

ASIAN DEVELOPMENT BANK

THE PUBLIC COMMUNICATIONS POLICY OF THE ASIAN DEVELOPMENT BANK *Disclosure and Exchange of Information*

March 2005

ABBREVIATIONS

| | | |
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| ADB | - | Asian Development Bank |
| ADF | - | Asian Development Fund |
| AfDB | - | African Development Bank |
| CRP | - | Compliance Review Panel |
| CSP | - | country strategy and program |
| CSPU | - | country strategy and program update |
| DEC | - | Development Effectiveness Committee |
| EBRD | - | European Bank for Reconstruction and Development |
| EIB | - | European Investment Bank |
| EU | - | European Union |
| IBRD | - | International Bank for Reconstruction and Development |
| IDB | - | Inter-American Development Bank |
| IFC | - | International Finance Corporation |
| IMF | - | International Monetary Fund |
| MDB | - | multilateral development bank |
| MIGA | - | Multilateral Investment Guarantee Agency |
| NGO | - | nongovernment organization |
| OER | - | Office of External Relations |
| PDAC | - | Public Disclosure Advisory Committee |
| PID | - | project/program information document |
| RCSP | - | regional cooperation strategy and program |
| RCSPU | - | regional cooperation strategy and program update |
| RRP | - | report and recommendation of the President |
| SPF | - | Special Project Facilitator |
| UNDP | - | United Nations Development Programme |

DEFINITIONS

“affected people” means people who may be beneficially or adversely affected by a project or program assisted by the Asian Development Bank (ADB).

“appraisal” means (i) for public sector projects or programs, the appraisal mission, or if the appraisal mission is waived, the management review meeting where such a waiver is approved, and (ii) for private sector projects, the mission that follows the project’s review by the Private Sector Credit Committee.

“available to affected people” means available in an appropriate form, manner, and language and at an accessible location to be understandable to affected people.

“Board”, unless specified otherwise, refers to ADB’s Board of Directors.

“completion” of a document means preparation up to and including the stage at which it meets the requirements of the ADB department responsible for its preparation.

“confidential business information” means information covered by a confidentiality agreement or a non-disclosure agreement that ADB enters into with clients, advisors, consultants and other related parties.

“final report” means a report (i) formally submitted to ADB as a final report; (ii) that ADB has determined to be of sufficient quality to be used in preparing an ADB-assisted project or program; and (iii) that requires no further changes.

“historical information” means information concerning ADB-assisted projects, programs, policies, and general operations that is no longer "active."

“publicly available” means available on ADB’s website.¹

“resettlement plan” means any full or short resettlement plan prepared pursuant to ADB’s Policy on Involuntary Resettlement, as amended from time to time, and Operations Manual section F2/OP on involuntary resettlement.

“resettlement framework” means any resettlement framework prepared pursuant to Operations Manual section F2/OP on involuntary resettlement.

“strategy and program assessments” refer to poverty analyses; economic analyses; gender, governance, environment and private sector thematic analyses; and sector assessments undertaken in preparation of a strategy and program. It also includes updates to such assessments.

“strategy and program” or “strategies and programs” means any country strategy and program, country strategy and program update, regional cooperation strategy and program, or regional

¹ The Policy also calls for other means of disclosure or dissemination, depending on the intended recipient or audience as well as the intended purpose for disclosing the information (for example, information to support a consultation process, information sought by affected people or other local stakeholders, or information for the public at large). These are specified separately and not included in the definition of publicly available.

cooperation strategy and program update prepared for any developing member country or region.

“upon” approval, circulation, completion, endorsement, discussion, issuance or submission, means as soon as is reasonably practical, and no later than two weeks (14 calendar days) following the date of approval, circulation, completion, endorsement, discussion, issuance, or submission.

NOTES

In this report, “\$” refers to US dollars.

The public communications policy uses future tense (“will”) to indicate ADB’s intention to carry out certain tasks or activities, and mandatory future tense (“shall”) to indicate ADB’s compliance reviewable obligations.

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EXECUTIVE SUMMARY

For the Asian Development Bank (ADB) to be effective, it must work with a broad range of people and organizations. If it is to create strong and productive partnerships, ADB must be widely known, its motivations and objectives must be clear and well understood, and it must be respected as a professional, results-oriented, and practical institution. To gain trust and support participatory development, ADB must demonstrate openness and accountability by proactively sharing information with, and seeking feedback from, all of its stakeholders. ADB must also respond to information requests from its stakeholders.

Effective external relations and disclosure of information—i.e., more open and proactive public communications—are central elements in building these partnerships.

In the past decade, there has been a clear global trend toward greater openness and access to information and it is now widely accepted that information sharing is essential to participatory development. This trend toward transparency, coupled with the global communications revolution, has raised public expectations about the type, range, and delivery of information provided by institutions in the public, private, and nonprofit sectors. ADB must adapt to this new era of greater openness to remain in step with its comparator institutions, the practices of many governments and the private sector in member countries, and public expectations.

ADB's public communications policy (the Policy) provides a framework to enable ADB to communicate more effectively. It replaces two policies that were adopted in 1994: the *Information Policy and Strategy* and the *Policy on Confidentiality and Disclosure of Information*. It expands the scope and type of information ADB will make publicly available.

The Policy aims to enhance stakeholders' trust in and ability to engage with ADB. To ensure ADB's operations have greater development impact, the Policy promotes:

- awareness and understanding of ADB activities, policies, strategies, objectives, and results;
- sharing and exchange of development knowledge and lessons learned, so as to provide fresh and innovative perspectives on development issues;
- greater two-way flow of information between ADB and its stakeholders, including project-affected people, in order to promote participatory development; and
- transparency and accountability of ADB operations.

To these ends, ADB will proactively share its knowledge and information about its work with stakeholders and the public at large. In the absence of a compelling reason for confidentiality, ADB will presume information can be disclosed. The Policy will ensure that ADB does not selectively disclose information; people should have equal access to the information that ADB makes publicly available under the Policy.

Improving Awareness and Understanding of ADB

ADB faces increasing pressures to respond to some of the most critical challenges of our time, including poverty, global insecurity, environmental sustainability, and economic uncertainty. The dynamism of the Asia and Pacific region is transforming the countries where ADB works, with global consequences. As a result, demands from governments, business, and civil society for

ADB to provide expert knowledge and insights into the region's development challenges are continually increasing.

ADB must enhance its intellectual leadership and articulate and communicate its substantial knowledge of the region more effectively. Member country governments, journalists, civil society organizations, and ADB staff have expressed the need for ADB to speak out and be heard on critical economic and social issues confronting the world's most populous region.

The Policy addresses these concerns by providing institutional mechanisms for more proactive communication on ADB operations, greater dissemination of information about ADB, and better access to information about ADB operations.

Through the Policy, ADB seeks to enhance the understanding of its members, civil society organizations, businesses, media, academic institutions, development partners, and the public at large of its role in poverty reduction in Asia and the Pacific.

Sharing Development Knowledge and Results

ADB has a responsibility to provide the public with a clear, balanced picture of its work. Moreover, as ADB now fully endorses a results-based management approach to delivering country assistance and helping its developing member countries achieve the Millennium Development Goals, it also has a greater public responsibility to report on those results.

With increased competition for scarce donor resources, there is greater public scrutiny of the cost-effectiveness of development programs. ADB produces numerous worthwhile studies, and their findings and insights must be widely disseminated.

The Policy meets these challenges. In an effort to improve performance by learning from experience, the Policy allows for ADB to report failures and disappointments as well as successes. Information will not be withheld just because it is negative. Such openness will encourage constructive dialogue on policies and operations. As a public institution, ADB should be publicly accountable.

Strengthening Communications

To ensure development effectiveness, ADB must expand opportunities for people affected by ADB-assisted operations to be informed about, and influence, the decisions that affect their lives. To facilitate greater community-level participation in decision making, ADB, member country governments, and private sector project sponsors need to adopt processes to inform stakeholders and allow them to provide feedback.

The success of projects often depends upon building trust with people, communities and organizations; explaining project aims; receiving local inputs; and securing the commitment of people living in the project areas. If it is to strengthen its links with project beneficiaries and other affected people, ADB must upgrade its communications policies, practices, and capacities.

The Policy supports the right of people to seek, receive, and impart information and ideas about ADB-assisted activities. Through the Policy, ADB seeks to provide information in a timely, clear, and relevant manner and to share information with project-affected people early enough to allow them to provide meaningful inputs into project design.

Improving Transparency

ADB recognizes that transparency not only enhances development effectiveness, but increases public trust in the institution. ADB seeks to be a positive example of transparency, and to act consistently with the advice it provides to members on transparency issues.

ADB also understands that full disclosure is not always possible for legal and practical reasons. For example, ADB needs to explore ideas, share information, and hold frank discussions internally and with its members, and in doing so, ADB must safeguard the privacy of its staff and protect confidential business information of private project sponsors and clients. However, exceptions are limited.

Implementation of the Policy

The Policy contains a strategy that ADB will use to implement its general principles. The strategy describes the approaches ADB will adopt to make its external relations more proactive and to improve access to information about ADB operations. The strategy describes information outreach, information sharing, and feedback from stakeholders; the key audiences ADB is aiming to reach; translation; and the roles of those responsible for implementing the Policy.

ADB will reinforce and refine its approaches to external relations by defining a focused external relations strategy. ADB will develop clear positions on issues of importance to its members, improve its information products to explain these positions, and disseminate these products more widely. To clarify the importance of external relations within the organization, ADB will align its organizational arrangements and modify its staff skills mix accordingly.

To ensure greater transparency, ADB is expanding the range of publicly available documentation covering both its public and private sector operations. The strategy describes the specific documents and other information ADB produces, indicates what will be made publicly available, and lists the exceptions to presumed disclosure.

To support participatory development, ADB will provide information to people affected by projects. The strategy describes how ADB staff will ensure that comments, advice, criticism, and other feedback on ADB's work are given due consideration. It also explains how ADB's response will be communicated clearly to the stakeholders who provided feedback.

A Public Disclosure Advisory Committee will be responsible for the interpreting, monitoring and reviewing the Policy's disclosure requirements. ADB's Office of External Relations (OER) will be the focal point for all public information activities and will bear overall responsibility for the implementation and consistent application of the Policy. OER will conduct training on the Policy. A new public information and disclosure unit in OER will monitor the disclosure requirements of the Policy, help operations departments to develop communication plans, create a network of public information centers, and establish a translation framework.

The Policy is the first step toward improving awareness and understanding of ADB and the development challenges of the region. ADB aims to provide the public with a clear, balanced picture of its work and results in the Asia and Pacific region. Through the effective dissemination of knowledge, ADB can achieve greater development effectiveness.

The Public Communications Policy of the Asian Development Bank

Disclosure and Exchange of Information

I. INTRODUCTION

1. ADB is engaged in one of the great endeavors of our time—the fight against poverty. It works in a region that is home to almost 700 million people who survive on less than \$1 dollar a day and almost 1.9 billion, well over a quarter of humankind, who live on less than \$2 dollars a day.

2. ADB works to reduce poverty in two main ways.¹ It gives financial support to specific projects and programs to reduce poverty and promote economic growth and it provides ideas and insights to member country governments as they shape the policies and the institutions that will help people improve their lives.

3. If it is to be effective, ADB must work with a broad range of people and organizations. If it is to create strong and productive partnerships, ADB must be widely known, its motivations and objectives must be clear and well understood, and it must be respected as a professional, results-oriented, and practical institution. To gain trust and to support participatory development, ADB must demonstrate openness and accountability by proactively sharing information with, and seeking feedback from, all of its stakeholders.² ADB must also respond to information requests from its stakeholders.

4. Effective external relations and disclosure of information—i.e., more open and proactive public communications—are central elements in building these partnerships. ADB recognized this in its *Long-Term Strategic Framework (2001-2015)*³ and its knowledge management framework.⁴

5. In the past decade, there has been a clear global trend toward greater openness and access to information⁵ and it is now widely accepted that information sharing is essential to participatory development. This trend toward transparency and the global communications revolution have raised public expectations about the type, range, and delivery of information provided by institutions in the public, private, and nonprofit sectors. ADB must adapt to the new era of greater openness to remain in step with its comparator institutions,⁶ the practices of many governments and the private sector in member countries, and public expectations.

¹ ADB. 1999. *Fighting Poverty in Asia and the Pacific: The Poverty Reduction Strategy*. Manila. See also ADB. 2004. *Review of the Poverty Reduction Strategy of the Asian Development Bank*. Manila.

² “Stakeholders” are people, groups, or institutions that may be affected by, can significantly influence, or are important to the achievement of the stated purpose of a development initiative.

