

AFRICAN DEVELOPMENT BANK GROUP



Disclosure and Access to Information Policy

Three-Year Implementation Retrospective 2013-2016
Annual Report

Developing Africa Openly and Transparently

Office of the Secretary General (PSEG)



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List of Acronyms

AfDB	African Development Bank
BBPS	Bank-wide Project Processing Schedule
BRAG	Board Rolling Agenda
CHHR	Corporate Human Resources Department
CHIS	Corporate IT (Information Technology) Services
CSO	Civil Society Organization
CTDR	Central Trusted Digital Repository
DAI	Disclosure and Access to Information
DARMS	Document and Records Management System
DBDM	Development and Business Delivery Model
DFIs	Development Finance Institutions
GCI	General Capital Increase
ICA	International Council on Archives
IDB	Inter-American Development Bank
IDC	Information Disclosure Committee
IFI	International Financial Institution
IRTS	Information Request Tracking System
MDB	Multilateral Development Bank
OIVP	Infrastructure, Private Sector & Regional Integration Vice-Presidency
OPSCOM	Operations Committee
OSVP	Operations Sector Vice-Presidency
PGCL	General Counsel and Legal Services
PSEG	Office of the Secretary General and General Secretariat
PSN	Project Summary Note
RCRS	Records Classification and Retention Schedules
RMAS	Records Management and Archives Section
SMCC	Senior Management Coordination Committee
SNSP	Strategy and Operational Policies
TM	Task Manager

EXECUTIVE SUMMARY

The African Development Bank Group has always strived for transparency and openness of its operations to maximize development impact. The Bank Group was one of the first among all MDBs that adopted a disclosure policy (1997) and at that time this policy was considered progressive and best practice. It was viewed by Management that transparency is essential for drawing more support for development as it improves its operations in terms of design and implementation and strengthens stakeholder engagement in using the Bank's knowledge. In the process to enhance openness, the Board of Directors of the Bank Group approved in 2012 a revised Disclosure and Access to Information Policy (DAI). The revised policy constituted a major change from the previous policy from one that spells out what information should be disclosed, to one under which the presumption of disclosure applies to any information in the Bank Group's possession that is not on a list of exceptions.

The General Secretariat (PSEG) is tasked to lead the implementation of the DAI. In compliance with paragraph 3.5.3 of the DAI Policy, the PSEG0 DAI Team has prepared a multi-year progress implementation report for Board consideration. This progress report covers (i) a Three-Year Implementation Retrospective review and Annual Report from February 2013 through December 2016 and; (ii) Recommendations to the Board of Directors to strengthen the objectives of the DAI policy.

Summarized from the following report some of the highlights:

- The first years of the implementation (2013-2016) were aimed at building the foundations for DAI including enhanced IT environment, adjusted processes, capacity building, governance, communications and awareness sessions internally and externally and at the same time transitioning new eligible documents under the revised policy to DARMS and the Bank's website.
- 71 training sessions attended by 450 participants, including face-to face instructions and instruction through video conferences.
- Visible Management support promoting the DAI policy.
- Number of documents on afdb.org increased from 3971 (2012) to 13,833 (2016).
- Number of views or downloads of the Bank Group documents on afdb.org increased from 1,461,658 (2013) to 1,715,343 (2016).
- AfDB ranked for the first time in the top tier of the 2016 Report on Aid Transparency in the category 'very good'. The report commended the Bank for raising its transparency to the highest category and meeting its commitment to the Busan agreements.

Although PSEG has put in place structures and processes for compliance the underlying report noted areas for improvements. There is a need to improve:

- the proactive disclosure of key project documents such as supervision or progress reports, aide memoire and financial audited statements of projects. While these can be ascribed to the reluctance of countries to give consent as per policy prescription, staff members can be more proactive in ensuring that countries fully comply with their obligations under the policy as part of doing business with the Bank.
- the need to implement a records management policy, retention schedules and instruction to ensure that departments/units can comply fully with the disclosure requirements.
- Further harmonization and integration of IT systems for document management.

The report recommends an action plan to address the areas for improvement.

