

ACC **ACCESS TO INFORMATION**

Policy Implementation Report

2014



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ABBREVIATIONS

ACP/REC	Records Management Section
AIC	Access to Information Committee
BRIK	Bank Repository of Institutional Knowledge
D2S	Document Distribution Request
EXR	Office of External Relations
IATI	International Aid Transparency Initiative
IDB-9	Ninth General Increase in the Resources of the Bank
IDBDocs	Electronic records management system
OTRS	Open-source Ticket Request System
OVE	Office of Evaluation and Oversight
Panel	External Review Panel
PIC	Public Information Center
RES	Department of Research and Chief Economist
SCF	Structured and Corporate Financing Department
SEC	Office of the Secretary
SEC/ATI	Office of the Secretary/Access to Information Section
SPD	Office of Strategic Planning and Development Effectiveness
VPC	Vice Presidency for Countries
VPP	Vice Presidency for Private Sector and Non-Sovereign Guaranteed Operations
VPS	Vice Presidency for Sectors and Knowledge



- 1.1 It has been four years since the Access to Information Policy (“Policy”) entered into effect. By adopting this Policy,¹ the Inter-American Development Bank (“IDB” or “Bank”) shifted to a standard of maximum disclosure in line with global trends.²
- 1.2 During this period, the Bank has conducted a process of implementing the Policy across a set of areas at the regulatory, institutional, and systems levels, guided by the principle of maximizing access to information regarding its operations and activities.
- 1.3 Pursuant to paragraph 11.1 of the Policy, this annual report has been prepared in order to inform the Board of Executive Directors (“Board”) of the implementation activities carried out in 2014. This report has been prepared by the Access to Information Section (SEC/ATI) together with the Office of External Relations (EXR) and is divided into five chapters. Chapter I is an introduction. Chapter II deals with the status of Policy implementation; Chapter III describes the disclosure practices of the borrowers and the Bank; Chapter IV addresses the challenges of implementation; and Chapter V deals with access to information and open data.

1 Document [GN-1831-28](#).

2 The Policy sets a standard of maximum disclosure, pursuant to which the Bank publishes any information not contained in a list of exceptions defined in the Policy.

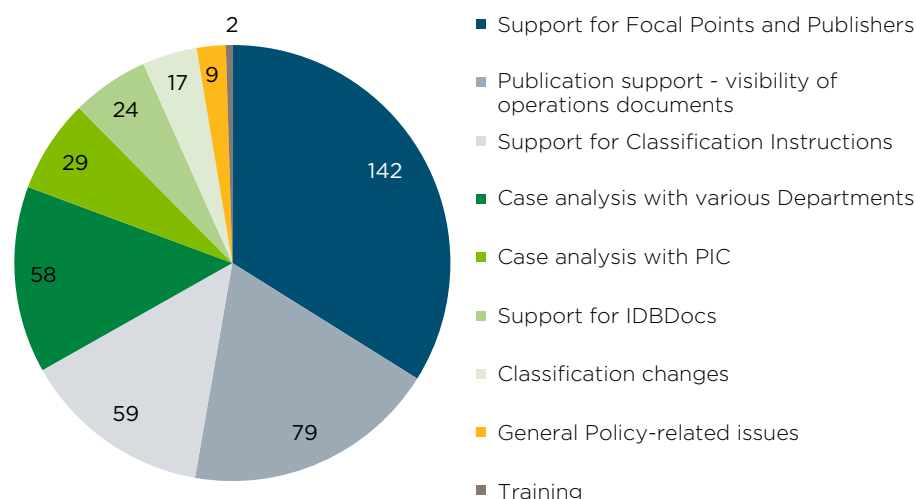


A. GOVERNANCE

1. Access to Information Section (SEC/ATI)

- 2.1 SEC/ATI's role is to coordinate the Policy implementation tasks. It is also responsible for providing continuous technical support to the Bank's various units with a view to ensuring that the Policy and its provisions are properly applied.
- 2.2 The budget allocated to this section for 2014 was US\$528,371, in order to finance the section's operating expenses, including, among other items, compensation for its staff of three professionals and a consultant.
- 2.3 SEC/ATI has a Help Desk for assisting Bank staff on issues relating to the Policy, its application, and technical implementation issues. This system was created in July 2012 and became automated in August 2013 through the Open-source Ticket Request System (OTRS), which makes it possible to record and respond to inquiries submitted to the Help Desk by telephone, by email, or in person. In 2014, the system recorded 419 inquiries, divided into the subjects listed in Figure 1. The largest number of consultations dealt with the support provided to Focal Points and Publishers on implementation issues, accounting for 34% of all consultations. Consultations on publication support – visibility of operations documents were also noteworthy, having increased from 30 in 2013 to 79 in 2014. This increase may be due to the fact that Publishers are becoming more familiar with the Policy and are increasingly verifying the visibility of documents published on the external website.
- 2.4 It is worth noting the rise in consultations, from 9 to 59, on the use of Departmental Classification Instructions with regard to document classification. The percentage of consultations on this subject matter amounted to 14% of the total recorded for 2014, suggesting greater staff involvement in the task of classifying documents correctly in accordance with the aforementioned Instructions. This has helped to raise key staff awareness of the importance of using this tool and enhance knowledge on how to apply the Policy.

Figure 1: ATI-Help Desk internal consultation tracking system³



2. Access to Information Committee (AIC)

- 2.5 The primary responsibility of the AIC is to supervise the overall implementation of the Policy.⁴ As part of its duties, the AIC held two meetings in 2014, one onsite and one virtual. In June 2014, the AIC held an onsite meeting to learn about progress made on implementation in 2013 and the activities to be carried out by Management in 2014.
- 2.6 In the regulatory area, in 2014 the AIC approved an update of the Departmental Classification Instructions, which serve as an essential staff support tool for document classification, as indicated in paragraphs 2.10 to 2.12.
- 2.7 With regard to the role of the AIC as the entity in charge of conducting a first-stage review of information requests in cases in which the Bank has denied access on the basis of one or more of the exceptions to disclosure provided in the Policy, provided the requester has asked for such review, this committee has thus far not been required to meet. Similarly, the AIC has not been called on to provide or deny access to information through positive or negative overrides since no requests of this type have been received to date.

³ Between 1 January and 31 May 2015, the system recorded a total of 168 inquiries.

⁴ The AIC is an administrative body chaired by the Chief of Staff of the Office of the President and comprised of the Executive Vice President, the four Vice Presidents, and the EXR Manager. The Legal Department serves on the committee in an advisory capacity, and the Office of the Secretary serves as AIC Secretary.