³ ADB. 2000. *The Long-Term Strategic Framework of the Asian Development Bank (2001-2015)*. Manila.

⁴ ADB. 2004. *Knowledge Management in ADB*. Manila.

⁵ The importance of the right of access to information has been recognized internationally for more than 50 years. The United Nations General Assembly resolved in 1946 that, “Freedom of information is a fundamental human right and is the touchstone of all the freedoms to which the United Nations is consecrated.” The right to information from public bodies has been recognized in constitutions and access to information laws in dozens of countries, and set forth in Article 19 of the International Covenant on Civil and Political Rights, which has been signed by most ADB member countries (see <http://www.unhchr.ch/pdf/report.pdf> for more details).

⁶ A discussion on communications and information disclosure trends at other multilateral development banks can be found in Appendix 1.

6. As ADB's existing policies in this area⁷ date back to the mid-1990s, an update is due. In May 2003, ADB's President appointed a steering committee, chaired by the Principal Director, OER, to review the *Policy on Confidentiality and Disclosure of Information (Disclosure Policy)* and the *Information Policy and Strategy (Information Policy)* and to consult proactively with stakeholders in the public, private, and nonprofit sectors on developing a new, unified policy.

7. In addition to soliciting written comments, ADB held 15 consultations in a number of member countries to hear the views of a broad range of interested parties within and outside the region. Altogether, more than 430 people participated in the workshops and a videoconference. About one quarter of the participants were public officials. Further details of the review process and a summary of external opinions are in Supplementary Appendix A.

8. This document reports the results of this review and presents ADB's new policy on its communications with the public. It will replace the existing policies.

II. PUBLIC COMMUNICATIONS AND DEVELOPMENT EFFECTIVENESS

9. Effective external relations (Box 1) that aim to make ADB more widely known, understood, and respected, will support ADB's development effectiveness in a number of areas. ADB's shareholders need to be reassured that it is playing an effective role in development and that its role is recognized by academics, civil society, and the media, all of which influence the broader public in their countries. In developing member countries, there will be more support for policies and practices advocated by ADB if they are better understood by development specialists, media, and civil society.

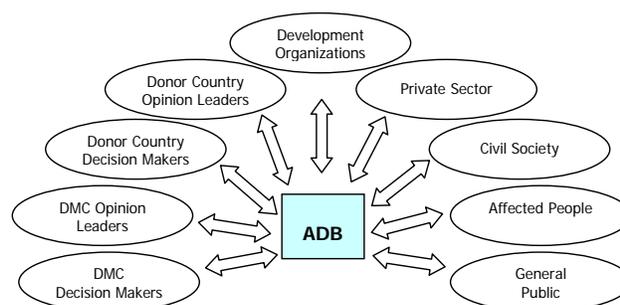
10. In donor countries, there is growing competition for scarce funds in official development assistance budgets, and governments must weigh the benefits of allocating resources to their bilateral programs, to global multilateral institutions, and to regional bodies like ADB. Officials of finance and aid ministries and political leaders need reassurance not only that their taxpayers' money is being effectively spent, but that the public perceives this to be the case.

11. There are other reasons for assigning importance to effective external relations. Greater understanding of, and respect for, the organization will promote partnerships with opinion

Box 1. What is External Relations?

The term **external relations** covers all aspects of an organization's affairs that involve contact with external constituents and audiences. This includes interaction on many levels—with decision makers, affected people, NGOs, consultants, academics, private sector partners and service providers, media, etc.—and for many reasons—to initiate, plan and implement projects and programs; to provide information; to agree and fulfill contracts for goods and services; to establish collaborative networks and working arrangements; and to explain ADB's work and objectives and seek feedback. Clearly, all working at ADB share responsibility for building its external relations to strengthen, maintain, and protect ADB's profile and reputation.

ADB's Constituents and External Audiences



⁷ ADB. 1994. *Information Policy and Strategy*, and *Policy on Confidentiality and Disclosure of Information*. Manila.

leaders in donor and developing member countries. Among other benefits, this will help attract and retain high-quality ADB staff. More proactive communications with affected people will improve the quality of project design and implementation.

12. The proactive disclosure of information is a prerequisite for effective communication, and for building productive relationships with a wide range of stakeholders. Without the provision of timely, relevant, accessible information, the effectiveness of consultations with communities in which projects are undertaken will be seriously reduced. Information will allow affected people to analyze the advantages and disadvantages of a project properly and to contribute more effectively to discussions on design and implementation. This process will ultimately lead to better and more sustainable projects.

13. Transparency is an important element of economic growth,⁸ financial stability, and effective governance. The greater transparency provided by increasing access to information will strengthen integrity in public institutions and private organizations.

14. Finally, there is a moral argument for the disclosure of information by public institutions. Many ADB members now consider government-held information to be public, either through right-to-information laws or through constitutional provisions. As a public institution, ADB should be publicly accountable. Accountability cannot be achieved without availability of information.

III. ADB'S EXPERIENCE IN PUBLIC COMMUNICATIONS

A. Implementation of the *Information Policy*

1. Key Features of the *Information Policy*

15. The *Information Policy* supports ADB's strategic agenda and objectives. It identifies messages to convey, target audiences to be reached, and modes of delivery to be employed. It has four main messages: (i) ADB fosters sustainable economic growth in the Asia and Pacific region, which is in the interest of all member countries; (ii) ADB fulfills an essential development role; (iii) ADB is a catalyst for economic and social change; and (iv) ADB fosters regional and subregional cooperation. It identifies the target audiences for these messages, and specifies various ways of disseminating the messages to them.

2. Assessment of Implementation

16. In the decade since the *Information Policy* was adopted, ADB has expanded and strengthened its relationships with a large number of target audiences, including civil society groups, development organizations, and international and local media. It has delivered news and views to a wider audience. It has begun the shift from reactive dissemination of information to proactive engagement with target audiences.

⁸ A study that tested multiple variables to explain different rates of growth among 78 developing and transition countries over 20 years found that the "individual feature that is most reliably significant in predicting growth is information access." Siegle, Joseph. 2001. *Democratization and Economic Growth: The Contribution of Accountability Institutions*.

17. Given the lack of clear benchmarks or a monitoring framework, it is difficult to assess whether the progress to date is sufficient to achieve the objective of the *Information Policy*. However, in the decade since the policy was adopted, ADB has conducted a number of reviews of various aspects of its operations and these have commented on ADB's external relations. The *Long-Term Strategic Framework (2001-2015)*, the *Review of Progress in Implementation of the Resident Mission Policy (2000)*, and the *Reorganization of the Asian Development Bank (2001)* all highlighted the need for stronger external relations. External reviews of ADB's external relations—both at headquarters and field level—reached the same conclusion and recommended actions to strengthen external relations (see Box 2 for the key lessons). Only a few of these recommendations were implemented.

18. The conclusion to be drawn is that, despite some progress in improving awareness of ADB among external audiences, ADB has still not achieved a public profile commensurate with its role in the development of the Asia and Pacific region. The *Information Policy* was written at a time when ADB considered that its contribution to development would speak for itself, and that explaining and promoting that contribution was unnecessary. ADB therefore committed few resources and assigned low priority to external relations. In short, the *Information Policy* was a product of the time in which it was formulated. Times have changed. The policy is no longer sufficient to achieve the corporate aspiration expressed in the *Long-Term Strategic Framework (2001-2015)* to “raise and strengthen its external profile” or its commitment to ADB becoming a learning institution and source of development knowledge in Asia and the Pacific.

B. Implementation of the *Disclosure Policy*

1. Key Features of the *Disclosure Policy*

19. The *Disclosure Policy* commits ADB to “a presumption in favor of disclosure of information”. The presumption applies in the absence of certain legal and practical constraints. The *Disclosure Policy* aims to provide the greatest possible degree of transparency and disclosure in all areas of ADB operations to ensure the success of its mission, sustain public support for the institution, and enable it to serve as a model for those it seeks to assist. The *Disclosure Policy* lays out three classification categories: “confidential,” “for official use only,” and “unclassified.”

Box 2. Reviews of ADB's External Relations: Key Lessons

For ADB to expand its external relations and raise its public profile, it must develop a more robust and focused external relations strategy. Such a strategy must be grounded in

- *Strong leadership and staff incentives.* Management must demonstrate leadership by directly engaging in public communications, and encourage staff to engage with external audiences whenever possible. Strong Management leadership is essential to promote a culture that favors more proactive staff engagement in external relations activities.
- *Greater clarity about ADB priorities.* ADB must know what its priorities are, where it stands on related issues, and why. This is central to its ability to effectively communicate that information to a wider audience.
- *Original thinking.* ADB must conduct research and form positions on issues of interest beyond the institution's walls and actively promote these positions to external audiences.
- *Effective dissemination strategy.* ADB must ensure that more of its operational experience and research is leveraged to create appropriate and accessible publications that are marketed to target audiences.
- *Active internal communications.* For staff to effectively communicate ADB's views to external audiences, they must first know ADB's views. This requires more active internal communications within ADB.

20. The *Disclosure Policy* requires that project or program profiles be prepared for all projects and programs when they are first listed in *ADB Business Opportunities*. It requires public sector project or program profiles to be updated regularly after Board approval of the project or program, but remains silent in this regard on private sector project profiles. The conditions under which disclosure may take place are explained for certain documents, including reports and recommendations of the President (RRPs), technical assistance reports, sector papers, feasibility studies, and environmental documents. Requests for technical information about projects or documents not cited in the *Disclosure Policy* must be approved by the concerned department or office, as well as by the relevant government. Finally, the *Disclosure Policy* specifies that requesters of information should receive a response from ADB within 22 working days.

2. Assessment of Implementation

21. Since the adoption of the *Disclosure Policy*, ADB has made more information available to external audiences, and, in the process, has contributed to an increase in public awareness of ADB's role, objectives, and operations. Although the many benefits of transparency have been recognized, the absence of an implementation strategy has prevented them from being fully realized.

22. Many external stakeholders have stated that disclosure is not always presumed, and that clear criteria for confidentiality are needed. In practice, whether information is “confidential” is subject to the discretion of ADB and member governments. ADB is said to often accept a borrower's designation of information as secret, thereby calling into question the presumption in favor of disclosure. External respondents claim that disclosure often occurs only after deliberations have concluded and decisions have been made regarding a specific strategy, policy, or project.

23. There are other areas where improvements to the current *Disclosure Policy* are required. The *Disclosure Policy* is unclear and confusing in some areas, and many current documents are not cited in the text. Many staff have expressed concern about the amount of time they spend responding to requests and seeking approvals from ADB and member country governments to disclose certain documents of interest to persons residing in project areas, and to organizations raising issues on their behalf. Some staff have expressed uncertainty about what information can be released, which offices are responsible for disclosure requests, and how those requests should be coordinated. They need clarity and training. Furthermore, staff say that the obligatory updating of project profiles is hindered by ADB's administrative systems, and is given low priority.

24. Experience has demonstrated that greater openness and information sharing have improved the quality of operations.⁹ Experience has also shown that projects generate complaints from local constituencies when insufficient information is made available during project design and implementation and when information is not made available early enough.¹⁰ Many staff feel there is a need for a revised policy that offers more support for meaningful consultation and participatory development.

⁹ Fowler, Alan. 2001. *Enhancing Participation in Country Strategy and Program Planning*. Manila. ADB.

¹⁰ Complaints presented to ADB's Office of the Special Project Facilitator, and submitted under the former Inspection Function, have cited a lack of disclosure of information about ADB-assisted activities.

25. At the same time, staff recognize that transparency must be balanced with the need to protect the internal deliberative process, maintain the trust of member country governments, and maintain a strong client orientation. Confidentiality is generally considered most relevant at the early stages of deliberation, when candid advice is often provided to governments in sensitive areas. Citing very heavy workloads, operational staff also warn against imposing new disclosure requirements that would add an unreasonable burden.

C. Conclusion

26. The 1994 *Information Policy* and *Disclosure Policy* need to be updated. To deliver on its commitment to greater transparency and to gain respect and trust from its stakeholders, ADB must develop a more robust and focused approach to external relations, supported by strong leadership, adequate resources, and a shift in thinking about the role of external relations within the institution. Such an approach must be grounded in a corporate culture favoring timely and adequate disclosure of information to enhance meaningful stakeholder participation in ADB's work.

IV. THE POLICY

27. The public communications policy (the Policy) aims to enhance stakeholders' trust in and ability to engage with ADB. To ensure ADB's operations have greater development impact, the Policy promotes

- awareness and understanding of ADB activities, policies, strategies, objectives, and results among ADB's constituents, other stakeholders, and the general public;
- sharing and exchange of development knowledge and lessons learned, so as to provide fresh and innovative perspectives on development issues;
- participatory development, ensuring a greater two-way flow of information between ADB and its stakeholders, including affected people; and
- transparency and accountability in ADB operations.

