Open Data for Development: The World Bank, AID Transparency, and the Good Governance of International Financial Institutions

Catherine E. Weaver*

Abstract

Development scholars and practitioners today see progressive access to information and transparency policies as necessary preconditions for improved effectiveness of international development aid and the legitimacy of modern international financial institutions. This chapter examines the evolution of access to information and broader open data policies in international development institutions. Drawing from the case of the World Bank as a "first mover," this chapter examines the complex internal processes and factors that shape the adoption and implementation of access to information policy reforms. While challenges to achieving robust information disclosure and open data policies across all multilateral and bilateral aid agencies persist, transparency is now a benchmark for good governance in global development finance and the proverbial genie that cannot be put back in the bottle.

*Associate Professor, LBJ School of Public Affairs and Co-Director, Innovations for Peace and Development, The University of Texas at Austin, US; ceweaver@austin.utexas.edu. I would like to thank Liz Teare for valuable assistance in gathering data on the current information disclosure policy of bilateral and multilateral development aid agencies.

1. INTRODUCTION

International development is experiencing a transparency revolution. Since the first high level forum on aid effectiveness in Paris in 2003, there has been a proliferation of declarations, initiatives, and organizations dedicated to improving access to information on donor agencies' own projects and programs. The presumed benefits of such transparency include the centralization of information for better donor coordination, better development planning and management, and the empowerment of aid stakeholders to push for greater voice and feedback.[1] Instrumentally, transparency, helps to makes aid more accountable and more effective. Normatively, transparency is a hallmark of modern, legitimate institutions in global governance.

Beneath the complex debates over transparency's normative theory of change[2] lies a pragmatic challenge. Donor agencies have enjoyed relative opacity for most of their existence. For years, efforts to enact fundamental changes in national freedom of information acts (FOIAs) and organizations information disclosure policies were met with resistance and persistent delays.[3] Numerous published analyses and interviews repeatedly point out pervasive problems of organizational inertia, technological and economic barriers to change, and staff's cultural fears surrounding transparency.[4] Yet over the past ten years, this landscape has shifted dramatically.[5] Why are donors' information disclosure and transparency reforms progressing now?

Twenty years ago, it was relatively easy to access information on aggregated aid data, as long as one had access to the internet and the capacity to search and decipher the dense online spreadsheets offered by the Organization for Economic Cooperation and Development (OECD) Development Assistance Committee (DAC). However, if one wanted to attain detailed information on the specific aid programs, such as information on subnational project locations, budget, implementing partners, and contracting information, it would require a physical trip to one of the few public information centers of institutions such as the World Bank (where some—but hardly all—hardcopy projects documents were available for purchase) or a patient Freedom of Information Access (FOIA) request for

---

[1] Ann Florini, "Increasing Transparency in Government" (2002) 19 *International Journal on World Peace* 3; Ann Florini (ed) *Transparency for an Open World* (Columbia University Press 2007). M Collin, A Zubairi, D Nielson, and O Barder "Costs and Benefits of Aid Transparency" (AidInfo 2009); Publish What You Fund "Briefing Paper 1: Why Aid Transparency Matters, and the Global Movement for Aid Transparency" <www.publishwhatyoufund.org/files/BP1_final.pdf> access 25 January 2018; Sarah Mulley "Donor Aid: New Frontiers in Transparency and Accountability" (Transparency & Accountability Initiative 2010); Thomas Carothers and Saskia Brechenmacher "Accountability, Transparency, Participation and Inclusion: A New Development Consensus" (Carnegie Endowment for International Peace 2014); Sheila Herrling "The Business Proposition of Open Aid Data: Why Every US Agency Should Default to Transparency" (*Publish What You Fund Blog*, 30 June 2015) <www.publishwhatyoufund.org/updates/by-country/us/business-proposition-open-aid-data-why-every-u-s-agency-should-default-transparency/> accessed 25 January 2018; Owen Barder "Aid Transparency: Are We Nearly There?" (*Center for Global Development Views from the Center,* 14 April 2016) < https://www.cgdev.org/blog/aid-transparency-are-we-nearly-there> accessed 25 January 2018.

[2] Jonathan Fox "The Uncertain Relationship between Transparency and Accountability" (2007) 17 *Development in Practice* 663; Archon Fung, Mary Graham, David Well, and Elena Fagotto "What Makes Transparency Work?" in Archon Fung, Mary Graham, and David Well (eds), *Full Disclosure: The Perils and Promise of Transparency.* Cambridge University Press 2008); Carothers and Brechenmacher (n1).

[3]Paul J. Nelson (2001) "Transparency Mechanisms at the Multilateral Development Banks" 29 *World Development*, 1835; Florini (2007) (n1); Carothers and Brechenmacher (n1).

[4] Rodney Bent "A Sad State of Affairs: Is Transparency a Solution?" (Publish What You Fund Blog, 23 September 2015) <www.publishwhatyoufund.org/updates/by-country/us/state-transparency-solution/> accessed 25 January 2018. George Ingraham "Making Aid Transparency a Reality" (Brookings Institution Blogpost, 11 February 2015), https://www.brookings.edu/blog/up-front/2015/02/11/making-aid-transparency-a-reality/> accessed 25 January 2018.

[5] For reviews of transparency and accountability initiatives in global development, including campaigns and initiatives focused on aid transparency, see Sefton Darby *Natural Resource Governance: New Frontiers in Transparency and Accountability* (London: Transparency & Accountability Initiative, Open Society Foundation 2010); Matthew Martin "Review of Progress in International and National Mutual Accountability and Transparency on Development Cooperation" Background Paper for the UN Development Cooperation Forum High-Level Symposium 7/2010 < http://www.un.org/en/ecosoc/newfunct/pdf/ma_study-status_and_progress.pdf> accessed 25 January 2018; Carothers and Brechenmacher (n1); Rosemary McGee and John Gaventa "Review of Impact and Effectiveness of Transparency and Accountability Initiatives" Synthesis report prepared for the Transparency and Accountability Initiative Workshop 10/ 2010 < http://www.transparency-initiative.org/wp-content/uploads/2017/03/synthesis_report_final1.pdf> accessed 25 January 2018.

USAID files. Even then, much of the information would be missing.

Today, this information landscape is dramatically different. Since the second and third High Level Forums on Aid Effectiveness in Paris in 2003 and Accra in 2008, several specific definitions and standards on aid transparency have emerged, as well as numerous efforts to construct monitoring and verification systems around compliance with international agreements and national transparency guarantees. At the Fourth High Level Forum on Aid Effectiveness in Busan, South Korea in November 2011, most major donor countries and agencies—including many from the global south—committed themselves to reporting their aid information to a common standard that combined three complementary systems: the Organization for Economic Cooperation and Development (OECD) Development Assistance Committee (DAC) Creditor Reporting System (CRS++),[6] the OECD DAC Forward Spending Survey (FSS)[7] and the International Aid Transparency Initiative.[8] Over this time period, international principles and standards for aid effectiveness, transparency and accountability has grown by leaps and bounds, constituted by a rich set of supranational initiatives,[9] national level policies and open data systems,[10] and international non-governmental organizations and networks devoted specifically to the advocacy and production of transparent and open aid data.[11]

Critically, a number of major development agencies launched aggressive reforms to their informational disclosure policies, which directly contributed to the open data initiatives we see today. At the forefront was the World Bank, which is examined closely in this chapter as case study of the complex processes of organizational change that such transparency reforms have entailed (see section 3). The World Bank's Access to Information Policy was established in 2009, and most other major multilateral and bilateral institutions quickly followed suit. As a result, nearly ten years later such transparency policies are widely seen in the international community as the benchmark for good governance in international financial institutions.

Most recently, the launch of the United Nations post-2015 Sustainable Development Goals included a distinct call for a "data revolution" in international development. Specifically, the UN established the Independent Expert Advisory Group on the Data Revolution for Sustainable Development (IEAG). In 2014, the IEAG issued a major report, entitled *A World That Counts: Mobilizing the Data Revolution for Sustainable Development.*[12] The report called for investments in new technologies and capacity building to improve the quantity and quality of data, including information on international aid flows, to address the inequalities in data access between countries and to promote the use of data in development decision-making, participation and accountability. Explicit references to transparency around aid also found in the 2013 G8 Open Data Charter. The 2015 African Data Consensus calls for a "partnership of all data communities that upholds the principles of official statistics as well as openness across the data value chain, which creates a vibrant data ecosystem providing timely, user-driven and disaggregated data for public good and inclusive development.[13]

2. WHY AID TRANSPARENCY NOW? THE GLOBAL MOVEMENT TOWARDS ACCESS TO INFORMATION

[6] <https://stats.oecd.org/Index.aspx?DataSetCode=CRS1> accessed 25 January 2018.
[7] <https://stats.oecd.org/Index.aspx?DataSetCode=FSS> accessed 25 January 2018.
[8] <http://www.aidtransparency.net/> accessed 25 January 2018.
[9] See, e.g., the EU Aid Transparency Guarantee and the Global Partnership for Effective Development Cooperation.
[10] For example, many countries—especially lead countries such as Sweden, Britain, Denmark and the US—adopted National Transparency Guarantees with specific references to aid (Sweden, Britain), integrated aid transparency commitments within their Open Government Partnership National Action Plans, and similar open aid data strategies and policy papers. For examples of aid transparency systems, see the UK Department for International Development's DevTracker, Sweden's openaid.se, Denmark's Danida Open Aid USAID's Global Aid Explorer, and the US Government's Foreign Assistance Dashboard. See also Ali Clare, Stefaan Verhulst and Andrew Young *OpenAid in Sweden: Enhanced Transparency and Accountability in Development Cooperation* (Report for the GovLab, in collaboration with the Omidyar Network 2016) <http://odimpact.org/case-openaid-in-sweden.html> accessed 9 February 2016.
[11] See, e.g., AidData, Aidwatch, aidinfo, Development Gateway, DevInfo, Development Initiatives, Data2X, Interaction, Modernizing Foreign Assistance Network, Open Aid Partnership, Oxfam International, and many others.
[12] < http://www.undatarevolution.org/report/> accessed 12 June 2017.
[13] African Data Consensus, signed 29 March 2015 in Addis Ababa, Ethiopia.

