

55268

THE WORLD BANK



ACCESS TO INFORMATION STAFF HANDBOOK

June 2010



Access to Information Policy

10 Things YOU NEED TO KNOW

CLASSIFY all information: Public or Restricted (if information falls under one or more of the 10 exceptions). Restricted information is classified as Official Use Only, Confidential, or Strictly Confidential.

FILE all information in the Bank's records management system. Filing *now* saves search time later and enables the Bank to implement this Policy!

E-MAILS are not subject to disclosure, unless they relate to official Bank business and are classified and filed in the Bank's records management system.

In **EXCEPTIONAL CIRCUMSTANCES**, decisions to restrict public information or release restricted information require proper authorization by Management or the Board (see Policy for further details).

Information received by the Bank **IN CONFIDENCE** may be made public only with the written agreement of the client or third party that provided/owns the information.

CAs, PADs AND PROGRAM DOCUMENTS may be disclosed before the Board discusses them, but only with the borrower's prior written agreement.

AIDE-MÉMOIRE may be made public, if the client and Bank agree.

Refer **REQUESTERS** to the central request channel —www.worldbank.org/wbaccess—so that requests can be tracked. Please do not respond directly unless the information requested is readily available from the Bank's external website.

ARCHIVES UNIT DECLASSIFIES eligible information after 5, 10, or 20 years, depending on the information, enabling public access.

The 10 Exceptions

1 PERSONAL INFORMATION

2 COMMUNICATION OF EDS' OFFICES

3 BOARD ETHICS COMMITTEE

4 ATTORNEY-CLIENT PRIVILEGE

5 SECURITY & SAFETY INFORMATION

6 OTHER DISCLOSURE REGIMES

7 CONFIDENTIAL CLIENT/THIRD PARTY INFORMATION

8 CORPORATE ADMINISTRATIVE

9 DELIBERATIVE

10 FINANCIAL

**A-C FORECAST, ANALYSIS,
TRANSACTIONS**

D BANKING & BILLING

Eligible for Declassification

THE WORLD BANK



ACCESS TO INFORMATION STAFF HANDBOOK

June 2010

This Staff Handbook is not a policy. It is intended only to provide general guidance to the staff of the World Bank (consisting of the International Bank for Reconstruction and Development and the International Development Association) on making information available to the public in accordance with the World Bank Policy on Access to Information. The Staff Handbook may be revised from time to time with more up-to-date general guidance, workflow arrangements and references. The online version of the Staff Handbook is the most current version available. Please note that any previous electronic or paper version may be outdated.



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Abbreviations and Acronyms



AI	Access to Information
AIC	Access to Information Committee
AMS	Administrative Manual
BP	Bank Procedures (Operational Manual)
C	Confidential
CAS	Country Assistance Strategy
CPPR	Country Portfolio Performance Review
EA	Environmental Assessment
ED	Executive Director
ESW	Economic and Sector Work
FTD	Factual Technical Document
GSD	General Services Department
ICR	Implementation Completion and Results Report
IDU	Internal Documents Unit
IEG	Independent Evaluation Group
INT	Integrity Vice Presidency
IP	Inspection Panel
IRIS	Integrated Records Information System
ISDS	Integrated Safeguard Data Sheet
ISR	Implementation Status and Results Report
JSAN	Joint Staff Advisory Note
MOP	Memorandum of the President
OP	Operational Policy (Operational Manual)
PAD	Project Appraisal Document
PD	Program Document
PIC	Public Information Center
PID	Project/Program Information Document
PRSP	Poverty Reduction Strategy Paper
RP	Resettlement Plan
SC	Strictly Confidential
SEC	Corporate Secretariat
TA	Non-lending Technical Assistance
UCS	Use of Country Systems
VPU	Vice President Unit

Introduction



The *World Bank Policy on Access to Information* (“Access to Information Policy” or “Policy”), effective July 1, 2010, constitutes a major shift in what information the Bank may disclose—from a policy that listed which information is available, to one that allows disclosure of any information in the Bank’s possession as long as it is not on a list of exceptions.

Under this Policy, the Bank grants access to more information than ever before—especially information about projects under implementation and the Board’s actions. At the same time, the Policy protects, among other things, the confidentiality of the deliberative processes that lead to Bank decisions and actions, as well as the relationship of trust with member countries¹ and other partners. Staff should be assured that they can openly and freely express opinions and recommendations both internally and to clients, without such deliberative information being made publicly available.

The new Policy is based on five guiding principles:

- ⇒ Maximizing access to information
- ⇒ Setting out a clear list of exceptions
- ⇒ Safeguarding the deliberative process
- ⇒ Providing clear procedures for making information available
- ⇒ Recognizing a requester’s right to an appeals process

The principal purpose of this Access to Information Staff Handbook (AI Staff Handbook) is to provide: (a) guidance to staff for determining whether information is public or non-public (i.e. “restricted”); and (b) workflow processes for making information publicly available. The Policy is set out in the *World Bank Policy on Access to Information*. This AI Staff Handbook should be used in conjunction with the companion *Classification Handbook for Restricted Information* for guidance on classifying restricted information. Translating the Bank’s work into local languages is also an important aspect of making information accessible; guidance to staff on what information should be translated and into what language(s) is provided in the *Translation Framework*.

Additional Resources. We hope that the AI Handbook answers most questions about how to make information available to the public under the Policy. The AI Handbook will be continuously revised online to provide up-to-date guidance and references. If staff should need additional guidance, they should refer to *Frequently Asked Questions*, contact their VPU’s *Focal Point* or go to the on-line Help Desk for staff on the intranet at <http://accesstoinfo>.

¹ Hereafter referred to as “clients”.



Outline. Following this Introduction, Section II outlines the scope of the Policy, including general guidance on what is publicly available, the exceptions that determine what is not public, and staff responsibilities for filing information. Section III gives guidance to staff on communicating with clients and partners about the new Policy. Section IV lays out the main channels through which information is made public. Section V explains how the public can appeal decisions to deny access to information.

Annex 1 provides examples of information on the exceptions list, Annex 2 lists documents routinely disclosed on the Bank's external website and, Annex 3 is a declassification schedule for certain historical documents.

The Handbook also includes three attachments for internal use only. Attachment A provides detailed guidance on work-flow arrangements for information that is routinely posted on the Bank's external website. Attachment B summarizes transmittal methods and provides templates. Attachment C gives sample language for communicating disclosure requirements to clients and partners.

The Policy



Under the Access to Information Policy, the Bank² allows public access to any information in its possession that is not on a list of exceptions. In addition, over time the Bank declassifies and makes publicly available certain information that falls under the exceptions. The Bank has also reserved the right, under exceptional circumstances, to disclose certain restricted information, or to restrict access to information it normally makes available to the public.