28. To this end, ADB shall proactively share its knowledge and information about its work, its views, and its opinions with stakeholders and the public at large. ADB shall also disclose information in response to individual requests for information. In the absence of a compelling reason for confidentiality, there shall be a presumption in favor of disclosure of information.

29. ADB recognizes that transparency not only enhances development effectiveness, but also increases public trust in the institution. ADB shall seek to be a positive example of transparency, and to act in a way that is consistent with the advice it provides to members on transparency issues.

30. ADB also recognizes the great importance of country ownership of the activities it supports in developing member countries. The views and interests of these developing member countries shall, therefore, be respected when the Policy is implemented.

31. ADB supports the right of people to seek, receive, and impart information and ideas about ADB-assisted activities. ADB shall provide information in a timely, clear, and relevant manner so it can communicate with, listen to, and consider feedback from its stakeholders. ADB

shall share information with affected people early enough for them to provide meaningful inputs into the project design and implementation.

32. To improve performance by learning from its past experiences, ADB shall report failures and disappointments as well as successes. ADB shall not withhold information just because it is negative. ADB shall encourage constructive debate and dialogue on policies and operations. As a public institution, ADB shall be publicly accountable.

33. ADB shall not selectively disclose information; people will have equal access to the information that ADB makes available under the Policy according to the terms of the policy, strategy, and implementation arrangements.

34. ADB shall seek to enhance the understanding of its members, civil society organizations, businesses, media, academic institutions, development partners, and the general public about its role in poverty reduction in Asia.

35. Full disclosure is not always possible for legal and practical reasons. For example, ADB needs to explore ideas, share information, hold frank discussions internally and with its members, and consider the special requirements of its private sector operations. ADB shall safeguard the privacy of its staff and protect non-public business information of itself, private sector sponsors, and clients. However, exceptions are limited, and ADB shall disclose all information it produces unless such information falls within the exceptions set out in paragraphs 126, 127, and 130 of the Policy.

36. Unless restricted by other provisions in the Policy, documents submitted to the Board for information shall be disclosed no later than upon circulation to the Board, and documents submitted to the Board for consideration shall be disclosed no later than upon approval or endorsement by the Board.

37. ADB shall implement the general principles set out in the Policy through the strategy outlined below. The strategy indicates the information ADB shall proactively make publicly available and indicates certain instances where information shall be made available on request or shall not be made available without the consent of ADB.

38. In the event of any conflict between the disclosure provisions (but not other provisions) of the Policy, and any other Board-approved policy, the disclosure provisions of the Policy shall prevail.

V. THE STRATEGY

39. To achieve the Policy objectives, this strategy is designed to deliver two specific outputs:

- (i) proactive external relations; and
- (ii) improved access to information about ADB operations.

40. The strategy comprises two separate but complementary components: external relations and disclosure of information. External relations will focus primarily on building strong external relationships by making ADB widely known and understood by its key constituents—output (i). Disclosure of information will aim to strengthen partnerships, particularly with people and organizations with direct operational and business links to ADB—output (ii).

A. External Relations

41. ADB will reinforce and refine its approaches to external relations by defining a focused external relations strategy. ADB will develop clear positions on issues of importance to its members, improve its information products to explain these positions, and disseminate these products more widely. To clarify the importance of external relations within the organization, ADB will align its organizational arrangements and modify its staff skills mix accordingly.

1. Prerequisites

42. To raise its profile with external audiences, ADB must ensure that:

- (i) it generates original ideas and insightful messages on development issues;
- (ii) it actively engages in international discussions of these issues derived both from its operational experience and research;
- (iii) it consistently seeks and exploits opportunities to meet media and other external audiences;
- (iv) it maintains active and open internal communications so that staff are aware of its views and positions on issues;
- (v) it maintains a sound operational record; and
- (vi) operations staff maintain strong relationships with people and organizations with direct operational and business links to ADB.

2. Leadership and Motivation

43. A strong, highly visible commitment to strengthening external relations by each member of ADB Management is critical. Management will play a key role in defining, updating, and executing ADB's external relations strategy. As ADB's key communicators, members of Management will actively participate in external relations activities, and establish strong relationships with ADB's primary audiences, including decision makers and opinion leaders in donor and borrowing countries.

44. Given the reluctance of many ADB staff to engage proactively with external audiences, and the widely held notion within ADB that external relations is not only a low-priority activity, but also a risky one, it is imperative that Management encourage all staff to participate actively in external relations. Management will ensure that all staff understand that the public explanation of their work should now be a priority. For its part, Management will strengthen its communications with staff, and share views with, and seek feedback from, staff at all levels.

3. Target Audiences

45. ADB works with and seeks to influence a broad range of audiences (Box 1). Each of these audiences is important to ADB and can contribute to its effectiveness. ADB's developing member countries, the countries in which it does the bulk of its work, are its most important partners in day-to-day operations. Strong relationships with decision makers and opinion leaders in these countries are critical if ADB is to achieve its long-term goals. Resident missions will play a key role in developing and maintaining these relationships. Trusted relationships with other audiences including decision makers and opinion leaders in donor countries, other development organizations, and civil society, are integral to enhancing ADB's operations and their effectiveness (see paragraphs 9-14).

46. Since resources will always be limited, ADB must prioritize its audiences. Given the already close working relationships with a broad range of decision makers and opinion leaders in developing member countries, this strategy emphasizes reaching out to new audiences, primarily in donor countries. Audience prioritization will be based on the following criteria.

- (i) *Level of influence on decision makers.* ADB's operations are affected by a variety of decision makers, primarily ministers, parliamentarians, and national executives. Target audiences will be selected on the basis of their influence on the thinking of these decision makers.
- (ii) *Role as "channels" to indirectly targeted audiences.* Information and opinions about ADB are expressed by many players and then channeled to wider audiences. ADB will build relationships that will enable its messages to reach audiences not directly targeted by the strategy.

47. Strengthening relationships with audiences in developing member countries will remain the responsibility of ADB's operations departments, which will be its contact points for affected people and will be responsible for building partnerships with civil society organizations directly involved in and concerned with specific operations. The NGO Center will be responsible for establishing and maintaining relationships with civil society in general.

48. While it is important for ADB to reach the general public, this strategy does not directly target the public in donor countries or in developing member countries, or the private sector. ADB's engagement with the general public will remain indirect.¹¹

4. Approaches to Reaching Target Audiences

49. Building strong and lasting relationships with target audiences will require consistent personal interactions and a regular exchange of substantive information, not just public relations materials. Establishing such relationships will take time and money, particularly as ADB is headquartered in Manila, which is neither an international media nor a research center. Relationships will be established and nurtured by Management and senior staff during missions and by representative offices.

50. ADB will intensify its relationships with top-tier media. Appearances by Management and staff on broadcast media will increase and efforts will be made to boost the number of references to ADB research and operations in newspapers, magazines, and TV news programs that influence target audiences. ADB will conduct regular surveys on opinion leaders' sources for information about ADB and will refine the selection of target media accordingly.

51. External relations will become the primary function of the representative offices in Europe, Japan, and North America. These offices will work to enhance relationships with media and opinion leaders, disseminate ADB views and information on development questions, and engage in public discussion and debate on development.

52. Management and staff will continue to promote ADB messages and its work at conferences, seminars, and other external and internal events.¹² To achieve significant impact, a more focused outreach strategy will be gradually introduced.

¹¹ It is recognized that information that reaches the public through the media and other opinion leaders will be influenced by the individual perceptions and views of opinion leaders.

5. Key Communicators

53. Given the limited resources available for external outreach, ADB must clearly identify its key communicators and the specific audiences they will target. The President and Vice Presidents will be ADB's most visible communicators. They will lead efforts to raise ADB's profile among target audiences through personal contacts, speeches at high-level forums, and interviews with and opinion articles in top-tier media. The Chief Economist and other heads of departments and offices—including senior staff at resident missions and representative offices—will also communicate actively with external audiences.

54. In addition, experts among ADB staff, particularly if they have conducted specific marketable research, will build networks through personal contacts, addressing conferences, speaking with media, and writing opinion articles on their areas of expertise.

B. Disclosure of Information

55. The Policy establishes the disclosure requirements for documents ADB produces or requires to be produced. It does not set forth the requirements for producing such documentation. References to other ADB policies are made throughout the Policy. Any reference to another ADB policy includes that policy as amended by ADB from time to time. Any policy or strategy developed or revised by ADB after the Policy's effective date shall clearly articulate the disclosure requirements for documents and other information required to be produced under that policy or strategy. Such disclosure requirements must be consistent with the general principles set out in the Policy.

1. Translations

56. English is the working language of ADB.¹² However, translation of documents and other information into languages other than English is often necessary to encourage participation in, as well as understanding and support of, ADB-assisted activities by its shareholders and other stakeholders. In consultation with external stakeholders, ADB shall develop a translation framework for documents related to its operations.

57. ADB will undertake translations depending on its operational needs. Such translations may include information that (i) addresses its overall business, policies, and strategic thinking, and is destined for a wide international audience; (ii) is for public consultation, particularly with affected people (see paragraph 74); (iii) relates to specific countries, projects, and programs; and (iv) is intended for the web.

58. Criteria for undertaking translation include the literacy level of the audience concerned, languages known to that audience, alternatives to translation, time required for translation, and costs.

¹² ADB is currently developing an electronic external events registry to improve tracking and planning of outreach activities.

¹³ ADB. 1966. *The Agreement Establishing the Asian Development Bank*. Manila: Article 39.1.

2. Information Pertaining to ADB's Operations

59. ADB works closely with its borrowers and private sector project sponsors to prepare and implement development activities. In doing so, it will inform borrowers and sponsors of its presumption in favor of disclosure of information about ADB-assisted operations. The following documents shall be made publicly available according to the time period specified, after consultation with the respective borrower or private sector sponsor as appropriate, and subject to the section on exceptions to disclosure (paragraphs 123-130).

a. Country and Regional Programming

i. Strategy and Program Assessments

60. ADB conducts assessment studies in preparation for country strategy and program (CSP) and regional cooperation strategy and program (RCSP) documents. Such strategy and program assessments include poverty analyses, economic analyses, thematic analyses (gender, governance, environment, and private sector), and sector assessments. The assessments may be made available to in-country stakeholders in draft form if they are developed in consultation with nongovernment stakeholders. ADB shall make strategy and program assessments publicly available upon completion.

ii. Strategies and Programs

61. The CSP defines ADB's medium-term development strategy and operational program as agreed with the country. Concept papers for projects expected to receive ADB assistance are included in CSPs. A CSP update (CSPU) takes into account the continued relevance of the CSP, describes its implementation, and sets out the operational program for the next 3 years.

62. Likewise, the RCSP provides the rationale for proposed ADB assistance at the subregional level. The RCSP specifies how ADB assistance complements national objectives and strategies, and includes concept papers for proposed regional projects. An RCSP update (RCSPU) is prepared annually.

63. ADB shall maintain and make publicly available on a rolling basis a list of new strategies and programs scheduled for preparation over the course of the next year.

64. To facilitate required consultations with stakeholders¹⁴ and to allow them to contribute to the draft strategy and program in their country and/or region, ADB shall make draft strategies and programs available to in-country stakeholders for comment before consultations. They shall be made available (i) after the initiating paper is completed; and (ii) after the strategy and program is drafted but before its management review meeting.

65. ADB shall make strategies and programs, and the chair's summary of each Board discussion on strategies and programs, publicly available upon endorsement by its Board of Directors. If English is not used widely in the relevant country, ADB shall translate any new country strategy and program (or its update) into a widely understood language within 90 calendar days of its endorsement by the Board.

¹⁴ ADB. 2001. *Business Processes for the Reorganized ADB*. Manila: Appendix 2: 2-4 and Appendix 4: 2.

b. Policies, Strategies and Operational Procedures

66. ADB seeks the active participation of its shareholders and other interested individuals and organizations during the development and review of its safeguard policies and sector and thematic strategies. ADB shall make a list of the safeguard policies and sector or thematic strategies to be developed or reviewed over the next 12 months publicly available on a rolling basis. Items will be added to the list after approval by Management of a concept paper for such development or review. ADB shall make plans for consultation, including any anticipated face-to-face meetings with external audiences, publicly available upon completion of such plans. ADB shall make at least one draft of the policy or strategy paper publicly available for consultation. For other policies and strategies—for example, the public communications policy, the poverty reduction strategy, and the accountability mechanism—ADB Management may determine that they are also subject to the requirements of this paragraph.