MESSAGE FROM THE SECRETARY GENERAL

I am pleased to present to you the Three-Year Implementation Retrospective & Annual Report (2013-16) of the Disclosure and Access to Information (DAI) policy of the African Development Bank Group. As a development institution, the objective of our work is to transform lives on the continent of Africa, providing an enabling environment for everyone to maximize their potential. SDG 2030, Goal 16 is clear on social justice and has a specific provision on providing access to information as a human right. Giving people access to information is enlightenment, it empowers individuals, communities, nations, and organizations to make better decisions, and live better lives. The effective flow of information and the related mechanisms form an essential building block for successful state and institution building and increased speed of development. It is also essential for the allocation and use of public resources and delivery of services.

The new DAI policy, implemented in 2013, has put greater emphasis on the Bank's ability to make information available to the public and its stakeholders. The increased disclosure and access to information builds confidence of stakeholders in the Bank's program and project operations by making the Bank transparent. Therefore, the realization of the goals of the Bank's transformative five priority agenda (High-5s) is clearly aligned, with the full implementation of DAI Policy provisions. The DAI policy re-affirms the Bank Group's commitment to the principles of good governance and commits to make public all information in its possession, pertaining to its activities or operations, and with a limited number of exceptions spelt out in the policy. This means that AfDB's stakeholders and the public at large will be able to access a much broader range of information than ever before.

The Office of Secretary General and General Secretariat (PSEG) is leading the implementation of the DAI policy and has committed in this regard to create awareness of the policy and the mechanisms for its implementation.

I would like to thank, on behalf of PSEG, Management and Staff who in various ways have helped kick-start the implementation of the DAI policy. From the report, we synthesize that we can be proud of the benefits of the policy so far to the development effectiveness agenda of the Bank, but its effective implementation remains a key challenge to all. Significant progress has been made in putting in place the necessary tools, processes and procedures at the Bank, to ensure that disclosure and access to Bank information should be seamless and felt by the citizens that we serve. I am indeed confident that we are on track with the implementation.

I look forward to your continuous support in moving another step forward in developing Africa openly and transparently through increased access to information. Successful implementation of the Bank's Group DAI policy is an ongoing effort and systems and processes require bold steps to ensure timely disclosure. This can only be achieved with the support of all of us.

Professor Vincent O. Nmehielle, Secretary General

1. INTRODUCTION

Over the past 20 years, the Bank Group's information disclosure policy has been amended in line with the Bank's continued commitment to enhancing transparency and accountability about its operations and the growing demand of shareholders and stakeholders to openness on the Bank's operations. The Bank's Board of Directors and Management have periodically reviewed the policy and expanded its scope towards more openness.

In this context, the Board of Directors approved on May 2, 2012 the Disclosure and Access to Information (DAI) policy, which became effective on 3 February 2013. The revised DAI policy is a centerpiece of the GCI-6 Reform commitments made by the Bank to its shareholders to raise the Bank's standards of transparency to the highest level of international practices to strengthen development effectiveness of Bank-financed projects. It may be noted that in 2016 the Bank Group received for the first time the 'very good', mark -the highest recognition- from the [Aid Transparency Initiative](#).

With the adoption of the policy, the Board of Directors set higher disclosure standards for the Bank Group. The policy reflects foremost a shift in the Bank Group's approach from a list-based eligibility to one under which the presumption of disclosure applies to any information in the Bank Group's possession that is not on a list of exceptions. The policy also introduced a two-stage appeals process to review information requests denied by the Bank.

This report has been prepared pursuant to paragraph 3.5.3 of the DAI policy and covers the period February 2013 - 31 December 2016, including the Bank's initial preparatory work leading up to the DAI policy effectiveness (2 May 2012- 2 February 2013). During the implementation timeframe PSEG periodically provided progress updates for management reports such as the ADF Replenishment Deputy Reports, Budget Framework Paper and Annual Work Program and Budget Performance Reports, Internal Audit Updates, and Multilateral Aid Review (MAR) documents such as MOPAN.

