



Bank Directive

Access to Information

Bank Access to Information Policy Designation

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Content

This Directive sets forth the objectives of the Bank's transparency agenda, and the directions for the implementation of the Bank Policy: Access to Information (Policy).

Applicable to

IBRD,IDA

Issuer

Vice President, ECRVP

Sponsor

Director, ECRRC

SECTION I – PURPOSE AND APPLICATION

1. This Directive sets forth the objectives of the Bank’s transparency agenda, and the directions for the implementation of the Bank Policy: Access to Information (Policy).
2. This Directive applies to the Bank.

SECTION II – DEFINITIONS

The terms used in this Directive have the meanings set forth in Section II of the Bank Policy: Access to Information, and below, including their respective successors thereto.

1. **ASA:** Advisory Services and Analytics.
2. **CAS:** Country Assistance Strategy.
3. **Chief Archivist:** chief archivist for the World Bank Group.
4. **Country Partnership Framework** or **CPF:** as the terms are defined in the *World Bank Group Directive: Country Engagement*, July 1, 2014, Catalogue No. OPCS 5.01-DIR.01.
5. **ECR:** External and Corporate Relations vice presidency of the WBG.
6. **ESW:** Economic and Sector Work, as the term is defined in the Policy.
7. **Information Classification and Control Directive:** the World Bank Group Directive: Information Classification and Control Directive, June 28, 2024, Catalogue Number MDC4.01-DIR.128.
8. **LEG:** Legal vice presidency of the Bank.
9. **Pension Benefit Administration Committee:** committee established by the Staff Retirement Plan to administer the benefits under the Plan.
10. **Pension Finance Committee:** committee established by the Staff Retirement Plan to be responsible for the financial management of the trust holding the assets of the Plan.
11. **President’s Report and Recommendation** or **President’s Report:** document used to set out the details for proposed operations financed by the Bank’s former adjustment lending instruments.
12. **Reimbursable Advisory Services** or **RAS:** reimbursable advisory services (formerly referred to as “fee-based services”) provided by the Bank as a direct response to requests from, and partly or fully paid for by, the recipient (“client”) of the service.
13. **Staff Retirement Plan** or **Plan:** the staff retirement plan of the World Bank Group.

14. **Translation Framework:** the framework on translations pursuant to “A Document Translation Framework for the World Bank Group”, Operations Policy and Country Services, August 6, 2003.
15. **Trust Funds:** as the term is referred to in the Bank Policy: Trust Funds, February 4, 2021, Catalogue No. SEC2.02-POL.104.
16. **VP:** vice president of the Bank.

SECTION III – SCOPE

A. OBJECTIVES

1. The World Bank recognizes that transparency and accountability are of fundamental importance to the development process and to achieving its mission to end extreme poverty and promote shared prosperity on a livable planet. Transparency is essential to building and maintaining public dialogue and increasing public awareness about the Bank’s development role and mission. It is also critical for enhancing good governance, accountability, and development effectiveness. Openness (a) promotes engagement with stakeholders, which, in turn, improves the design and implementation of projects and policies, and strengthens development outcomes, and (b) facilitates more equitable access, constructive scrutiny, and efficient re-use of research, knowledge, and data. It also fosters public oversight of Bank-supported operations during their preparation and implementation, which not only assists in exposing potential wrongdoing and corruption, but also enhances the possibility that problems are identified and addressed early on.
2. As the Bank has long recognized, a sound, open access to information policy is fundamental to fulfilling its many roles.
 - As a development finance institution, the Bank strives to be transparent about its projects and programs (particularly with groups affected by its operations), to share its global knowledge and lessons of experience with the widest possible audience, and to enhance the quality of its operations by engaging with a broad range of stakeholders.
 - As an intergovernmental organization owned by countries, the Bank is accountable for public money, and has an obligation to be responsive to the questions and concerns of its shareholders.
 - As a borrower, the Bank has established that meaningful disclosure of information helps attract purchasers to its securities.
 - As an employer, the Bank seeks to provide its employees with all the information they need to perform their duties.
3. At the same time, the Bank has an obligation to protect the confidentiality of certain information. The Policy endeavors to strike an appropriate balance between the need to grant the public maximum access to information in the Bank’s possession, and the Bank’s obligation to respect the confidentiality of its clients, shareholders, employees, and other parties.
4. The Bank also recognizes the importance of translating information that it creates. The Bank’s approach to translations is set out in the Bank’s Translation Framework, and the

Bank translates documents into appropriate languages in accordance with that framework.

B. ACCESS TO INFORMATION – IMPLEMENTATION

1. **Instructions for the Public to File Requests for Information and Appeals.** The public can request access to information by submitting a request through the World Bank website: www.worldbank.org/wbaccess. Requests may also be made in writing in country offices. To enable the Bank to locate the information within a reasonable period of time, such requests should indicate the information that is being sought with reasonable specificity (e.g., if a particular document is of interest, the request identifies it precisely, preferably by date and title or any other available information). If a request is denied, the requester will be provided with an electronic link to submit an appeal challenging the Bank's denial of access to information. Pursuant to the Policy, appeals are filed, in writing, within 60 calendar days of the Bank's decision being challenged.¹ Appeals received beyond the 60-day period for filing an appeal are deemed out of time and are dismissed.² To facilitate the Bank's consideration of appeals, such appeals should (a) reference the information originally requested and (b) provide an explanatory statement that sets out the facts and the grounds which support the requester's claim that (i) the Bank violated the Policy by improperly or unreasonably restricting access to the information requested; or (ii) there is a public interest for the Bank to override the Policy's exception(s) that restricts access to the information.

