projects and programs cycles, consultation plans, and key dates for decisions</p>	~	×	×
<p>The Bank discloses a project cycle and some key dates for decisions on projects, programs and policies. However, it does not require advance notice of policy reviews or the development of country strategies or analyses.</p>		While IFC makes information on some policy reviews and investment decision dates available in advance, advance notice of decision-making processes is very limited and no policy requirement for this exists.	MIGA does not require or provide on a routine basis advance notice to its policy and strategy or guarantee and operations decision-making processes.
<p><b>Timely access to iterative draft documents</b> The provision of iterative versions (at least one draft and one final draft) of documents related to core operations in sufficient advance of document finalization -; core operations include:</p> <ul style="list-style-type: none"> <li>Policy and strategy formulation</li> <li>Country strategy formulation</li> <li>Project and program development</li> <li>Social and environmental assessment</li> </ul>	~	~	×
<p>The Bank requires the disclosure of at least one draft social and environmental assessment document for medium and high-risk projects early in project preparation. The Bank requires the release of a project summary several months before project approval. The Bank does not disclose draft project documents. On an <i>ad hoc</i> basis, the Bank discloses draft operational policies and draft country strategies under review or development. The Bank has a pilot program to disclose final draft operational policies, but has not yet implemented this program.</p>		IFC requires its clients to disclose social and environmental information "early" in the assessment process and, for projects with significant impacts, to engage in "free, prior, informed consultation" with affected communities. These concepts imply, but do not specify, availability of draft documents for such projects. The IFC does not release draft investment information nor does it disclose investment summaries in a timely manner (prior to 60 days) before finalization. IFC may disclose one or more draft policies if they are "likely to have a broad impact on IFC's operations or a direct impact on communities."	MIGA does not provide any information early in the development of its guarantee operations. It does not disclose draft guarantee documents. MIGA does require, for high-impact projects, that the project sponsor disclose "relevant materials in a timely manner in a form and language that are understandable to the groups being consulted." MIGA may, on an <i>ad hoc</i> basis, disclose draft policies for public comments.
<p><b>Agendas and minutes of Board meetings</b> A list, plan or outline of matters scheduled for discussion by the Board of Directors, organized according to the specific days upon which the discussions are scheduled to take place, followed by a record of official business conducted and formal decisions taken, including voting records</p>	✓	✓	×
<p>A publicly available monthly calendar lists some issues to be discussed at upcoming Board meetings. Minutes of the Board of Directors meetings are publicly available and include: directors, officers and staff in attendance, approval of the previous minutes, titles and agendas, agreements and decisions reached, and names of Directors wishing to be recorded as abstaining or objecting.</p>		A publicly available monthly calendar lists a very limited number of issues to be discussed at upcoming Board meetings. Minutes of the Board of Directors meetings are publicly available and include: directors, officers and staff in attendance, approval of the previous minutes, titles and agendas, agreements and decisions reached, and names of Directors wishing to be recorded as abstaining or objecting.	A publicly available monthly calendar lists a very limited number of issues to be discussed at upcoming Board meetings. MIGA does not require the disclosure of Board meeting minutes.
<p><b>Transcripts of Board meetings</b> A verbatim account of a meeting of the Board of Directors including any statements (written or oral) provided by individual participants</p>	×	×	×
<p>There are no publicly available transcripts of meetings; there are no publicly available written statements from meeting participants.</p>		There are no publicly available transcripts of meetings; there are no publicly available written statements from meeting participants.	There are no publicly available transcripts of meetings; there are no publicly available written statements from meeting participants.
<p><b>Open Board meetings</b> The public and press are allowed to view the meetings of the Board of Executive Directors</p>	×	×	×
<p>The meetings of the Board of Directors are not open to the public.</p>		The meetings of the Board of Directors are not open to the public.	The meetings of the Board of Directors are not open to the public.
<p><b>Dissemination and translation strategy</b> A plan of action outlining how to expand communications and improve the provision of information as well as respond to public demand; this includes ensuring the provision of information in appropriate forms and languages</p>	~	~	~
<p>The World Bank Group has a strategy on improving public information centers and a framework on translation of Bank Group documents but, to date, it is unclear how either of these are being implemented. For projects with significant impacts, the Bank is required to provide social and environmental information in an accessible form and language to local communities.</p>		The World Bank Group has a strategy on improving public information centers and a framework on translation of Bank Group documents but, to date, it is unclear how either of these are being implemented. For projects with significant impacts, IFC is required to provide social and environmental information in an accessible form and language to local communities.	The World Bank Group has a strategy on improving public information centers and a framework on translation of Bank Group documents but, to date, it is unclear how either of these are being implemented. For projects with significant impacts, MIGA is required to provide social and environmental information in an accessible form and language to local communities.