3. External Review Panel

- 2.8 Under the Policy, the second-stage review of requests for information to which the Bank has denied access is to be conducted by an External Review Panel. While this Panel has not been required to meet to date since no requests for review have been received from the public, Panel members have from its inception participated in activities designed to keep them informed on the Policy implementation process as well as acquaint them with updates of procedures and systems, the application of other policies, and the Bank's operations in general.
- 2.9 These Panel activities have been aimed at helping Panel members become more familiar with the Bank in order to better perform their duties. Thus, Panel members visited Headquarters in November 2014 and participated in meetings with internal Policy stakeholders. They had occasion to meet with the AIC Chairperson to learn of progress made on Policy implementation and to engage in a dialogue with the members of the Board. During this visit, Panel members also had an opportunity to become better acquainted with the activities performed by various departments in relation to the Policy. These activities include, for example, the work being done by the Bank on data transparency; the Corporate Results Framework (CRF); support for countries in the region to strengthen transparency and accountability; the eArchives project; external website improvements; building a stronger relationship with civil society; and public consultations. Paragraph 2.47 includes information on the event conducted by Panel members during their visit to Headquarters.

B. TOOLS FOR BETTER APPLICATION OF THE POLICY

1. Departmental Classification Instructions

- 2.10 In August 2014, SEC/ATI submitted the fourth Departmental Classification Instructions update to the AIC. This update was prepared in coordination with the Focal Points⁵ and with the participation of all Bank departments/units. The main updates were made to Office of the Secretary (SEC); Vice Presidency for Sectors and Knowledge (VPS); Vice Presidency for Countries (VPC); Vice Presidency for Private Sector and Non-Sovereign Guaranteed Operations (VPP); Office of Outreach and Partnerships (ORP); Office of Ethics (ETH); Office of Institutional Integrity (OII); Legal Department (LEG); Human Resources Department (HRD); and Office of Strategic Planning and Development Effectiveness (SPD) documents.

5 Focal Points serve as a liaison on implementation issues between their department/unit and SEC/ATI.

- 2.11 In the context of this fourth update, work was done with all departments to show staff the importance of this classification tool and its use. Along these lines, SEC/ATI is working directly with the department heads in 2015 to resolve any questions regarding classification.
- 2.12 Work is currently under way on a fifth updated version, which includes an exhaustive review of documents classified as confidential in order to verify that the disclosure exception justifying this classification is duly in line with the Policy.

2. Automated publication compliance system

- 2.13 In order to verify publication of operational documents in compliance with the respective disclosure time frames under the Policy, SEC/ATI continued to monitor such compliance. Timely information disclosure is a significant issue on which Management has been focusing as part of the implementation. Accordingly, SEC/ATI has been working with the Information Technology Department (ITE) since 2012 to enable automated verification of compliance with publication deadlines. Adjustments were made to the automated system in 2014, including integrating technical cooperation operation documents; separating Project Abstracts for non-sovereign guaranteed operations (NSG) from Project Profiles for sovereign-guaranteed operations (SG) in order to have separate private and public sector data; and creating email reminders for project teams, advising them to proceed with publication of Project Profiles (from OPUS). Paragraph 2.32 on the disclosure of information relating to operations describes the rates of publication compliance in 2014.
- 2.14 Regarding the timeliness of disclosure of information, it is important to note that an indicator was created in 2013 to measure the level of compliance in terms of timeliness of disclosure of Loan Proposals. This indicator continued to be used in 2014. Titled “Board-related documents classified as public: timely disclosure of Loan Proposals (%)” it will now be part of the auxiliary table of definitions of the Corporate Results Framework (CRF). This indicator was also used in 2014 to measure the timeliness of disclosure of sovereign guaranteed Loan Proposals distributed to the Board.

3. Training

- 2.15 Training has been one of the priority activities in the context of the implementation process. In 2014, SEC/ATI continued to hold training workshops aimed at providing staff with effective tools that can contribute to a better understanding and application of the Policy. This activity reached a total of 684 staff members and encompassed various types of sessions, including general sessions for the entire Bank, specialized sessions for different departments and units addressing specific issues according to

the particular needs of each, and sessions for new Bank employees and interns. In addition, among other such activities, a session was held for new Board members and training workshops were conducted for civil society organizations via videoconference through ConSoCs.

2.16 Another noteworthy training activity was a program conducted together with the Office of Institutional Integrity (OII), with the support of the Vice Presidency for Sectors and Knowledge (VPS). This workshop, targeting project specialists, was titled *“Access to Information Policy and Integrity Risk Management.”* The objective of this workshop was to enable project specialists to identify tools and techniques related to the Policy and integrity risk management in order to work on these issues, which are often sensitive and difficult to address with their counterparts, in the context of their projects. As part of this program, three onsite sessions were conducted at Headquarters in the first half of 2014 and four onsite sessions were conducted in the second half of the year for Country Office staff in Colombia, Bolivia, Peru, and Ecuador (Country Department Andean Group – CAN). Onsite training for staff in Country Offices will continue in 2015, with a particular focus on project teams.

2.17 Table 1 provides a description of the 2014 training sessions:

TABLE 1: Training workshops in 2014

Title	Location	Number of participants
Access to information and integrity risk management	Headquarters and CAN countries	111
Specialized training for Departments	Headquarters	73
Access to Information Policy: maximizing access and disclosure	Headquarters	118
Session on the Access to Information Policy for new Bank employees and interns	Headquarters	279
Training for civil society organizations	Videoconference	80
Session for new members of the Board of Executive Directors	Headquarters	23
Total		684

4. Focal Points and Publishers

- 2.18 Proper coordination by significant stakeholders in the implementation process is crucial for continuing to make strides toward greater disclosure. In this regard, *Focal Points*⁶ have performed an essential role, not only helping to disseminate the Policy's content within their respective departments or units but also in many cases truly "*championing*" the Policy. This has led to greater coordination with other stakeholders, such as Publishers, and made it possible to address new aspects of Policy application raised by them. In 2014, SEC/ATI held 15 bilateral meetings with certain Focal Points to address specific Policy issues, as well as two plenary meetings. The meeting agendas included, document classification issues in the context of the Departmental Classification Instructions, updates on new procedures developed by SEC/ATI, presentations on the Policy by internal collaborators, inclusion of access to information in employee work plans (within the *Careerpoint*⁷ system used by the Bank for this purpose), and dissemination activities.
- 2.19 Publishers are just as important as Focal Points. In 2014, Publishers played an active role in the dissemination of documents classified as public. That year, this type of document and those disclosed over time exceeded 19,000, matching the 2013 figure, and were published on the Bank's external website. In addition, Publishers began in 2014 the task of reviewing the metadata for a list of prior-year documents awaiting publication. This activity is being carried out together with the authors of these documents and in coordination with SEC/ATI.⁸

5. Procedures created

- 2.20 The process of creating procedures to enable staff to more easily apply the Policy Implementation Guidelines continued in 2014. Thus, the need was identified to create quick references for publishing certain types of documents and/or process guidelines, and procedures were prepared for publishing Project Completion Reports and Project Profiles. In addition, a procedure was created to address cases when the classification/security

6 There are 41 Focal Points at the departmental level, including five for the 26 Country Offices and one for each Country Department.

