DOCUMENT OF THE INTER-AMERICAN DEVELOPMENT BANK

ACCESS TO INFORMATION POLICY IMPLEMENTATION REPORT

2017

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ABBREVIATIONS

AfDB	African Development Bank
AIC	Access to Information Committee
AsDB	Asian Development Bank
ATI Workflow	Workflow for document disclosure
CDB	Caribbean Development Bank
EBRD	European Bank for Reconstruction and Development
EIB	European Investment Bank
ESG	Environmental and Social Safeguards Unit
ESMR	Environmental and Social Management Report
EXR	Office of External Relations
EzShare	Information management system
IATI	International Aid Transparency Initiative
IDB Invest	Inter-American Investment Corporation
IFC	International Finance Corporation
ITE	Information Technology Department
KNL	Knowledge and Learning Sector
MICI	Independent Consultation and Investigation Mechanism
OVE	Office of Evaluation and Oversight
PIC	Public Information Center
SEC/ATI	Access to Information Section, Office of the Secretary
SPD	Office of Strategic Planning and Development Effectiveness
VPC	Vice Presidency for Countries
VPS	Vice Presidency for Sectors and Knowledge

I. PROGRESS IN IMPLEMENTING THE ACCESS TO INFORMATION POLICY

1.1   In 2017, the Bank continued to make progress in key areas of implementation of the Access to Information Policy: (i) the establishment of systems and use of platforms to facilitate application of the policy; (ii) training for better understanding of the policy by internal stakeholders; (iii) the establishment of procedures and tools to support Bank staff in classifying and disclosing information, etc. These advances, which were recognized by Office of Evaluation and Oversight (OVE) in its final evaluation of the Ninth General Increase in the Resources of the IDB, afford a good opportunity to address the challenges of implementation.

A. Proactive disclosure of information

1.2   Proactive disclosure of information is a reflection of the Bank's commitment to a high standard of transparency adopted when the policy took effect. The IDB's steady progress in information disclosure has been associated with a series of resources it has made available to the public intended to promote openness, access, use, and reuse of information and data, with the goal of tapping the potential of that information and placing it within everyone's reach. These resources include the Bank's projects website, which serves as a portal for active transparency by making it possible for data and documents related to its different projects to be consulted, broken down by countries and sectors, while identifying the different processing stages. The IDB also has an institutional website containing information on its governance, resources, and tools, and a website for public disclosure of its knowledge products.

1.3   The Bank also has eArchives, an initiative that has enabled the disclosure of different collections that reflect its historical memory, including operational archives, reports of the Annual Meetings of the Boards of Governors, speeches and publications by the Bank's Presidents and Governors, etc.

1.4   Along the same line, the IDB is continuing to progress in proactive information disclosure through its participation in the International Aid Transparency Initiative (IATI) which seeks to promote greater transparency of institutions that finance international aid, through the disclosure of information in open formats that can be easily accessed by any user. In 2017, the Bank increased the frequency with which it publishes IATI data to once a month, to facilitate public access to the most recent information on IDB activities.

1.5   The data published by IATI are also available on the IDB's open data portal. The Bank also has a georeferenced information portal on its operations, including subnational operations, through its platform MapAmericas. It supports the work of AidFlows, a partnership with the World Bank, the Organization for Economic Cooperation and Development (OECD), and regional development banks, to visualize flows of financing from the viewpoints of both suppliers and beneficiaries.

1.6   The Bank also shares knowledge in the form of data sets. Technology is making a dynamic contribution to the creation of applications and solutions that enable the potential value of open data to be developed, thereby contributing to sustainable development. Globally and in the context of these technological advances, the notion of open data has arisen as a vital tool for maximizing access to information that can be used, reused, and redistributed, at no reproduction cost and in structured formats that enable automated reuse by third parties.

1.7   To this end, in 2015 the IDB launched its open data portal [Numbers for Development](#) that enables users to explore, visualize, and reuse data on Latin America and the Caribbean compiled by the Bank over than 50 years. To strengthen this initiative, the Bank adopted [Creative Commons Licenses (CCLs)](#), which allow the public to copy, share, redistribute, and publish the content of various Bank publications. These initiatives contribute to the development of new knowledge and applications that enhance the institution's transparency.

1.8   Another indication of how the IDB has redoubled its efforts to open up and share its knowledge is the launch in early 2017 of the Code for Development initiative. It consists of a platform that allows governments, civil society, and citizens to explore, contribute, reuse, and adapt digital tools—mainly in open code—to help address social and economic development challenges. By the end of 2017, 15 tools had been published at [Code for Development](#) and many projects have adopted our guide for good practices to ensure that the tools created are reusable.

B.   Development of systems to improve efficiency in the disclosure of information

1.9   With the purpose of improving efficiency and timeliness in the disclosure of environmental and social information on category A and B projects, in 2017 under the Convergence platform, Management identified specific milestones for disclosure to be met by project team leaders, as a condition precedent to operations analysis missions. To that end, a special module was created in that platform containing the disclosure requirements applicable to this type of information.[1] The new technology tools are also expected to facilitate the work of project teams in disclosing key information while simultaneously contributing to full compliance with disclosure deadlines.

1.10   The Bank has also systemized the receipt of information requests so they can be answered on time. It has an online form for information requests from the public, and this data is used to create statistical reports so that information can be filtered by topic, country, sector, etc. The Bank is currently in the process of updating the system to enhance its efficiency through the use of even more advanced technology. During the second half of 2017, functions were developed, the necessary adjustments were made, and new processes were created for the Information Request Management System, based on the ServiceNow platform. The system has functions and flows to incorporate requests for information originating in the Country Offices.