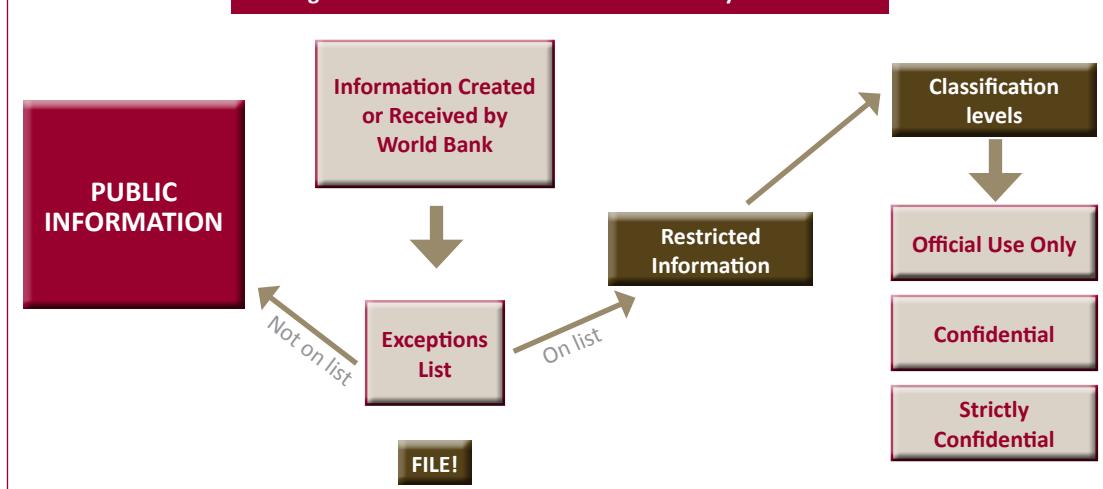
What is “Information in the Bank’s Possession”?

The Policy covers all information in the Bank’s possession. The Policy defines information to mean “documents of any type (e.g., paper, electronic, photograph, film, sound recordings, and videotapes) prepared or received by the Bank *in the course of its official business.*” AMS 10.11, *Management of Records* requires staff to file all information in the Bank’s records management system; this facilitates locating information that is deemed to be publicly available, and protects restricted information.

Determining What Information is Public and What is Not

The Bank’s Access to Information Policy provides that any information in its possession is publicly available, unless it falls under one of the exception categories (see Figure 1). When staff either create or receive information, they must first determine

Figure 1: Information Created or Received by the Bank



² The Access to Information Policy covers IBRD and IDA and does not cover the International Finance Corporation (IFC), Multilateral Investment Guarantee Agency (MIGA) or International Centre for Settlement of Investment Disputes (ICSID). The Policy also does not cover the disclosure of information restricted under separate regimes (i.e. the Independent Evaluation Group, the Inspection Panel, the Integrity Vice Presidency and the Bank’s sanctions process).



whether or not it includes any information that is on the exceptions list. If the document does not contain any information on the exceptions list, staff need to file it as Public; if it contains information which falls under one or more of the exceptions, it is restricted information and staff need to assign an appropriate classification level. *It is important that staff file all documents in the Bank's records management system.*

Once a staff member determines that information is restricted, s/he classifies and marks it as “Official Use Only”, “Confidential” or “Strictly Confidential” and files the document (e.g., in IRIS or submitting it to the Board). The classification level depends on the harm (i.e. reputational, financial or operational) that may be caused if the information is disclosed and on any restrictions about how the information can be shared. Staff should refer to AMS 6.21A, *Information Classification and Control* and the *Classification Handbook* for guidance on the appropriate classification levels.

What are the Exceptions?

The Policy explicitly sets out ten types of information that are considered to be exceptions.³ If information in the Bank’s possession meets one or more of the exceptions, it is considered to be “restricted information” and is not available to the public. (Table 1 lists the ten exception types, Boxes 2 and 3 provide additional information, and Annex 1 provides examples). If a document contains any restricted information, staff will be asked to indicate which exception(s) apply when

Table 1: List of 10 Exceptions

1. Personal
2. ED Communication
3. Board Ethics Committee
4. Attorney-Client Privilege
5. Security & Safety
6. Other Disclosure Regimes
7. Client/Third Party
8. Corporate Administrative
9. Deliberative*
10. Financial
a-c Forecast, Analysis, Transactions*
d Banking & Billing

*Eligible for Declassification

³ Refer to the *World Bank Policy on Access to Information* (Section IIA) for more details.



they file the information. This will assist Archives in later years when determining whether the information may be eligible for declassification.

Some types of information are not eligible for declassification and remain restricted (Exceptions 1 through 8 or 10d).

Box 1: What is “Deliberative Information” (Exception 9)?

Deliberative information is one of ten exceptions of information that are restricted from disclosure to the public. While the Bank discloses decisions, results and agreements that flow from its deliberative process, the Bank protects the integrity of the deliberative process by facilitating and safeguarding a free and candid exchange of ideas, both within the Bank and with partners and stakeholders.

Deliberative information includes e-mails relating to Bank business (as distinct from personal correspondence). When such official e-mails are filed in the Bank’s records management system, they should be assigned a restricted classification in accordance with AMS 6.21A.

Other examples of deliberative information:

- draft ESW reports
- notes
- memoranda
- statistical analyses to inform the Bank’s internal decision making processes
- Internal Audit’s individual audit reports

It is important to note that, with the passing of time, most deliberative information is eligible for declassification and public release (see Table 5 for declassification timelines for different types of deliberative information). Deliberative information that contains or refers to information under Exceptions 1 through 8 or 10d in Table 1 is not eligible for declassification, even after 20 years.

Box 2: What is “Information Given in Confidence” (Exception 7)?

Information given in confidence by clients or third parties (either explicitly or implicitly) is considered an exception; the Bank does not make it *publicly* available without the written consent of those clients or parties. Depending on the classification level, client or third party permission may be also necessary to share such restricted information *within the Bank* (e.g., if it is classified as Strictly Confidential).

What to do if... the client has not indicated whether the information should be restricted? If, to the knowledge of the Bank staff, the information has not already been made publicly available by the client or third party, staff should treat it as “deliberative” (i.e. restricted) and consult AMS 6.21A on the classification of restricted information. If Bank staff believe that the information was given in confidence (either explicitly or implicitly), the information is restricted and classified according to AMS 6.21A.