## Principle 4. The Right to Request Information

*Everyone has the right to request and to receive information from international financial institutions, subject only to a limited regime of exceptions, and the procedures for processing such requests should be simple, quick and free or low-cost.*

	World Bank	IFC	MIGA
<p><b>Clarity on how to submit a request for information</b></p> <p><i>Clear identification of where requests for information can be sent, in what form and language, and how assistance will be provided to requestors who have difficulty formulating their requests</i></p>	~	✓	✓
<p><b>Document register</b></p> <p><i>A catalogue of all documents produced and held by the institution including the document name and a brief description of the document's function, content and disclosure status</i></p>	~	✗	✗
<p><b>Prescribed timelines</b></p> <p><i>Timetable for processing information requests including clear maximum time limits for acknowledging the receipt of a request and providing a full response (within 15 days)</i></p>	✗	~	✗
<p><b>Obligation to disclose whole documents, justifying any redactions</b></p> <p><i>In every case possible, entire texts or documents are disclosed and redactions of any confidential information are justified</i></p>	✗	✗	✗
<p><b>Appropriate fees, possibility of fee waiver</b></p> <p><i>Reasonable charges related to the materials provided in response to information requests, including fee waiver procedures</i></p>	~	~	~
<p><b>Rules on the right to specify the form of receipt and language of information</b></p> <p><i>Guidelines regarding the requestors' prerogative to specify in what form they would like to receive the information, i.e. electronic or hardcopy, and, when reasonable, in what language</i></p>	✗	~	✗

## Principle 5. Limited Exceptions

The regime of exceptions should be based on the principle that access to information may be refused only where the international financial institution can demonstrate (i) that disclosure would cause serious harm to one of a set of clearly and narrowly defined, and broadly accepted, interests, which are specifically listed; and (ii) that the harm to this interest outweighs the public interest in disclosure.

	World Bank	IFC	MIGA
<b>Narrowly drawn exceptions to disclosure</b> <i>The scope of exceptions apply to a specific type of information so as to limit broad interpretation and, at the same time, not exempt entire categories of documents</i>	✗	✗	✗
	Most of the World Bank's disclosure exceptions are broadly drawn and could relate to almost all information held by the institution. Among other things, the "constraints" apply to: all information referred to in the Disclosure Policy; proceedings of the Board of Directors; third party information; internal documents; and information related to the deliberative process.	Most of the IFC's disclosure exceptions are broadly drawn. Among other things, IFC will not disclose: "communications" that relate to "the deliberative process" and "any internal documents."	Most of MIGA's disclosure exceptions are broadly drawn. While MIGA lists one more narrowly drawn exception ("evaluations of future economic and political scenarios, legal assessment of projects, and related reports"), others, like documents "that are related to the decision-making processes," could apply to a vast amount of information held by MIGA.
<b>Harm-based exceptions</b> <i>Exceptions indicate that disclosure would cause serious harm to legitimate interests</i>	✗	✗	✗
	Many of the World Bank's disclosure policy exceptions are not harm-based.	Many of IFC's disclosure policy exceptions are not harm-based.	Many of MIGA's disclosure policy exceptions are not harm-based.
<b>Public interest override to exceptions</b> <i>In cases where information falls within the definition of confidential, disclosure will nonetheless occur if access to information would protect the public interest including human health, livelihood or property</i>	✗	~	✗
	The World Bank does not have a public interest override for normally confidential information.	The IFC may disclose information that is normally confidential if disclosure "would be likely to avert imminent and serious harm to public health or safety, and/or imminent and significant adverse impacts on the environment." However, Senior IFC Management is the only party given authority to make that decision and IFC only makes such disclosure "after informing a client of IFC's concerns and considering the client's plans to address and mitigate the potential harm involved."	MIGA does not have a public interest override for normally confidential information.