7 Several Focal Points have included some type of Policy-related activity/task as part of their work program in CareerPoint. In addition, in 2014 a Policy compliance-related activity was added under the general CareerPoint goals as an example of work that contributes to the Bank's corporate execution and results. "Timely disclosure of public documents on the Bank's external website in accordance with the regulatory framework of the Access to Information Policy" was also included under the second category of CareerPoint goals, "Corporate - Focus on Execution and Results," as an example of work that contributes to achieving this objective.

8 The list includes a group of approximately 1,500 documents whose metadata is awaiting review to determine their proper classification and whether they should be authorized for release on the Internet as public documents or be reclassified.

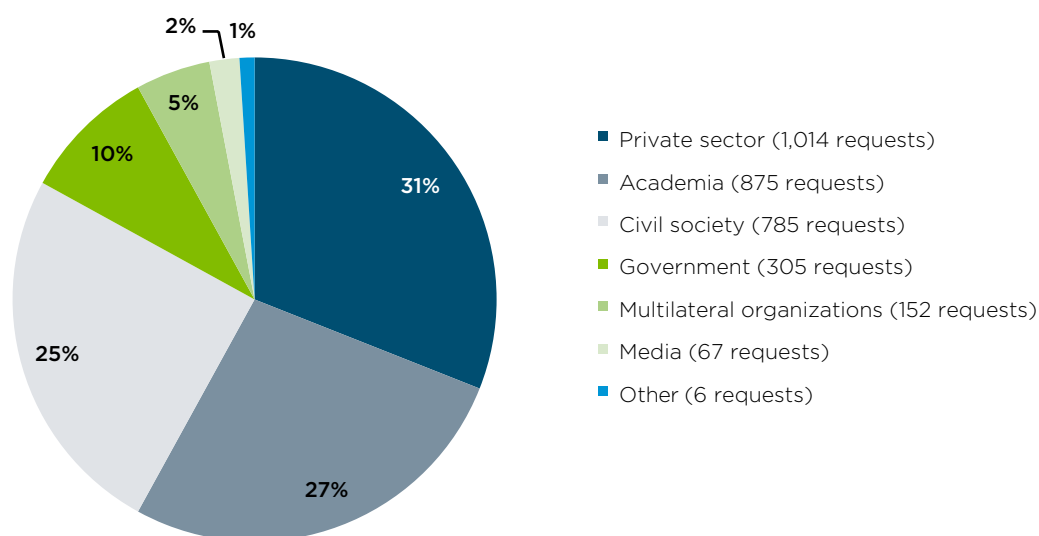
statement of documents sent to the Board⁹ needs to be corrected. Furthermore, work began in late 2014 on a process that can enable expeditious coordination of stakeholders involved in information requests that involve declassifying historical information.¹⁰

C. REQUESTS FOR INFORMATION

1. Response to requests for information in 2014

2.21 Any information subject to disclosure under the Policy but not available on the Bank's external website may be obtained by submitting a request. In 2014, the Public Information Center (PIC) received a total of 10,998¹¹ requests for information. Of these, 3,204 were received through the online form (4,215 in 2013) and 7,738 were received at the Country Offices (4,777 in 2013) by email or phone. Below, broken down by category of requester (Figure 2) and subject matter (Figure 3), is information submitted using the online form and received at Headquarters. A breakdown by country of information on requests received is available on Electronic Link 1 included on the Contents page of this report. It is important to note that a new Information Request Tracking System (OTRS) was put in place in May 2014.

FIGURE 2: Requests by sector



Source: Public Information Center (PIC)

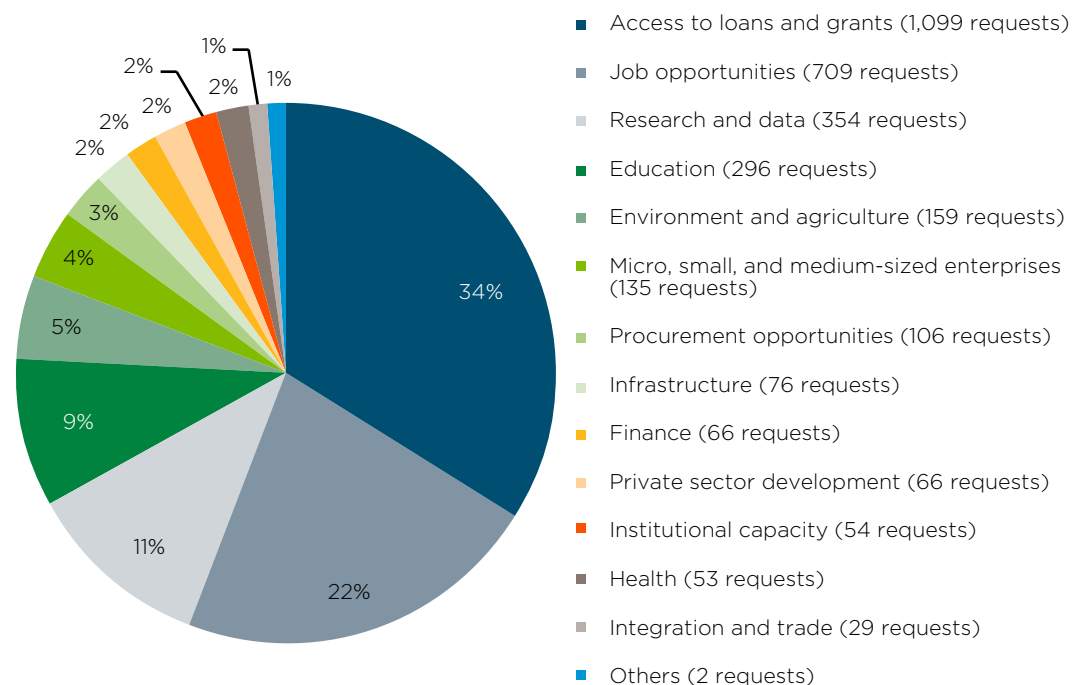
⁹ Six requests for change of classification were received in 2014.

¹⁰ This process will be implemented in 2015.

¹¹ The total number of requests received includes 40 requests received by phone and 16 requests on historical information. Historical information refers to information produced or held by the Bank prior to 1 January 2011, when the Policy took effect.

2.22 Below is a breakdown by subject matter of requests received:

FIGURA 3: Desglose por Temas



Fuente: Centro de Información Pública (CIP)

2. System for tracking requests for information

2.23 The Bank has the right to deny access to information on the basis of one or more of the ten exceptions to disclosure provided in the Policy.¹² In the event of denial, the requester has the right to a first-stage review of the request by the AIC and to a second-stage review by the Panel. In 2014, the Bank denied three requests for access to information pursuant to the Policy. In one case, the exception cited was “Information relating to non-sovereign guaranteed operations,”¹³ in another the exception cited was “Deliberative information,”¹⁴ and in the third case the requested information was of a deliberative nature but was not in the Bank’s records. As indicated in paragraphs 2.7 and 2.8, neither AIC nor the Panel was needed to conduct a review of these denials.