67. ADB shall make all ADB policy or strategy papers publicly available no later than upon final approval by either the Board of Directors or Management. For each policy and strategy discussed by the Board at a formal Board meeting, ADB shall make a chair's summary publicly available at the same time as the policy or strategy paper is disclosed.

68. ADB shall make its policies and procedures for country and regional programming and project processing publicly available. These include the *Operations Manual* (Bank Policies and Operational Procedures), and the *Business Processes for the Reorganized ADB*. ADB shall also make the Project Administration Instructions and staff guidelines and handbooks on ADB operations publicly available.

c. Projects and Programs

i. Project or Program Information Document (PID)

69. ADB shall make publicly available a project or program information document that provides a brief factual summary of a project or program. PIDs for public and private sector projects shall include (i) the project title; (ii) sector, thematic, and targeting classification; (iii) project/program number; (iv) type or mode of assistance; (v) location and geographical coverage; (vi) description; (vii) objectives and scope, including expected development impact; (viii) cost and financing plan (for public sector projects only); (ix) implementing agency or project sponsor(s); (x) allocated environmental and social safeguard screening categories; (xi) summary of environmental and social issues; (xii) country context; (xiii) consultations carried out or planned; (xiv) responsible ADB department, division, and officer; (xv) the date of approval of project concept paper or private sector project concept clearance paper; (xvi) the date of PID preparation and most recent update; (xvii) list of feasibility and technical documents prepared or scheduled to be prepared; and (xviii) a timetable for assistance design, processing, and implementation, including estimated dates for appraisal authorization and Board consideration. As the PID is a work in progress, information contained in items (viii), (x), (xi), (xiii), and (xvii) may not be included when the initial PID is made publicly available. These will be included as such information becomes available.

ii. Public Sector PID

70. ADB shall make the initial PID for a public sector project or program publicly available as soon as preparatory work begins on a project or program and no later than 30 calendar days following approval of the concept paper for the project or program. During the preparation of a

public sector loan project, a project design and monitoring framework is developed, which provides the basis for the project's performance assessment. ADB shall include the design and monitoring framework in the PID before appraisal of the project or program.

71. ADB shall update the PID quarterly during project or program preparation and processing to reflect the project's status. During implementation, ADB monitors public sector loan and technical assistance projects through its project performance management systems. ADB shall update the PID quarterly during implementation to reflect activities and issues, status of development objectives and covenants, and loan utilization.

72. Should ADB terminate its involvement in a public sector project or program, the corresponding PID shall include a statement indicating the reason for the termination. ADB shall keep PIDs for terminated projects publicly available for 6 months following termination.

iii. Private Sector PID

73. ADB shall make the initial PID for a private sector project publicly available after ADB has determined that a project is likely to be presented to the Board, but no later than 30 calendar days before the date for Board consideration. For environmentally-sensitive projects that are required by the environment policy to have a summary environmental impact assessment or a summary initial environmental examination made publicly available at least 120 calendar days before the date for Board consideration,¹⁵ ADB shall make the private sector PID publicly available at least 120 calendar days before Board consideration. As project preparation, processing, and implementation proceeds, ADB shall update the PID quarterly to reflect activities, status of development objectives, and material changes, if any, regarding the project. Should ADB terminate its involvement in a private sector project, the corresponding PID shall include a statement that ADB's involvement was terminated. ADB shall keep PIDs for terminated projects publicly available for 6 months following termination.

iv. Information for Affected People

74. To facilitate dialogue with affected people and other individuals and organizations, information about a public or private sector project or program under preparation (including social and environmental issues) shall be made available to affected people. ADB shall work closely with the borrower or project sponsor to ensure information is provided and feedback on the proposed project design is sought, and that a focal point is designated for regular contact with affected people. This should start early in project preparation, so that the views of affected people can be adequately considered in project design, and continue at each stage of project or program preparation, processing, and implementation. ADB shall ensure that the project's or program's design allows for stakeholder feedback during implementation. ADB shall ensure that relevant information about any major changes to project scope is also shared with affected people.

75. To support the requirements in paragraph 74, developing member country governments and ADB may jointly develop communications plans for certain projects and programs, particularly those likely to generate a high level of public interest. Such plans could, for example, recommend how to engage in dialogue with affected people, broaden public access to information on economic and legal reforms, help governments and project sponsors involve

¹⁵ For ADB's requirements for preparing environmental assessment reports, see ADB. 2002. *Environment Policy*. Manila.

affected people in the design and implementation of ADB-assisted activities, and increase involvement of grassroots and civil society organizations in the development process.¹⁶

76. Private sector entities and implementing institutions are a diverse group, with varying capabilities, and ADB is generally flexible in dealing with them. The substance of ADB's environmental and social safeguard requirements for private sector investments is generally the same as for the public sector. ADB's safeguard policies require private sector sponsors to assess, manage, monitor, and disclose the social and environmental impacts of their projects. They include requirements for early engagement by the private sector sponsor with affected people, and the timely dissemination of relevant project information to such communities in an understandable and accessible form. Toward this end, the project sponsor shall inform ADB, before appraisal, how it intends to engage with affected people.

v. Environmental Assessments

77. In accordance with the requirements under the environment policy, ADB shall make a summary environmental impact assessment for a category A project or summary initial environmental examination for a category B project deemed environmentally sensitive, publicly available at least 120 calendar days (i) before ADB's Board of Directors considers the loan, (ii) before approval of a category A subproject, or a category B subproject deemed environmentally sensitive, or (iii) in relevant cases before approval of a major change in a project's scope.¹⁷ ADB shall make the full environmental impact assessment and initial environmental examination available to interested parties on request.

78. The borrower or private sector sponsor shall make relevant information on the project's environmental issues available to affected people before or during the consultations with project-affected groups and local NGOs, as required under the environment policy.¹⁸ For category A projects, the borrower or private sector sponsor shall ensure that such information is available to affected people on two occasions: (i) during the early stages of environmental impact assessment field work; and (ii) when the draft environmental impact assessment report is available, and before appraisal.

79. For public sector projects or programs involving equity investment in a financial intermediary, or a credit line for subprojects and that require an environmental management system under the environment policy, the RRP for such a project or program shall include a description of the environmental management system.

vi. Resettlement Planning Documents

80. The borrower or private sector sponsor shall make available to affected people under Operations Manual section F2/BP on involuntary resettlement:¹⁹

¹⁶ Communication plans would indicate objectives, form (including languages), method, and timing for sharing information; the stakeholders; and the focal issues. They would also include a process for incorporating responses and inputs, and for reporting on the use of those inputs. Some communication plans could call for the development of project information centers. If relevant, project proposals would include a description and financing plan for such centers.

¹⁷ Major changes in project scope arise under section 5.04 of the Project Administration Instructions.

¹⁸ See paragraph 63 of the Environment Policy.

¹⁹ See footnote 3 of OM Section F2/BP. Affected persons under OM Section F2/BP on Involuntary Resettlement may be a subset of all affected people under the project.

- (i) before appraisal—a draft resettlement plan;
- (ii) after completion of the final resettlement plan—such resettlement plan; and
- (iii) following revisions to the resettlement plan as a result of detailed technical design or change in scope in the program or project²⁰—the revised resettlement plan.

81. The information from the documents specified in paragraph 80 can be made available as brochures, leaflets, or booklets in local languages. For non-literate people, other communication methods will be appropriate.

82. ADB shall make publicly available:

- (i) before appraisal—a draft resettlement plan or framework (or both);
- (ii) upon receipt of the final resettlement plan—the final resettlement plan; and
- (iii) upon receipt of a revised resettlement plan—the revised resettlement plan.

vii. Indigenous Peoples Planning Documents

83. The borrower or private sector sponsor shall make available to affected people who are indigenous peoples/ethnic minorities:

- (i) before appraisal—a draft indigenous peoples development plan;
- (ii) after completion of the final indigenous peoples development plan—such indigenous peoples development plan; and
- (iii) following revisions to the indigenous peoples plan as a result of detailed technical design or change in scope in the program or project²¹—the revised indigenous peoples development plan.

84. The information from the documents specified in paragraph 83 can be made available in as brochures, leaflets, or booklets in local languages. For non-literate people, other communication methods will be appropriate.

85. ADB shall make publicly available:

- (i) before appraisal—a draft indigenous peoples development plan or framework (or both);
- (ii) upon receipt of the final indigenous peoples development plan—the final indigenous peoples development plan; and
- (iii) upon receipt of a revised indigenous peoples development plan—the revised indigenous peoples development plan.

viii. Business Opportunities Listing

86. ADB shall make publicly available a listing of business opportunities for each public sector project being prepared for ADB financing, from identification through approval by the Board. ADB shall also make publicly available procurement notices issued by executing agencies, and contract awards.

²⁰ Dissemination of the plan or framework may be limited to those people affected by the change in scope.

²¹ Dissemination of the plan or framework may be limited to those people affected by the change in scope.

ix. Initial Poverty and Social Assessment

87. An initial poverty and social assessment is conducted for all investment projects and programs and indicates the people who may be beneficially or adversely affected by a project. ADB shall make the assessment publicly available upon completion.

x. Technical Assistance Report

88. A technical assistance report is a recommendation to finance a technical assistance project. ADB shall make all technical assistance reports publicly available no later than upon approval by the relevant authority (Board, President or Vice President).

xi. Documents Produced Under Technical Assistance

89. A technical assistance project requires certain reports to be generated, such as feasibility studies, detailed project designs, sectoral reviews, and other reports by consultants. ADB shall make final reports generated from technical assistance publicly available upon completion. In recognition of the fact that countries increasingly seek ADB advice on sensitive matters through advisory technical assistance, ADB shall give the government the opportunity to object to the disclosure of final reports produced under advisory technical assistance.²² ADB may make drafts of country-specific reports, or portions thereof, prepared under technical assistance available to in-country stakeholders if ADB determines that they are needed to facilitate consultative discussions or development partnerships, or to solicit views on project design.

xii. Report and Recommendation of the President

90. The report and recommendation of the President (RRP) is a decision document for ADB-assisted projects and programs presented to the Board for approval. ADB shall make public sector RRPs publicly available no later than upon approval by the Board. ADB shall make an abbreviated version of private sector RRPs publicly available no later than upon Board approval; this version will exclude confidential information and ADB's assessment of project or transaction risk.

xiii. Project Administration Memorandum

91. The project administration memorandum for each public sector loan project or program contains information that allows the borrower, executing agency, implementing agency, and ADB to administer the project. ADB shall make the project administration memorandum publicly available upon approval.

xiv. Social and Environmental Monitoring Reports

92. A loan agreement may require that certain social or environmental reports be prepared during the course of a project or program. ADB shall make environmental and social monitoring reports publicly available upon their submission to ADB. ADB shall require private sector sponsors to make environmental and social monitoring reports available to affected people.

²² Consistent with the Policy's presumption in favor of disclosure, any redaction or withholding of such documents shall be based on the exceptions listed in paragraph 126 or 127.

ADB shall make environmental and social monitoring reports that have been disclosed locally to affected people publicly available upon submission to ADB.

xv. Changes in Scope of Projects and Programs

93. ADB shall make documents submitted to its Board that are related to major changes in the scope of its projects or programs publicly available upon approval of such a change.

xvi. Progress Reports on Tranche Releases

94. ADB shall make progress reports on tranche releases of a multi-tranche public sector program lending operations publicly available upon Board or Management approval.

xvii. Project, Technical Assistance and Program Completion Reports

95. ADB shall make project, technical assistance, and program completion reports publicly available upon circulation to the Board. The completion report for a private sector project shall report on the achievement of its development objectives.

d. Other Information Pertaining to Strategies and Programs, and Projects

i. Operations Evaluation

96. ADB shall make a list of its operations evaluations planned for the year publicly available in December of the preceding year. The selection criteria for its evaluations shall also be made publicly available.

97. ADB regularly produces the following reports: project/program performance audit reports, technical assistance performance audit reports, impact evaluation studies, country assistance program evaluations, sector assistance program evaluations, and special evaluation studies. ADB shall make such evaluation reports publicly available upon circulation to Management and the Board. If the report is discussed by the Development Effectiveness Committee (DEC), ADB shall make a DEC chair's summary publicly available within 2 weeks of the discussion. ADB shall also make responses submitted by Management or the Operations Evaluation Department, if any, publicly available upon completion.