2. **Public Availability of Certain Information.**
 - a. **Routinely Available Documents.** The Bank proactively discloses certain routinely available documents, through its external website – www.worldbank.org – as soon as the documents are finalized after key process milestones. The processes involved in preparing and making certain information routinely available on the Bank's external website are set forth in the Bank Procedure: Access to Information Procedure.
 - b. **Draft CASs, CPFs, and ESW/ASA Reports for Public Consultation.**³ At the Bank's discretion, staff may publicly share draft CASs, CPFs and draft ESW reports during the documents' preparation.

¹ See Policy at Section III.B.8(b)i and ii.

² See Directive at Section III.D.1.a(i).

³ See related [Policy interpretation issued by the AI Committee on March 16, 2011](#) (Policy Interpretation No. 6). This Policy interpretation, as originally issued, addressed the disclosure of draft CASs and ESWs. Pursuant to the *World Bank Group Directive: Country Engagement*, effective July 1, 2014, for strategies whose concept decision reviews are held on or after July 1, 2014, the CAS is replaced by the Country Partnership Framework (CPF). Strategies presented to the Board after January 1, 2015, are also for CPFs or Country Engagement Notes. For the interim period before January 1, 2015, the Board continues to receive CASs and ISNs that were initiated and mostly prepared before July 1, 2014. See *World Bank Group Directive: Country Engagement*, July 1, 2014, Catalogue No. OPCS 5.01-DIR.01.

- c. **President's Reports.**⁴ The documents titled "President's Report and Recommendation" ("President's Report"), which set out the details for proposed operations financed by the Bank's former adjustment lending instruments, such as the structural adjustment loans and credits, sectoral adjustment loans and credits, rehabilitation loans, programmatic structural adjustment loans and credits, special structural adjustment loans, and subnational adjustment loans (i.e., predecessors of the Program Document), are declassified and made public, unless the documents are restricted from disclosure because:
- Information contained within the President's Report is restricted from disclosure pursuant to a Policy exception other than the *Deliberative Information* exception (in the case of information restricted only by the *Financial Information* exception, other than banking and billing information, the restriction only applies if the document is less than 20 years old); or
 - The VP concerned has decided to exercise the Bank's prerogative to restrict the President's Report, based on his/her determination that the potential harm of disclosure would outweigh the benefits.

The Archive's Unit notifies all relevant VPs of the intended declassification of President's Reports, giving the VPs concerned a reasonable period of time for review. Following which, absent a determination that a Policy exception other than the *Deliberative Information* exception applies (as explained above), or absent a decision by a VP concerned to exercise the prerogative to restrict access to a particular document, the President's Reports are declassified and made public.

- d. **Operational Guidance for Staff.**⁵ Business units creating guidance for staff in relation to the carrying out of Bank operational work determine whether any such guidance:
- (i) ***contains information that falls within one or more of the exceptions under the Policy.*** If the content of the information in the guidance for staff contains restricted information, as determined by the director of the responsible business unit, the guidance for staff is marked as restricted by the relevant Policy exception(s) triggered by the content of the information in the guidance and assigned the proper security classification.⁶ This means marking the guidance for staff with a clear written designation that such guidance contains restricted information that falls under one or more Policy exception(s). If the business unit creating such guidance would like to recommend disclosure of the guidance despite its restricted content, the director of the responsible business unit consults LEG on whether such disclosure is possible under the Policy and how to proceed.
 - (ii) ***does not contain information restricted under the Policy.*** In cases where the guidance for staff does not contain any information restricted by a Policy exception(s), the guidance (in its final format and as issued to staff, i.e., not a draft) should be disclosed except if, in exceptional circumstances, disclosure is

⁴ See related [Policy interpretation issued by the AI Committee on May 30, 2012](#) (Policy Interpretation No. 11).

⁵ See related [Policy interpretation issued by the AI Committee on May 2, 2012](#) (Policy Interpretation No. 10) which is superseded by this provision in this Directive.

⁶ See this Directive at Section III.B.6.

likely to cause more harm than benefit. If the harm of disclosure outweighs the benefits, the Bank, through the director of the business unit creating such guidance exercises the Bank's prerogative to restrict. Operational guidance materials that will be made publicly available should include language on the cover, clearly indicating that the document:

- (A) is not World Bank policy; and
- (B) is only intended to provide general guidance to World Bank staff in respect to the subject matter addressed in the guidance.⁷

As applicable, business units may also include language to explain that the World Bank may revise the guidance from time to time, and where the most current version of the document can be found (e.g., World Bank website).