¹² Section 4.1 provides the list of exceptions (document ([GN-1831-28](#))).

¹³ Access to Information Policy, Section 4.1 (j).

¹⁴ Access to Information Policy, Section 4.1 (g).

TABLE 2: DENIAL OF ACCESS TO INFORMATION

#	Request for information	Explanation of the decision
1	Private sector terms of reference and project completion report	Applicable exception: Information relating to non-sovereign guaranteed operations
2	Mission report	Applicable exception: Deliberative information
3	Internal correspondence between a Bank Representative and the President of the Bank	Information unavailable in the Bank's records (had it been available, it would have been deemed deliberative)
Total: 3		

3. System for tracking requests for information

- 2.24 The new System for Tracking Requests for Information using OTRS technology was launched in May 2014 with a view to enhancing the efficiency of responses to the public. The system makes it possible to track requests for information to ensure a response within the time frames provided by the Policy. With this system, all requests for information are channeled through an online form. When the PIC receives a request for information, the system generates and sends an automated response advising the requester that the request has been received by the Bank. Since its launch, this system has been under constant monitoring and updating of its functions. As part of this process, for example, the message to requesters was modified to include the time frame within which the Bank is required to respond. In addition, to provide better guidance to requesters, a definition of historical information was included along with an indication of the time frame for responding to this type of request.¹⁵ A functionality was added to the tracking system in order to have more data available on requests that require greater effort and coordination within the Bank, and it is expected that more disaggregated information will be available for this type of request by 2015.
- 2.25 An important improvement in this area is the update of the information request form, which included a link to frequently asked questions (FAQs) in order to facilitate the search for the information most commonly requested by the public. The FAQ tab in the access to information webpage received 539 hits in 2014. In addition, the form was updated to include pop-ups with

15 The PIC message reads in part: "The IDB will endeavor to provide a comprehensive response to your request within thirty (30) calendar days from the date the request was received (i.e., the date of this acknowledgement notice). Requests for historical information will be responded to within forty-five (45) calendar days. *For purposes of the Access to Information Policy, "historical information" refers to all Bank information created and/or received during the course of official business before 1 January 2011."

links to information on the three subject matters most often asked about through the online form¹⁶.

4. New information request management system

- 2.26 The OTRS system can generate new types of reports and provide new data relating to requests for information.¹⁷ For example, the system makes it possible to know the average time it takes to close a ticket, that is, examine, respond to, and close out a request for information. This is an important step, contributing to compliance with the response deadline while fostering Bank accountability in this area. Table 3 contains a breakdown by subject matter of the average time (in days) it takes to respond to a request for information,¹⁸ considering that the overall average response time is eight calendar days.

Table 3: Average number of days to respond to a request¹⁹

Subject matter	Average time to resolve (in days)
Access to grants	6
Access to loans	10
Job opportunities	6
Education	8
Environment and agriculture	7
Health	7
Infrastructure	8
Institutional capacity	14
Finance	5
Micro, small, and medium-sized enterprises	9
Integration and trade	7
Private sector development	9
Procurement opportunities	7
Research and data	13
Total	8 days

16 The three topics most often asked about through the online form are: access to IDB grants; access to IDB loans; and job opportunities.

17 May – December 2014. A full year of data will be available in 2015.

18 Under the Policy, the Bank must endeavor to respond to a request for information within 30 calendar days, and 45 calendar days in the case of requests for historical information.

19 May – December 2014. A full year of data will be available in 2015.

D. WEBSITE AS A TOOL FOR GREATER DISCLOSURE

- 2.27 Having a website that provides access to the public is an ongoing component of Policy implementation activities. The Access to Information website continued to be updated in 2014 to include more content and facilitate its accessibility. These activities were carried out in the context of EXR's work in developing the new digital strategy²⁰ for the launching of the Bank's new website. To this end, the Access to Information website was aligned with this strategy.²¹
- 2.28 The changes made to the access to information website included a redesign of the site with the aim of maximizing access to essential information in line with the changes implemented at the corporate level. Efforts focused on further facilitating access to documents that are being published in real time, allowing users to access all recently released public documents located on the website's main page. Similarly, access to documents identified for "simultaneous disclosure" under the Policy is also maximized.²² Furthermore, information on the website is better organized and identified, resulting in better access to Board documents and other publicly accessible sources of information. In addition, the website includes information relating to the entire Policy implementation process in the form of annual reports and semiannual bulletins that provide a detailed account of this process.
- 2.29 The access to information website received more than 23,000 hits in 2014, showing a significant increase compared to the 14,000 hits received in 2013. A breakdown of hits in 2014 shows 12,045 visits to the Spanish-language page, 10,025 visits to the English-language page, and 972 visits to the Portuguese-language page. The most visited pages were the page for information requests and the homepage.
- 2.30 Also worth noting is the increase in the number of documents downloaded by users from the Bank's website. In 2014, 982,204 documents were downloaded, compared with 859,000 in 2013 and 49,285 in 2012.²³ Electronic Link 2 included on the Contents page of this report shows the documents most often downloaded in 2014.

20 The new strategy focuses on building virtual communities around important issues for the Latin American and Caribbean region. This will allow the Bank to better coordinate its communications and use digital technologies more efficiently to interact and reach new audiences.

21 The changes to the IDB's external website were aimed at making the platform more accessible, transparent, and effective in accordance with the needs identified by external users who were consulted. The new IDB website focuses on integrating project-related information in a single place. To this end, a search was implemented in the projects section and project presentation was coordinated to make access to projects at their respective stages easier to understand and follow by users.

22 Sovereign guaranteed Loan Proposals, Country Strategies, Technical Cooperation Documents, Operational Policies, Sector Framework Documents.

23 In 2013, RES publications were included in the total number of documents downloaded from the Bank's website. In addition, BRIK publications were introduced and have contributed to the large number of document downloads. Source: Office of External Relations (EXR).

- 2.31 External feedback from users is an important tool for making improvements to the Bank's website. In the context of the changes made to the external website, the Bank conducted a survey²⁴ to examine and measure the level of user satisfaction when visiting the website. Aspects surveyed covered the following categories: look and feel, navigation, website information, online transparency, and website performance. A total of 5,183 users completed the online survey, which was available to the public from March 2014 to March 2015. One of the significant results of the survey was the high degree of user emphasis on, and interest in, searching for information on Bank projects. Table 4 presents detailed information on one of the questions related to the search for information. Electronic Link 3 included on the Contents page of this report shows the complete results of the survey.