## Principle 6. Appeals

Anyone who believes that an international financial institution has failed to respect its access to information policy, including through a refusal to provide information in response to a request, has the right to have the matter reviewed by an independent and authoritative body.

	World Bank	IFC	MIGA
<b>Administrative appeals</b> <i>An internal review that has full discretion in interpreting the policy and authority in overturning a denial of information</i>	✗	✓	✗
	Administrative appeals are not available.	The IFC allows for an appeal to the Disclosure Policy Advisor, "if a requester believes that a request for information from IFC has been unreasonably denied, or that this Policy has been interpreted incorrectly." The Disclosure Policy Advisory reports directly to IFC's Executive Vice President."	Administrative appeals are not available.
<b>Independent appeals</b> <i>A body that is wholly independent from the institution, vested with the power to consider disclosure appeals, and whose interpretation of the policy and the resulting decisions are binding</i>	✗	✗	✗
	Independent appeals are not available.	Independent appeals are not available.	Independent appeals are not available.
<b>Appeals disposed of in a timely fashion</b> <i>Decisions are transparent and considered in brief timeframes; delays in consideration and the handing down of the decision are anticipated and justified</i>	NA	NA	NA
	Not applicable because appeals process does not exist.	Not applicable because it is a new procedure that has not been tested.	Not applicable because appeals process does not exist.

	World Bank	IFC	MIGA
<b>Enforcement of recommendations</b> <i>Recommendations, interpretations, and decisions of the appeals body are adhered to in terms of immediate action and future interpretation of the policy</i>	NA Not applicable because appeals process does not exist.	NA Not applicable because there is a new procedure that has not been tested.	NA Not applicable because appeals process does not exist.

## Principle 7. Whistleblower Protections

*Whistleblowers – individuals who in good faith disclose information revealing a concern about wrongdoing, corruption or other malpractices – should expressly be protected from any sanction, reprisal, or professional or personal detriment, as a result of having made that disclosure.<sup>1,2,3</sup>*

