



Accessing Information from the World Bank: A Guide to Making Requests and Appealing Denials

The World Bank's [Policy on Access to Information](#) (the Policy) governs the public's access to information in the Bank's possession. It is accompanied by a [Directive](#) which provides more detailed guidance on implementation of the ATI Policy.

The Bank releases some information to the public on a routine basis, such as through its website. However, when information is not already publicly available, you can still submit a request for specific information. This Guide describes:

- How to submit a request for information
- How to appeal if the Bank refuses your request

Useful Links for Finding Information Already Disclosed by the Bank

- The list of routinely available documents from the Bank: [Annex 2](#) of the ATI Directive
- Projects and Operations: projects.worldbank.org
- Documents and Reports: documents.worldbank.org
- Open Knowledge Repository: openknowledge.worldbank.org
- Archives: worldbank.org/archives
- Data: data.worldbank.org
- Financial Data on the World Bank Group: finances.worldbank.org

Requesting information from the World Bank



HOW DO I REQUEST INFORMATION FROM THE WORLD BANK?

The easiest way to request information is through the Bank's electronic request system. The Bank's Directive states that requests can be submitted by mail, fax or at country offices in member countries.

However, the Bank offers no guidance on procedures for these formats. Letters can probably be sent to the Access to Information Secretariat, World Bank, 1818 H Street NW, Washington DC, 20433, United States of America.

The Bank accepts requests in written in languages other than English, but communications about the request will likely be in English.

To submit your request online:

1. Create an [account](#) with the World Bank. You will be asked for your name and email address, and to create a password and (optionally) a display name.
2. Submit a request by clicking on the “Create New Request” tab:
 - In the “Enquiry Details” section, indicate what information you wish to access.
 - * The more detail you provide in this section, the more likely it is that the Bank will find the information or document you seek.
 - * If you want a certain document, list its precise title and date.
 - Indicate the type of requester you are (such as academic, media, etc.). The system will require you to choose an option, but you can select “other”.
 - You may attach up to five files to support your request.
 - The Bank currently treats requests confidentially and does not publish your name or information, but you can click the “provided in confidence” box to exclude the substance of your request from the Bank’s public summaries of requests.
 - Click the “Submit” button.



WILL MY REQUEST COST MONEY?

There is no fee to submit a request. However, the Bank may charge “reasonable fees” for providing digital or hard copies, especially for requests that are complex or time-consuming. The Bank provides no guidance on what constitutes a “reasonable fee” but in practice, we are not aware of any instance where the Bank has actually charged a fee.



WHEN SHOULD I EXPECT A RESPONSE FROM THE WORLD BANK?

- The Bank should acknowledge receipt of the requests within **five working days**.
- The Bank attempts to respond within **20 working days**. However, it reserves the right to take additional time in special circumstances, such as for complex requests.



IS THERE A LIMIT TO THE NUMBER OF REQUESTS I CAN MAKE OR THE AMOUNT OF INFORMATION I REQUEST?

Technically, no. However, the Bank can refuse requests it considers unreasonable, including:

- Requests for more than 50 documents in a period of three months
- 500 pages of Board transcripts, information in more than 40 Board transcripts or 100 other Board records, within three months
- Six or more requests by the same requester within six months

In addition, the Bank has the discretion to decide other requests are unreasonable if they:

- Are “excessively burdensome”, including disproportionately disrupting Bank operations compared to the expected benefit from the public disclosure
- Are part of a series of overlapping or frequent requests from the same person, especially when they are submitted before the Bank has time to address the earlier requests

If you legitimately need a high number of documents or to submit multiple requests, consider having a second person submit some requests, and be mindful of the timing of your requests.



WHEN WILL THE BANK DENY MY REQUEST?

If the information falls under one of **ten exceptions** to information disclosure:

1. Personal information about staff members, such as staff records, hiring information, or internal investigations of staff misconduct.
2. Communications of Executive Directors' offices, either internally or with third-parties.
3. Proceedings of the Ethics Committee for Board officials.
4. Information subject to attorney-client privilege. For the Bank, this includes communications with its General Counsel and other legal advisors.
5. Information whose disclosure would threaten the security and safety of any individual, the environment, or Bank assets.
6. Information restricted under certain separate disclosure regimes (like the Inspection Panel, which takes complaints from persons harmed by a World Bank funded project), or information that would harm an investigation.
7. Information provided by countries or third parties in confidence, unless they give consent.
8. Corporate administrative matters of the Bank. This refers internal Bank administration, like the Bank's own real estate or procurement activities, or pension plans.
9. Deliberative information, meaning emails, draft documents, internal memos or other information prepared for or exchanged during internal deliberations.
10. Specified financial information, including banking or billing information, certain financial forecasts and assessments, and certain financial transaction details.