- e. **Public availability of documents that were previously approved by the Board for disclosure, but that could be interpreted as falling within the *Financial Information and Corporate Administrative Matters* exceptions of the Policy.**⁸ Specific categories of documents, which are of a financial or corporate administrative nature, that were previously approved by the Board for public disclosure continue to be publicly available under the current Policy (unless the documents are also covered by another Policy exception or is subject to the Bank's exercise of the prerogative to restrict access). The list of documents previously approved by the Board for public disclosure is set forth in the Bank Procedure: Access to Information Procedure.
- f. **Public Availability of Certain Financial Information.** While the Policy's Financial Information exception (which restricts from disclosure details of individual transactions under loans and Trust Funds⁹) covers information such as the monetary value of payments to, and names of, consultants, the Bank discloses monthly statements of loans and credits, and individual loan, credit, and trust fund documents such as financing, loan, development credit agreements, development grant agreements, project agreements, guarantee agreements, administration agreements, and grant and trust fund agreements.
- g. **Disclosure of Aggregated Financial Information.**¹⁰ For (a) grants made from IBRD administrative budget and IBRD net income (governed by OP/BP 8.45, *Grants*), and (b) grants and loans made from recipient-executed Trust Funds (governed by Policy: Trust Funds), the *Financial Information* exception of the Policy does not restrict the Bank from disclosing aggregated financial information (i.e.,

⁷ Staff should consult OPCS and/or LEG on such language on the cover. Nevertheless, the text below may serve as an example of how such language on the cover may read:

The information in this document is not World Bank policy nor is it mandatory. It is intended to provide general guidance to World Bank staff on different considerations that may be contemplated when determining how to *[add subject matter]*. The information in this document may change without notice.

⁸ See related [Policy interpretation issued by the AI Committee on April 20, 2011](#) (Policy Interpretation No. 7).

⁹ See Policy at Section III.B.2(j)iii.

¹⁰ See related [Policy interpretation issued by the AI Committee on August 10, 2011](#) (Policy Interpretation No. 9).

original principal; amounts undisbursed; amounts disbursed; and, in the case of loans made from recipient-executed Trust Funds, amounts repaid and amounts due), for each such grant or loan, as deemed appropriate by the business unit concerned. The relevant Bank business unit determines whether a specific business need exists to collate or create such aggregated financial information if the information does not already exist.

- h. **Information.** Information as defined in the Policy is to be widely understood to include data.¹¹ The Bank proactively and routinely discloses certain data through its external website at data.worldbank.org, or its successor thereof. The processes involved in preparing and routinely disclosing certain data are set forth in the Bank Procedure: Access to Information Procedure.

3. **Information Relating to Member Countries and Other Parties.** With respect to information related to member countries/borrowers:

- a. **Country-specific operational documents prepared by the Bank that are routinely discussed with the member country/borrower** (for example, Country Partnership Frameworks, project appraisal documents, economic and sector work reports). Before finalizing the document, the Bank requests the country/borrower concerned to identify whether the document contains any confidential information relating to the country/borrower, or information whose disclosure may adversely affect relations between the Bank and the country. The Bank, as it considers appropriate, adjusts the document to address the matters of concern to the country/borrower. The aide-mémoire of operational missions is made publicly available if both the Bank and the country/borrower agree.¹²
- b. **Country-specific documents prepared by the Bank that are not routinely discussed with the country** (such as research and knowledge products). The Bank director concerned consults the country concerned if the director believes that the document contains confidential information relating to the country, or information whose disclosure may adversely affect relations between the Bank and the country. The Bank, as it considers appropriate, adjusts the document to address the matters of concern to the country.
- c. **Documents prepared or commissioned by a member country/borrower that are made available to the public as a condition for doing business with the Bank.** The country/borrower provides such documents to the Bank with the understanding that the Bank makes them available to the public.¹³

¹¹ See Policy at Section II, para. 62.

¹² See Section III.B.4.c of this Directive.

¹³ Examples of such documents: (a) poverty reduction strategy papers (including interim PRSPs and PRSP annual progress reports); (b) letters of development policy (see OP/BP 8.60, *Development Policy Financing*); (c) safeguards assessments and plans related to environment, resettlement, and indigenous peoples (see OP/BP 4.01, *Environmental Assessments*, OP/BP 4.10, *Indigenous Peoples*, and OP/BP 4.12 *Involuntary Resettlement*); (d) audited annual financial statements for investment project financing (or, in exceptional cases, an abridged version thereof) for which the invitation to negotiate is issued on or after July 1, 2010; and (e) Procurement Plans.