98. ADB also produces annual evaluation reports. An annual review of evaluation activities summarizes the performance evaluation activities and findings of the Operations Evaluations Department. An annual report on loan and technical portfolio performance evaluates ADB's portfolio performance for a given year. ADB shall make such annual evaluation reports publicly available upon discussion by the DEC.

ii. Cofinancing Information

99. ADB shall make a quarterly summary of public sector projects requiring commercial cofinancing publicly available each quarter. ADB shall make information on official cofinancing—such as major terms and conditions for a given technical assistance or investment project—available in each respective technical assistance report or RRP. ADB shall make the legal and financial agreements for such official cofinancing available on request, unless the cofinancier

objects. ADB shall make channel financing agreements between ADB and any bilateral or multilateral cofinancier publicly available after their signing, unless such cofinancier objects. Commercial cofinancing agreements shall not be made publicly available.

iii. Anticorruption Information

100. ADB periodically investigates allegations of fraud or corruption in its operations. ADB shall make publicly available statistical information in relation to the results of its investigations into fraud and corruption. In addition, significant recommendations and issues from audits shall be incorporated into ADB's *Annual Report*. Consistent with its anticorruption policy,²³ ADB may share the results of investigations, including identities of the subjects of investigations and names of parties debarred, with governments of ADB member countries.

iv. Public Sector Project and Program Legal Agreements

101. For public sector loan agreements, project agreements, and amendments thereto entered into by ADB before 1 January 1995, ADB shall seek the consent of the government concerned before making such documents available. Unless the government concerned informs ADB of its objection to disclosure of such documents within 30 calendar days of ADB's request for such consent, ADB shall make such agreements available to any requester within 60 days of the request for the agreement.

102. ADB shall make public sector loan agreements and project agreements entered into between 1 January 1995 and the effective date of the Policy, and any amendments to such agreements, available on request, after excising any confidential information contained in such agreements and amendments and specified as such by the government concerned at the time of negotiation of such agreements and amendments.

103. ADB shall make public sector loan agreements, Asian Development Fund (ADF) grant agreements, and project agreements entered into after the effective date of the Policy, publicly available together and concurrently with the relevant RRP. ADB shall make such agreements publicly available after excising confidential information. In case of any amendments, ADB shall make such amendments publicly available within 2 weeks of their effectiveness.

v. Private Sector Project Legal Agreements

104. ADB shall not make private sector legal agreements entered into by ADB, or amendments to such agreements, publicly available.

3. Other Information

a. Performance-Based Allocation of Asian Development Fund Resources

105. ADB's graduation policy determines eligibility for ADF resources.²⁴ For eligible countries, the performance-based allocation policy defines principles and criteria to guide allocations.²⁵ For each country with access to ADF resources, ADB shall make numerical performance ratings publicly available in an annual report on country performance

²³ ADB. 1998. *Anticorruption*. Manila.

²⁴ ADB. 1998. *A Graduation Policy for the Bank's DMCs*. Manila.

²⁵ ADB. 2004. *Policy On Performance-Based Allocation for Asian Development Fund Resources*. Manila.

assessments. The guidelines for country policy and institutional assessments shall also be made publicly available.

b. Economic Data and Research

106. ADB shall make its *Annual Report*, as well as the *Asian Development Outlook*, the *Asian Development Outlook Update*, and *Key Indicators* containing economic and social data, analyses, and forecasts, publicly available.

107. ADB will also make publicly available an extensive catalog of online books, conference papers, periodicals, reports, studies, and technical briefs containing research, reports, and analysis.

c. Administrative and Other Information

108. ADB shall make the following documents publicly available:

- (i) Agreement Establishing the Asian Development Bank;
- (ii) by-laws of ADB;
- (iii) Rules of Procedure of the Board of Governors;
- (iv) Rules of Procedure of the Board of Directors; and
- (v) Agreement Between the Asian Development Bank and the Government of the Republic of the Philippines Regarding the Headquarters of the Asian Development Bank.

109. ADB shall make the following information publicly available:

- (i) ADB's member countries, their subscribed capital, and voting power;
- (ii) Members of the Board of Governors;
- (iii) Members of the Board of Directors and their voting groups;
- (iv) Committees of the Board of Directors and their members;
- (v) Members of ADB's Management and senior staff;
- (vi) ADB's organizational structure; and
- (vii) contact information for each of the above.

110. ADB shall make country classifications publicly available upon approval by the Board.

111. ADB shall make the work program and budget framework for each fiscal year publicly available upon discussion by the Board.

112. ADB shall make the summary proceedings of its annual meetings, including decisions taken by the Board of Governors and the speeches of the Governors, publicly available within 60 calendar days of each such annual meeting. ADB shall also make decisions made by the Board of Governors through mail vote available on request.

113. ADB shall make: (i) the tentative schedule and topics of Board discussions for the forthcoming 3 weeks publicly available on a rolling basis, (ii) the minutes of each regular Board meeting publicly available upon approval of those minutes by the Board and no later than 60 calendar days after the Board meeting.

114. ADB shall make reports of Board committees to the full Board publicly available if the committee so recommends and the Board approves.

d. Financial Information

115. ADB shall make the audited financial statements for ordinary capital resources, Asian Development Fund, Technical Assistance Special Fund, Japan Special Fund, and other funds as established, publicly available before the Annual Meeting of the Board of Governors.

116. The following shall be made publicly available upon approval by the Board:

- (i) Management's discussion and analysis of ADB's ordinary capital resources and Special Funds, including financial data on each of the funds;
- (ii) condensed quarterly financial statements;
- (iii) annual report on loan servicing of developing member countries; and
- (iv) the budget of ADB for each fiscal year.

117. ADB shall make any documents related to public offerings publicly available when the laws or regulations governing the financial market concerned require that they be filed with a government agency.

e. Employment Information

118. ADB shall make publicly available (i) ADB's basic salary structure, the methodology used to determine Management and staff salary levels and benefits, and (ii) ADB's broad objectives and strategy in recruiting, placing, redeploying, and retaining staff. ADB shall also make descriptions of positions for staff recruitment publicly available at least 2 weeks before a position is expected to be filled. Each decision of ADB's Administrative Tribunal shall be made publicly available upon the issuance of such decision.

f. Information Produced under ADB's Accountability Mechanism²⁶

i. Consultation Phase

119. The Special Project Facilitator (SPF) shall make the following information and documents publicly available, at the time and subject to agreement of the relevant parties as specified below:

- (i) the complaint letter—upon the SPF's determination of eligibility of the complaint and subject to the agreement of the complainant;
- (ii) SPF's determination of eligibility of the complaint—upon the SPF's determination of eligibility;
- (iii) a general description of the complaint—upon the SPF's determination of eligibility of the complaint if the complainant has not consented to disclosure of the complaint letter;
- (iv) the review and assessment report prepared by the SPF under step 4 of the consultation phase of the accountability mechanism (2003) —at the commencement of stage 7 of the consultation phase and subject to the consent of the complainant, the government and/or private sector sponsor;

²⁶ ADB. 2003. *Review of the Inspection Function: Establishment of a New ADB Accountability Mechanism*. Manila.

- (v) a general description of the course of action agreed to by the SPF and the parties involved in the consultation process to resolve the problems raised in the complaint—at the commencement of stage 7 of the consultation phase and subject to the consent of the complainant, the government and/or private sector sponsor;
- (vi) status reports on the implementation of the course of action mentioned under (iv) above—in accordance with any timetable for disclosure of any such reports agreed to by the parties involved in the consultation process;
- (vii) the SPF's final report—within 7 calendar days of circulation to the parties and subject to the consent of the complainant, the government and/or private sector sponsor;
- (viii) monitoring reports—upon circulation to the Board and subject to the consent of the complainant, the government and/or private sector sponsor; and
- (ix) the SPF's annual report—upon circulation to the Board.

ii. Compliance Review Phase

120. The Compliance Review Panel (CRP) shall issue²⁷ a press advisory within 7 calendar days of receipt of a request for compliance review with the requisite basic information. If the request is determined by the CRP to be eligible, the CRP shall make the its report on eligibility and the Board's decision on authorization of compliance review publicly available within 7 calendar days of the CRP's receipt of the Board's decision. If the request is determined by the CRP to be ineligible, the CRP shall make its report on eligibility publicly available upon circulation of the report to the Board. The CRP shall also make the terms of reference of the review publicly available within 14 calendar days of the CRP's receipt of the Board's authorization of the review. The CRP shall make the Board's decision and the CRP's final report, with attachments of any responses to the draft report from Management and the requester, publicly available within 7 calendar days of the Board's decision. The CRP shall make monitoring reports on implementation of any remedial actions approved by the Board publicly available upon circulation to the Board and other stakeholders. The CRP's annual report shall be made publicly available within 4 months of the end of each calendar year.

g. Information Related to Asian Development Fund Negotiations

121. Generally, ADB makes publicly available information related to negotiations for ADF replenishments and midterm reviews. ADB shall make nonfinancial discussion papers for donors' meetings publicly available upon circulation of such discussion papers to the donors. ADB shall make the Chair's summary publicly available following each meeting. The Donors' Report shall be made publicly available upon approval by the Board of Governors.

h. Other Documents Presented to the Board of Directors

122. ADB shall make documents circulated to the Board for information or approval not cited in the Policy publicly available unless Management informs the Board otherwise, and the Board agrees.

²⁷ Documents disclosed by the Compliance Review Panel (CRP) are posted at <http://www.compliance.adb.org>

4. Exceptions to Presumed Disclosure

123. Paragraphs 126, 127, and 130 set forth the exceptions to ADB's presumption in favor of disclosure of information. If information is removed from a document because the information falls under an exception, or if a document cited in the Policy is not made publicly available, ADB shall make reference to the removed information and/or the document publicly available, unless citing the removed information or document would itself violate an exception.

124. If only part of a requested document is subject to nondisclosure pursuant to the list of exceptions, any information in the document which is not subject to nondisclosure shall, to the extent it may reasonably be severed from the rest of the information, be communicated to the requester.

125. ADB shall not be required to comply with, or respond to, repeated or unreasonable requests for information on the same subject from the same person, organization, or group if ADB has provided such information after the previous request or has given reasons why it cannot provide the information.

a. Current Information

126. Notwithstanding any other provision of the Policy, the following information shall not be made publicly available:

1. Internal information that, if disclosed, would or would be likely to compromise the integrity of ADB's deliberative and decision-making process by inhibiting the candid exchange of ideas and communications, including internal documents, memoranda, and other similar communications to or from Directors, their Alternates, Director's Advisors, members of Management, ADB staff, and ADB consultants.
2. Information exchanged, prepared for, or derived from the deliberative and decision-making process between ADB and its members and other entities with which ADB cooperates that, if disclosed, would or would be likely to compromise the integrity of the deliberative and decision-making process between and among ADB and its members and other entities with which ADB cooperates by inhibiting the candid exchange of ideas and communications, particularly with respect to policy dialogue with developing member countries.
3. Information obtained in confidence from a government or international organization that, if disclosed, would or would be likely to materially prejudice ADB's relations with that party.
4. Individual records, including terms of employment, performance evaluations, and personal medical information of Directors, their Alternates, and Director's Advisors, members of Management, and ADB staff and consultants, as well as proceedings of internal appeal mechanisms and investigations, except to the extent permitted by staff rules and Board of Directors rules and regulations.
5. Estimates of ADB future borrowings, financial forecasts, data on individual investment decisions for ADB's treasury operations, and credit assessments.
6. Analysis of country creditworthiness and credit ratings.

7. Proceedings of the Board of Directors²⁸, with the exception of meeting minutes as referenced in paragraph 113 and summaries as referenced in paragraphs 65 and 67.
8. Information provided to ADB by a party that, if disclosed, would or would be likely to materially prejudice the commercial interests, financial interests, and/or competitive position of such party.
9. Confidential business information.
10. Information related to procurement processes, including pre-qualification information submitted by prospective bidders, tenders, proposals, or price quotations.
11. Information that, if disclosed, would or would be likely to endanger the life, health, or safety of any individual.
12. Information that, if disclosed, would or would be likely to materially prejudice the administration of justice.
13. Information subject to the attorney–client privilege, or whose disclosure might prejudice an investigation.
14. The source of a corruption allegation.
15. Names of those declared ineligible (blacklisted) or under investigation under the anticorruption policy.
16. Audit reports prepared by the Office of the Auditor General and ADB’s external auditor.
17. Information that if disclosed would or would be likely to materially prejudice the defense or national security of a member.
18. Financial information that if disclosed would or would be likely to materially prejudice the ability of a member country government to manage its economy.
19. Information that if disclosed would, or would have the potential to, violate applicable law, including copyright law.

b. Historical Information

127. ADB shall make historical information available on request 20 years after issuance, subject to the following exceptions.

1. Information subject to attorney–client privilege, or that if disclosed might prejudice an investigation.
2. Information provided to ADB in confidence with the express understanding that it be kept confidential and that, if disclosed, would or would be likely to materially prejudice ADB’s

²⁸ ADB produces transcripts for each formal Board meeting. These are retained in ADB’s archives.

relations with the party that provided the information or would violate the law or breach a legal agreement.