One can trace the roots of movements to open access to information and the contemporary transparency and accountability initiatives to the rise of national Freedom of Information Acts.[14] Sweden was the first country to adopt an access to information legislation in 1766, but the diffusion of such policies over time has been very slow. The US was the second country to adopt FOIA legislation in 1966 (amended in 1971), with supporting legislation that followed in the form of the Sunshine in Government Act (1976), Presidential Records Act (1978), Whistleblower Protection Act (1989) and Foreign Corrupt Practices Act (1977). The rise of FOIAs and access to information legislation outside of advanced democracies is a recent phenomenon. Only 14 enacted such legislation prior to 1990 and 35 by 2000. Yet by February 2014, 107 countries had adopted Access to Information or FOIA provisions in their national or federal laws and actionable decrees.[15]

The spread of FOIAs represents the spread of public values in political life that encapsulate the desire to counter corruption, open up decision-making processes by public officials and in general adhere to the principles of good governance that were the focus of many development programs in the 1990s.[16] Similar transparency legislation emerged in other areas of global governance. This included international conventions focused on promoting financial transparency and anti-corruption, such as the OECD's Anti-Bribery Convention (1996) and the UN Convention Against Corruption (2003).[17] The demand for transparency is multidirectional. For example, international financial institutions are demanding more transparency from their member governments. In turn, they themselves face increasing pressures from civil society groups to open up their own data and decision-making processes.[18]

The rise of FOIAs, information disclosure and right to information (RTI) policies by themselves represent "reactive transparency," meaning that citizens can request information, but that information is not provided a priori.[19] By contrast, more recent TAIs have shifted focus to "proactive transparency," access to information (AI) and open data initiatives, which entail the presumption not just of disclosure upon request, but the forthwith publication of data as an automatic part of the data production process.

In the development industries' parlance, this broader movement is encapsulated in the notion of "Open Data for Development" (OD4D).[20] OD4D rests upon clear principles and objectives: promote the development of open data "ecosystems" that promote the production, awareness and demand for user-driven and disaggregated data to improve decision-making, accountability and participatory, inclusive development). The movement also places emphasis on making data open, meaning that data is accessible and usable by all and follows established practices for producing data, including use of common standards and public application programming interface (API) for data reporting and publication.

Today, this international regime complex around open data for development presents a strong international normative framework for proactive information disclosure and open data policies. The regime includes transparency and accountability initiatives such as the 2002 Extractive Industry

---

[14] Ana Bellver and Daniel Kaufman "Transparenting Transparency: Initial Empirics and Policy Applications" (WBI Working Paper 8/2005), <http://siteresources.worldbank.org/INTEAPREGTOPRURDEV/Resources/573691-1175901454225/seminar1_background_reading.pdf> accessed 25 January 2018; Florini 2007 (n1); Carolyn Ball "What is Transparency?" (2009) 11 *Public Integrity* 293; R Calland "Annex 3 Freedom of information. Review of impact and effectiveness of transparency and accountability initiatives" (Institute of Development Studies 5/2011) <http://www.transparencyinitiative.org/wp-content/uploads/2011/05/impacts_annex3_final1.pdf> accessed 25 January 2018; R Calland and K Bentley "The Impact and Effectiveness of Transparency and Accountability Initiatives: Freedom of Information" (2013) 31 *Development Policy Review* s69.

[15] Open Society Justice Initiative. *List of Countries with Access to Information (ATI) Provisions in their National/Federal Laws or Actionable Decrees, and Dates of Adoption & Significant Amendments* (2014) <www.right2info.org/resources/publications/national-security-page/countries-with-ati-provisions-02.2014> accessed 7 July 2016. See also Stephen Kosack and Archon Fung "Does Transparency Improve Governance?" (2014) 14 *Annual Review of Political Science*: 65; Open Society Foundation *Access to Informational Laws: Overview and Statutory Goals* (Open Society Justice Initiative 2012).

[16] Florini 2002 (n1); Ball (n 14) 298; C Darch and P Underwood *Freedom of Information in the Developing World: Demand, Compliance and Democratic Behaviours* (OUP 2010). McGee and Gaventa (n5), Calland 2011 (n14).

[17] Bellver and Kaufman (n14) 4-5.

[18] Florini 2002 and 2007 (n1), Carothers and Brechenmacher (n1) 7-9.

[19] Timothy Davies, Perini Fernando and Jose Alonso, *Researching the Emerging Impacts of Open Data – ODDC Conceptual Framework* (World Wide Web Foundation 2013), 17.

[20] See opendatacon.org.

Transparency Initiative; Global Initiative on Fiscal Transparency (GIFT), the International Budget Partnership (2007) and Open Budget Initiative (2006); the 2011 Open Government Partnership, and the 2012 Open Contracting Partnership and Construction Sector Transparency Initiative.

The aid transparency movement emerged synergistically with the rapidly shifting donor landscape of development aid over the past decade. By the early 2000s the international development community included a growing number of public and private donor agencies, NGOs, civil society organizations, and foundations, in addition to the bilateral and multilateral governmental organizations that included many donors who were not members of the OECD's Development Assistance Committee (the so-called "south-south cooperation" agencies). This expanding industry of aid prompted reforms in existing processes to improve cooperation and better leverage development resources between all these new actors. In 2002, over 50 heads of state, along with representatives from the United Nations, the International Monetary Fund, the World Bank, and the World Trade Organization, convened in Mexico for the Monterrey Conference. The resulting Monterrey Consensus encapsulated the tenets of modern international development cooperation, with a focus on renewed funding commitments and better mobilization of financial resources for development, including foreign aid.

While the Monterrey Consensus set the stage for increasing cooperation in aid allocation, subsequent High Level Forums on Aid Effectiveness set the stage for setting the specific agenda around aid transparency and accountability.[21] Following the first forum in Rome in 2003 and the Rome Declaration on Aid Harmonization, the 2005 conference in Paris underscored the importance of aid transparency in achieving development results. The Paris Declaration on Aid Effectiveness was signed in 2005 by over 100 bilateral and multilateral donor agencies, developing-country governments, and international donor organizations. While the transparency agenda was not front and center in the Paris Declaration, the need for greater transparency was implicit in the commitment to achieving improved harmonization between donors and greater alignment between donors and recipient government in establishing development agendas.[22]

At the Third High Level Forum on Aid Effectiveness held in Accra, Ghana in 2008, donors sought to create implementation and monitoring plans to enforce the goals set by the Paris Declaration. The Accra Agenda for Action specifically pointed to transparency and accountability as essential to holding donors and recipient governments accountable for aid spent and its impact. Central to this goal was a strong focus on improving access to statistical and data information systems to better track, monitor and evaluate development results.

The International Aid Transparency Initiative (IATI) was launched in Accra in September 2008, the International Aid Transparency Initiative. IATI was designed as a multi-stakeholder, voluntary initiative, designed to improve upon prior donor report practices (through forums such as the OECD) through the inclusion of reporting by more donors and relevant actors (including non-DAC sovereign donors, NGOs, foundations and aid implementing partners), IATI also sought to establish a more robust system of comparability among donors by establishing a common standard for reporting and promoting the principles of open aid by making all data entered into IATI publicly accessible, machine readable and easily downloadable for replication and integration with other datasets. The establishment of IATI was accompanied by the creation of Publish What You Fund, a small but critically influential NGO based in London that created the annual Aid Transparency Index to monitor donor commitments to access to information reforms and compliance with IATI and other aid transparency commitments through an annual Aid Transparency Index.

The Fourth High Level Forum on Aid Effectiveness in Busan, South Korea, and the resulting Busan Partnership for Effective Development Cooperation was a tipping point in the aid transparency agenda in terms of eliciting a critical level of political commitment. More than 3,000 government officials, NGOs, official donors and other groups were present, including UN Secretary General Ban-Ki Moon, former UK Prime Minister Tony Blair, and US Secretary of State Hillary Clinton. One of the most important events was then Secretary of State Hillary Clinton's announcement that the US would become a signatory to IATI and reach full compliance with open data reporting by 2013. As the largest bilateral

[21] These includes forums in Rome (2003), Paris (2005), Accra (2008), and Busan (2011).
[22] Mulley (n1), 19.

donor, US inclusion in IATI brought IATI membership up to 75 percent of global aid.[23] The Busan agreement also established the Global Partnership for Effective Development Cooperation (GPEDC), supported by the OECD and UNDP, which identified transparency and accountability within and among donors to be one of four key objectives of the partnership (Busan Declaration 2011).[24]

In 2014, UN Secretary-General Ban Ki-moon announced the need for a data revolution to support the forthcoming post-2015 Sustainable Development Goals. At the same time, the Independent Expert Advisory Group was formed to provide recommendations for this agenda. This UN Data Revolution, as it became known, calls for the full integration of data and statistics in decision-making, closing of data gaps, as well as building technological capacity and data literacy in small and big data analytics. Most recently, international commitments to aid transparency have been reified by renewed pledges under the auspices on the UN post-2015 Sustainable Development Goals summit in 2015 and the mutual accountability pact of the 2015 Third International Conference on Financing for Development in Addis Ababa, Ethiopia—both of which call for an enhanced commitment from both donors and recipient governments to transparent and timely reporting of all developed-related financial flows, including aid, in as close to real-time as possible.[25]

3. OPENING FROM WITHIN: EXPLAINING HOW TRANSPARENCY EVOLVES AT THE DONOR AGENCY LEVEL[26]

The above account of the broader global movement towards aid transparency helps to explains why aid organizations have now - after many decades of incremental steps towards openness - signaled a strong commitment to transparency norms. Yet it says little about how these policies within aid agencies evolved from relatively restrictive information disclosure policies to quite liberal and proactive AI and open data policies. This account of internal reforms is important, insofar as it reveals specific strategies that may be more or less effective in overcoming initial concerns and organizational inertia and may provide insights for new organizations currently developing their own Access to Information policies, such as Asian Infrastructure Investment Bank (AIIB).