- d. **Other documents prepared by member countries/borrowers that are in the Bank's possession.** For information given to the Bank that does not fall into one of the above categories (for example, on a country's macroeconomic context, governance issues, or sector- or institution-specific analyses), the member country/borrower clearly conveys to the Bank whether and why the information is to be restricted from public access in light of the Policy. The member country/borrower provides its determination on how the information is treated in light of the Policy either at the time the information is given to the Bank or upon the Bank's reasonable effort to seek such determination from the country member/borrower, which may include a request for the country member/borrower to respond within 45 business days from receipt of the Bank's written request for such determination. If the member country/borrower conveys to the Bank that the information is provided in confidence or is restricted by confidentiality on the basis of a non-disclosure/confidentiality agreement or equivalent, the Bank treats the information as restricted from disclosure pursuant to Section III.B.2 (g) of the Policy and to Section III.B.4.a of this Directive. If the member country/borrower does not instruct the Bank to restrict public access to the information or fails to respond to the Bank within the required time period, and if, to the Bank's knowledge, the information is not already publicly available by the member country/borrower, such information is considered to be deliberative and the recipient Bank staff or unit assigns it with a security classification in accordance with the Information Classification and Control Directive, as referred to in Section III.B.6 of this Directive.
- e. **Documents prepared by the Bank for Reimbursable Advisory Services (RAS).** For Reimbursable Advisory Services provided pursuant to legal agreements signed on or after July 1, 2022, the Bank makes the RAS deliverables or outputs as well as related legal agreements available to the public.¹⁴ Before disclosing such RAS deliverables or outputs as well as related legal agreements, the Bank requests the client to identify in writing whether the RAS deliverables or outputs as well as related legal agreements contain any confidential information relating to the client, or information whose disclosure may adversely affect relations between the Bank and the client/country. The Bank, as it considers appropriate, makes adjustments to the RAS deliverables or outputs as well as related legal agreements to address the matters of concern to the client.
- f. **Documents Prepared Jointly with Partners.** The Bank makes available to the public the final documents that it prepares jointly with partners after reaching agreement on such disclosure with the partner concerned.¹⁵
- g. **Procurement Contracts Under Bank-Financed Projects.** Public posting of the final total contract price and other information referred to in Paragraphs 5.93-95 of the Procurement Regulations¹⁶, as applicable, is required for all contracts, whether

¹⁴ For Reimbursable Advisory Services provided pursuant to legal agreements signed before July 1, 2022, the Bank makes such documents (including related legal agreements) available to the public only after the client concerned has granted its written consent to disclose.

¹⁵ Before initiating such work, Bank staff explains the Policy to the potential partner and obtains the potential partner's agreement to the disclosure of the joint product. Documents prepared jointly with partners are not subject to public access if they include, or are based on, information that is restricted under section III.B.2 or section IV.2 of the Policy. For the purposes of this provision, other WBG entities are treated as partners; documents prepared jointly with WBG entities may be made publicly available if such disclosure is consistent with their disclosure policies.

¹⁶ See [Procurement Regulations](#).

subject to prior or post review. Such information is subsequently publicly available on the Bank's projects external website and the Procurement app. Full procurement contracts under Bank-financed projects are, however, restricted from public access. As the Bank is not a party to such contracts, a decision to disclose their full content belongs exclusively to Bank clients and their contractors/suppliers/consultants. Borrowers may decide on a case- by-case basis, or as required by their own regulatory framework, to disclose full contracts with the consent of the contracting parties. Any individual who is seeking this information can request it directly from the Borrower's procuring entity. The Bank has an interest in keeping full contractual information resulting from procurement processes carried out in Bank-financed projects restricted from public access since contracts may contain commercially-sensitive, proprietary commercial information whose disclosure could be detrimental to the contractors/suppliers' interests. Disclosure of such information may discourage qualified bidders from participating in Bank-financed procurement. This would negatively impact competition, thereby reducing quality and increasing costs in a manner inconsistent with the Procurement Policy's core principles of economy, efficiency and value for money. Hence, disclosing such information may cause harm to the client, contractor, and Bank's interests in the procurement process in a manner that outweighs the benefits of disclosure.¹⁷

For these reasons, *there may be exceptional circumstances that justify the Bank's exercise of its prerogative to restrict access* to procurement contracts under Bank-financed projects.

The Bank considers disclosure of the key contract information mentioned above as appropriate to meet its Procurement Policy's other core principle of transparency while also remaining consistent with the parties' ownership of the full information included in the contracts as well as good procurement practice.

4. Application of Certain Policy Exceptions – Select Documents.

- a. **Information Provided in Confidence by a Member Country or Third Party.** The Policy's *Information Provided in Confidence by a Member Country or Third Party* exception applies to information, data, reports and analysis (including holdings, positions and performance information), deliberations, and any other work product generated as a result of or in response to the Bank's receipt of confidential information from a member country or third party. To give effect to the above, when the Bank receives information in confidence from a member country of third party, the following parties have the following roles:

Bank staff

- (i) the recipient Bank staff or unit explains how the Policy's *Information Provided in Confidence by a Member Country or Third Party* exception applies (see template letter provided as [Annex 1](#) to the [Bank Procedure on Non-Disclosure Agreements \(NDAs\)](#)) and ensures that such information is:
- A. filed in the Bank's records management system;
 - B. properly marked as restricted from disclosure pursuant to the Policy and this Directive in accordance with the concerned party's instructions, in

¹⁷ See also see [Articles of Agreement](#), at Article III, Section 5(b), and [World Bank Procurement Regulations for IPF Borrowers](#), at Section I, para. 1.2, and at Annex II, para. 1.

which case Bank staff or unit asks the member country or third party the reason for the confidentiality and how long the confidentiality is to last, all of which is to be noted in Bank's record management system. If the third party has not instructed the Bank to restrict public access to the information or, upon the Bank's reasonable effort to seek such determination from the third party, has failed to respond to the Bank within the required time period (45 business days), and if, to the Bank's knowledge, the information is not already publicly available by the third party, such information is considered to be restricted by the *Deliberative Information* exception under the Policy; and

- C. assigned an adequate security classification using the Bank's information classification levels of "Official Use Only", "Confidential", or "Strictly Confidential", pursuant to the Information Classification and Control Directive, as referred to in Section III.B.6 of this Directive.