C.   Training in the values of the Policy and their internalization

1.11   In 2017, the IDB continued to focus on training for staff to increase understanding of the policy and ensure it is properly applied, given its impact on the Bank's regular

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[1]   To provide clear guidelines for project teams on the types of environmental and social information to be disclosed prior to analysis missions, as indicated in [Environment and Safeguards Compliance Policy (Operational Policy OP-703)](#) and on the timeliness of disclosure, in April 2017 the [guidelines for processing sovereign guaranteed operations](#) were updated to include all the disclosure requirements under the [Access to Information Policy (Operational Policy OP-102)](#). These updates to the rules and the development of new tools on the systems level have grown out of the lessons learned from several Independent Consultation and Investigation Mechanism (MICI) investigations to review compliance of Bank policies.

activities, particularly operations.[2] At the project level, some of these activities included training in the use of the ATI Workflow function to disclose operations information through the use of the Bank's systems (ezShare and Convergence).

1.12   Seven different types of workshops and training sessions were held, attended by 1,051 people.

D.   Future challenges

1.13   Implementing the Bank's new systems has offered an opportunity to enhance efficiency and timeliness in information disclosure. Despite the progress made with the new tools, adequately integrating the different platforms on the institutional and operations levels remains a challenge. Furthermore, since the systems are recent, their efficient use requires the ability to adjust them and tailor them to the Bank's particular needs so they can serve as the foundation for new advances in disclosure. This challenge is consistent with OVE's final report evaluating implementation of the policy on information disclosure as it relates to the Bank's new systems, as part of its examination of GCI-9.

1.14   Implementation of the recent developments in Convergence to ensure timely disclosure of environmental and social information will assist the Bank in better compliance with the disclosure of key project information. Notwithstanding the foregoing, one major challenge that goes beyond adequate training is the need to increase involvement within project teams. Internalizing and creating habits regarding to the importance of information disclosure can serve as an effective tool for enhancing the Bank's transparency.[3]

1.15   Lastly, another important challenge is disclosure of information during the implementation stage of projects. Information disclosure in the project preparation and approval stages has been a relevant factor in promoting greater transparency, with the adoption and implementation of access to information policies in different international financial institutions. Before senior decision makers approve financing for a given project, a large amount of information is produced and made available to the public. Nonetheless, project information and environmental and social information produced during project execution needs to be more widely disclosed.

II. IMPLEMENTATION ACTIVITIES IN 2017

A.   Proactive disclosure

2.1   The Bank's website is the main means of disclosing information. Since the 2015 improvements, users have been keenly interested in visiting and navigating it. The site received 6,523,687 hits in 2017 compared to 6,067,660 in 2016, representing a 7.5% increase.

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[2]   Management has made extensive efforts to train staff with positive results, as OVE recognizes its examination of implementation of the Access to Information Policy in the context of its final evaluation of the IDB's Ninth General Capital Increase. Document RE-515-6, paragraph 4.14, 2017.

[3]   Improvements in the efficiency with which operations documents are disclosed, particularly environmental and social information, has been a Bank priority in implementing the policy in 2017, as reflected, for example, in the inclusion of key aspects of Policy application in the new procedures for processing sovereign-guaranteed operations set forth in manual PR-200. The Bank is also making important changes in the Convergence platform to enable this kind of information to be disclosed in a timely manner.

2.2 In line with proactive disclosure, in 2017 the digital communication strategy promoted by the Office of External Relations (EXR) included the launch of a new website based on new technologies that will drive the Bank's website in the coming years. This new site focuses on results, knowledge products, and the opportunities offered by the Bank. During 2017, the new website received 6.5 million visits, 65% of which came from Google searches. In 2017, EXR supported social media campaigns to promote the content offered by the Bank, improved its ability to offer analysis and statistics on our web content, and launched a new project to unify the Bank's database in a single client management platform.

2.3 Today, the IDB has 23 blogs on sectors and regions and a similar number of social media accounts to inform the public about its projects. In line with the large increase in visits to the Bank's institutional site, during 2017 the public remained very interested in accessing information on the IDB, either through open data[4] or access to documents in digital format. For open data, there were 28,300 downloads of datasets in 2017, for example, the Database of Political Institutions 2015, the 2010 InfraScope Index for Latin America and the Caribbean, the Freight Transport and Logistics Statistics Yearbook, and surveys under the Emerging and Sustainable Cities Initiative. In 2017, 3,434,302 documents in digital format were downloaded compared to 1,858,386 in 2016. Link 1 in this report's table of contents includes a list of documents that were most frequently downloaded in 2017.

2.4 The Access to Information website continues to be frequently visited, with 38,909 hits compared to 38,740 in 2016 and 30,000 in 2015. Distribution of the 2017 visits was 23,034 visits to the site in Spanish, 13,142 visits to the site in English, 2,163 to the site in Portuguese, and 570 to the site in French.

2.5 During 2017 a new keyword search was added to the Access to Information site (not just by date) for recently-disclosed documents, simultaneously-disclosed documents, and Board of Executive Directors documents. From July 2017 to May 2018, the public conducted 2,634 searches in these three categories. The most frequently sought information (with more than 20 searches) was a loan operation with Brazil on the Program to Strengthen the Unified Health System in the Metropolitan Region of Salvador (BR-L1389). The most recent figures on Access to Information's external website show the 20 documents that were most frequently downloaded via the search function (see additional details at **link 2**).

2.6 Further improvements will be made to this website during 2018 to incorporate new content of interest to different groups of Policy users, provide a new design, match supply and demand for information more closely through use of the Policy, and facilitate greater access to the information produced by the Bank.

2.7 One important advance during 2017 was the launch of the Executive Directors' website and a generic contact email, intended to improve content and offer Board contact information, as a way of increasing our organization's transparency. With this project, the IDB brought itself into line with similar initiatives by other multilateral development organizations and provided concrete evidence of its commitment to transparency, by providing the public with the contact information of the most senior level of its governance. As part of the launch process, SEC/ATI

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[4] Open data are purpose-driven and accessible, with technical and legal characteristics that permit them to be used, reused, and redistributed free-of-charge by anyone at any time in any part of the world.

offered workshops for Executive Directors' assistants on the functions of the page. This session also served to explain the difference between requests for official information received by the Bank and the different communications received by the country chairs through the contact addresses that were created. Detailed information on this training is provided in **Table 2** below.