The analysis provided here draws extensively upon findings from primary research conducted on the World Bank (hereafter the Bank). In late 2009, the Bank was the first multilateral development bank to shift its more reactive information disclosure policy towards a more proactive access to information policy, and to take the dramatic steps of publishing extensive information on its projects, development data and budgets. The Bank shifted from a "positive list" of limited materials available for disclosure to a "negative list," which presumed automatic access to all materials except those on a carefully defined list of exceptions. This represented a "transformative change" in the Bank's culture and approach towards organizational transparency.[27] According to Barbara Lee, Manager of the Aid Effectiveness Unit at the Bank, the Bank shifted "from a hush-hush place to an era of openness" as the result of this policy.[28]

---

[23] Owen Barder, "What Happened in Busan?" (Owen Abroad, 11 December 2011) <www.owen.org/blog/5131> accessed 3 March 2014.

[24] During this same period, aid- receiving countries were adopting domestic aid information systems to track incoming aid flows. By 2013 (when IATI reached 200 signatories), 25 countries hosted aid management platforms (AMPs), 35 countries had development assistance databases (DADs), and numerous other developing countries had "home grown" aid information systems housed in their Ministries of Finance or Planning. Furthermore, between 2013-2015, most major donors incorporated transparency initiatives into their strategic operating plans and had either launched or made plans to release publicly accessible external databases with detailed information on their ODA projects and spending.

[25] ONE, The 2015 Data Report: Putting the Poorest First, 2015. <www.one.org/international/policy/data-report-2015/> accessed 15 January 2018.

[26] For a more detailed account of the evolution of the World Bank's informational disclosure policy reforms, see Catherine Weaver and Christian Peratsakis "Engineering Policy Norm Implementation: The World Bank's Transparency Transformation", in Alexander Betts and Phil Orchard (eds) *Implementation and World Politics: How International Norms Change Practice* (Oxford University Press 2014).

[27] Interviews with Caroline Anstey, World Bank Managing Director, Washington, DC (Washington, DC January 2012); Jeff Gutman, former World Bank Director of Operational Policy and Country Services (December 2011), Chad Dobson Director of the Bank Information Center (Washington DC, December 2011); and Owen Barder Senior Fellow at the Center for Global Development (Washington, DC, December 2011).

[28] Quoted in Rebecca Harris, "Knowledge is Power: Transparency and Participation Will Be the Drivers of Effective Development" *Huffington Post* (19 April 2011).

The Bank's embrace of transparency was by no means spontaneous. Instead, it was the result of a protracted debate over its information disclosure policy since the early 1990s. The timing of the Bank's long awaited reversal of its information policy reflects, in some sense, a dramatic alignment of ideational and material pressures for greater transparency in the mid-2000s described in the previous section. But it also reflects the fact that those championing transparency at the Bank were well aware of the potential pitfalls of pushing transparency too far, too fast. Advocates worked to ensure the passage of an "airtight [access to information, or AI] policy"[29] by the Bank's Board of Executive Directors that would minimize internal and external resistance to the AI policy. They also sought to cultivate an environment for nervous staff wherein compliance would be strictly enforced, while recognizing that "mistakes will happen."[30] The design of the AI policy and implementation plan also included extensive involvement of key actors inside the Bank, as well as some of its most vocal external critics. There was a seven-month preparation period between 2009, when the Board passed the new AI policy, and July 2010, when the policy went into practice, during which management sought to identify and deal with capacity constraints and resistance.

The ensuing integration of the AI policy into Bank standard operating practices was both more rapid and smooth than its architects, advocates and even critics expected.[31] Moreover, from the perspective of many Bank staff and managers, the surprisingly unproblematic implementation of the AI policy "opened the door" for a broader transparency agenda and "set the ball rolling down the hill"[32] for the "democratization of development.'[33] In turn, the Bank's transparency agenda started to diffuse (albeit unevenly) to other aid agencies, who adopted similar AI and open data policies in response to changing public expectations regarding aid transparency.[34]

The evolution of the Bank's access to information policy reflects a long history of moving from a relatively closed to quite open institution. The first discussion of AI policies began in 1985, when the Bank established its first set of staff guidelines on public information disclosure in response to demands of environmental activists concerned about the social and ecological impact of the Bank's lending programs. Over the next 20 years, the Bank made three significant revisions to its information disclosure policies. The first was in 1994 (the year of the "Fifty Years is Enough" campaign), when the Bank established its first official disclosure policy. This coincided with the creation of the Independent Inspections Panel and the opening of the Bank's Public Information Center.[35] The 1994 policy ostensibly worked on a presumption of disclosure. But in fact all Bank data and documents were not eligible for disclosure unless they were on a short list of permissible items—a so-called "positive list." For example, in 1993, it was nearly impossible for an interested party to obtain through official channels timely and detailed information on lending agreements, individual projects, or even announcements (much less minutes or transcripts) of Board meetings.

In response to shifting demands regarding informational disclosure, the World Bank incrementally revised its "positive list," roughly every two years. For example, in 1998, the Bank made Country Assistance Strategy papers public, albeit only with the permission of the country in question. In 2001 the Board expanded the list quite substantially, and also revised the Archival policies to make it slightly less difficult to access historical materials.[36] By 2002, the Bank's management began to discuss deeper policy changes.[37] In 2003, the Board of Executive Directors debated the disclosure of Board minutes and other deliberative process materials. However, the "presumption in favor of disclosure" remained limited by the existence of the cumbersome positive list, which many within the Bank felt to be ambiguous and difficult to interpret.

[29] Interview with Gutman (n26).
[30] Interviews with Anstey (n26) and Gutman (n26).
[31] Interviews with Anstey (n26), Gutman (n26), Dobson (n26), and Barder (n26).
[32] Interview with Gutman (n26).
[33] Robert Zoellick "Democratizing Development Economics," Speech delivered at Georgetown University, 29 September 2010.
[34] Mulley (n1).
[35] Richard E. Bissell "Regarding the World Bank's Policy on Disclosure of Information," *Committee on Financial Services, US House of Representatives* (Washington, DC, 10 September 2009).
[36] World Bank *World Bank Disclosure Policy: Additional Issues: Follow-Up Consolidated Report (Revised*) (World Bank Operations Policy and Country Services, 14 February 2005).
[37] In 2002, the Bank also established a global network of Public Information Centers to enhance public access outside of the US, by filling requests for information when documents could be disclosed.

Nonetheless, in 2004 several Executive Directors continued to push for more open access with respect to policy and strategy papers related to operations.[38] Of particular importance were the internal discussions over disclosure of documents related to Board deliberations. In a series of meetings between 2004 and 2005, the Executive Directors discussed the disclosure of Board minutes, drawing on the experience of other international financial institutions (such as the Inter-American Development Bank and Asian Development Bank). Informal notes between the Executive Directors in 2005 indicate "an emerging consensus to move toward greater transparency in this respect, with the understanding that the content of Board minutes would not change from its present form.'[39] The proposal to increase the transparency of Board discussions was approved, but with several caveats: material deemed by the Board to be too sensitive would be redacted prior to disclosure, and Board transcripts, summaries of discussion, committee minutes and reports to the Board (called "green sheets") would not be disclosed. The Board also solicited a cost-benefit study of simultaneous disclosure designed to assess the possibility of further disclosure creating opportunities for "undue pressure from special interest groups" or risks of "loss of candor." While there was some reluctance on the part of Board to go the distance on the release of deliberative documents, the progressive discussion of disclosure reform attracted some much desired praise from external watchdog groups.[40]

By the mid-2000s, momentum was building. Externally, the aforementioned influence of parallel transparency movements in areas such as extractives industries (EITI) and the growth in FOIAs clearly was influencing the Board's discussion of the Bank's information disclosure policies between 2001 and 2009. Both internal documents and interviews reveal that Executive Directors from countries with strong FOIA traditions—particularly India, Mexico and the US—were vocal proponents of similar freedom of information policies at the Bank. At the same time, these countries advised the Bank to approach freedom of information slowly and incrementally, as if "peeling an onion," in order to build broad support and develop the institutional capacity to manage a robust freedom of information system.[41]

The Board's internal discussions also reflected the mounting pressure of NGO campaigns. NGO demands for greater transparency were especially prominent at the Gleneagles G8 Summit in 2005.[42] The following year, the Global Transparency Initiative (GTI), a network of civil society organizations promoting openness in the international financial institutions (IFIs), was established. GTI went so far as to draft a model policy for the World Bank's Access to Information Policy in early 2009, parts of which later appeared in the official policy adopted by the Bank (GTI 2009).[43] The Bank Information Center (BIC), a leading DC-based NGO aid watchdog group within the GTI, was a central player running up to and during the 2009 AI policy negotiations. For years, BIC had pushed the Bank to move from a positive to negative list, and also advocated for the disclosure of particularly sensitive materials such as draft country programming plans, project appraisal and policy documents, and access to Board documents.[44]