	World Bank	IFC	MIGA
<b>Broad coverage of policy</b> <i>Scope of whistleblower protections articulates types of disclosure that are protected and who is covered</i>	~ Only staff, not consultants or others, are covered by the WBG Whistleblower Policy. However, the Bank does have adequate protections against the full scope of potential harassment and provides assistance to guide whistleblowers through possible options.	~ Only staff, not consultants or others, are covered by the WBG Whistleblower Policy. However, the Bank does have adequate protections against the full scope of potential harassment and provides assistance to guide whistleblowers through possible options.	~ Only staff, not consultants or others, are covered by the WBG Whistleblower Policy. However, the Bank does have adequate protections against the full scope of potential harassment and provides assistance to guide whistleblowers through possible options.
<b>Independent adjudication forum</b> <i>A forum to adjudicate a whistleblower's rights which is independent from the institution, free from institutional conflicts of interest, operating under rules of due process and which can pass binding judgments in whistleblower cases</i>	✗ Current policy fails to provide a forum for the whistleblower's defense of his or her rights that is free of institutional self-interest due to, in part, the lack of independence of adjudicators, the lack of a verifiable record of appeals and the arbitrary substitution of secret investigations for due process rights.	✗ Current policy fails to provide a forum for the whistleblower's defense of his or her rights that is free of institutional self-interest due to, in part, the lack of independence of adjudicators, the lack of a verifiable record of appeals and the arbitrary substitution of secret investigations for due process rights.	✗ Current policy fails to provide a forum for the whistleblower's defense of his or her rights that is free of institutional self-interest, partially due to the lack of independence of adjudicators, the lack of a verifiable record of appeals and the arbitrary substitution of secret investigations for due process rights.
<b>Fair burden of proof rules</b> <i>Fair and impartial standards that must be met in order to establish that a disclosure has standing under the whistleblower policy</i>	~ The WBG has some appropriate, objective standards to determine whether a disclosure deserves protection and provides a realistic statute of limitations time frame. But, it also includes subjective tests (of "good faith") that put an employee's motives on trial.	~ The WBG has some appropriate, objective standards to determine whether a disclosure deserves protection and provides a realistic statute of limitations time frame. But, it also includes subjective tests (of "good faith") that put an employee's motives on trial.	~ The WBG has some appropriate, objective standards to determine whether a disclosure deserves protection and provides a realistic statute of limitations time frame. But, it also includes subjective tests (of "good faith") that put an employee's motives on trial.
<b>Comprehensive relief, including reinstatement</b> <i>Relief compensates for any hardship born by the whistleblower, by reimbursing any loss of salary, reinstatement of position, and damage to reputation that occurs as a consequence of the dispute</i>	~ Prevailing whistleblowers do not have a right to reinstatement, a specific guarantee of attorney fees (although it is awarded regularly), initial interim relief (although offered in rare occurrence), nor the right to be transferred (although this occurs on an ad hoc basis).	~ Prevailing whistleblowers do not have a right to reinstatement, a specific guarantee of attorney fees (although they are awarded regularly), initial interim relief (although it is offered in rare occurrence), nor the right to be transferred (although this happens on an ad hoc basis).	~ Prevailing whistleblowers do not have a right to reinstatement, a specific guarantee of attorney fees (although they are awarded regularly), initial interim relief (although it is offered in rare occurrence), nor the right to be transferred (although this happens on an ad hoc basis).
<b>Corrective action</b> <i>Remedial and corrective outcomes stemming from whistleblower cases are enforced through strengthened institution-wide standards of accountability and transparency</i>	✗ There is no public record of institutional corrective actions stemming from whistleblower cases.	✗ There is no public record of institutional corrective actions stemming from whistleblower cases.	✗ There is no public record of institutional corrective actions stemming from whistleblower cases..

<sup>1</sup> The whistle-blower policy assessment is based on the transparency index produced by the Government Accountability Project ([www.whistleblower.org](http://www.whistleblower.org)).

<sup>2</sup> There is one set of staff rules on whistleblower protections that covers all arms of the World Bank Group.

<sup>3</sup> The WBG is scheduled to revise its rules governing whistleblower protections in 2006. However, as of August 2006, these revised rules were not publicly available.

## Principle 8. Promotion of Freedom of Information

*International financial institutions should devote adequate resources and energy to ensuring effective implementation of their access to information policies, and to building a culture of openness.*

	World Bank	IFC	MIGA
<b>IFI staff training on access to information rules</b> <i>Trainings for every staff member on the scope, constraints, and appeals procedures of all access to information rules</i>	~	~	×
<p>The Bank conducts general institutional staff training on the disclosure policy but more details regarding these trainings are not currently available.</p> <p>IFC conducts general institutional staff training on the disclosure policy but more details regarding these trainings are not currently available.</p> <p>No information available regarding MIGA staff training on implementation of its disclosure policy.</p>			
<b>Access to information as part of the corporate incentive structures and staff evaluation procedures</b> <i>Employee evaluations and promotions, including departmental, title and/or salary transitions, are connected to the practical implementation of and adherence to transparency rules and a spirit of openness</i>	×	×	×
<p>No information available on staff incentives for meeting transparency requirements.</p> <p>No information available on staff incentives for meeting transparency requirements.</p> <p>No information available on staff incentives for meeting transparency requirements.</p>			
<b>Requests tracking and records management</b> <i>A central system for tracking information requests and a progressive system of records management</i>	~	✓	~
<p>It is unclear if or how the World Bank tracks information requests and what type of records management system is in place.</p> <p>IFC will report on an "ongoing" basis "the types of information being requested or accessed by the public and the general responsiveness of IFC staff to requests for information."</p> <p>It is unclear if or how MIGA tracks information requests and what type of records management system is in place.</p>			
<b>Individual sanctions for willful obstruction of access to information</b> <i>Sanctions are in place that penalize staff who knowingly obstruct access to information.</i>	×	×	×
<p>It is unclear if sanctions exist for non-disclosure of public information. The World Bank's Staff Manual is required to be disclosed but is not currently available on the Bank's website.</p> <p>It is unclear if sanctions exist for non-disclosure of public information. The IFC does not disclose organizational manuals and procedures that may provide this information.</p> <p>It is unclear if sanctions exist for non-disclosure of public information. MIGA does not disclose organizational manuals and procedures that may provide this information.</p>			