2.8   As for public interest in accessing the Executive Directors' website, there were a total of 17,789 hits (10,116 in English and 7,673 in Spanish) from the time it was launched in May 2017 and the end of the year. EXR noted that the number of visits is high for a recently-created page and that the figures obtained in just eight months points to high public interest in this information.

B.   Information requests

2.9   In 2017, EXR's Public Information Center (PIC) received a total of 5,062 requests for information,[5] 2,203 of them through online forms and 2,859 received at the Country Offices by email or telephone.[6] **Figure 1** shows the number of online requests by source. **Figure 2** shows requests received via the online form by thematic area. **Link 3** provides the data for requests received by country.

FIGURE 1: Breakdown of requests received at headquarters by source
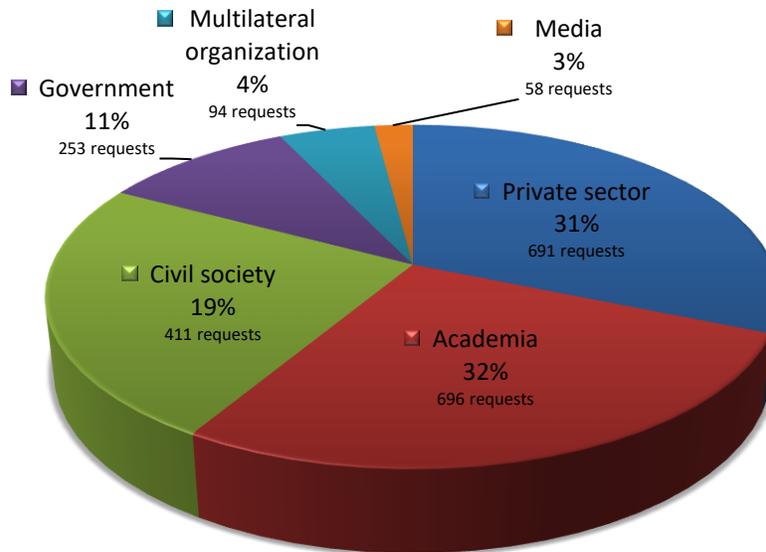
Source: PIC.

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[5]   The total number of requests includes 13 for historical information and 42 for information. The historical information is information produced by the Bank or in its possession prior to 1 January 2011, when the Access to Information Policy came into effect.

[6]   The PIC at Headquarters only received reports on requests for information in 2017 from the following countries: Argentina, Barbados, Costa Rica, Dominican Republic, El Salvador, Europe, Guyana, Mexico, and Paraguay.

FIGURE 2: Breakdown of requests received at Headquarters by topic
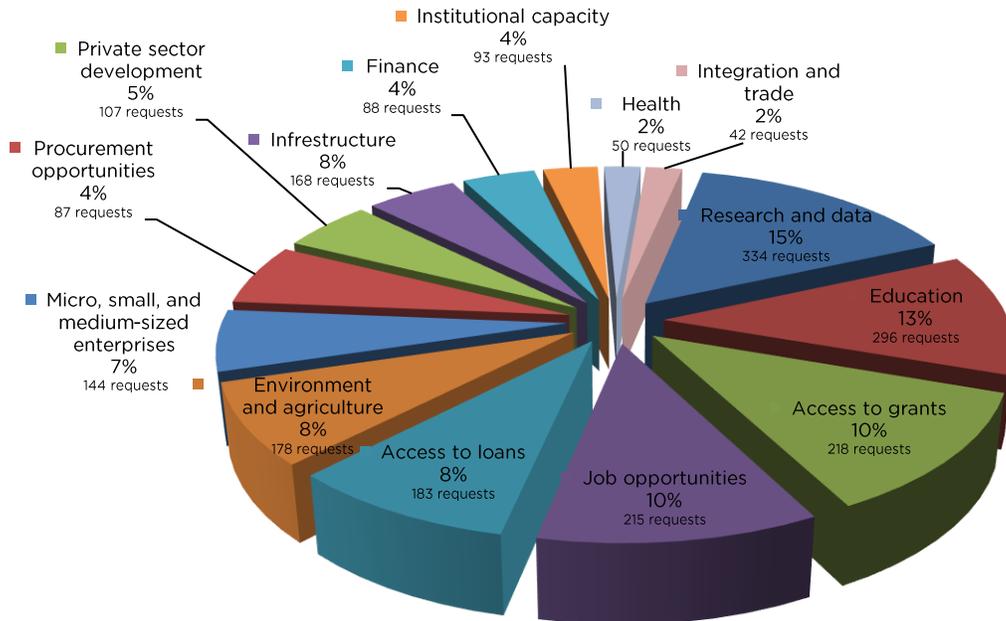
Source: PIC.

2.10 In 2017, a similar number of requests was received at Headquarters as in 2016, when 2,180 were received. The number has remained unchanged in recent years.

2.11 **Table 1** below contains information on the average response time to requests received through the online form in 2017. Although all information requests were answered, the longer response time in 2017 was due to system management problems encountered by EXR.

Table 1: Average days to respond to requests in 2017

Subject area	Average time (days)
Access to grants	36
Access to loans	31
Job opportunities	36
Education	32
Environment and agriculture	33
Health	33
Infrastructure	33
Institutional capacity	28
Finance	32
Micro, small and medium-sized enterprises	32
Integration and trade	35
Private sector development	29
Procurement opportunities	30
Research and data	30
Average	**32**

Source: PIC.

2.12   As mentioned in paragraph 1.10, to standardize communications between the Bank and the public and to facilitate handling by Country Offices of the requests they receive, with support from ITE, SEC/ATI worked to develop a system to compile all exchanges in a single platform for centralized processing.[7] This integration and standardization will also give a more accurate idea of public needs, identify trends based on types of information requested by users so the Bank can improve its proactive disclosure, and contribute to greater accountability in our work.