Table 4: What were you mainly looking for when you visited the website today? (choose one)

Project information	23%	General information on the IDB	4%
Employment/internship	16%	Statistics/data	4%
Training or workshops	11%	Information on a region in Latin America/ Caribbean	3%
Sectoral issue/information	9%	Events	3%
Business opportunities	8%	Country information	3%
Publications/reports	8%	News	2%
Other	7%	Press releases	0%

E. INFORMATION DISCLOSURE

1. Disclosure of information relating to operations

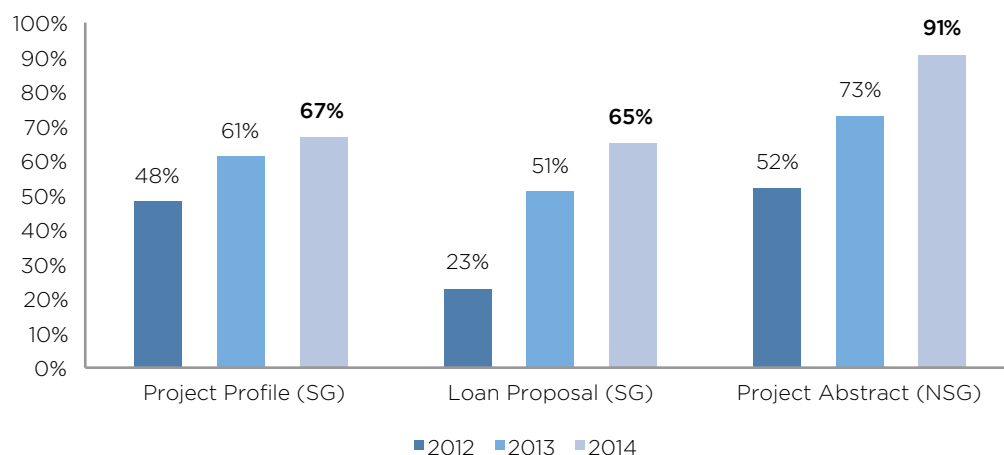
- 2.32 In 2014, SEC/ATI continued to perform a manual review to verify the level of compliance with publication time frames for key documents.²⁵ This review focused on compliance with publication time frames for project profiles and loan proposals for sovereign-guaranteed operations approved during the year. In addition, the review included project abstracts of non-sovereign guaranteed operations approved that year.²⁶

24 EXR was responsible for carrying out the survey, which was conducted through ForeSee Customer Insights.

25 To determine whether these documents were released within the time frame set by the Policy, SEC/ATI calculated the time elapsed between the approval date of the respective document in the case of project profiles or project abstracts, or the distribution date of the respective document to the Board in the case of loan proposals (documents for simultaneous disclosure), and the authorization date in IDBDocs for Internet publication of the document.

26 In 2014, the Bank approved a total of 168 operations. Of these operations, it has been confirmed that all information was disclosed, and compliance with the publication time frames is shown in Figure 4.

Figure 4: Compliance with publication time frames



2.33 Worth noting with regard to compliance with publication time frames for the documents included in Figure 4 (above) is the positive trend observable from 2012 to 2014. Thus, the timely publication compliance rate has experienced a sustained increase for all three types of documents. For Project Profiles, the rate rose from 61% to 67%; for Loan Proposals for sovereign-guaranteed operations, it rose from 51% to 65%; and for Project Abstracts for non-sovereign guaranteed operations, it rose from 73% to 91%.

2. Disclosure of information on private sector projects

2.34 Taking into account the recommendations made by the Office of Evaluation and Oversight (OVE) in the context of the midterm evaluation of commitments arising from the Ninth General Increase in the Resources of the Bank (IDB-9), Management has been exploring alternatives for greater disclosure of the results of non-sovereign guaranteed operations than is currently the case, while respecting the confidential nature of private information. In this regard, in view of the importance of communicating, reporting, and informing on the work of the private sector in the region, strides were made in 2014 on improving access to information on the results of private sector operations. Work was done to improve the guidelines for document classification for non-sovereign guaranteed operations and MIF operations; there was better coordination among windows; and an inventory was made of documents, media, and products that disclose project outcomes. In addition, the Vice Presidency for Private Sector and Non-Sovereign Guaranteed Operations (VPP) prepared a consolidated report on private sector activities, titled [Private Sector with Purpose: Stories of Development](#). This report was released in December 2014 and

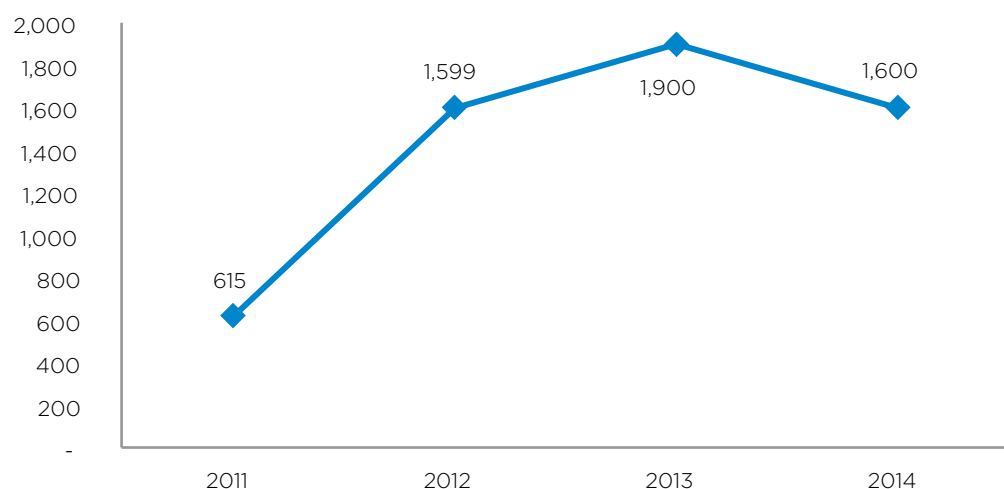
serves the purpose of publishing the results of projects and lessons learned from all four private sector windows.

- 2.35 In addition, VPP is continuing to consult with peers on good practices for the disclosure of project results and the application of access to information policies for NSG projects (SCF and OMJ).