In late 2007, the Bank reached out to BIC to help coordinate the Bank's external consultations in 33 countries of its new draft AI policy paper. Carolyn Anstey, one of the key architects of the new AI policy and (as of June 2013) one of the Bank's three Managing Directors, argued that having an NGO partner like BIC as a standard bearer was helpful to the Bank's evolving stance on its own AI policy and

[38] Word Bank (n35).
[39] Ibid, 4.
[40] H Kovach, C Neligan, and S Burall *Global Accountability Report: Power without Accountability?* (One World Trust 2003).
[41] Interview with Gutman (n26) and Anstey (n26). See also World Bank *FY2011 Access to Information Annual Report* (World Bank 2012).
[42] Mulley (n1).
[43] In addition to the NGOs and campaigns already mentioned, some of the most prominent watchdog NGOs with respect to the aid transparency and accountability movement include AidInfo, Aid Watch, BetterAid, Bretton Woods Project, EURODAD, and Reality of Aid Initiative.
[44] Bruce Jenkins "World Bank and IMF Launch Disclosure Reviews" 65 *Bretton Wood Project Update* 23 April 2009. See also Jonathan Fox "Transparency for Accountability: Civil Society Monitoring of Multilateral Development Bank Anti-Poverty Projects," (1997) 7 *Development in Practice* 167; Jonathan Fox and L. D. Brown (eds) *The Struggle for Accountability: The World Bank, NGOS, and Grassroots Movements* (MIT Press, 1998); D. Clark, J. Fox, and K. Treakle *Demanding Accountability: Civil Society Claims and the World Bank Inspection Panel* (Rowman & Littlefield 2003).

building external support for the policy.[45] BIC later became a member of the AI Working Group, in charge of preparing for the Bank's policy implementation in 2010-2011.[46]

Simultaneously, the growing attention to good governance in the Bank's programming was reverberating in terms of the institution's internal governance. The Bank's 2007 Governance and Anticorruption strategy paper specified the need for more transparency and accountability in the Bank's own internal conduct. The aim was to set an example for others and to demonstrate that the Bank lived up to its own ideals.[47] In the words of Shaida Badiee, then Director of the Bank's Development Data Group and now the Executive Director of Open Data Watch, "if we are going to support Open Data and Open Government in countries, the World Bank must not only preach it, but also do it."

Arguably, the final and most important impetus for the 2009 AI Policy shift came from Bank management. Arriving in the wake of the Wolfowitz scandal,[48] President Robert Zoellick proclaimed the Bank's transparency and accountability would be a key tool in restoring good governance. He quickly set about to revitalize the Bank from the inside out.[49] Interviews with Bank staff reveal that Zoellick and other senior managers[50] were keen to solidify the Board's support for the transparency agenda and willing to exercise authority to overrule reticent managers and staff. Resources needed for this (and later for the Open Data Initiative) were reallocated from existing budgets, already suffering from seven years of zero percent growth. Moreover, there was little tolerance for noncompliance. Vice Presidents reported directly to Zoellick on the progress of the AI policy implementation and were held responsible for lax enforcement within their units.

According to the World Bank's 2009 Approach Paper, "the disclosure policy and its effective implementation rank[ed] high in the Bank's corporate agenda"[51]:

> ...the existence of such a positive list has limited the Bank's ability to implement the expressed presumption in favor of disclosure. The policy is also not clear about what cannot be disclosed, and there are many ambiguous and overlapping rules that are cumbersome and difficult for Bank staff to implement, and for the public to understand. At the same time, public interest in transparency has been growing. Many countries have adopted freedom of information legislation and the transparency standards of international financial institutions are subject to increased public scrutiny. Both within and outside the Bank, many feel that the Bank's disclosure policy framework still does not go far enough.[52]

[45] Interview with Anstey (n26).
[46] Jenkins (n43); World Bank *FY2011 Access to Information Annual Report* (World Bank 2012). Interviews with Bruce Jenkins (Washington, DC, June 2009), Dobson (n26), Gutman (n26), and Anstey (n26).
[47] World Bank, *Implementation Plan for Strengthening World Bank Engagement on Governance and Anticorruption* (The World Bank 2007); Paul A. Volcker, et al. *Independent Panel Review of the World Bank Group Department of Institutional Integrity* (World Bank 2007); World Bank, *Towards Greater Transparency: Rethinking the World Bank's Disclosure Policy: Approach Paper* (World Bank Operations Policy and Country Services, 29 January 2009); World Bank 2012 (n45).
[48] Catherine Weaver, *Hypocrisy Trap: The World Bank and the Poverty of Reform* (Princeton University Press 2008).
[49] Sebastian Mallaby, "The Quiet Revolutionary Who Saved the World Bank," (Council on Foreign Relations 17 February 2012) <http://www.cfr.org/international-finance/quiet-revolutionary-saved-world-bank/p27398> accessed 25 January 2018.
[50] Zoellick was supported by a cadre of Bank managers in External Affairs (EXT) and Operations Policy and Country Services (OPCS). Carolyn Anstey was especially important in mobilizing internal resources for the AI policy reform and later the Open Data Initiative. Anstey formally served as a country director for Haiti, where she worked extensively with NGOs on the monitoring of government budget transparency. That experience made her keenly aware of the power of involving citizens in transparency and accountability movements, and is one reason she reached out to BIC and supported an extensive external consultation process during the drafting and implementation of the AI policy. Interview with Antsey (n1).
[51] World Bank (n46).
[52] World Bank (n46), 1.

The resulting policy, renamed Access to Information,[53] was passed by the Board in December 2009. The new policy maintained critical exemptions to disclosure that reflect continued concerns over the need to protect client confidences and preserve candor in key deliberations. Many of the exemptions, particularly related to Board documents,[54] were not warmly received by external critics, but were largely seen as a necessary compromise in order to "strike an appropriate balance between the need to grant maximum public access to information in the Bank's possession, and its obligations to respect the confidentiality of its clients, shareholders, employees, and third parties."[55]

Overall, the proposed policy was nothing less than a "paradigm shift."[56] It moved the Bank away from the infamous "positive" list to a "negative" list, consciously limited to narrow set of items exempted from automatic disclosure. The policy was intended to align the Bank with its espoused commitment to the "presumption of disclosure" and make publicly available vast numbers of previously closed documents, including those related to ongoing aid projects (e.g., Implementation Status Reports). It was also designed to mirror disclosure policies adopted in numerous countries through FOIAs, and "put the Bank at the forefront of other multilateral agencies with respect to disclosure."[57]

Herein lies the key not only to the successful adoption of the AI policy, but also the successful *implementation*. The six-month pre-implementation period was consciously designed to give the Bank time to put into place sufficient institutional resources, oversight mechanisms, and compliance measures. Strategic planning for the policy implementation included extensive consultation with NGOs (especially the aforementioned BIC) and their participation in testing the new system.[58] In addition, the new AI policy established an appeals process that ensured continued NGO participation in the Bank's development and initial implementation of the policy.[59] The preparation period between December 2009 and September 2010 further focused on securing Board approval to declassify more than 17,000 documents. In addition, the 2010 AI Policy moved the locus of the Bank's documents from the Public Information Centers to the World Bank's external website; using the preparation period to build and strengthen its technical infrastructure and in-house information management systems.

Predictably, there was considerable anxiety regarding how the Bank staff and management would respond to the new policy. The implementation architects were quite concerned that staff would resist the new policy. This was not because staff did not believe in making the Bank more transparent, as there was very little dissent on this general principle. Instead, staff reluctance stemmed from concerns regarding resources, loss of candor and uncertainty about how this would affect client relations with borrowing governments who did not favor such transparency.[60] Some Bank staff also feared that opening the Bank would mean a loss of revenue in instances where the Bank charged for access to information and data. This was particularly the case within the Development Economics Vice Presidency (DEC) and its Development Data unit, which used the sale of development indicators (now accessible through the Open Data Initiative) to help offset the cost of collecting, compiling, analyzing and reporting data. Zoellick, however, assured DEC that the Bank would suffer no revenue loss (and would even experience a revenue gain) by releasing the data.[61]

---

[53] Several interviewees noted that the term "information disclosure" was considered out of fashion by 2009. "Access to information" is considered to be better aligned with democratic principles, insofar as it highlights citizen's rights to information, not only governments' (or organizations') obligations to provide information.

[54] Specifically, the old policy barred the simultaneous disclosure of confidential information pertaining to Board proceedings, verbatim transcripts of Board and committee discussions and documents prepared by staff for the Board. The new policy presumes that Board papers would be disclosed at the end of the deliberative process, but any materials classified as confidential or strictly confidential would not be disclosed unless the Board specifically provides authorization. World Bank 2009 (n46) 7-8. Classified materials are subject to disclosure after 20 years.

[55] World Bank (n46), 2.

[56] World Bank 2009 (n46); World Bank, "New World Bank Access to Information Policy Takes Effect July 1," (Press Release no. 2010/448/EXC, 3 June 2010).

[57] World Bank 2009 (n46), 15.

[58] World Bank 2010 (n.55).

[59] Ibid.

[60] See also David Shaman, *The World Bank Unveiled: Inside the Revolutionary Struggle for Transparency* (Parkhurst Brothers Publisher 2009).