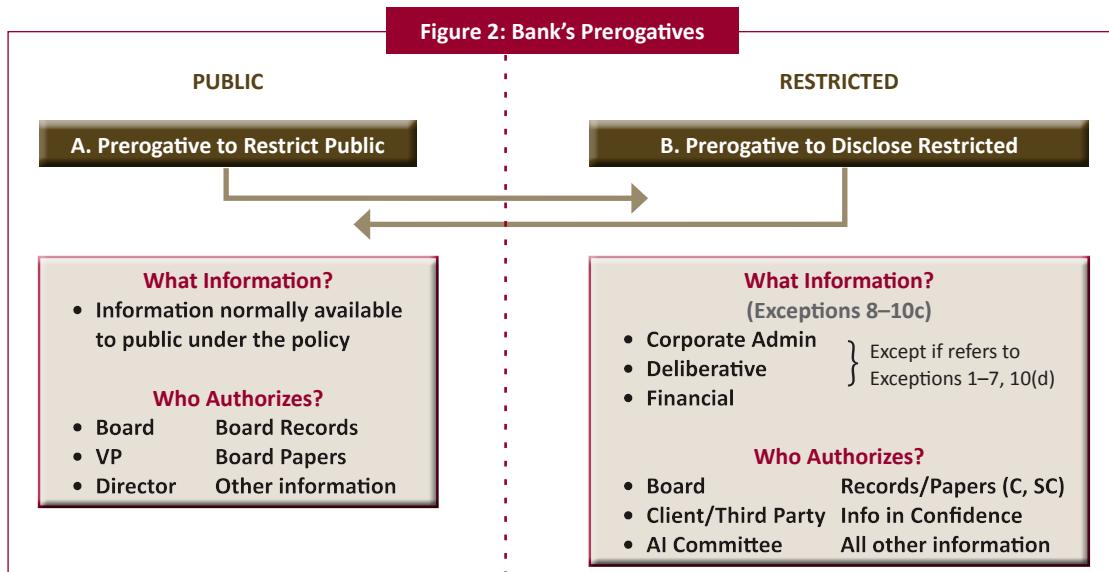


However, deliberative and some financial information may be declassified over time if they do not contain or refer to information that falls under the exceptions shaded in red. Corporate administrative, deliberative and financial (except banking and billing) information may be requested on a public interest basis, but the decision to release this information rests with the Access to Information Committee (AI Committee).⁴

Bank's Prerogatives to Disclose or Restrict Information

The Bank reserves the right, or prerogative, under exceptional circumstances, to: (a) grant access to certain information⁵ that otherwise would be on the list of exceptions and thus not publicly available; or (b) restrict access to information that it would normally disclose (see Figure 2).

If the Bank decides, on an exceptional basis, to *disclose certain restricted information*, it does so only after determining that the overall benefits of such disclosure outweigh the potential harm to the interests protected by the exceptions. Exceptional disclosure of Confidential or Strictly Confidential Board records or papers is the Board's prerogative and requires Board approval. For information given in confidence to the Bank by clients or third parties, their written consent is required. For all other restricted information, the prerogative to disclose is exercised by the Access to Information Committee.



⁴ An Access to Information Committee (AI Committee) supported by a Secretariat, has been established to advise Bank Management on the application of the new Policy, including proposals to disclose information that is on the list of exceptions. The AI Committee is comprised of senior representatives from EXT, LEG, OPCS, the Corporate Secretariat, the Archives Unit and GSD; other units will be represented as needed.

⁵ This prerogative applies only to three types of exceptions: corporate administrative, deliberative and financial information (with the exception of banking and billing). Information pertaining to all other exceptions, including references to them in deliberative, financial and corporative administrative information, may not be disclosed using this prerogative.



When in exceptional instances the Bank decides to *restrict access to information* that would normally be public, it does so only after judging whether such disclosure is likely to cause more harm than benefit. Approval to withhold such information must be given by: (a) the Board (for Board records); (b) the Vice President concerned (for Board papers); and (c) the Director concerned (for other information). Such decisions to restrict disclosure, other than those made by the Board, may be appealed.

Communicating with Clients and Partners



Communicating clearly with clients and partners about the implications of the Bank's new Policy (i.e., whether agreement to disclose is required) is important. For clients, the requirements vary depending on the nature of the information and who produces it (see Table 2). In some cases, the client's written consent is necessary. The Bank handles various kinds of documents as follows.

- a. ***Operational documents prepared by the Bank and routinely discussed with the client.*** Before finalizing the document, the Bank requests the client to identify whether the document contains any sensitive information, or information whose disclosure may adversely affect relations between the Bank and the client. The Bank, as it considers appropriate, makes adjustments to the document to address the matters of concern to the client. Some documents, however, do need the client's consent if they are to be disclosed before Board consideration: disclosure of CASs, PADs or Program Documents before they are considered by the Board consideration (see Box 3) requires the client's **written consent**. Additionally, aide-mémoire of operational missions may be made publicly available, if both the Bank and the client agree to disclosure; the task team obtains written confirmation from the client.
- b. ***Operational documents prepared by the Bank and not routinely discussed with the client.*** The Director concerned may consult the client if the Director believes that a document contains confidential information relating to the client, or information whose disclosure may adversely affect relations between the Bank and the client. The Bank, as it considers appropriate, makes adjustments to the document to address the matters of concern to the client.
- c. ***Documents prepared by a client as a precondition for doing business that must be made available to the public.*** Clients provide these documents with the understanding that the Bank will make them available to the public.
- d. ***Other documents prepared by the client that are in the Bank's possession.*** Clients also give the Bank information that does not fall into one of the above categories. It is good practice for staff always to ask clients/third parties to assign a security classification to their own documents, so that staff can determine how the information should be treated. If the information given by the client is public, the Bank may disclose it. If the information is given in confidence (either explicitly or implicitly), because the client believes the information must be kept confidential, the Bank does not disclose the information without obtaining the client's written consent; such information needs to be marked to indicate this (i.e., "provided in confidence" or "confidential") (Exception 7, information given in confidence). If the client



has not assigned a security classification to the material, and to the Bank's knowledge, the information has not already been made publicly available, the information should be considered "deliberative" (Exception 9) and classified in accordance with AMS 6.21A, *Information Classification and Control*.

- e. **Documents prepared by the Bank for a fee** ("fee-based services"). The Bank makes such documents (including the related legal agreements) available to the public only after the client has granted its **written consent** to disclose to the public.