The rationale to blend progress into a 2013-2016 retrospective and annual report, is attributable to numerous institutional challenges the DAI team faced during the implementation timeframe. It is expected that yearly progress reports will forthwith be submitted to the Board.

The report is structured as follows: Chapter 3 highlights the policy implementation readiness and capacity building activities that the Bank conducted toward effective implementation, development of resource materials, outreach in Regional Member Countries (RMCs), and strengthening and harmonization of technology and systems to support the implementation of DAI. Chapter 4 is divided into three sections: (i) an assessment of disclosure compliance, access to information activities and the handling of external information requests, (ii) a review of the roles and responsibilities of Information Disclosure Committee (IDC), the Appeals Panel and the Office of the Secretary General and General Secretariat (PSEG) in implementing the DAI policy, and (iii) the linkages between DAI activities and other transparency initiatives, including the Bank's commitments under the International Aid Transparency Initiative, Global Partnership for Effective Development Cooperation, and the Africa Information Highway.

Chapter 5 and 6 identifies implementation challenges and issues encountered and proposed actions in each respective area and Chapters presents a two (2) year (Y2016-2017) action plan to address the challenges and issues identified.

2. READINESS FOR THE DAI POLICY IMPLEMENTATION

2.1 Pre-implementation phase

With the adoption of the DAI policy, the Bank moved from a positive list approach to a negative list approach to disclosure of information. The implementation of this paradigm shift required time to review lessons learned and benchmark progress with other international development organizations. Experiences were exchanged with other multi-lateral development banks (MDBs), the World Bank, the Asian Development Bank, the International Monetary Fund, the Inter-American Development Bank, European Bank for Reconstruction and Development, and the European Investment Bank. The exchange provided useful input to improve operational matters, harmonize IT systems, governance, draft manuals and communications materials, and the design of information workshops.

2.2 Preparatory work and Staffing

As a first step, PSEG developed a DAI communication plan to guide the preparation work to be carried out during the first year of implementation. The team produced awareness-raising and guidance materials, and put into place resources and processes to comply with the new policy requirements. PSEG, tasked with the implementation, reallocated staff positions to create the enabling environment for implementation. In addition, three consultants were recruited and a new staff hired to support the policy implementation. Furthermore, 12 DAI focal points were designated in Complexes and regional hubs to support the roll-out of the DAI policy.

2.3 Staff Training Workshops

Extensive training sessions were conducted throughout the Bank to ensure staff preparedness and to provide them with practical information and tools to comply with the policy in their daily tasks. The training sessions highlighted the changes introduced in the revised DAI policy, their impact on the Bank's business processes, and staff responsibilities in disclosing required information. Focus was also given to the exception list to presumed disclosure, giving the participants an understanding of how the DAI must be applied. A total of 71 training sessions were organized and attended by 302 participants. In the first year of implementation 2013, PSEG organized 24 formal training sessions in addition to numerous one-on-one sessions. The training materials were tailored to the needs of each Complex, activities, and the type of information and documents they work with. AfDB's field offices joined the training sessions via videoconference. Additional training sessions were provided for the field offices for both Francophone and Anglophone countries. Details of the training are provided in table 1.

Table 1: Breakdown of training events

	Focal Point Training	Complex Training	Regional Training	Board Training	One-on-One Training	HR Orientation Training
	No of Training (Participants)					
2013	10 (15)	4 (85)	4 (90)	4 (12)	5 (5)	2 (23)
2014	2 (2)	1 (17)	1 (20)	2 (8)	8 (5)	5 (54)
2015	0	0	0	2 (6)	7 (5)	4 (46)
2016	0	0	0	2 (8)	4 (5)	4 (44)
Total	12 (17)	5 (102)	5 (110)	10 (34)	24(20)	15 (167)

2.4 Outreach Activities

Regional workshops were conducted in North Africa, Southern Africa, West Africa, and in East Africa for Central and Eastern Africa stakeholders covering most countries. The 4 regional workshops were attended by more than 150 external stakeholders, including government officials, project implementation units, civil society groups, the private sector, academia, media, and other interested institutions and stakeholders. The outreach activities were organized in close collaboration with NGOs in various regions, the Bank's CSOs Unit and the Banks Compliance Department. The objective was not only to achieve a good understanding and application of the policy, but also to initiate dialogue with AfDB stakeholders, - civil societies - and listen to their questions and recommendations. The lively sessions showed that participants had a great interest in the implementation of the new policy.