3. The source of a corruption allegation.
4. Names of those having been declared ineligible (blacklisted) or having been investigated under the anticorruption policy.
5. Information that if disclosed would or would be likely to materially prejudice the defense or national security of a member.
6. Information that if disclosed would, or would have the potential to, violate applicable law, including copyright law.
7. Individual records, including terms of employment, performance evaluations, and personal medical information of Directors, their Alternates, and Director's Advisors, members of Management, and ADB staff and consultants, as well as proceedings of internal appeal mechanisms and investigations, except to the extent permitted by staff rules and Board of Governors' Resolutions.
8. Trade secrets.
9. Financial information that, if disclosed, would or would be likely to materially prejudice the ability of a member country government to manage its economy.
10. Information that, if disclosed, would or would be likely to materially prejudice the administration of justice.

128. Information that was not publicly available at the time of its issuance, but would be publicly available if created under the Policy, shall be available on request at the discretion of ADB, subject to the terms and conditions of the Policy and its exceptions.

129. ADB may disclose information listed in paragraph 126 (1) and (2) and paragraph 127, if ADB determines that the public interest in disclosing the information outweighs the harm that may be caused by such disclosure, or if a member country requests it to do so in accordance with its own laws. ADB may also disclose any other information listed in paragraph 126, if ADB determines that the public interest in disclosing the information significantly outweighs the harm that may be caused by such disclosure, or if a member country requests it to do so in accordance with its own laws.²⁹

130. However, notwithstanding paragraph 129, ADB shall not disclose information listed in paragraph 126 (i) if ADB has given an express legal commitment to a party to keep such information confidential and not to disclose such information, unless such party consents, or (ii) if disclosure of such information is prohibited by any applicable law.

²⁹ The "public interest override" may be triggered by, for example, a request for information that reveals a serious public safety or environmental risk.

VI. IMPLEMENTATION ARRANGEMENTS

A. Roles and Responsibilities

131. The aim of the Policy is to enhance stakeholders' trust in, and ability to engage with, ADB. All its departments and offices will be accountable for implementing the Policy. The specific roles and responsibilities of ADB Management and staff are outlined as follows.

1. Management

132. Management will demonstrate its commitment to strengthening external relations by intensifying its engagement with external audiences and media, and encouraging all staff to actively participate in external relations activities. Management, through regular Management Committee meetings, will define and update ADB's external relations approaches—priority areas, key messages, outreach opportunities—and lead and monitor their implementation to ensure maximum impact. Management will promote open and effective internal communications to ensure staff at all levels are aware of Management views and positions.

2. All Departments and Offices

133. All ADB departments and offices will be responsible for implementing the Policy. As ADB's key communicators, heads of all departments and offices will proactively communicate with external audiences and lead efforts to strengthen ADB's external relations, expand understanding of ADB's motivations and objectives, and build stakeholder trust in the institution. Staff from operational departments will play a key role in communicating with project-specific stakeholders, and in ensuring the disclosure requirements are met. They will seek to ensure that people from the public, private, and nonprofit sectors with whom they interact are aware of the Policy and the public's right to access information from ADB in accordance with the Policy.

3. Office of External Relations

134. While ADB Management and all departments and offices, including resident missions and representative offices, are responsible for implementing the Policy, OER will bear overall responsibility for its implementation and consistent application. To ensure well-coordinated approaches to external relations, the work of the representative offices will be integrated into OER. To raise the profile of external relations within ADB and enable effective management of expanded responsibilities, OER will be upgraded to a department and work under the close guidance of Management. To maximize its impact within available resources, the department will sharply define its roles and rigorously prioritize its functions based on the new strategic directions discussed in the Policy.

135. Within 3 months of approval of the Policy, OER will develop a detailed action plan and monitoring framework to guide and assess implementation of the external relations component of the strategy.

a. Disclosure

136. A new public information and disclosure unit (InfoUnit) in OER will provide advice and policy interpretation to all ADB departments, and monitor the disclosure requirements of the Policy. The InfoUnit will also design and conduct mandatory training for operations staff on the disclosure requirements of the Policy, and will develop alert systems and staff incentives to

ensure ADB is in compliance with the Policy. It will support operations departments to develop communications plans for strategies, programs, and projects. It will directly support the work of the PDAC, and submit to the PDAC monitoring reports on progress in carrying out the Policy (see paragraph 151). The InfoUnit will regularly update the list of operational documents produced by ADB and keep the public informed about publicly available operational documents. It will also maintain a system for tracking requests in accordance with the requirements of the Policy.

137. OER's web team will create and maintain an e-mail notification system that enables users to indicate what types of information they are interested in and to receive e-mail alerts as the relevant documents become available.

138. OER will encourage a culture of openness among ADB staff and seek to develop incentives for the proactive sharing of information.

b. Translation

139. In consultation with interested stakeholders, the InfoUnit will prepare a translation framework within 6 months of approval of the Policy. The translation framework will outline the ways in which ADB will expand the extent of information made available in languages other than English, the working language of ADB.

140. The InfoUnit will also coordinate translation work within ADB, create a centralized record of major translation efforts across ADB, and maintain a database of translators proficient in the languages used in ADB members. The InfoUnit will promote awareness among ADB departments and offices of the translation services available to them.

c. Public Communications Policy Handbooks

141. OER will produce a public communications policy staff handbook with step-by-step procedures to guide ADB staff in making operational information and documents publicly available. The staff handbook will be made readily available to Management and staff. A separate handbook will be developed to guide ADB's borrowing governments and private sector project sponsors to implement the Policy. OER will update its media guidelines to clarify and further streamline procedures for communicating with the media. All handbooks would be publicly available (see paragraph 68).

d. Network of Public Information Centers

142. During the first year of the Policy's implementation, OER will conduct a review of ADB's depository library program and develop a strategy for upgrading ADB's public information centers. The strategy and program for public information centers will be finalized within 2 years of the Policy's effective date.

143. The strategy may include ADB's creation of and/or participation in information centers in partnership with other international agencies. It will also identify ways in which civil society organizations, such as umbrella and apex NGOs, and nongovernment research institutions, can be used to disseminate information about ADB-assisted activities.

4. Representative Offices and Resident Missions

144. Representative offices and resident missions play a critical “front line” role in building and maintaining ADB’s profile, given their proximity to target audiences, their operational and economic expertise, and their understanding of unique cultural and communications realities in the country or region where they are based.

145. Heads of representative offices and resident missions are key ADB communicators and will be tasked with expanding and strengthening ADB’s interactions with media, opinion leaders, and decision makers in their country or region. ADB should appoint individuals with the operational expertise, communications skills, and appropriate attitude required to carry out these responsibilities.

146. ADB will gradually increase the number of external relations staff at resident missions.³⁰ External relations staff will provide professional support and advice to the heads of their mission or office, will be part of the resident mission management team, and will be fully aware of all activities at the mission. Resident mission external relations staff will have consistent job descriptions and qualifications and will receive structured and ongoing training.

147. Major responsibilities of the resident mission external relations staff will include establishing and cultivating relationships with a wide variety of public and private groups to facilitate interaction with senior ADB staff; ensuring regular access for local and international media to ADB representatives and information; assisting resident mission staff to implement disclosure aspects of this strategy; helping the public within the country to interpret the disclosure requirements of the Policy; and monitoring local, national, and international news in English and local language(s) for coverage of issues of interest to ADB.

148. To improve consistency and maximize the benefits of information sharing, an external relations network comprising all external relations staff at representative offices, resident missions, and OER will be created and meet regularly by videoconference (and annually in person). Resident mission external relations staff will have dual reporting lines to the respective country director and OER.

149. Resident missions and representative offices will coordinate the translation of documents and review the accuracy of translations as necessary.

5. Borrowers or Private Project Sponsors

150. For ADB projects, much of the responsibility for disclosing information will rest with the borrowing government or private sector sponsor. The borrower will work with staff from operations departments to provide focal points in project areas to dialogue with affected people about the project (paragraph 74). Project focal points may use ADB’s website to access project- and country-related information and to disclose such information to interested parties, using locally- and culturally-appropriate delivery mechanisms.

³⁰ Currently, five of ADB’s 20 resident missions have external relations officers at the national officer level (the People’s Republic of China, India, Indonesia, Nepal, and the Philippines).

6. Public Disclosure Advisory Committee

151. ADB will create a Public Disclosure Advisory Committee (PDAC) as an oversight body to interpret, monitor, and review the disclosure requirements of the Policy. The PDAC will be composed of the Managing Director General (serving as chair), the Principal Director of OER, the Secretary, and the General Counsel, and will report directly to the President. It will convene as needed to review requests for information that have been denied by other ADB departments or offices.

152. The PDAC will contribute to the annual report on the public communications policy (paragraph 162) by assessing the implementation of the disclosure elements of the Policy. The annual report will include a summary of refusals to provide information to the public, as well as any recommendations for changes to the Policy, the Operations Manual, or the organizational structure supporting ADB's public disclosure of information.

B. Procedures for Accessing Information

1. Proactive Disclosure

153. Requests for information identified in the Policy as publicly available may be communicated to ADB orally or in writing. However, the time limits outlined in paragraph 157 shall start to run only from ADB's receipt of a request in writing. Requests may be directed to the InfoUnit, a resident mission or representative office, or an operations department. Any ADB staff member shall provide publicly available documents in the most expeditious and practical manner possible, which may include referring the requester to the relevant web link if the document is located on ADB's website and the requester has ready access to the internet.³¹

2. Exception-Based Requests for Information

154. For information and documents that are not publicly available under the Policy, requests must be received in writing (e-mail, mail, internet feedback form, or fax). Requests may be directed to the InfoUnit, or to the concerned resident mission or representative office. The contact details for the above offices shall be made publicly available.

155. Where a request concerns an ADB-assisted activity in a developing member country, the relevant operations department shall determine whether the document contains information that may not be made publicly available in accordance with the exceptions section (paragraphs 123-130), and shall consult with the government, project sponsor, or cofinancier, as appropriate. When certain information in a document is deemed confidential in accordance with the Policy's exceptions, the concerned department shall remove the confidential information before disclosing the document, while leaving reference to the excised material (with the reason for its removal). Staff from OER's InfoUnit shall provide guidance to other departments on the interpretation of the Policy as necessary.

3. Language of Requests

156. Requests may be submitted to ADB in English or in any of the official or national languages of ADB's members. Requests for information and documents submitted in languages other than English may be addressed to the relevant resident mission or InfoUnit.

³¹ A procedure for cost recovery will be detailed in the public communications policy staff handbook.

4. Time Limits for Responses to Requests for Current Information

157. ADB shall acknowledge receipt of a request (as described in paragraphs 153 and 154) within 5 working days. ADB shall then notify the requester as soon as a decision has been made, and, in any event, no later than 30 calendar days after receiving the request. In its response, ADB shall either provide the requested information or the reasons why the request has been denied, indicating the particular provision in the Policy that justifies such refusal. ADB shall make the list of requests reviewed, and the corresponding decisions and reasons, publicly available.

5. Complaints

158. If a requester believes that a request has been unreasonably denied, or that the Policy has been interpreted improperly, a request for review may be submitted in writing to: Public Disclosure Advisory Committee, Asian Development Bank, 6 ADB Avenue, Mandaluyong City, 1550 Metro Manila, Philippines, or by e-mail to pdac@adb.org, or by fax to +63 2 636 2640.

159. The PDAC shall acknowledge receipt of a request within 5 working days. The PDAC will convene as soon as possible to consider complaints. In considering denials of requested information, the PDAC will consider the Policy's exceptions to making information publicly available, as well as the public's interest in disclosure of the requested information. The PDAC shall notify the requester of its decision in writing, giving its reasons, as soon as a decision has been made and, in any event, no later than 30 calendar days after receiving the request. The PDAC shall make a list of all such requests, the nature of each request, and the decision taken in each case publicly available on a rolling basis, updated no later than 2 weeks after a request or decision has been made.

6. Requests for Historical Information

160. Historical information is available on request in accordance with paragraphs 127-129 of the Policy. Such requests may be submitted in writing to: Information Resources and Services Section, Asian Development Bank, 6 ADB Avenue, Mandaluyong City, 1550 Metro Manila, Philippines, or by e-mail to adblibrary@adb.org, or by fax to +63 2 632 5020. Requests for historical information must identify the specific information requested; blanket requests for access to historical information will not be accepted. ADB shall acknowledge receipt of such requests within 5 working days, and shall respond to requests for historical information within 30 calendar days. This time period may be extended if the request is for a large amount of information.