2.13   Although the Bank has the right to deny access to information based on any of the ten exceptions of the policy,[8] in 2017 just one request for information was denied on the grounds of the exception relating to nonsovereign guaranteed operations, and no request for reconsideration was received.

C.   Training

2.14   To provide Bank staff with effective tools that contribute to better understanding and implementation of the Policy, training workshops for the different departments continued to be offered during 2017, reaching 1,051 employees.

2.15   During 2017, SEC/ATI continued to provide training in the document-disclosure workflow (ATI Workflow) in ezShare—the Bank's information management system. It also continued training Publishers under the certification/recertification process that requires this staff to receive training in ATI Workflow to obtain the access they require to disclose information through ezShare.[9]

As part of the update to the Departmental Classification Instructions, SEC/ATI held training sessions on the Policy and its exceptions, to provide staff in different Bank areas with an understanding of how the exceptions are to be applied in cases in which the information produced or received by the Bank could be confidential and therefore not subject to disclosure. Eighteen sessions for 483 staff members were held, which indicates their keen interest in sessions of this kind. The workshops will continue in 2018, to reach departments where sessions could not be programmed in 2017, particularly VPS and staff working in the Country Offices.[10]

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[7]   In 2017, SEC/ATI worked with ITE to adapt the Service Now system, which is now being used by various Bank departments, as a new tool for processing information requests received at Headquarters and the Country Offices.

[8]   Paragraph 4.1 of document GN-1831-28 establishes the list of exceptions.

[9]   A total of 258 Publishers (staff authorized to publish documents*)* have been certified and are trained to carry out their role of disclosing information on the Bank's external website.

[10]   The work to update the Departmental Classification Instructions began in 2016 and will continue during the first part of 2018.

2.16   **Table 2** provides a breakdown of training in 2017.

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TABLE 2: Training workshops, 2017

Title	Place	No. of participants
Sessions on the exceptions of the Access to Information Policy	Headquarters and WebEx	483
Certification sessions for Publishers in ATI Workflow in ezShare	Headquarters	235
VPC workshops for Representatives and Operation Chiefs	Headquarters	50
Specialized training with the departments	Headquarters	57
Session on the Access to Information Policy for new Bank employees	Headquarters	191
Session for new members of the Board of Executive Directors	Headquarters	20
Session for Executive Directors' assistants on the new external website	Headquarters	15
Total		**1,051 people**

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The session held with the Executive Directors as part of the onbording workshop conducted each year by the Office of the Secretary is particularly important.

D.   Technical assistance in access to information

2.17   The ATI Help Desk, a platform to provide Bank staff with technical assistance on the Policy and its implementation, responded to nearly 300 consultations, 213 of which were received and resolved with support from ITE's 1111 service platform. In all cases, the assistance involved solving technical problems in the ezShare ATI Workflow. As in previous years, most of the consultations involved support for Focal Points and Publishers. This year, consultations were also made relating to technical problems encountered by authors uploading public documents in ezShare and Convergence.[11]

2.18   Given the foregoing, during 2017 support from the ITE Client Center was necessary to resolve 213 cases of technical problems relating to the use and integration of the Bank's documentation systems. The figures provided by ITE refer to 114 incidents (INC) and 99 requests for changes (WRK), representing 14% and 9% of all cases received by the Service Now (SNOW) platform for 2017. The technical failures include problems related to the pubic document disclosure function in ezShare – ATI Workflow (ranging from the public "trigger" activated by the author when uploading a document in Convergence or ezShare, to notifications to the Publisher to disclose a document and document visibility on the website). Examples of specific issues were notifications/messages that were not reaching Publishers, inconsistencies in permissions to publish on various sites, and "disclosed" and "reject" buttons that did not work. These issues will be analyzed in 2018 to obtain more information on the incidents resolved and those pending resolution, so they can be included in ATI's 2018 action plan with ITE.

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[11]   The SEC survey highlighted that Management's level of satisfaction with ATI Help Desk assistance in classification and disclosure of documents was 91%.

E.   Systems

2.19   In the context of implementation of the ezShare system and the new Convergence platform for operations management, in conjunction with ITE, SEC/ATI prepared an action plan to resolve technical problems that arose during start-up, mainly related to the new information disclosure functions.

2.20   In addition, considering OVE's suggestion about establishing a control mechanism for classification of confidential information to facilitate compliance with the Policy's exceptions,[12] SEC/ATI is exploring with ITE how to automatically incorporate exceptions into the system. The specific objective is to allow for better monitoring of their correct use, in line with the sixth update to the Departmental Classification Instructions. As for Convergence and the disclosure of operational documents, in 2017 SEC/ATI participated in a working group to determine the requirements for a module to be created in Convergence that would ensure the disclosure of environmental and social information for category A and B projects. These new developments are expected to contribute to better compliance with the Access to Information Policy and the Environment and Safeguards Compliance Policy.

2.21   The ATI portal is a new access to information tool and one of the new functions created as part of the ezShare system especially for ATI Workflow. All personnel who act as Authors or Publishers have access to the ATI portal which offers them the possibility of generating reports on the public documents they have created and disclosed and on documents produced by their departments. The portal has a place where Authors can review the documents that have been disclosed and documents classified to be "disclosed over time." Publishers have a site where they can review their pending tasks (documents classified as public awaiting disclosure by their respective Publishers). The portal also has a box for reviewing documents that have been disclosed and are available on the Bank's external website. As for the reports function, the ATI portal allows reports to be generated for five types of document status—disclosed, undisclosed, pending publication, rejected by publishers, and disclosed over time. The portal also allows filters related to the document properties: date, title, author, activity, language, and Bank unit.