2.5 Resource Materials

As part of the implementation work, PSEG produced various communication materials to increase understanding of the policy and guide staff on its proper application. [All presentation materials prepared are accessible here](#). The DAI policy paper was published in an attractive format and disseminated to all staff and posted on the DAI information page of the Bank Group's website. At the same time, posters, banners, and digital signage were made available. A message from the Secretary General was video recorded and disseminated on the DAI web page. To provide staff with the technical skills to comply with the DAI, a Staff Disclosure Handbook was released. The handbook outlines the workflow arrangements for making operations-related information available to the public in accordance with the DAI policy. For task managers in Private and Public Sector operations, a specific guidance note was issued. Designed as a checklist template, the guidance note will facilitate disclosure compliance by the task managers.

2.6 Information Technology Systems and Tools

To support the implementation of the DAI, numerous information technology changes were designed and implemented. A single-entry DAI page was developed on the AfDB public website that provides information on the DAI including clicks to resource materials. Changes were also initiated for the DAI/BPPS system. This system incorporates classification, filing and disclosure components in accordance with the policy. The system is built on the existing BPPS platform. All project documents (e.g., operations project documents) are expected to be processed using BPPS. PSEG and CHIS developed an online information tracking system (IRTS) that enables DAI to effectively monitor public requests submitted to the Bank through a dedicated page on the AfDB website. To manage, monitor and respond to questions two email addresses were created; one on the AFDB website to allow visitors to directly submit a question to the DAI team (DAI Information Request@afdb.org) and another to respond to internal and external queries (dai@afdb.org). On average, DAI received during the reporting period about 5 questions a week.

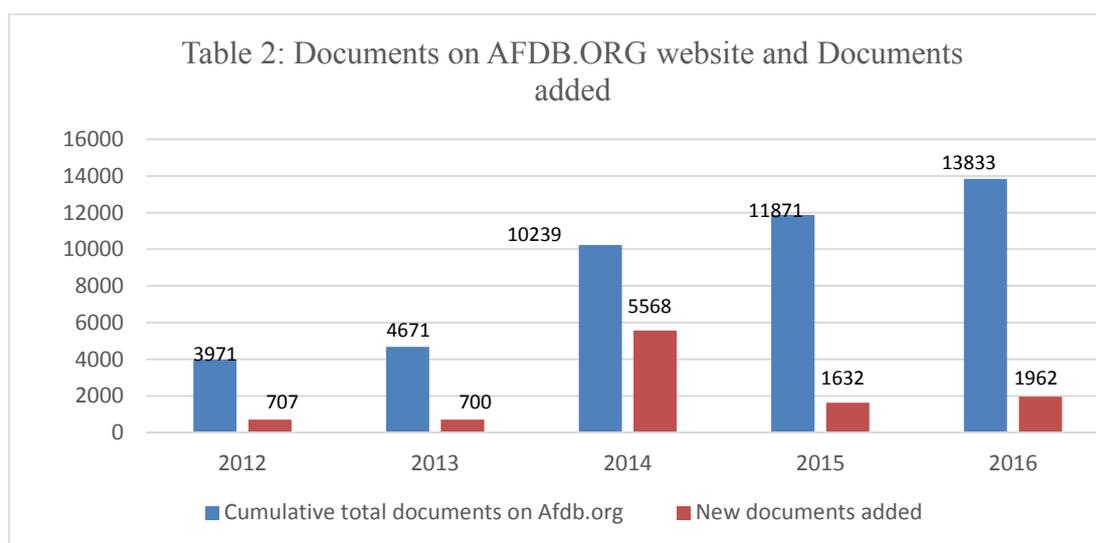
3. OVERVIEW ON THE POLICY IMPLEMENTATION ACTIVITIES

The following sections provide an overview of the policy implementation activities that cover the two major aspects of the DAI, namely the disclosure activities and access to the Bank’s documents.