Archives

(ii) Archives determines the understanding of confidentiality for information in its custody that is not explicitly marked by considering:¹⁸

- A. the nature and content of the information in the main body of the record, regardless of marginalia or other markings;¹⁹ or
- B. a detailed written explanation of the confidentiality by the member country or third party;²⁰ or
- C. a non-disclosure/confidentiality agreement or equivalent that applies to the information, in which case the terms and conditions of such agreement or equivalent govern the confidentiality of the information and override the provisions of this Directive. Such non-disclosure/confidentiality agreement follows the template provided for in the [Bank Procedure on NDAs](#), Annex 3.

(iii) Archives seeks the express permission to disclose information provided in confidence by following clear and cost-effective procedures:

¹⁸ Markings of security classification are unreliable indicators of whether the information is provided in confidence within the meaning of Section III.B.2(g) of the Policy; such markings are corroborated by this subparagraph (ii) before the information is restricted based on Section III.B.2(g) of the Policy.

¹⁹ For purposes of this provision, the nature and content of the information, or the detailed written explanation of confidentiality by the member country or third party, all of which restricts access to the information, may include, but is not limited to:

- A. financial, business, or proprietary information;
- B. trade secrets;
- C. references to the information being intentionally provided in confidence;
- D. explicit reference to the duration of the confidentiality and being within said duration;
- E. information whose disclosure would prove to be a threat to the national security of a member country;
- F. the need to protect the interest of national defense or foreign policy of a member country;
- G. information that, if disclosed, seriously undermines policy dialogues;
- H. the harm that the disclosure may cause to the interests protected by the confidentiality;
- I. reference to material prejudice or potential damage to relationships;
- J. information that, if disclosed, prejudices the continued exchange of confidential information;
- K. information that, if disclosed, would undermine the legitimate rights and interests of member countries or third parties; or
- L. other reason considered compelling, at the Bank's discretion.

²⁰ See *id.*

- A. When the Bank locates the owner of the information to seek “express permission” from a member country or third party, Archives requests the recipient Bank unit to contact the concerned party to ask that party’s written consent to disclose. The recipient Bank unit specifies that the concerned party is expected to reply within 45 business days from the date of the Bank unit’s correspondence to the concerned party and that:
- (1) in case the concerned party has any objection to disclosure, the concerned party provides a written detailed explanation that specifies the grounds for restricting the information as provided in confidence in light of the Policy, including, but not limited to, a copy of the non-disclosure/confidentiality agreement or equivalent which overrides any provision of this Directive, and specify how long such confidentiality lasts; and
 - (2) absence of a reply is considered no objection to disclose, except when there is a non-disclosure/confidentiality agreement, in which case such agreement governs the confidentiality of the information.
- B. Whenever the Bank is unable to seek “express permission” from a concerned party and the information does not contain trade secrets and/or information restricted by other Policy exceptions, or is protected by a non-disclosure/confidentiality agreement, the Bank considers it to be *Deliberative Information*, which may also apply in addition to other Policy exceptions that may restrict the information based on its content; the recipient Bank unit classifies it in accordance with the Information Classification and Control Directive.²¹

b. Corporate Administrative Matters. This exception applies to:

- i. **Pension and other retirement Plans of the World Bank Group.** Specifically, the exception covers the pension and other retirement benefit plans of the World Bank Group, which are governed by the Pension Finance Committee and the Pension Benefit Administration Committee.
- ii. **Procurement Information resulting from Bank-executed Trust Funds.**²² Specifically, the exception covers procurement information resulting from Bank-executed Trust Funds, which are funds that support the Bank’s work program.

c. Deliberative Information.²³ The term *Deliberative Information* under the Policy applies broadly to include any internal communications and communications with external parties. For this reason, the examples listed in the Bank Policy: Access to Information, at Section III.B.2.(i), footnote 9, are non-exhaustive and include any Aide-Mémoires prepared under a Bank financed project.

²¹ The Bank’s inability to seek the “express permission” may occur due to, for example, but not limited to, the death of the author of the information, third party no longer exists, no identifiable successor to the third party, not possible to identify the concerned party at face value of the information, or circumstances in the country preventing the Bank from reasonably contacting the relevant counterpart.

²² See related [Policy interpretation issued by the AI Committee on July 14, 2010](#) (Policy Interpretation No. 1). This does not preclude the disclosure of information relating to certain corporate procurement contract awards with an initial value of \$250,000 (\$500,000 for works).