2.22   As for the 2017 data available in the ATI portal, **link 4** provides details on all the categories. The most important information permits the documents pending disclosure in each department to be identified. Pending documents should not remain on the list for more than five days, and it is therefore important for Publishers to be thoroughly familiar with the procedures for frequently reviewing their lists of documents pending disclosure. Another important figure is for documents removed from the website. It is important to know the cases in which Authors withdraw documents from the website, which should only occur if an error was made in their disclosure. This is being monitored and addressed in the different training sessions considering the use of the new systems by Bank staff.

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[12]   Background document on implementation of the Access to Information Policy as part of the final evaluation of the IDB's Ninth General Capital Increase, paragraph 5.6. Document RE-515-6, paragraph 5.6, 2017.

F. Stakeholders (Focal Points and Publishers)

2.23   The role of the Focal Points[13] has been vital for spreading knowledge of the Policy and for better coordination with the different departments/units in the implementation process.

2.24   In June 2017, a plenary meeting of Focal Points was held, attended by 30 people representing the Bank's different departments. The objective of the session was to inform them about the status of the Access to Information Policy, with emphasis on the start-up of the information disclosure systems, mainly ezShare and Convergence. The new external website with contact information for Executive Directors was also presented, as was progress in preparing IDB Invest's new Access to Information Policy. Lastly, the new process for certifying Publishers and the process for updating the Departmental Classification Instructions were also reported.

2.25   The Publishers continued to play an active role in document disclosure. To keep them up to date in the use of information disclosure tools, in 2017 specialized training workshops focusing on the disclosure process through the ezShare information management system were held for them. SEC/ATI also continued with the certification process, as mentioned in paragraph 2.15.

G. Access to Information Committee (AIC)

2.26   As part of its supervisory functions, the Access to Information Committee (AIC)[14] met in 2017 to learn about progress during 2016 in implementing the policy and the activities to be carried out by Management in 2016. At the meeting, the AIC approved the 2016 Annual Report, which was distributed to the Board of Executive Directors' Policy and Evaluation Committee for information in June 2017.

H. External Review Panel

2.27   The three members of the External Review Panel visited Headquarters in November 2017 to learn about progress in implementation over the last year. During their visit, the panel members had the opportunity to meet with various Bank departments: (1) KNL and SPD to learn the details of the Bank's open agenda, with the advances in Numbers for Development and Open Code; (2) SPD to learn about the Bank's progress in the IATI initiative and other transparency initiatives; (3) progress on the MICI policy; (4) a workshop on the new system for processing information requests in Service Now with SEC/ATI; and (5) a presentation by ESG on the new module in Convergence for the disclosure of environmental and social documents. The panel members also met with IDB Invest to familiarize themselves with the process of discussing and preparing the entity's new Access to Information Policy.

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[13]   In 2017, 35 Focal Points were active on the departmental level, including five for each of the Country Departments.

[14]   The AIC is an administrative body chaired by the Chief of Staff of the Office of the Presidency and consisting of the Executive Vice President, the three Vice Presidents, and the Manager of EXR. The Legal Department acts as the committee's legal advisor and SEC acts as its secretary. The AIC's responsibilities include supervising general application of the Policy, interpreting the Policy in accordance with its guiding principles, and examining and deciding on requests for reconsideration received from external requestors who have been denied access by the Bank.

2.28 Under the new service-level agreement between the Office of the Secretary and the IIC,[15] SEC/ATI continued to provide technical assistance in preparing IDB Invest's new Access to Information Policy, in line with best practices and international trends in information disclosure for private sector projects. During 2018, SEC/ATI will work with IDB Invest on public consultations on its Access to Information Policy.

I.   Dissemination and external activities of the Policy

2.29 Dissemination activities are vital for creating awareness among staff of the importance of the Policy as a tool for increasing the Bank's transparency with its stakeholders.[16] In 2017, SEC/ATI produced a promotional video for an external audience on the Policy's progress. The activity included recorded interviews with different champions in the Bank, in which they described how they interacted with the Access to Information Policy and its implementation and transmitted a message to the public, inviting it to engage more closely with the Bank by using the Policy. The video with the recordings is expected to be released in the first half of 2018.

2.30 Along the same line, a panel discussion was held on best practices for public consultation on private sector projects in November 2017. Ximena Abogabir, member of the IDB's External Access to Information Panel and Gonzalo Castro De La Mata, then Chair of the World Bank's Inspection Panel took part. The activity underscored the importance of high quality public consultations on the content of investment projects. The event was attended by various civil society organizations such as the Accountability Counsel, the Bank Information Center, the Accountability Project, and the Organization of American States (OAS). On the same date, a discussion panel on contract disclosure under the Extractive Industries Transparency Initiative (EITI) was held, with the participation of Rob Pitman, researcher with the Natural Resource Governance Institute. The event highlighted the importance of promoting greater transparency by disclosing information on transactions and contracts in the extractive sector, particularly given the growth in projects of this kind in our region.

2.31 In 2017, the IDB continued with its data transparency initiatives, including the regular publication of information on its operations through AidFlows and IATI mentioned in paragraphs 1.4 and 1.5. For more information on these initiatives, visit the IDB's data transparency page.

2.32 In November 2017, SEC/ATI participated in the International Financial Institutions' Working Group Meeting on Information Disclosure and Stakeholder Engagement. The meeting was intended to report on progress in implementing information policies, sharing experiences and knowledge of these processes, and identifying common challenges in these areas. The event was organized by the Black Sea Trade and Development Bank and drew participants from the African Development Bank, the IDB, IDB Invest, the World Bank, the Asian Development Bank, the

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[15]   IIC is the legal name of IDB Invest.

[16]   The results of a survey conducted as part of the audit of cybersecurity conducted by AUG in February 2017 are one example of the impact of Policy dissemination activities in recent years. The survey included questions to identify the level of knowledge of different subjects. One was about the Bank's regulations on information disclosure. Ninety-two percent of the respondents stated that they were fully or partly aware of these regulations. The survey consulted 4,598 Bank employees, including staff and contractors, with a 26% response rate.