3. Disclosure of Board-related information

- 2.36 The disclosure of key information, such as Board-related documents, helps to enhance the level of transparency in the Bank's decision-making process. Accordingly, since adopting the Policy, the Bank has continued a process characterized by greater public disclosure of information, particularly with respect to Board-related documents.²⁷
- 2.37 In 2014, the number of documents classified as public in the Document Distribution Request (D2S) system reached approximately 1,600, consistent with the high volume observed in recent years.²⁸ Figure 5 below includes information from 2011 to 2014:

Figure 5: Public documents in the D2S system



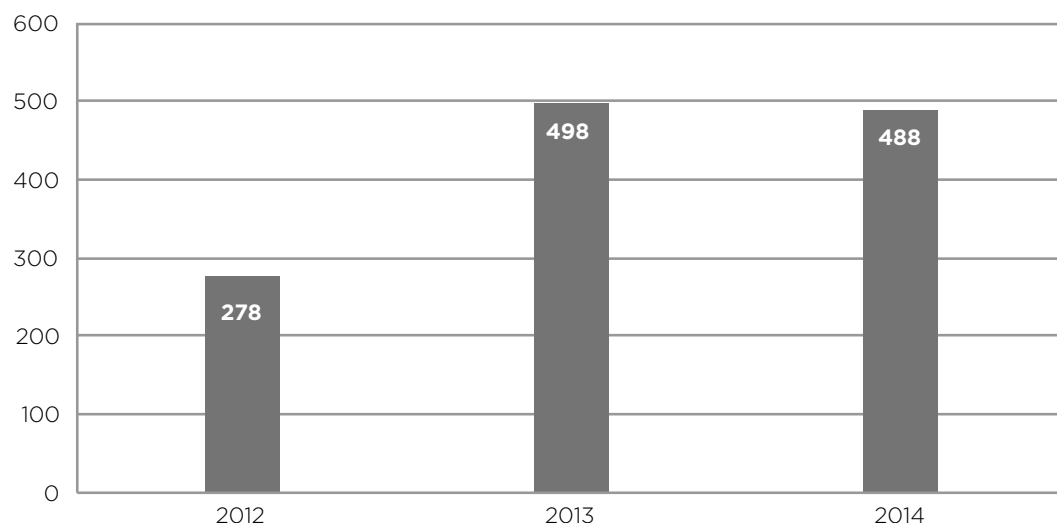
- 2.38 Disclosure of Board information is essential for the Bank's public audience and external counterparts. It not only allows the Bank to maximize access to information but also helps to enhance the Bank's decision-making transparency and improve accountability in the Bank's operations. Board information encompasses Board agendas, minutes, and committee

²⁷ Includes Sovereign-Guaranteed Loan Proposals, Country Strategies, Operational Policies, Sector Framework Documents, and Evaluation Documents.

²⁸ Source: D2S.

chairperson reports. Figure 6 illustrates the volume of disclosure of this type of information from 2011 to 2014:

Figure 6: Board documents disclosed to the public



Source: IDBDOCs

4. Disclosure of information on the Annual Meeting of the Board of Governors

2.39 The Board of Governors is the Bank's highest decision-making body. In this regard, the resolutions approved by the Board of Governors in the framework of the Annual Meeting held in Brazil in 2014 were made available to the public on the Bank's external website within the time frame established by the Policy.²⁹

2.40 The electronic link included in this section lists the resolutions adopted at the Annual Meeting of the Board of Governors: <http://kp.iadb.org/lawlib/es/Paginas/Resoluciones.aspx>.

5. Disclosure of historical information (e-Archives)

2.41 The disclosure of historical information is an important activity for the Bank. It not only contributes to enhancing the institution's transparency but makes valuable information available to the public on IDB activities since the institution's inception, thereby creating an open "repository" of knowledge. In 2014, the PIC received 16 requests for historical information,

²⁹ Routinely disclosed documents should be published within five business days following their approval or consideration.

leading to the publication of 116 historical records. The majority of the disclosed records were loan proposals, loan contracts, project completion reports, consultant reports, environmental impact assessments, and annual reports from the Bank and the Boards of Governors.

- 2.42 With the recent launch of the external [eArchives](#) website by the Records Management Section (ACP/REC),³⁰ the number of requests for historical information is very likely to increase in 2015, along with an increase in the number of records to be declassified and disclosed. ACP/REC is coordinating this issue with all stakeholders involved.

6. Exception to disclosure related to “Country-Specific Information”

- 2.43 One of the exceptions to information disclosure under the Policy is categorized as “Country-Specific Information.” Under this exception, the Bank may not disclose information contained within certain country-specific documents produced by the Bank if such information has been identified in writing by the relevant country as confidential or potentially damaging to its relations with the Bank. Application of this exception involves the partial or full nondisclosure of information.
- 2.44 In 2014, this exception was invoked with respect to documents for seven Sovereign-Guaranteed Loan Operations, including Project Profiles and Loan Proposals, as well as one Project Completion Report. In some cases, application of the exception resulted in full nondisclosure of the information, which is what occurred with respect to three Project Profiles and three Sovereign-Guaranteed Loan Proposals. However, it is worth noting that the restriction on disclosure was subsequently lifted by the borrower and the Bank therefore proceeded to publish the respective information on its external website.³¹ Regarding partial nondisclosure of information, the exception was applied to three Loan Proposals for Sovereign-Guaranteed Operations and one Project Completion Report.³²

30 In December 2014, ACP/REC launched eArchives on the Bank’s external website.

31 These documents were confidential for a temporary period ranging from February to November 2014.

32 In these cases, as in those initially involving full nondisclosure, the Bank promptly informed the public through a nondisclosure notice, while also informing the Board of Executive Directors in the case of Loan Proposal documents.

F. DISSEMINATION OF THE POLICY

1. Internal

- 2.45 Dissemination activities targeting internal stakeholders are essential for raising awareness in the Bank about the importance of the Policy. At the internal level, these activities help to build a culture of greater transparency. The third internal campaign to promote the Policy was conducted in May 2014, with notable active participation by staff. Focal Points and Publishers also collaborated, and senior management staff participated by becoming directly involved in the campaign, which allowed them to identify themselves as true promoters of the Policy.
- 2.46 In addition, in the context of the Annual IFI Working Group Meeting on Information Disclosure and Stakeholder Engagement, there was a discussion panel titled *International trends on the right of access to information and participation by interested parties*. This panel was moderated by the AIC Chairperson and included international experts Jacqueline Peschard, former Chairperson of Mexico's Instituto Federal de Acceso a la Información Pública y Protección de Datos Personales [Federal Institute for Access to Public Information and Personal Data Protection] (IFAI); Álvaro Esteban Pop, independent expert on indigenous issues of the United Nations Permanent Forum on Indigenous Issues; and Catalina Botero, then Special Rapporteur for Freedom of Expression of the Organization of American States' Inter-American Commission on Human Rights (IACHR).
- 2.47 Also worth noting as an important internal dissemination activity was the presentation made by the members of the Panel on international and regional developments regarding access to public information and the direct link between these developments and citizen participation and accountability. This activity was aimed at Focal Points, Publishers, and advisors to AIC members.

2. External

A. Promoting the Policy among civil society organizations

- 2.48 Various activities were carried out in 2014 with a view to disseminating the Policy in civil society. Using the Policy as an effective tool to help civil society organizations achieve their objectives is part of the implementation tasks with external stakeholders. Accordingly, in 2014 SEC/ATI began a training program with civil society organizations, with the collaboration of VPC, that was coordinated through the Bank's liaisons at each Country Office (COF). Seven training workshops were held in 2014, covering various organizations from The Bahamas, Chile, Honduras, El Salvador, Uruguay, Mexico, and Costa Rica. In addition, as part of the Policy promotion

activities, SEC/ATI participated in the Mini-Fair of the IDB Caribbean Civil Society Forum held in Suriname on 20-21 May.