C. Effective Date and Transitional Period

161. The Policy shall become effective on 1 September 2005. For those activities that have not yet begun or are just beginning preparation, all disclosure requirements of the Policy shall apply. For policies, strategies, and strategies and programs that have completed their Management Review Meeting at the time of the Policy's effective date, the disclosure requirements of the Policy shall apply only for their reviews or updates. For those projects or programs that have completed appraisal at the time of the Policy's effective date, the disclosure requirements of the Policy shall not apply to the preparation phase before the project's or program's Board approval, but it shall apply to the implementation and completion phases of the project. Within 2 years of the Policy's effective date, ADB shall have made publicly available

PIDs for all ADB-assisted projects being implemented. Within the first year of the Policy's effective date, ADB shall have made PIDs publicly available for at least 50% of all projects and programs being implemented.

D. Monitoring and Reporting

162. ADB will monitor the implementation of the Policy and evaluate its impact. ADB shall make the results of ADB's monitoring of its information activities publicly available in an annual report. Appendix 2 outlines ADB's performance assessment framework for the Policy.

163. ADB allows scope for stakeholders to raise issues, access information, and engage effectively with ADB in implementing the Policy. If so requested, ADB will not disclose the names of individuals or groups that raise concerns about the implementation of the Policy.

E. Review and Amendment

164. ADB may need to review and amend the provisions of the Policy to reflect experience in implementation, the results of reviews of other ADB policies and strategies, and the evolving disclosure practices elsewhere. Flexibility will be needed to incorporate such changes periodically. Accordingly, ADB may revise or amend the Policy, as needed, following approval by the Board.

165. Where the Policy has set new disclosure requirements for existing other ADB policies or strategies, the Operations Manual sections of such policies or strategies shall be updated within six months of the Policy's approval.

166. ADB shall conduct a comprehensive review after a period of time, not to exceed five years from the effective date of the Policy. The review will actively engage interested individuals and organizations.

VII. STAFFING AND RESOURCE IMPLICATIONS

167. The successful implementation of the Policy will place new demands on many ADB staff, and involve additional costs. An ADB-wide shift toward greater openness, fuller disclosure, and more proactive sharing of information is an ADB-wide responsibility, and the critical processes and actions identified in the preceding paragraphs will require additional resources in certain areas. All efforts have been made to contain the additional costs of implementing the new Policy; they will be kept under close review as it takes effect, and budget allocations adjusted accordingly.

168. As discussed in more detail below, ADB will allocate the necessary resources in a phased manner. In total, one professional staff position, ten national officer positions, the equivalent of 5.2 professional staff-years, and 1.5 support staff-years will be required in the short term.³² Implementation of the Policy will also require one-time costs of approximately \$203,000 and recurring costs of approximately \$208,000 per annum.

³² One professional staff and six national officer positions have been included in ADB's 2005 budget.

A. External Relations

169. Following the approval of the Policy, eight new national officer positions will be assigned to key resident missions that currently have limited external relations capabilities: Bangladesh, Kazakhstan,³³ Kyrgyz Republic, Pakistan, Sri Lanka, Thailand, Uzbekistan, and Viet Nam (paragraph 146).³⁴ In the medium term, ADB will prioritize the remaining resident missions in terms of external relations demand and opportunities, and assign additional positions accordingly. ADB will also assess the need to create professional staff positions with regional responsibility at appropriate resident missions.

170. Based on the new organizational arrangements for external relations, ADB will further assess the human resource requirements to implement the external relations strategy under the Policy, identify the scope for improving and realigning the staff skills mix in OER and representative offices, and reallocate, where necessary, the available resources within the approved budget envelope. A one-time cost for the perception survey and other recurring costs such as mission travel, training, and media outreach activities for external relations will also be assessed and appropriate funding for these activities will be sought through the annual budget process.

171. Possible upgrading of public information centers at resident missions and other field offices serving developing member countries will be reviewed by OER, and an appropriate cost estimate will be brought to the Board separately.

B. Disclosure of Information

172. The creation of OER's new public information and disclosure unit (InfoUnit), which will oversee the implementation, monitoring, and evaluation of the disclosure requirements of the Policy, will require the addition of one professional staff position and one national officer position. In addition, one new national officer will be assigned to the web team to coordinate with the InfoUnit, operations departments, and other offices in posting many more documents on the ADB website. OER will require a training budget of approximately \$133,000 in the first year, and \$20,000 each succeeding year to monitor the Policy.

173. Additional operational staff time will be needed to disclose additional documents required under the Policy, communicate more systematically with affected people, address feedback received from stakeholders, and arrange for translations of CSPs and their updates. Regional departments will require the addition of 5.2 professional staff-years (\$960,000) and 1.5 support staff-years (\$32,500), and associated travel costs of \$60,000 per annum. Regional departments will also require \$70,000 in one-time costs to create project information documents, and \$128,000 annually in translation costs. OER will develop, within 6 months of the Policy's approval, a framework for expanding the range of documents ADB systematically translates. The translation framework will include a more comprehensive annual translation budget.

174. The increased number of inquiries for historical information that can be anticipated as a result of the new Policy will be accommodated through strengthened and more cost-effective library, records, and archives management systems.

³³ External relations staff will cover public communications in Kazakhstan and on Central Asia Regional Economic Cooperation.

³⁴ See footnote 30.

175. Under the new ADB information systems and technology strategy II (2004-2009), ADB's computer systems will be reconfigured and consolidated to cater for the provision of timely, relevant information. New information repository and retrieval systems currently being developed and planned under the strategy are also expected to facilitate easier and quicker entry and access to operational information. It is expected that, by making more project-related information available on the ADB website—and organizing it to promote easier user access—the time staff currently spent responding to requests for information will be reduced.

176. For loans and technical assistance, the cost of implementing communications plans and developing mechanisms for communicating with affected people (see paragraphs 74-76) will vary according to project type and geographical location, and will be identified and incorporated at the design stage into the budget of each program or project.

VIII. COMPLIANCE REVIEW

177. The disclosure requirements of the Policy shall be subject to compliance review in line with ADB's accountability mechanism.³⁵ The policy set forth in paragraphs 28-38, the specific disclosure requirements set forth in paragraphs 55-130, and the implementation arrangements set forth in paragraphs 153-166 shall be subject to compliance review under the ADB accountability mechanism.

IX. RECOMMENDATION

178. The President recommends that the Board approve the public communications policy.

³⁵ ADB. 2003. *The Review of the Inspection Function: Establishment of a New ADB Accountability Mechanism*, 8 May, R79-03.

APPENDIX 1

COMMUNICATIONS AND INFORMATION DISCLOSURE TRENDS AT OTHER MULTILATERAL DEVELOPMENT BANKS

A. External Relations at Other Multilateral Development Banks

1. Other multilateral development banks (MDBs) have increased proactive outreach work in recent years, backed by the commitment of their managements and greater staff and financial resources for media and public relations. The Washington-based MDBs have taken significant steps in responding directly to the growing demand for information about development institutions, a rising tide of criticism about the operations of international financial institutions from advocacy NGOs, and increasing competition for concessional funds from donor countries.

2. The World Bank has 250 professional staff engaged in external relations. Its field offices are particularly active in this area, especially in the Asia and Pacific region. The Inter-American Development Bank (IDB), perhaps ADB's closest comparator, has also increased its resources for external relations and has a current staff contingent of about 45 professional staff, supplemented by substantial consultant resources. In response to a critical report, the International Monetary Fund (IMF) has increased the number of professional staff engaged in external relations work from 70 in 2000 to 90 at the end of 2004. The World Bank, the IMF, and the IDB all have offices in Europe and Asia that are actively engaged in media and public relations. Consequently, they are all better known today than they were two decades ago.

B. Disclosure of Information at Other Multilateral Development Banks

3. In the realm of information disclosure, public access to information within the MDBs is now a topical issue because of the perceived influence of MDBs in developing countries. The United Nations Development Programme (UNDP) *Human Development Report 2002* asserted that there are "serious gaps in transparency" at the international financial institutions, noting the lack of minutes or records of votes of the executive boards of the World Bank and IMF. The *Human Development Report* concluded that, as a result, "citizens of member countries (or interested outsiders) cannot hold executive directors or their governments accountable for their policies in the IMF or the World Bank."¹

4. The first formal MDB information and disclosure policies—developed in the early 1990s—encouraged the public release of more details on policies, programs, and projects. However, there were considerable limitations and restrictions on the release of information. Further, the policies provided no guarantees that people living in project areas would have information about proposed activities to enable them to make meaningful contributions to project design and implementation. As a consequence, public calls to strengthen MDB disclosure policies were heard soon after their adoption. These calls have increased in recent years and have been echoed by some governments.

5. As a consequence, all MDBs have reviewed and expanded their information disclosure policies—or are actively doing so. These new policies share many common characteristics and features. All new policies, adopted as well as proposed, are more proactive in the provision of operational and other information. They expand the scope and type of information made publicly

¹ UNDP. *Human Development Report 2002: Deepening Democracy in a Fragmented World*. New York: 115. Available: <http://www.undp.org/hdr2002/chapterfive.pdf>

available, and usually highlight the official websites as important vehicles for information dissemination. They face similar constraints to making some information available to the public, including privileged information such as legal advice, information provided by another party, confidential business information, and information that would negatively affect relations between an MDB and member country governments.

6. Selected key features of individual MDB policies are noted below.

1. African Development Bank (AfDB)

7. The AfDB approved the *Disclosure of Information Policy Paper* in December 1997. The AfDB began a review of the policy in 2003, and, in March 2004, adopted a new policy incorporating greater transparency.

8. For example, the 2004 policy specifies that draft operational policy papers and draft country strategy papers will be disclosed at least 50 days before Board discussion of those papers in order to promote consultation and stakeholder participation. Country performance assessments are disclosed, as is summary documentation on any substantial changes made to a project following the project's approval by the Board of Directors.

9. The new policy also provides for the disclosure of summary proceedings of annual meetings, and gives directors of country and sector departments the authority to provide technical information about a project requested by an interested party.

10. When approving the revised *Disclosure of Information Policy*, the Board directed that the Policy should be updated regularly to incorporate best practices from similar institutions. In particular, the Board emphasized the need to monitor developments at similar institutions with regard to the disclosure of Board minutes.

2. European Bank for Reconstruction and Development

11. The European Bank for Reconstruction and Development (EBRD) approved a *Public Information Policy* in June 2000. The following year, EBRD conducted an initial review of the policy's implementation, as a result of which the Board requested a full-scale review. The review culminated in the adoption of a revised policy on 29 April 2003.

12. Project profiles (project summary documents) are made publicly available 30 days before Board consideration for private sector projects, and 60 days before Board consideration for public sector projects, and are kept up-to-date on the website after Board approval. Evaluations of private sector operations are also posted on the website.

13. Under the new policy, the public is invited to comment on the preparation of country strategies, and given at least 8 weeks in which to do so. An addendum summarizing the comments received, and the country team's response to the comments, are to be provided to the Executive Committee as well as to Directors ahead of consideration at the relevant country strategy workshop. The addendum will be posted on the EBRD website following Board approval of the country strategy. The policy also specifies that draft sectoral policies will be posted on the bank's website for public comment for at least 45 days after pre-Board discussion by Directors.

14. The 2003 policy also calls for translation, on a pilot basis, of future approved country strategies into local languages. In addition, it states that the Bank will translate three major bank policies (on disclosure, inspection, and the environment).

15. EBRD is the only MDB that posts an annual report on the implementation of its disclosure policy on its website.

3. European Investment Bank

16. In October 2002, the European Investment Bank (EIB) issued a brief Information Policy Statement, accompanied by a brochure describing key information disclosed (*How EIB Communicates – An Overview*), and the *Rules on Public Access to Documents*, composed primarily of a preamble, definition of scope and terminology, and exceptions to disclosure.

17. Although EIB has not adopted a “presumption of disclosure” clause, the *Rules* state that it “is committed to applying an active information policy and will continue and strengthen its efforts to provide the public with information on its strategy, policies, activities and practices.” They also specify that EIB, “will also, where and to the extent appropriate, continue to release basic information on concluded individual operations, in agreement with its cocontracting parties.” The *Information Policy Statement* adds that, as the European Union’s (EU) financing institution, EIB bases its information policy on “relevant EU policies on transparency and public disclosure of information and other legislation.”

18. The *Information Policy Statement* indicates that statutory documents are available in all official EU languages, while availability of publications in EU languages and/or non-EU languages is determined by the bank’s operational objectives. The website appears in English, French, and German.

19. Regarding historical documentation, the *Rules* specify that confidentiality of documents generally ends after 30 years.

20. The *Information Policy Statement* explicitly recognizes that the public can issue complaints about information disclosure with the European Ombudsman in accordance with the Treaty on European Union.