Asian Infrastructure Investment Bank, the European Bank for Reconstruction and Development, the European Investment Bank, and the Caribbean Development Bank.

2.33   Among the activities to promote the Policy, SEC/ATI, in colaboration with KNL, produced a series of knowledge videos to provide information on the key aspects of the Policy, for example how to search for information on the IDB's external website and how to request information using the online form. These [audiovisual](#) materials, coupled with other knowledge products developed during 2017, will serve as complementary tools for disseminating knowledge of the content included in the training sessions on the Policy.

III. DISCLOSURE OF INFORMATION

### A.   Disclosure of information on operations

3.1   In 2017, 100% of the project profiles and loan proposals approved by the Bank were disclosed.[17] In addition, work continued on verifying compliance with the publication periods for these key documents.[18] As can be seen in **Figure 3**, in 2017 the Bank continued its positive trend in complying with the deadlines for publication of project profiles. Although the figure for loan proposals was lower than in the previous year, this can be explained by the challenges of using the new document disclosure system, ATI Workflow in ezShare, and by the integration of Convergence and ezShare for the disclosure of operations documents. For example, in the case of loan proposals, whose disclosure standard is two days after distribution to the Board, in cases where the project teams required additional time to successfully disclose their documents, they were published within an average of eight days after distribution.[19]

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[17]   In 2017, a total of 91 operation were distributed to the Board for approval, reformulation, or amendment. Of these, a total of nine operations had no project profile since they were a second programmatic operation, a second operation under a conditional credit line for investment projects (CCLIP), a second multiphase operation, or an emergency operation. It is important to note that all relevant information was disclosed on the Bank's external website.

[18]   To determine whether these documents were disclosed within the period established by the Policy, the time differential was calculated between the date of approval of the respective document in the case of project profiles or the date of distribution of the document to the Board in the case of loan proposals (documents for simultaneous disclosure) and the date on which Internet publication of the document was authorized in the ezShare system. The term for disclosure of project profiles is five working days and for loan proposals it is two working days.

[19]   Since the period for disclosing project profiles is five working days, but just two working days for loan proposals, there was more time for the former to resolve technical problems stemming from interaction with ezShare. In 2018, an action plan is being worked on with ITE to improve resolution of the technical problems that affected timely disclosure of the loan proposals, such as elimination of the draft areas in ezShare, the option of disclosing certain types of operational documents directly through ezShare, and elimination of the "publish" option from the Convergence "documents" module.

FIGURE 3: Compliance with publication periods
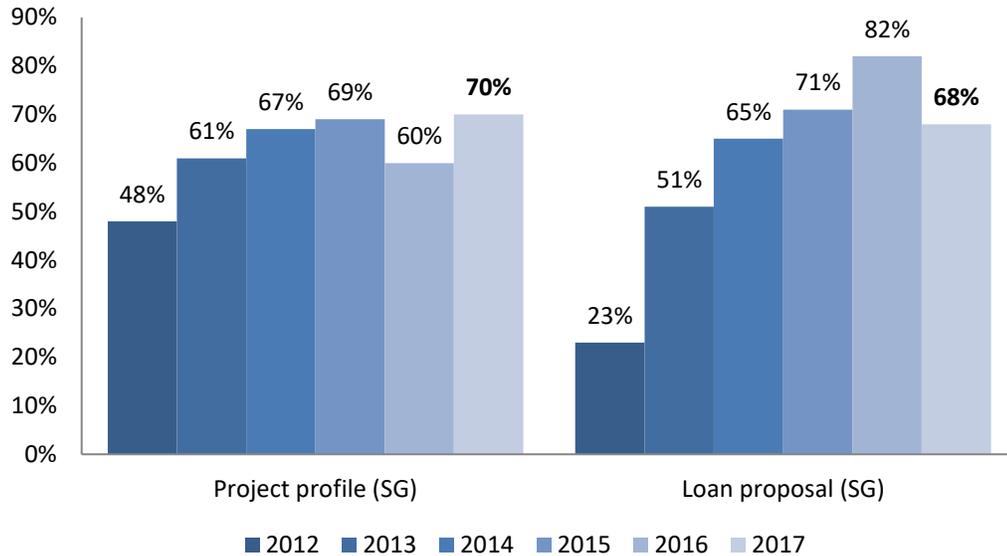
3.2   The monitoring of disclosure also included the country strategies approved by the Board.[20] With the operation of Convergence and its due integration with other Bank systems, it is expected that full compliance rates will be achieved.

B.   Disclosure of information on the Annual Meeting of the Boards of Governors

3.3   The Meeting of the Boards of Governors is the IDB's highest decision-making authority. The resolutions approved by the Governors at the 2017 Annual Meeting held in Asunción, Paraguay were published on the Bank's external website within the period established in the Policy.[21]

C.   Disclosure of historical information (eArchives)

3.4   Requests may be submitted to obtain information that is not available on the eArchives site. In 2017, the PIC received 13 requests for historical information which resulted in the publication of 46 historical records.[22] All the requests for historical information were answered by the Bank. Most of the files were loan proposals, plans of operations for technical cooperation projects, project completion reports, and reports by individual consultants or consulting firms.

D.   Exception to disclosure: "country-specific information"

3.5   Under this exception, the Bank does not disclose information in specific documents it prepares on countries if the country states in writing that the information is

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[20]   Although all the country strategies approved by the Board in 2017 were disclosed and made available to the public on the Bank's external website, the disclosure compliance rate with the deadline for the six strategies approved was 66%. Documents of this kind, like sovereign guaranteed loan proposals, are supposed to be disclosed simultaneously with their distribution to the Board.

[21]   Routinely disclosed documents are to be published within five working days after their approval, authorization, or conclusion of their consideration. This link provides details on the resolutions adopted by the Boards of Governors in 2017.