If the Bank exercises its **prerogative to restrict access**, meaning it denies access at its discretion:

- Only the following have this prerogative:
 - * The Board of Governors with respect to Board Records.
 - * The concerned vice president, with respect to Board Papers.
 - * The director concerned, with respect to any other information.
 - When the information concerns a particular country, this means the director for that country, or it can mean sector directors or other directors depending on the nature of the information.
- This discretion should only be exercised:
 - * In exceptional circumstances
 - * If the harm caused by disclosing the information outweighs the benefits

If the Bank refuses the request as an **unreasonable request**:

- This mostly refers to repetitive or burdensome requests.
- The Banks also says it considers requests unreasonable if they are for information scheduled for

declassification before the declassification term has expired. This includes information listed in the Policy at Section III.B.6(b), like Board transcripts and memos. If the Bank does refuse your request on this basis, you could try contesting this interpretation.

Appealing when the World Bank Denies Access to Information



THE WORLD BANK DENIED MY REQUEST. CAN I APPEAL?

Yes. However, if the Bank's Board of Executive Directors makes the decision not to disclose, this decision cannot be appealed.

Appeals are made to the Access to Information Committee (**AI Committee**). The AI Committee is an internal administrative body within the Bank.

In certain circumstances, the decision of the AI Committee can be appealed to an independent **AI Appeals Board**. The AI Appeals Board consists of three outside experts.

While you can appeal denials of your request, the appeals process cannot address other complaints, such as lengthy delays in responding to your request.



HOW DO I MAKE AN APPEAL?

You should first appeal to the **AI Committee**. You must file your appeal in writing within **60 calendar days** of the Bank's initial decision to deny access to the requested information. Submit your appeal through the electronic system or via a letter.

Your appeal should contain:

- The original case number provided in the Bank's response to the request
- A description of the information originally requested; and
- A statement explaining the facts and the grounds that support the claim.



WHAT SHOULD I ARGUE IN MY APPEAL?

There are two grounds on which you can base your appeal:

1. The Bank violated its Policy: You should show that the Bank improperly or unreasonably denied access to information it would normally disclose under its Policy. This can be done by arguing that:
 - The information does not fall within one of the Bank's ten exceptions. When the Bank denies your request, it will likely cite one or more exceptions. You can argue the information should not be included in those exceptions.
 - The Bank improperly exercised its prerogative to restrict access. You can argue, for example, that there were no exceptional circumstances justifying the denial, or that the harm caused by disclosure does not outweigh the benefits.
 - * You can only appeal on this basis if a vice president or director denies access. While the Board of Governors has discretion to deny access to Board Records, this decision cannot be appealed.
2. The public interest overrides the exceptions: You can make a public interest case for releasing the information even though it properly falls within an exception.
 - However, a public interest override is only available for three of the ten exceptions: corporate administrative, deliberative, and financial information (exceptions 8-10 on the above list)

These are the only grounds the Bank permits for an appeal. However, Ground 1 is broad enough

to possibly include other arguments. For example, the Policy does not clearly provide whether you can appeal when the Bank believes your request is unreasonable, but you could probably argue that refusing the request violated the ATI Policy.

Your appeal should argue as many of the above grounds as possible, especially Ground 1(a), because decisions of the AI Committee on Grounds 1(a) can be appealed to the AI Appeals Board.

For guidance on how the Committee may decide your appeal, you can review past decisions [here](#).



WHAT HAPPENS NEXT?

In theory, the AI Committee tries to reach a decision in 45 working days, but this is not a requirement. If there are delays, they should communicate this to you.

You will be notified of a decision. You should also be notified if your appeal is dismissed because you did not file it within the 60-day limit, you failed to provide sufficient information to support the appeal or if the AI Committee does not have the authority to consider the appeal.



THE AI COMMITTEE DENIED MY APPEAL. CAN I APPEAL TO THE AI APPEALS BOARD?

It depends. You can appeal if the AI Committee denies your appeal on the ground that the Bank violated its Policy (Ground 1, per our numbering above), but you cannot further appeal decisions related to the Bank's exercise of its prerogative deny access (Ground 1(b)). You also cannot appeal decisions on whether the public interest override applies (Ground 2).

To appeal to the **Appeals Board**, follow the same process and include the same description described above in the appeal process for the AI Committee (but address the appeal to the Appeals Board). You must file the appeal within **60 calendar days** of the AI Committee's denial.

The Appeals Board says it will try to consider appeals within a reasonable time period before its next session but has no set deadlines for responding. The Appeals Board's decision is final. You can view prior decisions of the Board [here](#).

FURTHER INFORMATION

- Policy on Access to Information: <https://ppfdocuments.azureedge.net/3693.pdf>
- Access to Information Directive/Procedure: <https://ppfdocuments.azureedge.net/e5c12f4e-7f50-44f7-a0d8-78614350f97c.pdf>
- The Bank's AI FAQ's: <https://thedocs.worldbank.org/en/doc/e33abdc86db358437acd4e9b38360492-0090012021/original/AI-FAQs.pdf>
- The Bank's main Access to Information page: <https://www.worldbank.org/en/access-to-information>

IF YOU HAVE QUESTIONS ABOUT THE PROCESS FOR MAKING A REQUEST OR AN APPEAL, YOU CAN REACH US AT:

Centre for Law and Democracy
info@law-democracy.org
@Law_Democracy

Bank Information Center
info@bankinformationcenter.org
@BIC_Updates

Next Steps When the Bank Denies an Information Request: Appeals Process