- 2.49 Promotion activities include transmitting knowledge on the Policy and its connection to the region's advances in the area of transparency. In this regard, access to information was on the agenda at the XIV Annual IDB - Civil Society Meeting held on 22-23 October in Managua, Nicaragua. There, SEC/ATI participated on the panel *Tools for greater transparency*, aimed at showing advances made on, and challenges facing, access to information in the Americas and active transparency as an information disclosure tool. In addition, in 2014 SEC/ATI continued to focus efforts on supporting the technical cooperation operation Strengthening Civil Society in LAC - The Caribbean (RG-T2393) by contributing to the operation's access to information component.

B. Host of the Annual IFI Working Group Meeting

- 2.50 In September 2014, the IDB hosted the Annual IFI Working Group Meeting on Information Disclosure and Stakeholder Engagement, which was held to learn of advances made by institutions in the process of implementing access to information policies, discuss information disclosure issues and participation by interested parties, and share experiences, trends, and good practices in this area.³³ The event was organized by the Bank's Office of the Secretary (SEC) and Environmental and Social Safeguards Unit (VPS/ESG), with the participation of representatives from the World Bank, African Development Bank, Asian Development Bank, Caribbean Development Bank, European Bank for Reconstruction and Development, European Investment Bank, Black Sea Trade and Development Bank, and other internal IDB participants.

C. IATI

- 2.51 In 2014, the Bank continued to make progress on its data transparency initiatives, including regularly publishing data on its operations through both AidFlows and the International Aid Transparency Initiative (IATI). AidFlows is a partnership between the IDB, the World Bank, the OECD, and other regional development banks to show development financing flows from the perspective of both providers and beneficiaries. IATI provides a common standard for development funding information in order to enable users to have access to data from various development partners on a single website and in a uniform format. The Bank publishes updated data each quarter on both platforms, AidFlows and IATI. In 2014, the Bank made a series of improvements to its IATI data, which included adding links to documents and georeferenced information on the location of projects.

33 The 2012 annual meeting was held in London with the EBRD as host, while the 2013 annual meeting was hosted by the AsDB.

These improvements were acknowledged by the nongovernmental organization *Publish What You Fund* in its *ATI Index 2014 report*, where the Bank is given a score almost 17 percentage points higher than in 2013 (73.9% vs. 57.1%) and is cited as a high-performance organization.

D. Promotion via bulletin, blog, Flickr

- 2.52 In 2014, as part of its external dissemination work, SEC/ATI carried out supplementary activities on the Policy. Since 2012, SEC/ATI has been producing newsletters that include detailed information on the Policy implementation process to enable the Bank's staff and external audience to become familiar with implementation activities. The 2014 newsletter is available on the access to information website: www.iadb.org/access.
- 2.53 In addition, SEC/ATI published a blog post in *Abierto al Público* [Open to the Public] titled "*El Derecho de Acceso a la Información en las Américas*" [The right of access to information in the Americas] in the framework of the panel event held on 26 September. This information is available at: <http://blogs.iadb.org/abierto-al-publico/2014/10/16/el-derecho-de-acceso-la-informacion-en-las-americas/>.
- 2.54 Lastly, as a more visual way of publicizing implementation activities, SEC/ATI created a Flickr page to share photographs/images of these activities with internal and external stakeholders. This initiative not only encourages collaborator participation on the agenda while helping to raise awareness of the importance of Policy compliance, but also helps to build a culture of greater transparency at the Bank.³⁴

34 <https://www.flickr.com/photos/69696173@N04/>.



BORROWER DISCLOSURE PRACTICES

- 3.1 Section 5.2 of the Policy provides that the disclosure practices of borrowers with respect to environmental and social assessments related to Bank-financed projects will be reviewed.
- 3.2 In 2014, the Board approved eight category “A” projects and 55 category “B” projects. These projects required disclosure of environmental impact assessments (EIAs) or other environmental and social evaluations by the borrower and the Bank.³⁵ For the category “A” and “B” projects that required EIAs, these assessments were disclosed by the borrowers via the websites of the respective ministries, a national newspaper, or other public venues, in accordance with the information provided by the respective Project Team Leaders and the information contained in the Environmental and Social Management Reports for these operations. Likewise, for the category “B” projects that required other types of environmental or social evaluations, the information was disclosed by the executing agency, using these same disclosure channels. Furthermore, in the case of projects that, due to their nature or the execution status of their works, required disclosure over time of environmental information, such disclosure was to proceed in accordance with the Bank’s Environment and Safeguards Compliance Policy and Access to Information Policy. In addition, it is important to recall that the respective borrowing member countries have internal regulatory frameworks that require them to disclose environmental information.
- 3.3 Lastly, it should be noted that the Bank has made the environmental and social evaluations of these projects available to the public on its external website.

³⁵ In accordance with the provisions of the Environment and Safeguards Compliance Policy (Operational Policy OP-703) and Access to Information Policy (Operational Policy OP-102).



IMPLEMENTATION CHALLENGES

- 4.1 In order to move forward with effective implementation of the Policy, the following challenges must continue to be addressed:

A. SYSTEMS TO PROMOTE MORE EFFICIENT DISCLOSURE

- 4.2 Having more integrated systems in place that contribute to the Policy's implementation and bring greater efficiency to the disclosure of information is an ongoing challenge that continues to be addressed. Information systems are essential tools for managing information and for resolving the Bank's needs in terms of compliance with the Policy, especially for disclosing all the information produced or received by the Bank in accordance with the time frames provided in the Policy.
- 4.3 In the context of the changes being promoted by the Bank, under Program Optima, SEC/ATI has been actively collaborating with various stakeholders on the design of the *Convergence* platform,³⁶ to integrate Policy requirements within the project cycle in both the preparation and the supervision stages. Between the creation of the information and its publication, there will be milestones related to the Policy that will be integrated with the new records management system that will be implemented under the IDB 365 project. The new system functionalities are expected to help enhance the management of information as well as the efficiency of its disclosure.
- 4.4 The new platform (IDB 365) will help standardize information management processes and make them uniform throughout the Bank, as well as improve the efficiency of information searches, reduce costs due to the use of different creation and storage systems, and further reduce security risks in information handling. In addition, in order to continue to enhance efficiency in the publication of documents distributed to the Board of Executive Directors, opportunities will be explored to integrate systems enabling benefits including functionalities that help ensure compliance with disclosure time frames under the Policy.