[61] A similar debate occurred within the context of the Zoellick's effort to "democratize development economics" (Zoellick 2010) by not only opening public access to key development databases like the World Development Indicators, but also by supporting the creation of open source analytical tools (such as PovcalNet and ADePT) that would empower people outside of the Bank to access datasets and draft publications, and replicate the Bank's analytical work in areas such as calculations of global poverty figures. Martin Ravallion, Senior Economist

Staff were also concerned that public exposure would diminish honest discussions in key project documents like Implementation Status Reports, which were critical for mid-course corrections in lending programs. The AI policy team defended the disclosure by arguing that disclosure would *improve* candor by promoting greater accountability and access to third party information and incentivizing staff to produce higher quality reports. But more compelling was the built-in oversight mechanism:

> ...the main indicator of candor is the "realism index" which measures the extent to which the current ratings of projects in the portfolio reflect the average rating of projects at exit over the recent past. But, at any point in time, the number of operations classified as being in 'problem' status is well below the average for the projects that exit the portfolio. During the first 18 months following the adoption of the revised policy, Management [will] closely monitor the implications of the changes in the policy on candor, including the realism index.[62]

Arguably, the most important part of the implementation plan focused on preparing staff for the policy change. This was a daunting task in an organization that includes over 15,000 staff, with high turnover, with a large DC headquarters and over 100 mission offices worldwide. To prepare staff, senior Bank managers enacted a series of measures to educate staff on the new AI policy. For example, numerous materials were compiled and disseminated, and an internal AI website with helpdesk was created. Training sessions were held on how to classify and declassify materials. Bank Vice Presidents designated 189 staff to serve as AI focal points to provide staff support as well as provide feedback on implementation challenges.

Rigorous oversight and compliance measures were put in place. Most prominent was the *mandatory* AI e-learning program during the first few months after the formal adoption of the AI policy. Completion reports were compiled and distributed every two weeks to all the Vice Presidents, who publicized a list of those who had not yet completed the training. Severe sanctions were threatened: staff were repeatedly told that failure to complete the e-learning program would result in the loss of their email privileges.[63] This proved extremely effective. One staff member we spoke with said, "I can confirm the seriousness with which the staff awareness of the policy was approached. Within my VPU, we were regularly reminded of the need to do the training module, lists of non-complying staff were circulated on several occasions and the VPs office did pursue staff who had not done the training module. The threat to cut off email access was taken seriously. The training module was actually not bad either."[64]

Overall, the preparation for the implementation period involved an impressive amount of foresight and attention to detail. The AI Working Group (now AI Committee) established vigilant monitoring mechanisms and the published detailed progress reports every quarter during the first year and annually thereafter. The progress reports, produced by the Bank's Legal Department and published online, provide extensive information on internal compliance rates with the mandatory e-learning program (now near 100 percent) as well as a precise list of all public access requests (with time taken for the requests to be filled) and all appeals (with data on which appeals were granted and reasons provided for those that were not).[65]

Thus, by the time the 2010 Policy was formerly adopted, everything was in place for a smooth transition. A strong consensus was built, reinforced by oversight and control mechanisms and a clear delegation of responsibilities regarding policy enforcement. The architects of the AI implementation plan

---

at DEC, calls this the "wholesale retailing" of development economics. Bank economists feared this will interfere with their first mover advantages in publishing the results of their data collection and analysis and run up against copyright rules in peer-reviewed journals where they are encouraged to publish. Martin Ravallion "Wholesaling Research for Development," World Bank Blog, 29 September 2010. <http://blogs.worldbank.org/developmenttalk/wholesaling-research-for-development> accessed 2 March 2012; interviews with Anstey (n26) and Gutman (n26).

[62] World Bank 2009, (n46), 20.

[63] Interviews with Gutman (n26) and Anstey (n26). See also World Bank "World Bank Policy on Access to information Progress Report, October through December 2010," (Legal Vice Presidency, 28 March 2011).

[64] Email correspondence with Jeff Chelsky, World Bank, 10 March 2012.

[65] World Bank 2010 (n55) and 2012 (n45).

were nonetheless surprised a year later to see how smoothly and quickly the AI policy took hold.[66] According to one interviewee, "change does not usually come that quickly in the Bank!"

4. CONCLUSIONS: THE PATH TOWARDS AID TRANSPARENCY

The Bank's 2011 Access to Information Annual Report opens by calling the AI policy a "radical policy shift" which "has heightened the World Bank's interaction with the public...and positively impacted the development community by broadly encouraging other development institutions to adopt similar public access policies, which has helped to push forward the objective of aid transparency and accountability."[67] Once seen as the bastion of secrecy, the Bank was held up in these early years of the current donor transparency as a model of best practice.[68]

The embrace of transparency through its AI policy has contributed to the growth of other major aid transparency initiatives within the Bank and other institutions. The most prominent of these agendas is the aforementioned Open Data Initiative, which makes available to the public - at no cost - the Bank's immense collection of development data, including the once pricey World Development Indicators. The World Bank also initiated a data visualization campaign by mapping all of its active aid projects worldwide through its "Mapping for Results" program. This is an unprecedented exercise in transparency, widely lauded in the press, and has spurred a virtual geomapping race between international aid agencies aspiring to attract similar accolades.

Early information disclosure and accountability policy shifts at the World Bank did not spontaneously diffuse to other regional development banks (RDBs), but have had some spillover effects. As Paul Nelson (2001) documents in his excellent review of earlier disclosure reforms,[69] in the 1990s, the RDBs diverged from the path taken by the World Bank, creating initially weaker disclosure rules and less independent investigation mechanisms. Others, however, argue that since this period "the [World Bank's] policy has encouraged other development institutions to adopt similar public access policies, and, equally important, fosters more systematic engagement with civil society organizations… For example, local civil society organizations have leveraged the AI policy to monitor project procurement plans, encourage access to information initiatives from their own government, and conduct independent review of development outcomes."[70]

There are clear trends in terms of the diffusion of AI policies. Annex 1 below ("Summary of Access to Information Policies in Bilateral and Multilateral Development Banks") overviews the current set of access to information policies at other major multilateral and bilateral development banks. Most of these institutions have overhauled their information disclosure policies and opted for more proactive access to information and open data policies over the past 10 years.

This growth of AI policies in bilateral and multilateral development agencies signals a strong convergence around transparency norms in international development aid. Moreover, the transparency and accountability movement as a whole has resulted in a number of national and agency level initiatives around open aid data. For example, Sweden and the UK passed Aid Transparency Guarantees in January and June 2010, respectively. Each also developed open data platforms (Sweden's openaid.se and UK's DevTracker), which were followed by others, including Denmark's Open Aid website, the US Department of States' Foreign Assistance Dashboard and USAID' Foreign Aid Explorer.

In sum, the past ten years of aid agencies' experiences in adopting proactive AI and broader open data policies offers several key lessons for other development institutions seeking to follow suit.

---

[66] Interviews with Gutman (n26), Dobson (n26), and Anstey (n26). See also Hannah George, "Raising the Bar on Transparency, Accountability and Openness," (Blog entry on World Bank's "Inside the Web", 16 February 2012); World Bank, "World Bank's Financial Data, Open and Transparent," World Bank Press Release No. 2012/148/CTR, 9 November 2011.

[67] World Bank (n45), 1. See also Bank Information Center. *Unlocking the World Bank's Access to Information Policy: Your Key to the Vault* (Bank Information Center, September 2010) <www.bicusa.org/en/Document.102341.aspx> accessed 10 June 2015.

[68] According to Chad Dobson, Executive Director of the BIC, in 2012 "the World Bank's Access to Information Policy continues to set the standard for other institutions to strive for" [quoted in *George* (n65)].

[69] Nelson (n3).

[70] George (n65).

First, strong organizational leadership is needed to initiate transparency initiatives and to overcome the "cultural fear" among staff regarding what open data standards will mean for daily work routines and relationships with client governments. Management and staff of organizations understandably also have concerns that data may be misinterpreted and misused by the public.[71] AI policy reforms may be easier in multilateral and bilateral institutions whose political principals are in countries with preexisting FOIA and commitments to other open data initiatives. Second, agencies (and their respective principals) must be able and willing to devote time and resources to developing systems to support such policies. Interviews with numerous staff of development aid agencies over the past seven years, at both headquarters and mission officers, reveal that there are often unanticipated technological challenges and hidden costs in replacing established data systems.

Moreover, the human element of switching over to new data standards and norms cannot be neglected. Organizational learning and change takes time and constant monitoring to ensure full compliance with new policies. This is especially true for agencies with more decentralized structures. For example, key informant interviews suggested that agencies with more centralized data systems (e.g., in UK DFID) have fewer—albeit not insignificant—barriers to entry than less centralized organizations. For example, for USAID, most of the required data is held at the mission level in different software systems, all of which have to converge towards a common standard. This represents significant transaction costs. Similarly, as Rodney (2015) points out, "the [US] State Department is decentralized, with spending authority, contracting authority and procurement norms that vary greatly by bureau and office. If mapped, the State Department would resemble pre-1870 Germany, a colored jigsaw puzzle of different regions, each jealous of its unique culture and authorities." The State Department's bifurcated budget system (with a separation of operational and program spending) and ingrained commitment to upholding "intent and symbolism of its spending" makes the agency more hesitant to reveal spending data that may conflict with its project image. Likewise, the US Millennium Challenge Corporation (which, since 2015 has been at the top or near top of the Aid Transparency Index) reported significant challenges in internal changes around open data policies that were more attributable to technical challenges than any other factor: "The construction of internal data management tools to structure, store and public complex datasets in consumable formats often requires specialized skills not found among the policy staff charged with deciding on agency publication priorities. At the same time, in order to release data responsibly—in a way that allows the public to utilize the data to correctly understand the reality that the data represents—care has to be taken at each stage of the decision-making process to ensure a balance between data quality, openness and potential risks."[72]

Despite what appear to be formidable challenges to organizational reform, the transparency revolution is described by many in the international development community as "the genie you can't put back in the bottle." The growth of NGOs and other organizations devoted to monitoring and promoting aid transparency also reinforces this shift in development norms. If development institutions are not proactive in their information policies, it is highly likely that others will seek to fill in the gap with data generated through other means.[73] At a minimum, progressive access to information—and even "right to information" and open data policies—are now integrated centrally into the expectations and goals of international treaties and commitments such as the 2030 UN Sustainable Development Goals. Ultimately, while aid transparency may not be the silver bullet for alleviating poverty or inciting economic growth, it at least holds forth the promise of accountability and enhanced legitimacy for the global governance of development.