[22]   In 2016, 22 requests for historical information were received for the disclosure of 64 historical documents.

confidential or could damage its relations with the Bank. Application of this exception allows for partial or full nondisclosure.

3.6   In 2017, this exception was invoked for five sovereign-guaranteed operations and one electronic link in a country strategy that corresponded to the document entitled "Country Development Challenges." With respect to the five loan operations, all were for partial nondisclosure, specifically optional or required electronic links. Just one of these requests referred to information contained in the loan proposal itself, and the paragraphs declared to be confidential were removed, following the procedure established for such cases.

3.7   It should be noted that use of this exception by countries in recent years has only been partial in comparison with previous years when the nondisclosure was total, as occurred in the early years of the Policy.[23]

IV. DISCLOSURE PRACTICES OF BORROWERS

4.1   Paragraph 5.2 of the policy calls for reviewing borrower practices in disclosing environmental and social assessments related to Bank-financed projects.

4.2   In 2017, the Board approved three projects in category A and 36 in category B. Environmental and social assessments have been or will be produced for each of these 39 projects, including environmental impact assessments (EIAs) in certain cases.

4.3   It should be kept in mind that in addition to the provisions of the Bank's Environment and Safeguards Compliance Policy and Access to Information Policy, the borrowing member countries also have internal regulatory frameworks that require them to disclose environmental information relating to their projects.

4.4   Looking at the environmental and social management reports (ESMRs) for each of these operations, in 37 of them the Bank found that the borrowers had complied with their obligation to disclose the environmental and social assessments or that the borrower had disclosed the relevant environmental and social information as part of its public consultation processes.

4.5   In the other two operations, the ESMRs did not provide information about whether the borrower had made disclosures.

4.6   Lastly, the analysis of the ESMRs showed that the Bank disclosed the environmental and social assessments for each of the 39 category A and B projects approved in 2017, pursuant to the Policy.

V. INFORMATION DISCLOSURE FOR PRIVATE SECTOR PROJECTS

5.1   Pursuant to paragraph 11.1 of the Policy, this section presents some of the main practices and trends adopted in recent times by different international financial institutions (IFIs) that support private sector investment initiatives and seek to promote greater transparency in their activities by disclosing key information about their operations.

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[23]   This exception was requested in six operations in 2012; six in 2013; seven in 2014; three in 2015, and four in 2016.

5.2   To increase the efficiency of their activities, enhance the impact of their interventions, and improve their governance and accountability, the IFIs have made significant progress in promoting greater access to information in their roles as development institutions. This progress has been obtained in a global and regional context of greater demand for transparency in public and private institutions and the efforts made by many countries in acknowledging the importance of the right to access to information through the adoption of regulatory frameworks that reflect this reality.

5.3   The situation quickly evolved to include a larger private sector presence in making improvements in transparency and disclosure of information about their activities. The active role of citizens demanding greater transparency from their governments and authorities has extended to private sector activities, precisely because of their contribution to the world economy, growth, and the development of countries. In this context, the IFIs have been updating their information policies (including IDB Invest which has recently begun a public review and consultation process to adopt a new Access to Information Policy) to reflect this greater openness and incorporate the new trends in this area.

5.4   Greater openness constitutes an essential factor for promoting relations among stakeholders, improving project design and implementation, and fostering the return on investments over the long term.[24] Simultaneously, by adopting a business approach, the IFIs have sought to apply specific parameters for handling information provided by their clients which, on account of its nature, content, and sensitivity, needs to be protected.

5.5   Given the need to strike an adequate balance between the benefits of greater information disclosure in terms of transparency and the need to maintain client confidentiality, the IFIs have focused on improving their standards in this area, particularly those discussed below.

A.   Accessibility

5.6   The establishment of mechanisms for timely disclosure of information in a format and language that can be understood by the affected communities is one of the main advances implemented by IFIs in recent years. Due access to information enables affected communities to participate more actively in processes and decisions that could affect them. Under these principles, IFIs have been gradually improving the design and ways in which they disclose information on their websites, which have become the main vehicle for disclosing information in formats that allow its dissemination with wide coverage.[25] To strengthen this position, some IFIs have determined that project information should be disseminated in their zone of influence in a timely manner and appropriate format that can be understood by local communities.[26] Emphasis has also been placed on the need to disclose environmental information on an institution's website (headquarters) and in its country offices in local languages and any other relevant language.[27] Under an approach intended to promote participation and inclusion,

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[24]   International Finance Corporation (IFC), Access to Information Policy, 1 January 2012, paragraph 4.

[25]   See, for example, the changes in the IDB Invest web page.

[26]   AfDB, Integrated Safeguards System. Policy Statement and Operational Safeguards, December 2013. OS requirements. Project design.

[27]   EBRD, Public Information Policy, 7 May 2014, paragraph 3.4.1.

the use of communication media that are appropriate for illiterate persons[28] is required, and the borrower's obligations include presenting a "nontechnical executive summary" of the environmental and social impact assessment to the public.[29] Various IFIs also refer to the need to take a culturally appropriate approach to indigenous communities in disclosing information.[30]

B. Predictability in the disclosure of information during the project cycle

5.7   To provide stakeholders with an effective opportunity to participate in project design, implementation, and monitoring, the IFIs have established a series of mechanisms to make information disclosure during the project cycle more predictable. These practices include providing key information on the main elements of projects;[31] informing the general public and the affected communities about how and where they can obtain project information, including contact points with the borrower and the project team in the IFI;[32] and providing general information about performance standards and any applicable complaint mechanisms,[33] etc. Through the disclosure of investment summaries,[34] some IFIs provide links to the main documents throughout the project cycle.[35] In terms of the timeliness of disclosure, the IFIs have committed to update information during the project cycle to enable affected communities to exercise their rights in different stages of the operation and make any applicable decisions.[36] This is now one of the main components included in the proposed Access to Information Policy under consideration by IDB Invest.