Jointly Produced Information. Under the Policy, the Bank makes publicly available final documents that it prepares jointly with partners. When the Bank initiates joint work with the client or a development partner, staff should explain that the guiding principle of the Bank's Access to Information Policy is that all information it creates is made public, unless it contains restricted information. Staff should get the partner's agreement

Table 2: Client Consultation or Agreement for Operational Documents

Consultation/Agreement Needed		Example
Prepared by the Bank		
Routinely discussed	<p>Final text: Before disclosing, client identifies any sensitive information. Bank adjusts the document as it considers appropriate and finalizes text. Client's written consent not required to disclose a CAS, PAD or PD at the end of the Board deliberative process.</p> <p>Simultaneous disclosure: To disclose a CAS, PAD or PD before Board consideration, client's written consent is required for simultaneous disclosure.</p>	CAS PAD PD CPPR JSAN FTD
Not routinely discussed	Director concerned may consult with client; Bank adjusts document as it considers appropriate to address client concerns.	ESW Research
For a fee	Written consent from client.	Reimbursable Technical Assistance
Prepared by the Client		
As a precondition for doing business	Understanding that the Bank will make public.	Environmental and Social Safeguard reports
Other info in Bank's possession	If given in confidence, client's written consent.	Financial sector information



in advance to disclose the joint product when it is finalized (i.e. when it is no longer deliberative). For documents prepared jointly with IFC or MIGA, the information may be made publicly available if such disclosure is consistent with their disclosure policies.⁶ At the outset of the joint activity, staff should discuss with their IFC and MIGA counterparts to ensure that any sensitive information which may be restricted under their institution's disclosure policy is protected.

⁶ *IFC Disclosure Policy, MIGA Disclosure Policy*

Main Channels for Making Information Public



Information is made accessible to the public in three ways: posting on the Bank's external website; responding to requests; and declassifying certain restricted documents over time. A large amount of the information created or received by Bank staff after July 1, 2010 is routinely made available on the Bank's external website. (Annex 2 lists selected document types that are routinely posted on the external website; Attachment A provides workflow processes for these documents). Other public information that may not be either available on or accessed through the Bank's external website is available on request through a central request line. Finally, some restricted information is also available over time ("declassified"), following the declassification schedules of the Policy and based on a review by the Bank's Chief Archivist to determine if the information concerned is eligible for declassification.

Staff Responsibilities. While staff are not engaged directly either in answering requests or in declassifying information, they **are** responsible for filing information in the Bank's records management system (e.g. ImageBank, IRIS⁷). If information that is eligible for public access cannot readily be found in the records management system when it is requested, the Bank conducts a reasonable search for such information. If the information is not found in the Bank's records management system, the Director concerned is contacted and asked to request relevant staff to search for the information. Following the search, the Director is asked to confirm that a reasonable search has been conducted, and that all relevant substantive information identified (including communications and deliberative documents) has been filed in the Bank's records management system (or otherwise produced to the Archives Unit), and properly classified. ***It is important that staff file documents in the Bank's records management system.***

Posting on the Bank's External Website

The bulk of information received or created after July 1, 2010 is available to the public on the Bank's external website. Many such documents make their way to the external web via the Board through submission to the Corporate Secretariat. For documents that do not go to the Board, staff may submit them through the Operations Portal, the InfoShop or directly to the Internal Documents Unit (IDU). Finally, other information is posted directly on the external website (see Table 3).

Corporate Secretariat (SEC) is the interface between management/staff and the Board in the handling of information for Board proceedings, much of which is available to the public under the Policy. There are two broad types of information on

⁷ The Integrated Records Information System (IRIS) will be replaced by WBDocs.

**Table 3: General Workflows for Key Document Types**

Submitted To	Document Type	Preferred Method	Example
Corporate Secretariat	Board papers	Board eSubmission Form	CAS, PAD, PD, ESW
Operations Portal	Operational documents Safeguard documents	Electronic	ISR; ICR; Procurement Notice; ESW/TA, ISDS, PID
InfoShop	Safeguard documents	Email	EA, RP
IDU/ImageBank	Other documents	Electronic	Legal agreement Procurement Plan
Directly to web	Other information	ePublish	Country Pages, Treasury Reports

Board proceedings—*Board papers* and *Board records*. Publicly available Board papers and Board records are posted on the Bank’s external website at specific milestones.

- ⌚ *Board papers* are documents that are prepared by staff for: (a) discussion or consideration (decision) by the Board; (b) discussion by a Board Committee; or (c) information of the Board or a Board Committee. Board papers distributed for discussion by a Board Committee are posted at the end of the Committee’s deliberation unless a subsequent discussion is anticipated; Board papers distributed for Board consideration are normally posted at the end of the Board’s deliberative process, once they are finalized. Board papers sent to the Executive Directors for information are made public when distributed. Selected document types are eligible for “simultaneous disclosure,” that is, they may be made public before the documents are considered by the Board (see Box 3). Until Board papers have been considered or made public according to simultaneous disclosure procedures, they remain restricted (as “deliberative information”) and most are classified as Official Use Only. SEC notifies the IDU when a Board paper should be disclosed; IDU then changes the classification to Public and posts the paper on the Bank’s external website.
- ⌚ *Board records* are records of Board or Board committee proceedings (e.g., minutes of Board or Committee meetings, summaries of Board discussions, Annual Reports of Board Committees). Board records are made public at the end of the Board’s deliberative process unless they fall under one of the exceptions under the Policy, in which case they are classified as Confidential or Strictly Confidential and subject to the appropriate declassification timeline (see Table 5). SEC notifies IDU when the record can be made available to the public and IDU then posts them on the Bank’s external website.

**Box 3: What is Simultaneous Disclosure?**

Selected Board papers are eligible for simultaneous disclosure—that is, they may be made publicly available before the Board has considered them.

CASs, PADs and PDs may be made publicly available before the Board has considered them provided that the client has given its **written** consent (e.g. during negotiations) to such early disclosure.

Operational policy papers and sector strategy papers may be simultaneously disclosed if they have had public consultations and Executive Directors have already reviewed a draft version of the paper (e.g. during consideration by a Board Committee). If EDs have not previously reviewed the paper, it may still be made available before Board discussion, if the Board approves such early disclosure.

Documents that are simultaneously disclosed must have on the **front cover** a notice that the document is still to be discussed by the Board, and therefore not final:

"This document is being made publicly available prior to Board consideration. This does not imply a presumed outcome. This document may be updated following Board consideration and the updated document will be made publicly available in accordance with the Bank's Policy on Access to Information."