²³ See related [Policy interpretation issued by the AI Committee on March 16, 2011](#) (Policy Interpretation No. 5).

5. Bank Prerogatives.

a. Prerogative to Disclose Information Restricted by Certain Policy Exceptions.

- i. **Procedure for Referring Requests to the AI Committee.**²⁴ The Policy provides that the exercise of the Bank's prerogative to disclose certain information requires the approval of the AI Committee.²⁵ The Archives Unit and ECR refers to the AI Committee public access requests for information restricted by the *Corporate Administrative Matters, Deliberative Information* and/or *Financial Information* (other than banking and billing) exceptions in order to consider whether to exercise the Bank's prerogative to disclose restricted information if the information (a) is at least five years old and (if applicable) involves a closed operation, (b) has not been restricted by the exercise of the Bank's prerogative to restrict access, (c) has not been supported for disclosure by the responsible business unit, and (d) is not unreasonable pursuant to this Directive. For requests for restricted documents that (i) are less than five years old or that involve an open operation, (ii) are restricted by the Bank's exercise of the prerogative to restrict, or (iii) are unreasonable, the Archives Unit and ECR deny or refuse the request based on, as relevant, the exception that applies to the information, the prerogative to restrict access, or the unreasonableness of the request.²⁶ For requests for restricted information for which the responsible unit supports disclosure, the Archives Unit and ECR coordinate the disclosure of the information documents directly with the business unit. The Archives Unit and ECR, as relevant, inform the AI Committee of the number of requests that the Archives Unit and ECR have denied or refused on this basis.

b. Prerogative to Restrict Access to Information Normally Disclosed Under the Policy.

- i. **The "director" concerned who has authority to restrict access.**²⁷ The Policy provides that the "director" concerned is authorized to exercise the Bank's prerogative to restrict access to information (other than Board records and papers) that is normally disclosed under the Policy.²⁸ When information concerns a country, the director concerned is the relevant country director, who may consult with others (e.g., senior global practice director) as needed. In other cases, the relevant director may be the senior global director, depending on the nature of the information. More stringent approval mechanisms (e.g., approval by the VP concerned to restrict access to information normally disclosed) put into place by individual business units do not impact the authorization framework set out in the Policy.

²⁴ See related [Policy interpretation issued by the AI Committee on September 22, 2010](#) (Policy Interpretation No. 4).

²⁵ See Policy at Section IV.1(c).

²⁶ See Directive at Section III.C.3.

²⁷ See related [Policy interpretation issued by the AI Committee on July 14, 2010](#) (Policy Interpretation No. 2).

²⁸ See Policy at Section IV.2.

- ii. **The Bank's exercise of the prerogative to restrict access is subject to appeal.**²⁹ The decisions of VPs and directors to exercise the Bank's prerogative to restrict access to information that is normally disclosed under the Policy may be subject to appeal; such appeals are considered by the AI Committee, whose decisions in the cases are final. In line with the Policy, the decisions of the Bank's Board of Executive Directors to exercise the prerogative to restrict access are not subject to review.³⁰

6. **Classification of Information.** Pursuant to the Information Classification and Control Directive, Bank staff or an originating unit, who creates, provides or receives information while conducting Bank business, is responsible for classifying information³¹. Information in the Bank's possession is assigned one of the following four security classifications: *Public*, *Official Use Only*, *Confidential* and *Strictly Confidential*. Information created or received by the Bank that does not contain or refer to information restricted by a Policy exception is available to the public and is classified as *Public*. Information created or received by the Bank that contains or refers to information listed in one or more of the Policy exceptions is restricted from public access and is assigned a security classification of *Official Use Only*, *Confidential*, or *Strictly Confidential* in accordance with the Information Classification and Control Directive. Bank staff or an originating unit receiving information from member countries or third parties ask the member country or third party whether information is public or restricted by a Policy exception and which exception restricts the information from public access; if information is restricted, Bank staff, or originating unit, assign the appropriate security classification of *Official Use Only*, *Confidential* or *Strictly Confidential* in accordance with the Information Classification and Control Directive.

7. **Declassification of Restricted Documents.**

- a. **Declassification Schedules.** The declassification schedules set forth in Section III.B.5 of the Policy are read holistically to ensure that documents concerned are declassified appropriately.³²
- b. **The Process for Implementing the Policy Provision on Declassifying Certain Documents At Least 20 Years Old.**³³ In declassifying documents at least 20 years old – *but not including Board records or communications between Bank staff and Executive Directors' offices* – the archivists in the Bank Group's Archives Unit, under the supervision and authority of the Chief Archivist, determine:
 - i. Whether the documents concerned are eligible for declassification pursuant to the Policy, and:

²⁹ See related [Policy interpretation issued by the AI Committee on June 28, 2011](#) (Policy Interpretation No. 8).

³⁰ See Policy at footnote 24.

³¹ See Information Classification and Control Directive, at Section III.1.e.

³² For example, although an "Official Use Only" Board paper may be declassified after five years, Memoranda of the President (which may also be classified as "Official Use Only" Board papers) are declassified only after 20 years.