[71] Heather Hansen, Heather and Catherine Marschner, "Millennium Challenge Corporation: Principles into Practice," Millennium Challenge Corporation 2015) <https://assets.mcc.gov/reports/paper-2015001163301-principles-transparency.pdf> accessed 25 January 2018.
[72] Ibid.
[73] See, for example, the efforts by AidData to track Chinese development finance: < http://china.aiddata.org/> accessed 26 January 2018.

Annex 1: Summary of Access to Information Policies in Bilateral and Multilateral Development Banks

Donor	ATI Index Rating	Information Disclosure Policy	Summary of policy	Adoption Date of policy	URL to Policy
UNDP	Very good	Yes, clear information disclosure policy in place	Presumption in favor of disclosure unless information falls under confidentiality exceptions which are provided in the policy. Information defined as printed or electronic materials that provide knowledge about UNDP activities, including, but not limited to, programs and operations of UNDP. Four principles guiding policy: Maximize access to information; limited exceptions; simple and broad access to information; explanation of decisions and right to review. Has an information disclosure oversight panel "to oversee the implementation of the Information Disclosure Policy and to consider and review appeals relating to information disclosure."	10 January 1997; major revision in August 2004	http://www.undp.org/content/undp/en/home/operations/transparency/information_disclosurepolicy.html
US, MCC	Very good	Yes, some form of information disclosure policy in place through the Open Government Plan	"Decisions on public release of information are based on a presumption of disclosure. If information does not meet any of the exceptions laid out by the Freedom of Information Act (FOIA) or in other regulations or presidential memos, MCC works to disclose the information." There is a Policy on Access to Information and Materials that outlines exceptions to disclosure and "provides internal guidance to MCC staff on how to effectively disclose information." The Open Government Plan outlines how the MCC works towards proactive disclosures. The section states that the MCC works to share its wealth of data and information with the public; the MCC releases complete financial and program performance information, monitoring and evaluation data, independent evaluations, economic analysis, country selection and procurement information to the public.	17 March 2017	Open Government Initiative https://www.mcc.gov/initiatives/initiative/open https://www.mcc.gov/resources/doc/policy-for-monitoring-and-evaluation

Donor	ATI Index Rating	Information Disclosure Policy	Summary of policy	Adoption Date of policy	URL to Policy
UNICEF	Very good	Yes, clear Information Disclosure Policy under UNICEF"s Legal information	Information should be accessible as much as possible, reasonable and practical, on one or more of the UNICEF public-access websites or websites of the United Nations System and disclosed except for confidential information. Information is any produced content, whatever its medium (paper, electronic or sound, visual or audiovisual recording) concerning a matter relating to the policies, activities and decisions of UNICEF.	Adopted in September 2010; updated in May 2011	https://www.unicef.org/about/legal_58506.html https://www.unicef.org/publicpartnerships/files/UNICEF_Transparency_and_Accountability_-_UNICEF_Information_Disclosure_Policy.pdf
UK, DFID	Very good	There is a Freedom of Information Act	Under the Freedom of Information Act 2000, every public body in the UK must produce a publication scheme. The scheme makes it easy for you to access information about our activities.	2002	https://www.gov.uk/government/organisations/department-for-international-development/about/publication-scheme
Global Fund	Very good	Yes, there is a Policy for the Disclosure of Reports Issued by the Office of theInspector General. There is also an information disclosure policy in the Core Documents Policy	The Global Fund will make the fullest disclosure of records possible, consistentwith the rights of individuals to privacy, the property rights of persons in trade sects and confidential commercial or financial information, and the need of the Global Fund to promote frank internal deliberations. There are disclosure categories included in the Core Documents Policy as well as exceptions to the disclosure policy.	The Documents Policy was published in May 2007.	https://www.theglobalfund.org/media/3042/oig_disclosureofreportsissuedbyoig_policy_en.pdfhttps://www.theglobalfund.org/media/5715/core_documents_policy_en.pdf

Donor	ATI Index Rating	Information Disclosure Policy	Summary of policy	Adoption Date of policy	URL to Policy
World Bank, IDA	Very good	Yes, there is the World Bank Policy on Access to Information and The World Bank Policy on Disclosure of Information	The World Bank Policy on Access to Information: Underlying the policy is the principle that the World Bank (namely the International Bank for Reconstruction and Development and the International Development Association) will disclose any information in its possession that is not on its list of exceptions. The policy also outlines a clear process for making information publicly available and provides a right to appeal if information-seekers believe they were improperly or unreasonably denied access to information or there is a public interest case to override an exception that restricts access to certain information. Based on five principles: Maximizing access to information; Setting out a clear list of exceptions; Safeguarding the deliberative process; Providing clear procedures for making information available; and Recognizing requesters' right to an appeals process.	World Bank Policy on Access to Information: adopted on July 1, 2010. The URL links to a document that reflects revisions made on June 30, 2015	http://pubdocs.worldbank.org/en/393051435850102801/World-Bank-Policy-on-Access-to-Information-V2.pdf
IADB	Very good	Yes, there is an Access to Information Policy document	The policy will apply to information produced by the Inter-American Development Bank and to specific information that is in the possession of the Bank, subject to a list of exceptions. The policy will cover information on Bank activities produced by the Bank in connection with its Office of Evaluation and Oversight, its Office of Institutional Integrity (OII), its Sanctions Committee and the Independent Consultation and Investigation Mechanism (ICIM). Based on four principles: Maximize access to information; Narrow and clear exceptions; Simple and broad access to information; Explanations of decisions and right to review.	4/26/2010; supersedes a policy dated August 17, 2006	http://idbdocs.iadb.org/wsdocs/getdocument.aspx?docnum=35167427
ADB	Very good	Yes, there is the 2011 Public Communications Policy (PCP) of the Asian Development	ADB's Public Communications Policy (PCP) expands the scope and type of information ADB makes publicly available. It also allows for earlier disclosure of most Board documents, and offers a more effective framework for proactively disclosing information and responding to information requests on a timely basis.	October 2011; revised a 2005 Public Communication Policy	https://www.adb.org/documents/pcp-2011 https://www.adb.org/site/disclosure/main

Donor	ATI Index Rating	Information Disclosure Policy	Summary of policy	Adoption Date of policy	URL to Policy
		Bank: Disclosure and Exchange of Information	Based on the following principles: presumption in favor of disclosure; accountability and transparency in ADB operations; proactive sharing of knowledge and lessons learned; improved access to operational information; promotion of an information and knowledge-sharing culture; greater two-way information exchange to promote participatory development; timely response to requests for information and documents.		
Sweden, MFA-Sida	Very good	Could not find a policy but there is an Sweden Open Aid Website		2011	https://openaid.se/aid/2016/
AfDB	Very good	Yes, there is a Policy on Disclosure and Access to Information	The objective of the new Policy on Disclosure and Access to Information (DAI) is to provide aclear framework for ensuring greater awareness and understanding of the Bank's developmentmandate and activities through public outreach, and providing better access to information,particularly on the Bank's operations. The revised policy constitutes a major change from a list-based eligibility approach for disclosure, to one under which the presumption of disclosure applies to any information in the Bank Group's possession that is not on a list of exceptions. Based on guiding principles: Maximum disclosure; Proactive disclosure; Limited exceptions to disclosure; Enhanced access to information; Consultative approach; Safe-guarding the deliberative process; Right to Appeal	Adopted in 1997; revised in 2004 and 2005	https://www.afdb.org/fileadmin/uploads/afdb/Documents/Policy-Documents/Bank_Group_Policy_on_Disclosure_and_Acess_to_Infomation.pdf

Donor	ATI Index Rating	Information Disclosure Policy	Summary of policy	Adoption Date of policy	URL to Policy
GAVI	Good	yes, there is the Gavi Access to Information Policy	The purpose of this policy is to enhance Gavi's accountability towards Alliance partners and stakeholders, as well as the general public who may be interested in Gavi's work, by providing access to the information that will enable Gavi partners and stakeholders to understand its governance, strategies, policies and activities. Guiding principles: Transparency; presumption in favor of disclosure; easy access to information. Policy includes disclosure categories and exceptions to the presumption in favor of disclosure. Also includes appeals process.	Approved 5 March 2015	https://www.gavi.org/library/gavi-documents/corporate-policies/gavi-access-to-information-policy/ http://www.gavi.org/about/governance/corporate-policies/
Canada, (CIDA->Global Affairs Canada?)	Good	There is an Access to Information Act under the Canadian government. I had trouble finding the document itself			
EC, NEAR	Good	Sort of, in the EU (so in the European Commission I assume) there is a commitment to transparency and Freedom of Information under Article 15 of the Treaty of the Functioning of the European Union	In the spirit of transparency, EU residents can access and obtain documents directly online, through registers and databases or by individual requests. Under Article 15 of the Treaty on the Functioning of the European Union, citizens and residents of EU countries have a right of access to the documents of the European Parliament, the Council and the European Commission. Each institution, body, office or agency shall ensure that its proceedings are transparent and shall elaborate in its own Rules of Procedure specific provisions regarding access to its documents, in accordance with the regulations referred to in the second subparagraph.	2003	https://ec.europa.eu/info/about-european-commission/service-standards-and-principles/transparency/freedom-information_en