The originating unit is responsible for submitting Board papers to SEC using the Board Document Submission Form ("eSubmission" is available electronically as a web-based interface on the SEC website⁸ starting July 1, 2010). This form includes the following information: (a) whether the paper is to be disclosed (or, if it is not to be disclosed, the exception(s)); and, (b) at what point it is to be disclosed (i.e. Distribution, Board Discussion, Closing Date). Board papers that include information about IFC or MIGA may be restricted if the information is not publicly available under those institution's separate disclosure regimes.⁹

When an otherwise disclosable Board document contains limited and clearly identifiable information that falls under one or more of the exceptions, and this information is material to the Board decision, the information is removed from the document and conveyed to the Board in the Memorandum of the President (MOP), if one accompanies the particular document (e.g., PADs, PDs). MOPs are declassified and disclosed after 20 years (unless they contain information that may not be declassified). Under exceptional circumstances, if the Vice

⁸ The web submission form enables staff to monitor the status of their submission during the clearance and publishing process, provides for higher quality products, facilitates more reliable searches and eliminates physical submission of hardcopies to IDU/Print Shop.

⁹ See IFC Disclosure Policy, MIGA Disclosure Policy. Staff should consult with IFC and/or MIGA counterparts to confirm the requirements of their institution's disclosure policy.



President concerned determines that disclosing a Board paper is likely to cause harm that outweighs the benefits of disclosure, the Bank may restrict disclosure of the paper.

Operations Portal. Operational documents that are not submitted to the Board are channeled to the external website through the Operations Portal (e.g. ESW, TA, ISDS), transferred automatically into the Bank's records management system, and posted on the Bank's external website. Table 4 lists key lending documents submitted through the Operations Portal.

InfoShop. Task teams submit environmental and social safeguard operational documents to the InfoShop before the Bank begins formal appraisal of the project, preferably by e-mail to the InfoShop. Any PIDs and ISDSs that cannot be processed through the Operations Portal may be submitted to the InfoShop in the same way.

Internal Documents Unit (IDU). Operational documents that are not distributed to the Board or processed through the Operations Portal (e.g. translated versions) can be submitted to the IDU, preferably via the IDU website although e-mail and hard copies are also accepted (see Attachment B for standard submission templates). When submitting information, staff indicate whether the information is to be publicly available; the IDU posts public documents on the Bank's external website.

Posting Directly on the External Website. Information posted to the external web directly (e.g. on country pages) should also be filed in the Bank's record management system and classified as Public. *Information loaded directly to the external web from laptops or shared network drives, and not also filed in the Bank's records management system, is difficult or impossible to find if requested at a later date.*

Table 4: Key Lending Documents Submitted through the Operations Portal

Phase	Document
Preparation	Monthly Operational Summary
Concept/Pre-Appraisal	Project/Program Information Document
	Integrated Safeguard Data Sheet
	Safeguard Documents
Appraisal	Project/Program Information Document (<i>updated</i>)
	Integrated Safeguard Data Sheet (<i>updated</i>)
Implementation	Implementation Status and Results Report (ISR)
	Procurement Notice
Completion	Implementation Completion and Results Report (ICR)



Providing Information on Request

Information that should be publicly available but is not available or accessible on the Bank's external website may be requested. Such requests are received by a central request line and delegated to the relevant unit (i.e. Archives or InfoShop). Requests are reviewed to confirm that there is no information that is on the list of exceptions, particularly for documents filed before July 1, 2010. If the information does not contain any exceptions or is able to be immediately declassified, it is made available to the requester. Section V discusses the request tracking system, including what happens if the request contains restricted information.

Declassifying Restricted Information

The Bank declassifies and makes available certain kinds of restricted information as their sensitivity diminishes over time—5, 10 or 20 years after the date on the document (see Figure 3). The only categories of restricted information that *may* be declassified are deliberative and financial information (except banking and billing).¹⁰ Information falling under the remaining types of exceptions (e.g. personal information), however, is not eligible for declassification. The Bank's Chief Archivist declassifies and makes information publicly available either on the Bank's external website or in response to requests, consulting when necessary the Corporate Secretariat or the relevant business unit. The timelines for disclosing Board records, Board papers and other specific documents containing deliberative or financial information that are eligible for declassification are shown in Table 5.

Figure 3: Information Eligible for Declassification

What Information? (Exceptions 9–10c)	
• Deliberative	{
• Financial	}
Who Declassifies?	
• Archives in consultation with Units	
When Eligible?	
• After 5, 10, 20 years	

¹⁰ Deliberative or financial information that relates to other exceptions may not be declassified.

**Table 5: Information Eligible for Declassification and Related Timelines**

Board Records:
<p>After 5 years</p> <ul style="list-style-type: none"> • Board Minutes prepared before April 1, 2005, other than those of Executive Sessions & Restricted Executive Sessions • Minutes of Board Committee meetings prepared before July 1, 2010, other than those of Executive Sessions & Restricted Executive Sessions • Chairman's Concluding Remarks & Summings-up of Board meetings prepared before January 1, 2002 • Summings-up of Committee of the Whole Meetings prepared before July 1, 2010 • Summaries of Discussion (relating to Board meetings) prepared before July 1, 2010 • Annual Reports of Board Committees prepared before July 1, 2010
<p>After 10 years</p> <ul style="list-style-type: none"> • Verbatim transcripts of Board meetings & Board Committee meetings • Statements of Executive Directors & staff regarding Board or Board Committee meetings • Reports to the Board from its Committees (Green Sheets)
<p>After 20 years</p> <ul style="list-style-type: none"> • Minutes of Executive Sessions & Restricted Executive Sessions of the Board & its Committees • Communications & memoranda originating in Executive Directors' offices relating to Board or Board Committee proceedings
Board Papers:
<p>After 5 years</p> <ul style="list-style-type: none"> • Board papers prepared before July 1, 2010 and classified "Official Use Only"
<p>After 10 years</p> <ul style="list-style-type: none"> • Miscellaneous memoranda or informal notes distributed to the full Board or to a Board Committee
<p>After 20 years</p> <ul style="list-style-type: none"> • Board papers classified as "Confidential" or "Strictly Confidential" • Memoranda of the President that accompany Board papers
Other Information:
<p>After 5 years</p> <ul style="list-style-type: none"> • Final documents listed in Annex 3 of the Handbook prepared before July 1, 2010, and classified as "Official Use Only"
<p>After 20 years</p> <ul style="list-style-type: none"> • Financial information restricted under Exceptions 10 (a) through (c) (unless the information pertains to Exceptions 1 through 8 or 10 (d) in Table 1) • Other deliberative information restricted under Exception 9 (unless the information pertains to Exceptions 1 through 8 or 10 (d) in Table 1) • Final documents listed in the Annex 3 of the Handbook prepared before July 1, 2010, and classified as "Confidential" or "Strictly Confidential" • Other documents in the possession of the Bank's Archives Unit (unless the documents pertain to the Exceptions 1 through 8 or 10 (d) in Table 1, including any deliberative or financial information containing or referring to those exceptions).