³³ See related [Policy interpretation issued by the AI Committee on May 30, 2012](#) (Policy Interpretation No. 12).

- ii. If the documents concerned are eligible for declassification, whether:
 - The content of the documents to be declassified raises issues that require notification of, as relevant, the vice president or director concerned, in order for the authorized party to consider exercising the Bank's prerogative to restrict access; or
 - To proceed with declassification and disclosure without such notification based on the responsible archivist's judgment that the content of the document raises no significant issue.

8. **Application of the Access to Information Policy to the Records of the Board of Governors.**³⁴ Notwithstanding the Policy's statement that it applies to any information in the Bank's possession, the Policy's legislative history and its terms support the conclusion that it has not been approved to apply to the records of the Board of Governors. Pending a decision on matters concerning the records of the Board of Governors, the disclosure and declassification processes set out in the Policy cannot be applied to the nonpublic records of the Board of Governors.

C. ACCESS TO INFORMATION – MANAGING PUBLIC ACCESS REQUESTS

1. **Timelines for Responding to Requests.** The Bank acknowledges receipt of written requests for information within five working days, and endeavors to provide a more comprehensive response within 20 working days. Additional time may be justified in special circumstances, including, for example, those involving complex or voluminous requests, or requests requiring review by or consultations with internal Bank units, external parties, the AI Committee, or the Board.
2. **Redaction.**³⁵ The Bank considers disclosure of documents in their original form. The Policy imposes no obligation or duty on the Bank to either consider redaction or modification of a document that includes information restricted by one or more Policy exception. The Policy also imposes no obligation or duty on the Bank to redact or in any way modify a document that includes such restricted information. Documents that include information restricted by one or more Policy exception(s) are, on their face, restricted from disclosure under the Policy. The Bank may, in its sole discretion, choose to redact or modify a document that includes restricted information, as the Bank may deem appropriate, to make the document eligible for disclosure in accordance with the Policy. A determination as to whether to redact restricted information from a document in order to make it publicly available is, therefore, a discretionary decision to be taken by Bank.
3. **Unreasonable or Unsupported Requests.** The Bank reserves the right to refuse unreasonable³⁶ or unsupported requests, including multiple requests, blanket requests, and any request that would require the Bank to create, develop, or collate information or

³⁴ See related [Policy interpretation issued by the AI Committee on February 27, 2014](#) (Policy Interpretation No. 13).

³⁵ See related [Policy interpretations issued by the AI Committee on July 14, 2010, and June 25, 2014](#) (Policy Interpretations Nos. 3 and 14).

³⁶ Unreasonable requests include those that are excessively burdensome or distort the implementation of the Policy, as exemplified by the criteria set forth in this Directive.

data that does not already exist or is not available in the Bank's records management system.³⁷ The Bank normally communicates its decision to refuse an unreasonable or unsupported request within the time period set forth in paragraph 1 above. To assist the Bank in exercising its right to refuse unreasonable public access requests, a public access request is considered unreasonable if it meets one or more of the following criteria:

- (a) The public access request exceeds any of the following, either per request, or in aggregate per calendar quarter:
 - (i) Fifty (50) documents (other than Board Records) that are less than twenty (20) years old at the time of the request;
 - (ii) Five hundred (500) pages of Board transcripts, or, if the information responsive to a public access request is set out across more than forty (40) Board transcripts; or
 - (iii) One hundred (100) Board Records other than Board transcripts;
- (b) The public access request is the sixth or subsequent request submitted by the same requester in *any 3 month period*;
- (c) The public access request is for one or more of the specific documents listed under the Policy, at *Section III.B.6.(b), Information Eligible for Declassification*, but which documents have not yet become eligible for declassification because the relevant time period to have such document(s) declassified has not yet been met at the time of the request; or
- (d) Notwithstanding the criteria set forth in this Directive, the public access request, at the Bank's discretion:
 - (i) is excessively burdensome or distorts the implementation of the Policy by, for example, and not limited to, disrupting Bank operations and/or units in a manner that is disproportionate to the expected benefit from public disclosure; or
 - (ii) the request is part of a series of overlapping and/or frequent requests from the same requestor, especially if the request has been submitted before the Bank has had an opportunity to address the requestor's earlier requests.

4. **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 and knowledge products, including subscription-based services, may be

³⁷ 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.

purchased through the Bank's Publishing and Knowledge division. The full text of books published by the Bank 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.

D. ACCESS TO INFORMATION – APPEALS

1. Notification of Decision.

- a. Requesters are notified if the appeal is dismissed: (i) for failure to file within the required time; (ii) for failure to provide sufficient information that would reasonably support the appeal; or (iii) for appealing a matter that the AI Committee or Appeals Board does not have authority to consider.
- b. After the AI Committee or the Appeals Board reaches its decision concerning the appeal, the requester is notified of the decision. If the AI Committee or Appeals Board upholds the initial decision to deny access to the information requested, the notice specifies the reasons. If the AI Committee or Appeals Board reverses the decision to deny access, the requester is notified of the decision and of the process for making the information available to the requester.
- c. The AI Committee makes its best efforts to reach a decision on appeals within 45 working days of receiving an appeal (delays are communicated in writing to the requester).
- d. The Appeals Board makes its best efforts to consider all appeals that are received within a reasonable time period before the next scheduled Appeals Board session.