## Principle 9. Regular Review

*Access to information policies should be subject to regular review to take into account changes in the nature of information held, and to implement best practice disclosure rules and approaches.*

	World Bank	IFC	MIGA
<b>Periodic disclosure policy reviews</b> <i>An independent and consultative comprehensive review of disclosure requirements resulting in improved standards conducted every two to three years</i>	~	✓	~
<p>World Bank has no policy requirement for periodic review. However, Bank has updated its disclosure policy on an ad hoc basis.</p> <p>IFC will conduct an overall review of its disclosure policy and transparency standards no more than 5 years after disclosure policy effectiveness.</p> <p>MIGA has no policy requirement for periodic review of the disclosure policy. However, MIGA is scheduled to publicly review and update its disclosure policy in 2006/2007.</p>			
<b>Annual review of disclosure policy implementation and effectiveness</b> <i>Annual audits or evaluations of implementation and effectiveness of transparency requirements</i>	×	✓	×
<p>No requirement for annual audits or evaluations of its disclosure policy.</p> <p>IFC's Corporate Relations Unit will monitor and report on the implementation of the disclosure policy on an "ongoing basis".</p> <p>MIGA has no requirement for annual audits or evaluations of its disclosure policy.</p>			

## ANNEX 1

### List of indicators and indicator descriptions

All indicators in the Transparency Scorecard are based on research in the IFI Transparency Resource (IFITR) ([www.ifitransparencyresource.org](http://www.ifitransparencyresource.org)).

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#### Principle 1: Right of Access

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Disclosure policy	Transparency rules are established and articulated in a binding institutional policy <i>IFITR reference indicator: 9.A.i.</i>
Maximum disclosure	Disclosure rules are based on a presumption of access subject to limited exceptions <i>IFITR reference indicator: 9.A.ii.</i>
Comprehensive scope	Disclosure rules apply to all information held by the institution <i>IFITR reference indicator: 9.A.iii</i>

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#### Principle 2: Automatic Disclosure

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Basic institutional information	Founding documents including the statutes and by-laws of the institution, and basic information on the organizational structure <i>IFITR reference indicator(s): 1.A.i., 1.A.ii, 1.A.viii.</i>
Directory of contact information	Detailed contact information (including title, phone, fax, email and mailing address) for the various departments and staff that make up the institution, including the various country offices located outside of the institution's headquarters <i>IFITR reference indicator: 1.A.iii.</i>
Financial and budgetary information	Detailed description of the financial position each fiscal year and estimates of all expenditures and outlays as well as information about the operational budgets of individual departments and units within the institution <i>IFITR reference indicator: 1.A.v., 1A.vi.</i>
Institution policies, strategies and procedures	Overall plans that outline the general goals, overarching development objectives, administrative functioning, and the procedures by which all the operations of the institution are developed and implemented <i>IFITR reference indicators: 1.A.iv., 3.C.v.</i>
Country analyses and strategies	Reports that examine a borrowing member country's economic status, lending portfolio, and various country-specific themes or issues; these can include poverty strategies, environmental strategies, and general country strategies <i>IFITR reference indicator: 5.A.i.-5.A.v, 5.D.iv.</i>
Projects and program information	Documents related to a specific lending, grant, investment or guarantee operation available on an anticipated basis throughout the project or program cycle including: <ul style="list-style-type: none"><li>• Project or program documents</li><li>• Social and environmental documents</li><li>• Project supervision and monitoring reports</li><li>• Project completion and evaluation reports</li></ul> <i>IFITR reference indicators: 6.B-F</i>