B. INCREASE ENGAGEMENT WITH THE POLICY

- 4.5 A constant challenge in the context of Policy implementation is to raise the level of engagement and collaboration of staff at all levels of the Bank. While progress has been made by conducting training workshops on an

³⁶ Convergence will be the Bank tool for managing operations.

ongoing basis, reinforcing work in the various departments/units, and carrying out promotion and dissemination activities, still greater efforts are required to enable staff to view the direct link between Policy compliance and transparency as an asset that helps to strengthen the institutional framework. It is worth noting that certain indications already suggest that the perception of Policy compliance is already shifting toward a means of providing value added.³⁷ However, successfully integrating the value of disclosure and transparency into the day-to-day tasks of staff members continues to be a challenge.

37 In 2014, the Bank's President, Executive Vice President, and Vice Presidents included a Policy compliance-related activity under the general CareerPoint goals as an example of work that contributes to the Bank's corporate execution and results.

ACCESS TO INFORMATION AND OPEN DATA

- 5.1 With the consolidation of democracy in the countries of the Americas, the region has experienced significant changes in terms of transparency and citizen participation. Access to public information has contributed directly to these changes and has served as an essential catalyst to cement democratic processes. At present, more than 100 countries in the world have regulatory frameworks regulating such access.³⁸ Within the region, at least 22 countries³⁹ have enacted this type of legislation while others⁴⁰ are in the process of doing so.
- 5.2 In this context, the concept of Open Data is gaining ground as a form of access to information that complies with special standards of accessibility. This trend seeks to maximize access to information by opening data to the public so that it may be used, reused, and distributed. To be considered open, data must be accessible in bulk, without discrimination, at no cost or at a reasonable cost of reproduction, and in a convenient and modifiable format that allows interaction with other databases so that use of the data can be extended beyond the purposes for which it was originally intended.⁴¹
- 5.3 Furthermore, the concept of “open data” implies that the information will not be subject to any type of copyright, license fees, or other restrictions, thus facilitating its free circulation. This is normally achieved through the use of open licenses, such as the Creative Commons Licenses (CCL).⁴²

38 [Global Right to Information Rating](#).

39 Antigua and Barbuda, Belize, Brazil, Canada, Chile, Colombia, Dominican Republic, Ecuador, El Salvador, Guatemala, Guyana, Honduras, Jamaica, Mexico, Nicaragua, Panama, Paraguay, Peru, Saint Vincent and the Grenadines, Trinidad and Tobago, United States, and Uruguay, 20 of which are IDB member countries.

40 Argentina, Bahamas, Barbados, Bolivia, Costa Rica, Grenada, Saint Kitts and Nevis, Saint Lucia, and Venezuela.

41 Open Knowledge Foundation. [Open Data Handbook Documentation](#). Release 1.0.0. 14 November 2012, pp. 6, 10-11.

42 [Creative Commons Licenses \(CCL\)](#).

- 5.4 By way of example, the United Kingdom has become a leader in open data, with one of the world's largest repositories. U.K. authorities have developed a transparency and open data plan while establishing the Open Government Licence for public sector information.⁴³ Along the same lines, the United States issued an executive order requiring that public information be disclosed in open, computer-readable formats.⁴⁴
- 5.5 Our region is also moving in this direction. Thus, we have examples such as that of Mexico, where robust legislation on access to public information has facilitated the transition to open data publication. Mexico has an action plan⁴⁵ resulting from the joint efforts of civil society, academia, the business sector, and the government, showing how citizen participation makes it possible to identify commitments to satisfy citizen demands.⁴⁶
- 5.6 In addition, organizations, companies, and individuals are also making open data available to the public for access, use, and distribution, allowing such information to be used to improve services, create new businesses, or make aid recipients accountable for the allocation of resources.⁴⁷ This is particularly important in the area of sustainable development, where open data has operated as a tool for measuring progress and finding solutions. Making information more open is a necessary but insufficient condition for capturing the true value of open data. This requires, once the data are open, additional action aimed at realizing the potential value of the information,⁴⁸ such as by creating applications and solutions that contribute to sustainable development.
- 5.7 Many International Financial Institutions (IFIs), such as the Bank, are making strides in this regard, participating in forums such as the International Aid Transparency Initiative (IATI),⁴⁹ which seeks to develop specific standards requiring participating donors to publish information in free formats easily accessible to all.⁵⁰

43 The National Archives UK. [Open Government License for Public Sector Information](#).

44 The White House. [Executive Order - Making Open and Machine Readable the New Default for Government Information](#), 9 May, 2013.

45 Open Government Partnership. [Action Plan 2013-2015](#).

46 Open Government Partnership. [Mexico](#).

47 Open Data Institute. [Supporting sustainable development with open data](#), ODI-WP-2015-000, p. 6..

48 McKinsey Global Institute; McKinsey Center for Government; McKinsey Business Technology Office. [Open data: Unlocking innovation and performance with liquid information](#), October 2013, pp. 2, 8.

49 The International Aid Transparency Initiative (IATI) is a voluntary initiative, involving multiple stakeholders, including donors, countries, and civil society organizations, with the objective of making information about development aid easier to access, use, and understand through an open common international standard for the publication of information on aid expenses incurred. This initiative includes components including financial, geographic, and information outcomes. The Bank became a signatory of IATI in November 2011 in the framework of the High Level Forum in Busan, Republic of Korea.

50 Access Info Europe; Open Knowledge Foundation. [Beyond Access: Open Government Data and the 'Right to Reuse'](#), Draft for consultation dated 30 September 2010, pp.15-16.

- 5.8 Along these lines, the Bank has a data transparency portal in which it enters information in IATI format,⁵¹ as well as georeferenced information on the Bank's operations, including subnational operations, through its MapAmericas platform,⁵² and supports the work of AidFlows,⁵³ a partnership with the World Bank, the OECD, and other regional development banks aimed at showing financing flows from the perspective of both providers and beneficiaries. In addition, in 2015 the Bank launched a new Open Data portal on Development in Latin America and the Caribbean,⁵⁴ and adopted the Creative Commons Licenses (CCL).⁵⁵ All of this is in keeping with the new international trends encouraging greater access to information.
- 5.9 Lastly, making data more freely available is a natural step for institutions that handle a great deal of not only public information but information related to development, an area in which open data can be and have been of great value. The new regulatory approach of granting greater access to information has allowed these institutions to further open up data on a proactive basis, using open, accessible formats, maximizing the value derived from the use of data to solve problems of public interest and create services or products of public value that foster development for all.

51 Inter-American Development Bank. [Data Transparency](#).

52 Inter-American Development Bank. [MapAmericas](#).

53 [AidFlows](#).

54 Inter-American Development Bank. [The Inter-American Development Bank Launches its Open Data Portal: Numbers for Development](#). 28 April 2015.

55 Inter-American Development Bank. [The IDB adopts Creative Commons licenses that will facilitate knowledge dissemination](#). 3 February 2015.



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