¹ Documents listed in this Table are declassified provided they do not contain or refer to information that is not eligible for declassification (i.e., Exceptions 1–8, 10(d)). See *Bank Policy on Access to Information*, paragraph 32.

Public Access to Bank Information



Bank's External Website or on Request

Publicly available information may be accessed through the World Bank's website at www.worldbank.org. For information that is not accessible through the website, requests may be submitted in writing by mail, fax or electronic means. Electronic requests are encouraged and should be submitted via www.worldbank.org/wbaccess where they are logged, assigned a case number and tracked. Requests may also be made in person at the InfoShop in Washington, DC and the Public Information Centers in member countries where they will be entered into the request tracking system. If the members of the public approach Bank staff with information requests, staff may provide the information if it is readily available on the Bank's external website. Otherwise, ***it is important that requests be sent to the central request line*** so that they can be tracked and service standards ensured.

Handling of Requests. The Bank acknowledges written requests within 5 working days, and tries to provide a more comprehensive response within 20 working days; additional time may be needed in special circumstances. If the Bank believes that the request is unreasonable or unsupported, it may deny the request and inform the requester. Unreasonable requests may be multiple requests, blanket requests, and those that require the Bank to create, develop, or collate information. Unsupported requests include those that: (a) do not provide enough information to enable the Bank to locate the requested document in the Bank's records management system; and/or (b) are for documents that the Bank is unable to locate in the Bank's records management system after a reasonable search.

Figure 4 summarizes the key steps for handling requests. When the Bank receives a request for information that is not accessible on the Bank's external website, staff of the responding unit (i.e., Archives or InfoShop) review the request to determine whether the information falls under any of the exceptions or have been otherwise restricted using the Bank's prerogative; if it does not, the information is made available to the requester. If the information falls under Exceptions 1 through 7 or 10(d), listed in Table 6, staff inform the requester in writing that this information is not available under the Policy.

Requests for information that falls under Exception 8 (corporate administrative matters) are sent to the Director concerned (if the information requested is dated after July 1, 2010).

- ⌚ If the Director does not recommend releasing the information, it is not released. The requester is informed including the reason(s) why and informing them of their right to appeal the decision.
- ⌚ If the Director believes the request is warranted, then s/he recommends the request to the AI Committee which may

**Figure 4. Handling Access to Information Requests**

Information Contains:	Action:
No Exceptions	<ul style="list-style-type: none"> Information released
Exceptions 1–7 or 10(d)	<ul style="list-style-type: none"> Information not released
Exception 8	<ul style="list-style-type: none"> AIC considers to override exception 8: <ul style="list-style-type: none"> Agrees: Information released Denies: Information not released (appealable)
Exceptions 9 or 10 (a–c)	<ul style="list-style-type: none"> Eligible for immediate declassification: <ul style="list-style-type: none"> Yes: Information released No: request sent to AIC AIC considers to override exceptions 9, 10 (a–c) <ol style="list-style-type: none"> Denies: Information not released (appealable) AIC may refer to Board/Client/Third Party if info provided or owned by such party <ul style="list-style-type: none"> Party Agrees: Information released Party Denies: Information not released (not appealable) AIC releases other eligible deliberative/financial information

authorize the request for information pertaining to Exception 8, where necessary consulting the Board if it is a Board record or paper.

- ⦿ If the AI Committee denies the request, the requester is informed and notified of their right to appeal. Board decisions to deny access may not be appealed.

If the request for information falls under Exceptions 9 (deliberative) or 10 (a–c) (financial information), it is reviewed by Archives to determine whether it is eligible for immediate declassification. Otherwise, the process followed is similar to Exception 8. However, in considering a request to release such

Table 6: Restricted Information Not Available on Request

1. Personal Information
2. Communications of Executive Directors' Offices
3. Proceedings of Ethics Committee for Board Officials
4. Information subject to Attorney-Client Privilege
5. Security and Safety Information
6. Information under Separate Disclosure Regimes and Other Investigative Information
7. Information provided by Client or Third Party in Confidence
8. Corporate Administrative
- 10d. Banking or billing information of World Bank Group entities, member countries, clients, donors, recipients, or vendors, including consultants



restricted information, the AI Committee may need to consult the Board. If the deliberative or financial information is contained in a Confidential or Strictly Confidential Board record or paper, the Board considers the request. If the request is denied, the requester is informed and notified that there is no right to appeal a Board decision. If the Bank considers disclosing restricted information that also contains or refers to information given in confidence to the Bank by a client or a third party, the Bank needs that party's written agreement. If the requested document belongs to a client or third party, the requester is referred to that party. The disclosure of other restricted information requires the approval of the Access to Information Committee

Service Fees. Most operational information is routinely posted on the Bank's external website, and is available for download free of charge. For any request for information that is not routinely posted, the Bank may charge reasonable fees for providing digital or hard copies, particularly for requests that are complex or time-consuming. Publications, some specialized databases, and other knowledge products (including subscription-based services) may be purchased through the Bank's Office of the Publisher. The full text of books published by the Office of the Publisher may be viewed and downloaded free of charge on the World Bank website or viewed on Google Books. The core statistical databases may be accessed free of charge on the World Bank website.

Appeals of Denial of Access to Information

A requester whose request for information is denied may submit an appeal if the requester is able to: (a) establish a reasonable (*prima facie*) case that the Bank has violated the terms of the Policy by improperly or unreasonably restricting access to information that it would normally disclose under the Policy; or (b) make a public interest case to override the policy exceptions regarding corporate administrative matters, deliberative information or certain financial information.

Appeals are first considered by the Bank's Access to Information Committee. The AI Committee makes its best effort to reach a decision on appeals within 45 working days of receiving an appeal; if the AI Committee upholds the original decision to deny access to the information, it provides the reasons to the requester. If the AI Committee reverses that decision, the information will be provided to the requester.

An appellant who is not satisfied with a decision of the AI Committee—***on an appeal alleging the Bank has violated the Access to Information Policy by denying access to information that would normally be disclosed under the Policy***—may appeal the decision to the Appeals Board. The Appeals Board



does not consider appeals concerning requests to override the policy exceptions (Figure 5).¹¹

All appeals must be submitted in writing to the Access to Information Secretariat (which is managed by the Information Policy unit of the Legal Vice Presidency) within 60 calendar days after a decision to deny access. Appeals received beyond the respective 60-day period for filing an appeal with the AI Committee (first stage of appeal) and the Appeals Board (second stage of appeal) are deemed out of time and are not considered. Appeals may be submitted electronically through the Bank's website at www.worldbank.org/wbaccess or in a letter to Access to Information Secretariat, World Bank, 1818 H Street, NW, Washington, DC, 20433. If provided by letter, the Policy indicates the information needed to be included in the appeal request.¹² Appeals should be addressed to either the AI Committee or the Appeals Board.