21. In June 2004, the EIB Board approved several specific changes to the institution’s disclosure practices, without formally revising the *Information Policy Statement*. For example, codes of conduct applicable to sensitive positions are now made publicly available, as are the remuneration of the Board of Directors and the Audit Committee, and a new report on corporate responsibility.

4. Inter-American Development Bank

22. In October 1994, the IDB approved its first disclosure policy and incorporated it into IDB’s Operational Policy Manual (OP-102) in November 1994. It was amended in February 1998 and again in April 2001 to reflect documents that were being added to those made publicly available. In 2002, IDB launched a review of the policy, culminating in a revised and updated document in November 2003.

23. The new policy introduces a more systematic and quicker approach to accessing bank archives. Historical information is made publicly available 20 years after issuance. Historical

information that was not publicly available at the time of issuance, but would be publicly available under the policy, is publicly available after issuance when the project/program has been completed and when the government has given its consent.

24. In addition, the Board's annual and 3-month work programs are now made publicly available. Reports to the Board by the chairs of the Board committees on committee discussions of operational and sector policies, sector strategies, IDB country strategies, documents on heavily indebted poor countries, poverty reduction strategy papers and interim poverty reduction strategy papers are also made publicly available. The policy makes IDB the first MDB to commit to releasing minutes of Board meetings (within 60 days of their approval).

25. Although not included in its policy, the IDB generally makes documents submitted to the Board available in both English and Spanish. Documents submitted to the Board of Governors must be available in each of the four official languages of IDB, English, French, Portuguese, and Spanish.

5. The World Bank Group

a. International Finance Corporation

26. The International Finance Corporation (IFC) adopted its first disclosure policy in July 1994. A revised policy became effective in January 1996, and the Board approved further clarifications and revisions in a revised disclosure policy in July 1998. Like policies at other international finance institutions, it is founded on "a presumption in favor of disclosure," and contains similar caveats.

27. Profiles of private sector projects (summary project information documents) are made publicly available at least 30 days before Board consideration, and kept up-to-date on the website until Board approval. Environmental and social information on project impacts is made publicly available a minimum of 30 or 60 days before Board approval, depending on the project's environmental and social risk category.

28. IFC publishes numerous evaluation documents on its private sector operations, including lessons learned from past IFC investments (grouped by sector, subject, and country). The IFC also makes publicly available special evaluation studies, abstracts of special studies, and annual reviews.

29. In 2004, IFC began a review of its disclosure policy and, following an initial round of web-based consultations and a client survey, is now soliciting input on a consultation paper made publicly available on 16 August 2004, and a revised draft policy framework made publicly available in November 2004.

30. The draft policy framework proposes that IFC clients disclose environmental and social impacts to project-affected people as early as possible and that they monitor and publicly report on action plans on mitigating social and environmental impacts of projects. IFC would also make these plans available through its disclosure channels. The draft also proposes that IFC publicly report on expected development impacts of proposed projects, and, on an ex-post aggregate basis, the annual development impacts of IFC investments in a systematic, comprehensive, and comparable manner.

31. The draft policy framework also proposes that minutes of Board meetings be made publicly available following the redaction of information deemed too sensitive for public disclosure.

32. A new policy is expected to be submitted to IFC's Board for approval during the third quarter of 2005.

b. Multilateral Investment Guarantee Agency

33. The Multilateral Investment Guarantee Agency (MIGA) maintains a disclosure policy which, among other things, requires the publishing of quarterly reports that provide a summary of insured projects, including details such as name and country of the investor, identity of the host country, amount of the investment, and amount of guarantee and coverage.

34. MIGA's standard contracts of guarantee, which are used as the basis for drafting a project-specific contract, are available to applicants and the public at large. Also, MIGA's basic premium rates are published in order to assist potential applicants to estimate the premium cost for a proposed investment.

35. MIGA is closely monitoring the review of the disclosure policy of the IFC, and intends to begin a review of its own policy once the IFC has completed its process (in 2005).

c. World Bank

36. The World Bank continues to increase public access to information about its operations: it has initiated a pilot program to expand the range of documents available in selected countries, budgeted substantial amounts to build up a global network of public information centers, adopted a framework supporting increased translation, and begun discussion on setting up a mechanism to address public complaints about information disclosure.

37. The World Bank became the first MDB to adopt a policy on information disclosure in August 1993. Following staff reviews in 1995 and 1997, and in subsequent years, additional documents were added to the list of those made publicly available. A comprehensive review conducted during 2000 and 2001 led to the approval of an expanded disclosure policy in September 2001. The World Bank's disclosure policy became effective in 2002.

38. Among other things, the new policy introduced disclosure of documents related to adjustment lending operations and the chairman's concluding remarks on Board discussions of country assistance strategies and sector strategy papers. The new policy also put in place a more systematic and quicker approach to accessing bank archives. Although not stated in its policy, the World Bank makes public the names of blacklisted firms.

39. The World Bank requires that environmental assessments, indigenous peoples plans and frameworks, and resettlement plans be made available to affected people in a form, manner and language understandable to them. The project information document, prepared for all lending operations, requires listing of factual technical documents that underpin project preparation.

40. In approving the policy in 2001, the World Bank Board also endorsed further work to investigate options for increasing translation of documents to ensure outreach to affected people, to strengthen the public information center, and to involve communications experts

more effectively in the dissemination and outreach elements of the new policy. Since 2001, the World Bank has increased the number and capacity of its public information centers, and launched a pilot program with interested member countries to explore ways of providing additional information on the preparation and implementation of country assistance strategies, poverty reduction strategy papers, and projects.

41. In July 2003, the Board endorsed a program to strengthen public information centers, and is budgeting millions of dollars for that purpose. The World Bank is now training country office public information center staff to serve as in-house experts on disclosure, foster the production of documents in local languages, advise staff on translation matters, raise awareness of operational activities, and facilitate dissemination partnerships within and outside the institution.

42. Also in July 2003, the World Bank adopted a document translation framework. Responsibility for translation decisions is vested with those responsible for the document ("business sponsor"). Depending on business needs, they would adopt a language approach that would allow them to reach the widest relevant audience.

43. The World Bank's public information center unit is mandated to create a recourse mechanism for users who have been denied access to information. The public information center unit intends to bring together World Bank departments and NGOs to explore this issue in the near future.

44. In 2004, the extractive industries evaluation and review identified the importance of reporting on government contracts and revenue paid to governments for major extractive industries projects in promoting governance, reducing corruption, and facilitating the appropriate use of such revenues. The World Bank Management response to this review calls for transparency for payments to governments for large projects, and the disclosure of the relevant terms of key agreements whenever these contracts are of public concern.²

45. The Management and Board of the World Bank continue to discuss the possible expansion of disclosure. In March 2005, the Board of Directors approved a paper entitled *World Bank Disclosure Policy: Additional Issues, Follow-Up Consolidated Report (Revised)*, in which 16 new disclosure items were approved. These included the routine disclosure of country assistance strategies for IBRD countries; releasing, on a pilot basis, draft operational policies when they are circulated to the Board for an informal Board meeting; and disclosing the Board minutes, budget document, staff compensation paper, and staff manual.

² World Bank. 2004, 17 September. *World Bank Group Management Response to the Extractive Industries Review*. Available: http://www-wds.worldbank.org/servlet/WDS_IBank_Servlet?pcont=details&eid=000160016_20040921111523

APPENDIX 2

PERFORMANCE ASSESSMENT FRAMEWORK

| Design Summary | Indicators/Targets | Monitoring Mechanism | Monitoring Focal Points |
|--|---|---|---|
| Impact | | | |
| <ul style="list-style-type: none"> Improved development effectiveness | <i>Monitored by Reform Agenda progress reports</i> | | |
| Outcome | | | |
| <ul style="list-style-type: none"> Stakeholders' trust in, and ability to engage with, ADB greatly enhanced | <ul style="list-style-type: none"> Improvements in stakeholders' perception of ADB and their assessment of ADB openness, accountability, and partnering | <ul style="list-style-type: none"> Comprehensive review of the Policy after 5 years Perception surveys of opinion leaders (every 3 years) Client and partnership surveys, and other stakeholder assessments | <ul style="list-style-type: none"> OER OER SPD |
| Outputs | | | |
| 1. Proactive external relations of ADB | <ul style="list-style-type: none"> Increased number of outreach missions to donor countries by Management 5% annual increase in Management media interviews and outreach activities Consistent presence in top-tier print media (i.e., at least six Op-eds published in <i>Asian Wall Street Journal</i>, <i>Financial Times</i>, and <i>International Herald Tribune</i>) | <ul style="list-style-type: none"> Public communications policy annual report (drawing on media unit inputs) Media monitoring | <ul style="list-style-type: none"> OER |
| 2. Improved access to information about ADB operations | <ul style="list-style-type: none"> Annual increase in the number of communications plans developed by operations departments for CSPs, RCSPs, and projects Starting in year 2, 10% annual decrease in complaints that the Policy's disclosure requirements have not been properly implemented PIDs created for 50% of projects by end of year 1 and 100% by end of year 2 | <ul style="list-style-type: none"> InfoUnit records and public communications policy annual report PDAC records and public communications policy annual report InfoUnit records and public communications policy annual report | <ul style="list-style-type: none"> OER OER OER |
| | <ul style="list-style-type: none"> Improvement in public satisfaction as stated in comment cards submitted to resident missions and representative offices Percentage of requests for information fulfilled within 30 calendar days 100% compliance with disclosure requirements | <ul style="list-style-type: none"> Comment card survey InfoUnit records and public communications policy annual report Sampling by InfoUnit and public communications policy annual report | <ul style="list-style-type: none"> RMs, ROs and OER |

| Design Summary | Indicators/Targets | Monitoring Mechanism | Monitoring Focal Points |
|--|---|---|--|
| Activities | | | |
| 1.1 Prepare an action plan for the Policy's strategy for external relations | <ul style="list-style-type: none"> • Within 3 months of the Policy's approval | <ul style="list-style-type: none"> • Action plan and its progress report | <ul style="list-style-type: none"> • OER |
| 1.2 Realign organizational structure and start aligning skills mix to support new strategic directions on external relations | <ul style="list-style-type: none"> • Within 3 months of the Policy's approval | <ul style="list-style-type: none"> • Management's approval of the refined arrangements | <ul style="list-style-type: none"> • BPMSD, OER |
| 1.3 Update media guidelines | <ul style="list-style-type: none"> • Circulation to staff within 4 months of the Policy's approval | <ul style="list-style-type: none"> • Issuance of the guidelines | <ul style="list-style-type: none"> • OER |
| 2.1 Establish and put into operation the InfoUnit | <ul style="list-style-type: none"> • Within 3 months of the Policy's approval | <ul style="list-style-type: none"> • Public communications policy annual report | <ul style="list-style-type: none"> • OER |
| 2.2 Establish PDAC | <ul style="list-style-type: none"> • By the Policy's effective date | <ul style="list-style-type: none"> • Public communications policy annual report | <ul style="list-style-type: none"> • OER |
| 2.3 Prepare and disseminate staff handbook on the Policy | <ul style="list-style-type: none"> • Circulation to staff by the Policy's effective date | <ul style="list-style-type: none"> • Issuance of the handbook | <ul style="list-style-type: none"> • OER |
| 2.4 Prepare and disseminate borrower and sponsor handbook on the Policy | <ul style="list-style-type: none"> • Within 6 months of the Policy's effective date | <ul style="list-style-type: none"> • Issuance of the handbook | <ul style="list-style-type: none"> • OER |
| 2.5 Conduct training on disclosure requirements | <ul style="list-style-type: none"> • All mission leaders and project analysts within 1 year of the Policy's effective date | <ul style="list-style-type: none"> • InfoUnit's monitoring records • Public communications policy annual report | <ul style="list-style-type: none"> • OER |
| 2.6 Review the depository library program and develop strategy for upgrading public information centers in member countries | <ul style="list-style-type: none"> • Within 1 year of the Policy's effective date | <ul style="list-style-type: none"> • Review paper • Public communications policy annual report | <ul style="list-style-type: none"> • OER |
| 2.7 Expand and/or upgrade public information centers in member countries based on the above review | <ul style="list-style-type: none"> • Within 2 years of the Policy's effective date | <ul style="list-style-type: none"> • Public communications policy annual report | <ul style="list-style-type: none"> • OER |

BPMSD = Budget, Personnel, and Management Systems Department, CSP = country strategy and program, OER = Office of External Relations, PID = project/program information document, PDAC = Public Disclosure Advisory Committee, RCSP = regional cooperation strategy and program, RM = resident mission, RO = representative office, SPD = Strategy and Policy Department