C. Proactivity in the disclosure of environmental and social information

5.8   As a mechanism for risk prevention and mitigation, the IFIs have been firming up their commitments to disclose environmental and social information. The main developments in this area include disclosure commitments linked to project categories, with emphasis on projects entailing high environmental and social risk,[37] disclosure of environmental impact assessments,[38] resettlement and indigenous peoples plans,[39] including specific publication deadlines;[40] and

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[28]   AsDB, Public Communications Policy, 2011, paragraph 42.

[29]   CDB, Draft Environmental and Social Review Procedures, May 2008, paragraph 4.15.

[30]   EBRD, Environmental and Social Policy, 7 May 2014; and EBRD, Performance Requirement 7. Indigenous Peoples. Information disclosure, meaningful consultation and informed participation, paragraphs 21-23.

[31]   AsDB, Public Communications Policy, 25 October 2011, paragraphs 42-46.

[32]   EBRD, Public Information Policy, paragraph 3.1.1.

[33]   Ibid., paragraph 31 (i).

[34]   The IFIs call their investment summaries by different names: for example, the AsDB calls it the Project Data Sheet; the IFC, Summary of Investment Information; the EIB, Project Summary; the EBRD, Project Summary Document.

[35]   AsDB, Public Communications Policy, 25 October 2011, paragraph 42.

[36]   By way of example: (i) the AsDB updates its project status documents at least twice a year; (ii) the IFC establishes that it will update investment information as necessary to ensure the "continued accuracy of the information disclosed;" and (iii) the EBRD incorporates a specific requirement to keep environmental and social impact assessments in the public domain throughout the life of the project. Projects in category A and the environmental sections of the Project Summary Documents will be revised annually and updated as necessary.

[37]   IFC, Access to Information Policy, 1 January 2012, paragraph 31.

[38]   EIB, Transparency Policy, 6 March 2015, paragraph 4.9.

[39]   AsDB, Public Communications Policy, 25 October 2011, paragraphs 51, 56, etc.

[40]   IFC, Access to Information Policy, 1 January 2012, paragraph 34.

disclosure of measures adopted in support of the affected community,[41] etc. The benefits of disclosing information of this kind are reflected in the dialogue and agreements with affected communities, which contribute to adequate and effective project implementation.

D.   Development impact results

5.9   As development organizations whose shareholders are their member countries, IFIs are required to account for and report on their activities, to enable stakeholders to better understand their interventions, including their contribution to and impact on development. With access to timely information, data that are accurate, reliable, and relevant, stakeholders have the opportunity to participate in the discussion of subjects that affect them and influence the strategies and projects that IFIs implement in the private sector. At the same time, taking a market-based approach, these data also enable bondholders to obtain more accurate information on the potential impact of their investments, particularly when making decisions based on "informed risk." In line with these trends, the IFIs have been making headway in disclosing more information on development prospects and key indicators, providing economic and social data, analysis, and forecasts. Some IFIs have opted to disclose this kind of information annually, in an aggregate manner.[42] Under an approach intended to maximize information disclosure, the possibility has been established of disclosing the development results for each specific investment, with the client's agreement, and only for projects with high environmental and social risks.[43]

E.   Protection of confidential and commercially-sensitive information

5.10   As mentioned earlier, the IFIs are gradually increasing the transparency of their activities with the private sector, while considering the interests of their clients and the nature of their businesses. Striking an adequate balance that will enable more information to be disclosed while avoiding adverse impacts on the relationships of clients with the institution or jeopardizing market competitiveness, among other consequences that could have a negative effect on their commercial interests, is an ongoing challenge. With clear-cut exceptions, some IFIs have decided that they will not disclose financial or business information, or privileged or other information about their clients that is not in the public domain.[44] Other IFIs are improving their positions with their clients by seeking to determine whether disclosure would likely cause material damage to their commercial and/or financial interests or their competitive positions.[45] Focusing on their clients' positions, some IFIs have opted to consult their clients about whether the information contained in a document is confidential in nature, in accordance with their policy.[46] Based on these approaches, the IFIs seek to dispel client worries about the release of information that could affect their decisions on whether to continue working with IFIs.[47]

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[41] Ibid., paragraph 32.

[42] EBRD, Public Information Policy, 2014, paragraph 3.5.1.

[43] IFC, Access to Information Policy, 1 January 2012, paragraph 42.

[44] Ibid., paragraph 11 (a) (i and ii).

[45] AsDB, Public Communications Policy, 25 October 2011, paragraph 97 (iv).

[46] EIB, Transparency Policy, 6 March 2015, paragraph 5.9.

[47] Ibid., paragraph 2.5.

5.11   Despite the considerable headway made recently, challenges remain with respect to the IFIs' commitment to disclosing information. This is particularly important considering the dynamic evolution of the right to access information taking place in our region. To address these challenges, it is important to move forward in building consensuses with clients to strike a better balance regarding the information to be disclosed. Avoiding a dominant position by the client on the disclosure of project information is important in the quest for balances that will avoid unwarranted restrictions on access to information.[48] Another important challenge is the need to fortify the methodology, commitments, and responsibilities of clients in compiling and disclosing environmental and social information, and generating higher quality and more accessible "fit for disclosure" mechanisms, in formats the allow for its use, reuse, and redistribution.[49]

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[48]   For example, see the following positions taken by experts and civil society: (i) Global Transparency Initiative, Transparency Charter for International Financial Institutions: Claiming our Right to Know, 2 November 2006, page 5; (ii) Various organizations, Comments on the Public Information Interim Policy of the Asian Infrastructure Investment Bank, December 2016, page 27; and (iii) Various organizations, A Joint CSO Submission on the Draft Revised Version of the EIB Transparency Policy, 24 September 2014, page 22.

[49]   IDB, Access to Information Policy Implementation Report 2015, paragraph 6.15.