Institutional performance audits and evaluations

Assessments of the institutions' operations, impacts, and performance that are carried out by internal evaluations units  
*IFITR reference indicator: 4.A.i.-viii.*

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### **Principle 3: Access to Decision-Making**

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Advance notice

This includes access to, among other things: timelines for the development of policies and strategies; projects and programs cycles; consultation plans; and key dates for decisions  
*IFITR reference indicator: 3.A.ii-iii., 5.B.ii.-iii., 6.A.ii.-iii.*

Timely access to iterative draft documents

The provision of iterative versions (at least one draft and one final draft) of documents related to core operations insufficient advance of document finalization; core operations include:

- Policy and strategy formulation
- Country strategy formulation
- Project and program development
- Social and environmental assessment

*IFITR reference indicators: 3.B.ii., 3.C.i., 5.C.i., 5.C.ii., 6.C.iii.-vii., 6.C.ix., 6.D.i.*

Agenda and minutes of Board meetings

A list, plan or outline of matters scheduled for discussion by the Board of Directors, organized according to the specific days upon which the discussions are scheduled to take place, followed by a record of official business conducted and formal decisions taken, including voting records  
*IFITR reference indicators: 2.B.v., 2.B.vii.*

Transcripts of Board meetings

A verbatim account of a meeting of the Board of Directors and would include any statements (written or oral) provided by individual participants  
*IFITR reference indicator: 2.B.iii., 2.B.viii.*

Open Board meetings

The public and press are allowed to view the meetings of the Board of Executive Directors  
*IFITR reference indicator: 2.B.ii.*

Dissemination and translation strategy

A plan of action outlining how to expand communications and improve the provision of information as well as respond to public demand; this includes ensuring the provision of information in appropriate forms and languages  
*IFITR reference indicators: 10.A., 13.A.i.*

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### **Principle 4: The Right to Request Information**

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Clarity on how to submit a request for information

Clear identification of where requests for information can be sent, in what form and language, and how assistance will be provided to requestors who have difficulty formulating their requests  
*IFITR reference indicator: 9.A. iv.*

Document register

A catalogue of all documents produced and held by the institution including the document name and a brief description of the document's function, content and disclosure status  
*IFITR reference indicator: 9.A.x.*

Prescribed timelines

Timetable for processing information requests including clear maximum time limits for acknowledging the receipt of a request and providing a full response  
*IFITR reference indicator: 9.A.vi.*

Obligation to disclose whole documents, justifying and redactions

In every case possible, entire texts or documents are disclosed and of any confidential information are justified

Appropriate fees, possibility of fee waiver	Reasonable charges of related to the materials provided in response to information requests, including fee waiver procedures <i>IFITR reference indicator: 9.A.vii.</i>
Rules on the right to specify the form of receipt and language of information	Guidelines regarding the requestors' prerogative to specify in what form they would like to receive information, i.e. electronic or hardcopy, and where reasonable, in what language <i>IFITR reference indicator: 9.A.viii.</i>
	Guidelines regarding the requestors' prerogative to specify in what form they would like to receive information, i.e. electronic or hardcopy, and where reasonable, in what language <i>IFITR reference indicator: 9.A.ix.</i>

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### **Principle 5: Limited Exceptions**