Monitoring and reporting. The Bank is introducing a system to track access to information requests which captures all disclosure and declassification decisions as well as compliance with service standards. The Information Policy unit (Legal VPU) draws on information from this system and from Archives/InfoShop to prepare periodic reports for Management and the Board. Decisions concerning access to information requests and declassification of information under the Policy are publicly disclosed.

Figure 5: Process for Appealing Denial of Access

- | |
|---|
| <p>What Basis?</p> <ol style="list-style-type: none"> 1. Restricted access to normally disclosable information
(i.e. violation of Policy) 2. Override Policy exceptions (i.e. Exceptions 8, 9, 10 a–c) <p>Who Decides?</p> <ul style="list-style-type: none"> • Level One: AI Committee hears (1) + (2) • Level Two: Appeals Board hears (1) only |
|---|

¹¹ Refer to the *Bank Policy on the Access to Information* (Section IV, F) for more details on the appeal process.

¹² See *Bank Policy on the Access to Information*, paragraph 39.

Annexes

Annex 1: Examples of Information on
the Exceptions List

Annex 2: Selected Routinely Available Documents

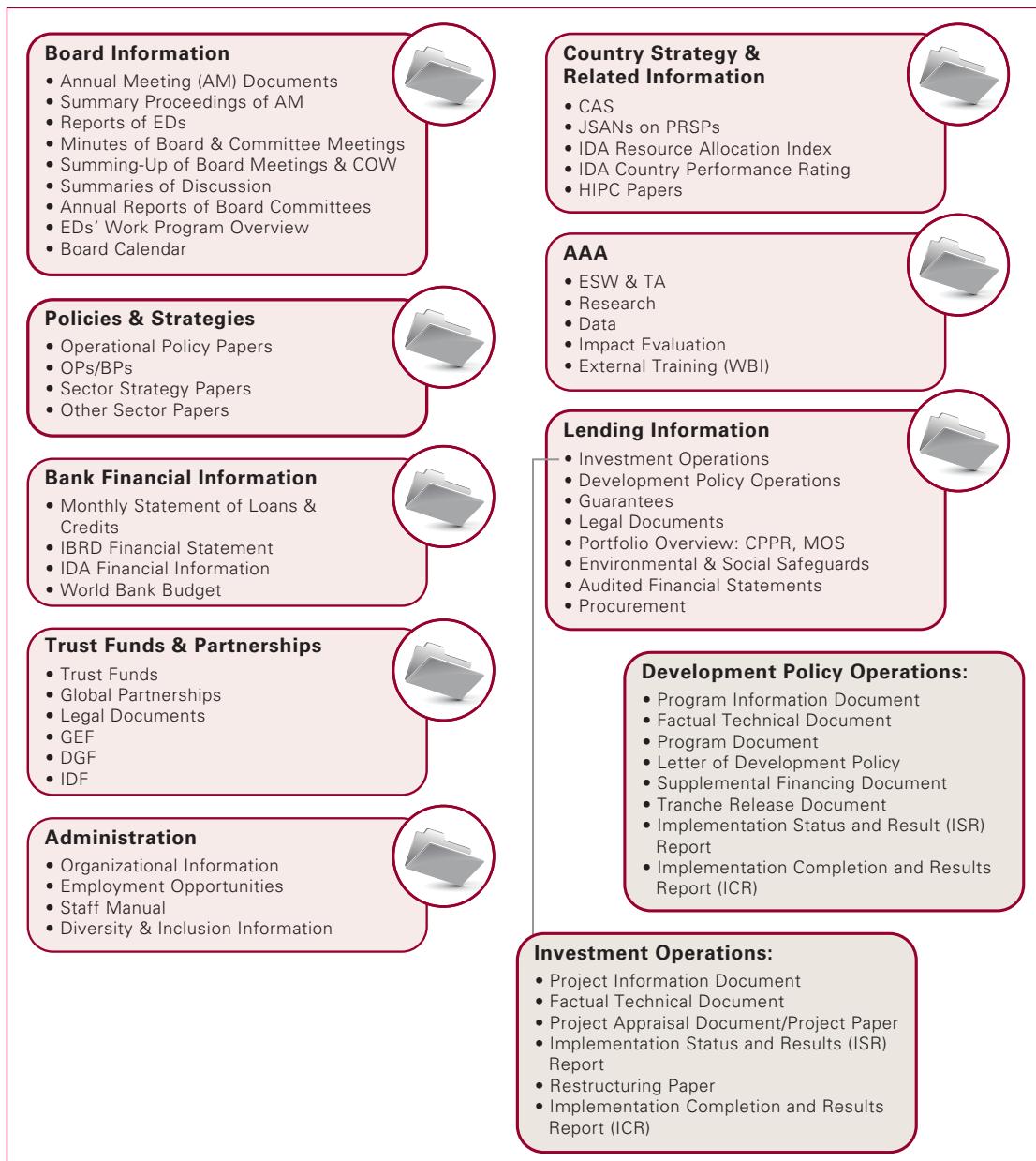
Annex 3: Declassification Schedule for Certain
Historical Documents – Created Before July 1, 2010

**Annex 1: Examples of Information on the Exceptions List**

Exception	Examples
Personal Information	<ul style="list-style-type: none">• Staff records, medical information, and personal communications (including e-mail)
	<ul style="list-style-type: none">• Staff appointment and selection processes
	<ul style="list-style-type: none">• Proceedings of the Bank's internal conflict resolution mechanisms
	<ul style="list-style-type: none">• Investigations of allegations of staff misconduct
Communications of Executive Directors' Offices	<ul style="list-style-type: none">• Communications within and between individual Executive Directors' offices, or with member countries they represent or with third parties
Ethics Committee	<ul style="list-style-type: none">• Proceedings of the Ethics Committee for Board Officials
Attorney-Client Privilege	<ul style="list-style-type: none">• Communications provided and/or received by the General Counsel, in-house Bank counsel, and other legal advisors
Security and Safety Information	<ul style="list-style-type: none">• Information whose disclosure would compromise the security of Bank staff and their families• Logistical and transport arrangements
Information Restricted Under Separate Disclosure Regimes	<ul style="list-style-type: none">• Independent Evaluation Group (IEG)• Inspection Panel (IP)• Integrity Vice Presidency (INT)• Bank's sanctions process
Information in Confidence	<ul style="list-style-type: none">• Information underlying financial sector assessments• Guarantee Agreements (under OP 14.25)• Fee based service reports and legal agreements
Corporate Administrative Matters	<ul style="list-style-type: none">• Corporate expenses, procurement, real estate• Pension and other retirement benefit plans• Staff statement of expenses
Deliberative Information	<ul style="list-style-type: none">• Draft ESW and other reports• Financial sector stress tests• Assessment of government debt management capacity• Communications with governments relating to lending• Communications with donors relating to trust funds• Verbatim transcripts of Board meetings• Green Sheets when a subsequent Board discussion is expected• Memoranda of the President• Regional Board Briefings• Quarterly Business Reviews• Miscellaneous memos or informal notes for the Board or Committee
Financial Information	<ul style="list-style-type: none">• Estimates of future borrowings by IBRD• Financial forecasts and credit assessments• Treasury operations transactions• Individual loan or trust fund transactions• Banking or billing information related to the Bank, member countries, clients, donors, recipients, or vendors, including consultants.