2. **Scope of the term “violated this Policy”.** The term “violated this Policy” as used in the Policy is to be broadly interpreted to include the provisions of both the Policy and this Directive.³⁸ For the avoidance of doubt, appeals alleging a “violation of Policy” ground are to be considered against the mandatory provisions of both the Policy and this Directive which are to be read together as they have the same mandatory nature for the Bank.

SECTION IV – EXCEPTIONS

None.

³⁸ See Policy at Section III.B.8.(a)i and Section III.B.8(b)ii.

SECTION V – WAIVER

1. Provisions of the Directive, unless cited as governed by a policy or other directive or procedure, may be waived by the AI Committee.
3. Provisions of the Directive that originate from policy interpretations issued by the AI Committee may only be revised as a result of a new or revised policy interpretation issued by the AI Committee.

SECTION VI – OTHER PROVISIONS

None.

SECTION VII – TEMPORARY PROVISIONS

None.

SECTION VIII – EFFECTIVE DATE

This Directive is effective as of the date on its cover (Effective Date).

SECTION IX – ISSUER

The Issuer of this Directive is as stated in the cover page.

SECTION X – SPONSOR

The Sponsor of this Directive is as stated in the cover page.

SECTION XI – RELATED DOCUMENTS

1. Access to Information Policy – Implementation Issues Related to Board Records and Papers, June 20, 2011 (COGAM 2011-0010/1).
2. [A Document Translation Framework for the World Bank Group](#), Operations Policy and Country Services, August 6, 2003.
3. [AI Interpretations](#), issued by the AIC.
4. [Bank Directive Procurement in IPF and Other Operational Procurement Matters](#), April 1, 2024, Catalogue No. OPS5.03-DIR.119.

5. [Bank Guidance: Access to Information: Disclosure of Documents related to Emission Reduction Crediting \(formerly Carbon Finance\)](#), June 2, 2020, Catalogue No. GGS4.01-GUI.118.
6. [Bank Guidance – Disclosure of Audited Financial Statements and Other Financial Management Information](#), September 13, 2016, Catalogue No. OPS5.05-GUI.170.
7. [Bank Guidance on Restricted Information in LEG’s Possession](#), May 23, 2018, Catalogue No. LEG4.01-GUI.116.
8. [Bank Policy: Access to Information](#), July 1, 2015, Catalogue No. EXC4.01-POL.01.
9. [Bank Policy: Trust Funds](#), February 4, 2021, Catalogue No. SEC2.02-POL.104.
10. Bank Procedure: Access to Information Procedure.
11. [Bank Procedure on the Implementation of Board-Related Access to Information Requests](#), June 13, 2017, Catalogue No. SEC9.05-PROC.102.
12. [Bank Procedure on Development Dataset Acquisition, Archiving and Dissemination](#), March 31, 2022, Catalogue No. MDO4.05-PROC.134.
13. [Bank Procedure on Non-Disclosure Agreements \(NDAs\)](#), February 12, 2021, LEG2.01-PROC.105.
14. [Bank Procedure Procurement in IPF and Other Operational Procurement Matters](#), March 28, 2024, Catalogue No. OPS5.03-PROC.247.
15. [Guidance for Financial Management Specialists on World Bank Policy on Access to Information](#), OPSOR, Published June 2010, updated May 15, 2015.
16. [Toward Greater Transparency Through Access to Information – The World Bank’s Disclosure Policy](#), December 10, 2009 (R2009-0259/2; IDA/R2009-0273/2).
17. [World Bank Access to Information – Staff Handbook](#).
18. [World Bank Group Directive: Information Classification and Control Directive](#), June 28, 2024, Catalogue No. MDC4.01-DIR.128.
19. World Bank Policy on Access to Information, June 27, 2013 (SecM2013-0301; IDA/SecM2013-0401).
20. World Bank Policy on Access to Information – Proposed Modification, March 25, 2013 (R2013-0051; IDA/R2013-0072).
21. World Bank Policy on Access to Information – Proposed Modification, June 24, 2015 (R2015-0129; IDA/R2015-0191).
22. [World Bank Policy on Access to Information: Guidance for Financial Management Staff](#), Version: June 24, 2010, OPCS, Financial Management Unit (OPCFM).

SECTION XII – REVISION HISTORY

1. The revision of November 2024 for this Directive revises the approach to disclosure for RAS deliverables and outputs and simplifies the legal framework applicable to the Access to Information Policy by separating the preceding Bank Access to Information Directive/Procedure (Directive/Procedure) into two separate documents:

(a) this Directive, which includes the main text of the Directive/Procedure revised to include the text of Annexes 1 and 4 to the Directive/Procedure into the main portion of this Directive; and

(b) the Bank Procedure: Access to Information Procedure, which includes the text of Annexes 2 and 3 to the Directive/Procedure.

Questions regarding this Directive should be addressed to the Sponsor.