Donor	ATI Index Rating	Information Disclosure Policy	Summary of policy	Adoption Date of policy	URL to Policy
EC, ECHO	Good	Sort of, in the EU (so in the European Commission I assume) there is a commitment to transparency and Freedom of Information under Article 15 of the Treaty of the Functioning of the European Union	In the spirit of transparency, EU residents can access and obtain documents directly online, through registers and databases or by individual requests. Under Article 15 of the Treaty on the Functioning of the European Union, citizens and residents of EU countries have a right of access to the documents of the European Parliament, the Council and the European Commission. Each institution, body, office or agency shall ensure that its proceedings are transparent and shall elaborate in its own Rules of Procedure specific provisions regarding access to its documents, in accordance with the regulations referred to in the second subparagraph.	2003	https://ec.europa.eu/info/about-european-commission/service-standards-and-principles/transparency/freedom-information_en
EC, DEVCO	Good	Sort of, in the EU (so in the European Commission I assume) there is a commitment to transparency and Freedom of Information under Article 15 of the Treaty of the Functioning of the European Union	In the spirit of transparency, EU residents can access and obtain documents directly online, through registers and databases or by individual requests. Under Article 15 of the Treaty on the Functioning of the European Union, citizens and residents of EU countries have a right of access to the documents of the European Parliament, the Council and the European Commission.Each institution, body, office or agency shall ensure that its proceedings are transparent and shall elaborate in its own Rules of Procedure specific provisions regarding access to its documents, in accordance with the regulations referred to in the second subparagraph.	2003	https://ec.europa.eu/info/about-european-commission/service-standards-and-principles/transparency/freedom-information_en
Netherlands, MFA	Good	Could not find a policy			

Donor	ATI Index Rating	Information Disclosure Policy	Summary of policy	Adoption Date of policy	URL to Policy
Denmark, MFA	Good	There is the Danish Access to Public Administration Files Act	Under the Access to Public Administrations Files Act, the public can request access to administration files. This applies to missions abroad. The default option is disclosure of both physical and digitally stored information, but the public right of access to information may be subject to limitations when the specific information in question is "internal case material" or when protection of information is essential with regard to national security or economic or foreign policy interests. The Legal Department at the MFA has issued internal guidelines on how to respond to requests for access to public administration files and organizes internal courses for staff of the MFA. The act includes exemptions and a duty to take notes.	19 December 1985	http://workingfordenmark.um.dk/en/mfa-at-work/political-and-legal-mandate/our-legal-foundation/public-access-to-information/ http://legislationline.org/documents/action/popup/id/6833
Germany, BMZ-GIZ	Good	Yes, there is an is a Transparency and Information Policy.	The policy is designed not only to provide the public with data and documents on GIZ's work and results, but also to foster an intensive exchange of information with partners in project countries, clients and cooperation partners. Based on the principles of transparency, confidentiality, copyright, economic efficiency, reciprocity. GIZ is bound by the provisions of the German Government's Public Corporate Governance Code and guided by the Code's recommendations on transparency.	Document published October 2011	https://www.giz.de/en/downloads/giz2011-en-policy-transparency.pdf
US, USAID	Fair	There is a Freedom of Information Act (FOIA)	The Freedom of Information Act (FOIA), enacted in 1966, generally provides that any person has the right to request access to federal agency records or information. Federal agencies are required to disclose records upon receiving a written request for them, except for those records that are protected from disclosure by any of the nine exemptions or three exclusions of the FOIA. This right of access is enforceable in court.	1966	https://www.usaid.gov/foia-requests
Germany, BMZ-KfW	Fair	Could not find a policy			

Donor	ATI Index Rating	Information Disclosure Policy	Summary of policy	Adoption Date of policy	URL to Policy
US, Treasury	Fair	There is a Freedom of Information Act (FOIA)	The Freedom of Information Act (FOIA), enacted in 1966, generally provides that any person has the right to request access to federal agency records or information. Federal agencies are required to disclose records upon receiving a written request for them, except for those records that are protected from disclosure by any of the nine exemptions or three exclusions of the FOIA. This right of access is enforceable in court.	1966	https://www.treasury.gov/FOIA/Pages/index.aspx
US, PEPFAR	Fair	I did not find much information, but I did find an interesting blog-post on the Center for Global Development.			https://www.cgdev.org/blog/improving-pepfar%E2%80%99s-data-management-and-disclosure
US, State	Fair	There is a Freedom of Information Act (FOIA)	The Freedom of Information Act (FOIA), enacted in 1966, generally provides that any person has the right to request access to federal agency records or information. Federal agencies are required to disclose records upon receiving a written request for them, except for those records that are protected from disclosure by any of the nine exemptions or three exclusions of the FOIA. This right of access is enforceable in court.	1966	https://foia.state.gov/Request/Guide.aspx
EIB	Fair	Yes, there is the EIB Public Disclosure Policy also a Transparency Policy	This Policy is guided by openness and the highest possible level of transparency with the underlying presumption that information concerning the Group's operational and institutional activities will be made available to third parties (the public) unless it is subject to a defined exception ("presumption of disclosure"). Policy includes list of types of documents it will publish, how and where it will publish them, in a variety of languages, and the restrictions of this policy. The policy document includes a section on the disclosure of information and exceptions, as well as procedures for handling requests.	Adopted in 2002; revised in 2007 and 2015	http://www.eib.org/attachments/strategies/eib_group_transparency_policy_en.pdf

Donor	ATI Index Rating	Information Disclosure Policy	Summary of policy	Adoption Date of policy	URL to Policy
Australia	Fair	There is Freedom of Information Act 1982 under the Australian government. There is also a Principles on open public sector information.	The Freedom of Information Act 1982 enforces the right of citizens to access information held by the government, restricted only where there is a stronger public interest in withholding access. There is a process for citizens to request information. There is also the Office of the Australian Information Commissioner (OAIC) advises the Australian Government on how to be more open, accountable and transparent; make public sector information accessible, discoverable and useable; collect, use and manage public sector information efficiently; make public sector information more readily and freely available to the public to maximize its reuse and value give citizens new opportunities to engage in, and develop, Australian Government processes and policies. There are also the Principles on open public sector information: Open access to information—a default position; Engaging the community; Effective information governance; Robust information asset management; Discoverable and useable information; Clear reuse rights; Appropriate charging for access; Transparent enquiry and complaints processes.	Adopted in 1982	https://www.oaic.gov.au/information-policy/about-information-policy http://dfat.gov.au/about-us/corporate/freedom-of-information/pages/freedom-of-information.aspx https://www.oaic.gov.au/resources/information-policy/information-policy-resources/principles-on-open-public-sector-information.pdf
EBRD	Fair	Yes, there is a EBRD Public Information Policy	The EBRD is guided by the underlying presumption that, whenever possible, information concerning the Bank's operational and institutional activities will be made available to the public in the absence of a compelling reason for confidentiality. Based on the following principles: Transparency; Accountability and governance; Willing to listen and receptive to comment; Safeguarding the business approach to implementing the mandate; Requesting Board Reports for public sector projects. The website also publishes yearly reports on the implementation of the policy.	May 2014	http://www.ebrd.com/what-we-do/strategies-and-policies/public-information-policy.html

Donor	ATI Index Rating	Information Disclosure Policy	Summary of policy	Adoption Date of policy	URL to Policy
Belgium, DGCD	Fair	There is a commitment to transparency and communication; member of IATI	There is a section on transparency between the Belgian public and stakeholders and the international community. Our vision of a transparent development policy consists of: adequately collecting information and documentation related to the policy, activities, results and partners of Belgian development cooperation; systematically communicating this information to the Belgian population, to stakeholders and beneficiaries of the Belgian development cooperation in the South.As laid out in the Aid Effectiveness Agenda, the DGCD believes that Effective transparency requires: that information is easily accessible for interested parties which means it should be published somewhere online, and that (as far as possible worldwide) standards are used both in terms of content (which parameters, which information) as well as in terms of format (specific classifications, codes, deadlines when new data can be expected to be published, agreements on software).	signed IATI in 2012	https://diplomatie.belgium.be/en/policy/development_cooperation/who_we_are/our_organisation/aid_transparency https://diplomatie.belgium.be/en/policy/development_cooperation/how_we_work/effectiveness_of_aid
US, Defense	Fair	There is a Freedom of Information Act (FOIA)	The Freedom of Information Act (FOIA), enacted in 1966, generally provides that any person has the right to request access to federal agency records or information. Federal agencies are required to disclose records upon receiving a written request for them, except for those records that are protected from disclosure by any of the nine exemptions or three exclusions of the FOIA. This right of access is enforceable in court. Open and Transparent Government expands upon the principles of full disclosure of information from the government to its citizens, established in the Freedom of Information Act, to further provide a culture in which agencies are responsible for reporting their plans, successes and failures to the citizens they serve. The Department of Defense (DoD) is committed to the Open Government initiative and FOIA is at the core of government transparency at the DoD	1966	http://open.defense.gov/Transparency/FOIA.aspx