Annex 2: Selected Routinely Available Documents





Annex 3: Declassification Schedule for Certain Historical Documents – Created Before July 1, 2010

The final documents listed below—if created before July 1, 2010 and not already made public under earlier disclosure policies of the World Bank—are eligible for declassification according to the following schedule:

- a. 5 years after the date of a document classified as “Official Use Only”
- b. 20 years after the date of a document classified as “Confidential,” or “Strictly Confidential”

These documents are eligible for declassification if they do not contain or refer to information that fall under an exception that is not eligible for declassification.

A. Operational documents prepared by the Bank

- ⌚ Country Assistance Strategies (CAS)
- ⌚ CAS Progress Reports
- ⌚ Interim Strategy Notes
- ⌚ CAS Completion Reports (included as an annex to the follow-on CAS)
- ⌚ Public Information Notice for a CAS
- ⌚ Joint Staff Advisory Notes on Poverty Reduction Strategy Papers (PRSPs)
- ⌚ Country financing parameters (including the analyses that underpin their preparation)
- ⌚ Economic and Sector Work and Non-Lending Technical Assistance reports
- ⌚ Factual Technical Documents that underpin project preparation
- ⌚ Project Appraisal Documents (previously Staff Appraisal Reports)
- ⌚ Project Papers
- ⌚ Program Documents for Development Policy Operation (DPOs)
- ⌚ Supplemental Financing Documents (DPOs)
- ⌚ Tranche Release Documents (DPOs)
- ⌚ Integrated Safeguards Data Sheets



- ⌚ Country Assessment Reports on the Use of Country Systems (UCS)
- ⌚ Project Assessments for UCS pilot countries
- ⌚ Implementation Completion and Results Reports (ICR)
- ⌚ Note on Cancelled Operations (NCO) (previously Project Completion Note)
- ⌚ Monthly Statement of Loans and Credits
- ⌚ Monthly Operational Summary of the lending pipeline (MOS)
- ⌚ *Status of Projects in Execution* (SOPE)
- ⌚ Country Portfolio Performance Reviews (CPPRs)
- ⌚ Sector Strategy Papers (SSPs), Draft Sector Strategy Papers, Draft Concept Notes and Consultation Plan for an SSP
- ⌚ All other operational policy and strategy papers
- ⌚ Numerical Country Policy and Institutional Assessment (CPIA) Ratings for countries eligible for IDA financing
- ⌚ Numerical IDA Country Performance Ratings (derived from CPIA ratings)
- ⌚ Funding proposals for activities financed through Bank-administered trust funds
- ⌚ Preliminary, decision-point, and completion-point documents prepared under the Heavily Indebted Poor Country (HIPC) Initiative
- ⌚ QAG synthesis

B. Financial information

- ⌚ Annual Budget Document

C. Documents prepared by a client

- ⌚ Poverty Reduction Strategy Papers
- ⌚ Letters of Development Policy
- ⌚ Procurement Plans and updates

D. Board proceedings

- ⌚ Executive Directors' Work Program

Who Does What?

A Quick Reference Guide for Access to Information

STAFF

- ⇒ Determine if information is public or restricted.
- ⇒ Classify as “Public” all information that does not contain any of the Access to Information Policy “exceptions.”
- ⇒ Classify non-public or “restricted” information using AMS 6.21A (i.e., as Official Use Only, Confidential, or Strictly Confidential), including different language versions.
- ⇒ Ask clients and third parties to mark their own documents.
- ⇒ Mark all documents accordingly, both electronic and paper.
- ⇒ File information created or received as part of Bank business in Bank’s records management system (e.g. IRIS, Image Bank). For restricted information, indicate which exception(s) apply when filing.
- ⇒ If outside parties approach Bank staff with requests for information, staff may provide it if it is readily available on the Bank’s external website. Otherwise, the requester should submit a request to www.worldbank.org/wbaccess. If, however, requested information is public but cannot be found, staff will be asked by their Director to search for it and provide it in a timely and complete manner.

DIRECTORS

- ⇒ In exercising its **prerogative to restrict access** to information that it would normally disclose, the Bank determines whether such disclosure is likely to cause more harm than benefit. Directors may exercise this prerogative when deeming that information in area of their concern (not a Board paper or Board Record) may cause more harm than benefit. This decision is subject to appeal by the public.
- ⇒ Directors also consider whether certain restricted information (i.e., corporate administrative matters, deliberative information, and some financial information) should be made available under the Bank’s **prerogative to disclose restricted information**. A request for restricted information (dated after July 1, 2010) is referred to the Director concerned, who may decide that the request is not warranted. In this case, the requester is informed of the decision and the right to appeal. If the Director believes the request may be warranted, s/he recommends the request to the Access to Information Committee for decision.
- ⇒ If information that would normally be made public is requested but not located in the Bank’s records management system, Directors will be contacted and asked to request relevant staff to search for the information; Directors will need to confirm that a reasonable search has been conducted and relevant documents, if located, filed appropriately or provided to Archives.

VICE PRESIDENTS

- ⇒ Vice Presidents may exercise the Bank’s prerogative to **restrict access** to a Board paper that would otherwise be public information. This decision is subject to appeal by the public.

THE BOARD

- ⇒ The Board exercises the Bank’s prerogative to **disclose** Confidential or Strictly Confidential Board records or papers. Similarly, it is the Board’s prerogative to **restrict access** to Board records that would otherwise be public. The Board’s decisions are not subject to appeal.

For questions related to *Access to Information*,
staff should go to the on-line Help Desk
on the Bank's intranet:

<http://accesstoinfo>



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