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Narrowly drawn exceptions to disclosure	The scope of exceptions apply to a specific type of information so as to limit broad interpretation and, at the same time, not exempt entire categories of documents from disclosure <i>IFITR reference indicator: 9.B.i.</i>
Harm-based exceptions	Exceptions indicate that disclosure would cause serious harm to legitimate interests <i>IFITR reference indicator: 9.B.ii.</i>
Public interest override to exceptions	In cases where information falls within the definition of confidential, disclosure will nonetheless occur if access to information is would protect the public interest including human health or property <i>IFITR reference indicator: 9.B.iii.</i>

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### **Principle 6: Appeals**

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Administrative appeals	An internal review that has full discretion in interpreting the policy and authority in overturning a denial of information <i>IFITR reference indicator: 9.C.i.</i>
Independent appeals	A body that is wholly independent from the institution, vested with the power to consider disclosure appeals, and whose interpretation of the policy and the resulting decisions are binding <i>IFITR reference indicator: 9.C.ii.</i>
Appeals disposed of in a timely fashion with no undue delays	Decisions are transparent and considered in brief timeframes; delays in consideration and the handing down of the decision are anticipated and justified <i>IFITR reference indicator: 9.C.iii.</i>
Full enforcement of recommendations handed down by appeals body	Recommendations, interpretations, and decisions of the appeals body are adhered to in terms of immediate action and future interpretation of the policy <i>IFITR reference indicator: 9.C.iv.</i>

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### **Principle 7: Whistleblower Protection<sup>1</sup>**

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Broad coverage of policy	Scope of whistleblower protections articulates types of disclosure that are protected and who is covered <i>IFITR reference indicator: 8.G.i.</i>
Independent adjudication forum	A forum to adjudicate a whistleblower's rights which is independent from institutional conflict of interest, operating under rules of due process and can pass binding judgments in whistleblower cases

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<sup>1</sup> The whistleblower policy assessment is based on the index produced by the Government Accountability Project.

	<i>IFITR reference indicator: 8.G.i.</i>
Fair burden of proof rules	Fair and impartial standards that must be met in order to establish that a disclosure has standing under the whistleblower policy <i>IFITR reference indicator: 8.G.i</i>
Comprehensive relief, including	Relief compensates for any hardship born by the whistleblower, by reimbursing any loss of salary, reinstatement of position, and damage to reputation that occurs as a consequence of the dispute <i>IFITR reference indicator: 8.G.i.</i>
Corrective action	Remedial and corrective outcomes stemming from whistleblower cases are enforced through strengthened institution-wide standards of accountability and transparency <i>IFITR reference indicator: 8.G.i.</i>

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### **Principle 8: Promotion of Freedom of Information**

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IFI staff training on access to information rules	Trainings for every staff member on the scope, constraints, and appeals procedures of all access to information rules <i>IFITR reference indicator: 13.B.i.</i>
Access to information as part of corporate incentive structures and staff evaluation procedures	Employee evaluations and promotions, including departmental, title and/or salary transitions, are connected to the practical implementation of and adherence to transparency rules and a spirit of openness <i>IFITR reference indicator: 13.B.ii.</i>
Requests tracking and records management	A central system for tracking information requests and a progressive system of records management <i>IFITR reference indicator: 9.A.xi., 11.A.iii.</i>
Sanctions for willful obstruction of access to information	Sanctions are in place that penalize staff who knowingly obstruct access to information <i>IFITR reference indicator: 12.B.iii.</i>

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### **Principle 9: Regular Review**

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Periodic disclosure policy reviews	An independent and consultative comprehensive review of disclosure requirements resulting in improved standards conducted every two to three years <i>IFITR reference indicator: 13.C.i.</i>
Annual review of disclosure policy implementation and effectiveness	Annual audits or evaluations of implementation and effectiveness of transparency requirements <i>IFITR reference indicator: 13.C.ii.</i>



## **How to contact the GTI:**

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Information is also available from

GTI Steering Committee organisations:

Access to Information Network (Philippines); ARTICLE 19 (U.K.); Bank Information Center (U.S.A.); Bretton Woods Project (U.K.); CEE Bankwatch Network (Poland); Freedominfo.org (USA); Libertad de Información-México AC (México); and Institute for Democracy in South Africa (South Africa)