Donor	ATI Index Rating	Information Disclosure Policy	Summary of policy	Adoption Date of policy	URL to Policy
Spain, MAEC-AECID	Fair	Under the 2014-2017 Strategic Plan there is the SG7: Improving communication with citizens on development,cooperation and the Agency. There is also the Law 19/2013, on transparency, access to public information andgood governance.	The Law on Transparency, Access to Public Information and Good Governance will in general terms be a useful tool for citizens and organizations interested in inquiring on the government's actions in this area. Consequently, they will be able to demand that public institutions be accountable for the obligations they contracted.Several measures are laid out in the Strategic Plan regarding accountabilty and transparency. Under transparency, the AECID there is the Consolidation of "Info@od," which consists of a tool that facilitates coordination among the actors of the Spanish Cooperation for data collection. There is also a commitment to complement previously described measures, and endeavor to publish and explain the logic behind all documents related to strategic planning.	2013	http://www.aecid.es/Centro-Documentacion/Documentos/Planificaci%C3%B3n/Plan_Estrategico_AECID_2014-2017_%20EN.pdfhttp://www.aecid.es/Centro-Documentacion/Documentos/Planificaci%C3%B3n/iv_master_plan_spanish_cooperation.pdf#search=Law%2019%2F2013%2C%20on%20transparency%2C%20access%20to%20public%20information%20and%20good%20governance
Gates Foundation	Fair	Yes, there is the BILL & MELINDA GATES FOUNDATION OPEN ACCESS POLICY	There is an Open Access policy that enables the unrestricted access and reuse of all peer-reviewed published research funded, in whole or in part, by the foundation, including any underlying data sets. The policy contains the following elements: Publications Are Discoverable and Accessible Online; Publication Will Be On "Open Access" Terms; Foundation Will Pay Necessary Fees; Publications Will Be Accessible and Open Immediately; Data Underlying Published Research Results Will Be Accessible and Open Immediately.	January 1, 2015	https://www.gatesfoundation.org/How-We-Work/General-Information/Open-Access-Policy
Switzerland, SDC	Fair	There is a Freedom of Information Act (FOIA) and many	Like the rest of the federal administration, the SDC is subject to the Freedom of Information Act (FoIA), which entered into force on 1 July 2006. The law grants any citizen the right to inspect official documents and to obtain information from the	July 1 2006	https://www.eda.admin.ch/deza/en/home/activities-projects/grundsaetze-transparenz.html

Donor	ATI Index Rating	Information Disclosure Policy	Summary of policy	Adoption Date of policy	URL to Policy
		commitments to transparency	authorities without the need to state a reason for the request. The requests must be processed within 20 days.		
France, AFD	Fair	Could not find a policy			
Japan, JICA	Fair	No clear access to information policy, I include a link to Compliance and Anti-Corruption policies.			https://www.jica.go.jp/english/our_work/compliance/index.html
Norway, MFA	Fair	Could not find a policy			http://ati.publishwhatyoufund.org/2014/donor/unocha/
Finland, MFA	Poor	Could not find a policy			
France, MAEDI	Poor	Could not find a policy			
UN OCHA	Poor	Could not find a policy	From the ATI website: It should publish a disclosure policy in line with best practice on presumption of disclosure, exceptions, public interest overrides and independent appeals processes.		
Ireland, IrishAid	Poor	There is are the Freedom of Information Acts of 1997 and 2003	The Freedom of Information Acts 1997 and 2003 allows you to access, to the greatest extent possible, information held by the Department. It gives you the right to have your personal data corrected or updated and to get reasons for decisions taken by the Department that affect you. For transparency and openness, we post FOI requests for non-personal information and the subsequent reply on our Freedom of Information Request Database. The database is ordered by year and month.	1997; 2003	https://www.irishaid.ie/accountability/how-we-are-accountable/

Donor	ATI Index Rating	Information Disclosure Policy	Summary of policy	Adoption Date of policy	URL to Policy
IMF	Poor	Yes, Funds Trasparency Policy - Archives Policy. There is also a Transparency at the IMF fact sheet outlining internal policies to ensure transparency.	Publication of country documents prepared for consideration by the IMF Executive Board ("Board documents") is typically "voluntary but presumed," meaning that, while voluntary, the publication of these documents is encouraged. An even stronger presumption applies to publication of documents relating to the use of Fund resources, though their publication is voluntary. Outside persons, on request, will be given access under the terms specified in this Decision to documentary materials maintained in the Fund's archives	IMF Fact Sheet published in October 2017; The Funds Transparency Policy - Archives Policy became effective on March 17, 2010.	http://www.imf.org/About/Factsheets/Sheets/2016/07/27/15/35/Transparency-at-the-IMF?pdf=1
World Bank, IFC	Poor	Yes, there is a IFC access to information policy	This document sets out the policy of the International Finance Corporation (IFC) regarding the scope of information that it makes available to the public either as a routine matter or upon request. IFC believes that transparency and accountability are fundamental to fulfilling its development mandate. Transparency is essential to building and maintaining public dialogue and increasing public awareness about IFC's development role and mission. It is also critical for enhancing good governance, accountability, and development effectiveness. This policy reaffirms and reflects IFC's commitment to enhance transparency about its activities, improve development effectiveness, and promote good governance. The policy lists exceptions to the policy and what information should be made routinely avaiable, including institutional, financial, investment, advisory-services related documents. It also includes implementation information of the policy like how to access the information and appeals processes.	January 1, 2012	http://documents.worldbank.org/curated/en/232091480670640577/pdf/110692-AIP-English-2012.pdf

Donor	ATI Index Rating	Information Disclosure Policy	Summary of policy	Adoption Date of policy	URL to Policy
Korea, KOICA	Poor	Sort of, there is a commitment to improving its transparency	This commitment includes: continuously stepping up the level of its information disclosure to the International Aid Transparency Initiative(IATI). In 2015, Korea became a member of IATI to boost aid effectiveness. KOICA launched the Integrated ODA Information System in an effort to promote information disclosure for ensuring aid transparency. To manage data more effectively, KOICA reflected the reporting items with criteria based on both OECD DAC and IATI in the system. Also, it enables us to publish more accurate and timely data to the public. KOICA has been operating an official website that shows statistics on its ODA activities both in Korean and English. KOICA's updated website provides the public with a user-friendly service that allows the user to easily access various types of data regarding KOICA's activities. Moreover, KOICA expects to increase the cooperation with various domestic and foreign partners through this service.	Became a member of IATI in 2015	http://www.koica.go.kr/english/koica/Trans/index.html
Italy, MAE	Very poor	I did not find much information, though Italy recently passed a Freedom of Information Act.		Passed in 2016	http://www.foia4italy.it/en/news/italy-approves-freedom-of-information-act/
Japan, MOFA	Very poor	There is an Active Provision of Information to the Public MOFA blue book and an Information Disclosure and Public Relations section in Japan's Official Development	MOFA has committed itself to appropriate information provision through various media, such as newspapers, television and the Internet in order to gain the understanding and support of Japanese nationals for Japan's foreign policy. Specific measures to provide information concerning ODA and create opportunities for Japanese citizens to come into contact with ODA activities include the issuance of government publications such as the ODA White Paper and the Diplomatic Blue Book.	Active Provision of Information to the Public: 2015. Information Disclosure: 2006.	http://www.mofa.go.jp/policy/other/bluebook/2017/html/chapter4/c040301.html http://www.mofa.go.jp/policy/oda/white/2006/ODA2006/html/honpen/hp202050204.htm

Donor	ATI Index Rating	Information Disclosure Policy	Summary of policy	Adoption Date of policy	URL to Policy
		Assistance White Paper 2006.			
France, MINEFI	Very poor	Could not find a policy			
China, MOFCOM	Very poor	There is a "Regulations of the People's Republic of China on the Disclosure of Government Information" policy	Since the enforcement of the "Regulations of the People's Republic of China on the Disclosure of Government Information", MOFCOM has been disclosed government information in an all-around and timely manner in accordance with the regulations and has achieved initial effect. By the end of 2008, a total of 1,692 items of government information from 2003 onwards are available in the government information column on MOFCOM website, and 52 applications on government information disclosure were handled. MOFCOM is committed to enforce the "Regulations of the People's Republic of China on the Disclosure of Government Information," and to actively promote the disclosure of government information.	2008	http://english.mofcom.gov.cn/article/newsrelease/significantnews/200904/20090406146961.shtml
UAE	Very poor	Could not find a policy			
World Bank, MIGA	n/a	Yes there is a Access to Information Policy.	There is a presumption in favor of disclosure with respect to the information described in this Policy, absent a compelling reason not to disclose such information. There is a list of exceptions included in the policy as well as a list of information that is routinely made available. There is a process for requesting information included in the policy.		https://www.miga.org/documents/Access_Information_Policy.pdf
World Bank, IBRD	n/a	Yes, there is the The World Bank Policy on Access to Information and The World Bank Policy on Disclosure of Information	The World Bank Policy on Access to Information: Underlying the policy is the principle that the World Bank (namely the International Bank for Reconstruction and Development and the International Development Association) will disclose any information in its possession that is not on its list of exceptions. The policy also outlines a clear process for making information publicly available and provides a right to appeal if information-seekers believe they were improperly or	World Bank Policy on Access to Information: adopted on July 1, 2010. The URL links to a document	http://pubdocs.worldbank.org/en/393051435850102801/World-Bank-Policy-on-Access-to-Information-V2.pdf

Donor	ATI Index Rating	Information Disclosure Policy	Summary of policy	Adoption Date of policy	URL to Policy
			unreasonably denied access to information or there is a public interest case to override an exception that restricts access to certain information. Based on five principles: Maximizing access to information; Setting out a clear list of exceptions; Safeguarding the deliberative process; Providing clear procedures for making information available; and Recognizing requesters' right to an appeals process.	that reflects revisions made on June 30, 2015	
DANIDA	n/a	There is a commitment to transparency	Danida is committed to transparent development cooperation. Although Danida is one of the most transparent donors, we are continuously striving to improve the public's access to data from programmes and projects. There is a programmes and projects database.	Open Aid website launched in 2013	http://um.dk/en/danida-en/about-danida/Danida-transparency/http://openaid.um.dk/en/
Asian Infrastructure Investment Bank	n/a	In draft form	The AIIB is currently developing its information disclosure policy. As of January 2018, the policy was released for public discussion.		https://www.aiib.org/en/policies-strategies/operational-policies/public-consultation/.content/_download/draft_policy_on_public_information.pdf