3.1 Disclosure Activities

Under the DAI policy, most project-related documents produced during the project cycle are to be made publicly available prior or after Board consideration, or following internal clearance (for non-Board documents). Since the new policy came into effect in 2013, most operational documents were generally disclosed to the public in compliance with the DAI policy. Nevertheless, the Bank has been going through an adjustment process for the documents newly required to be disclosed or required to be disclosed at the earlier stages in the project cycle.

The breakdown in table 2 shows the disclosure of Bank’s documents on the Bank’s website covering the period 2012-2016. Notably, there has been a steady increase in the total number of documents disclosed during the post-policy effectiveness period (2013-2016). The big jump from 2013 to 2014 is attributed to documents added because of the new policy and a backlog of documents. Active engagement and campaign by the DAI Team and the positive spirit of PISD and PSEG contributed to the decision to include PSN for private sector projects and BRAG and Board Agenda for disclosure. The peak in new documents normalized in the subsequent years.



3.2 Key Categories of Disclosed Bank’s Documents

In accordance with the DAI Policy, the Bank regularly makes available a varied category of documents in the external website through proactive disclosure. These pertain to routine workflow of project or program implementations or responses to requests for disclosure by the Bank stakeholders. The information routinely disclosed by the Bank includes categories of documents prepared jointly with member countries or commissioned as a condition for doing business with the Bank, research and knowledge products produced by the Bank, documents prepared by member countries and provided to the Bank and information related to the private sector operations.

In addition to the presented statistics on disclosure, PSEG has conducted a self-assessment on the following 3 categories of documents:

3.2.1 Board Records and Documents

The disclosure of Board-related documents helps to enhance the level of transparency in the Bank's decision-making process. According to the DAI policy, the Board's Work Plan and Agenda of the Board Meetings shall be disclosed. In addition, the following information is eligible for disclosure, but subject to the exclusion of records or portions thereof relating to confidential matters or documents or deliberative information: highlights of Board discussions/Minutes of the Board and Final Reports of the Board Committees in which subsequent Board discussion is not expected; reports to the Board from its Committees; summary proceedings of Annual Meetings of the Board of Governors; and Resolutions adopted by the Board of Governors. Accordingly, since adopting the Policy, the Bank has continued a process characterized by greater public disclosure of Board-related documents.

3.2.2 Project Completion Reports (PCR)

Project Completion Reports (PCRs) constitute a key document in Bank Group operations with borrowing countries and the public. The value of such documents to the public is undeniable as it presents the picture of achievements of bank Group investment in a specific sector and in a country. The public interest for these documents is very important and hence, the PCRs have been proactively posted on the Bank's website after their circulation to the Board for information. Based on the assessment, all PCRs circulated to the Board in 2016 were posted on the AfDB website on average within 2 days of their circulation to the Board.

3.2.3 Project Summary Note (Non-Sovereign Operations)

According to the policy, Project Summary Notes (PSNs) with key and non-sensitive information are required to be posted on the AfDB website for all non-sovereign investments projects. Based on the assessment, private sector operations have started disclosing PSN only beginning in 2015. Between 2015 and 2016 there were 85 PSNs posted on the AfDB external website. The primary reason for the delay in disclosure of PSNs is that this is a new requirement of the policy. Staff needed time to adjust to this requirement and to explain it to their private sector clients. To address this issue a PSN template has been developed and provided to all concerned staff.

To ensure that PSNs for all applicable investment projects will be disclosed in a timely manner, an inter-office memorandum was sent to concerned Managers and Task Managers, urging them to comply with their obligations under the policy and indicating that distribution of the concerned Project Appraisal Reports to the Board for investment projects will be frozen until the PSN for disclosure is drafted. Following this communication, the backlogs of PSN was cleared rapidly. However, the requirement to submit both PAR and PSN simultaneously to PSEG and for simultaneous disclosure to the Board (PAR) and the public (PSN) remains a challenge.

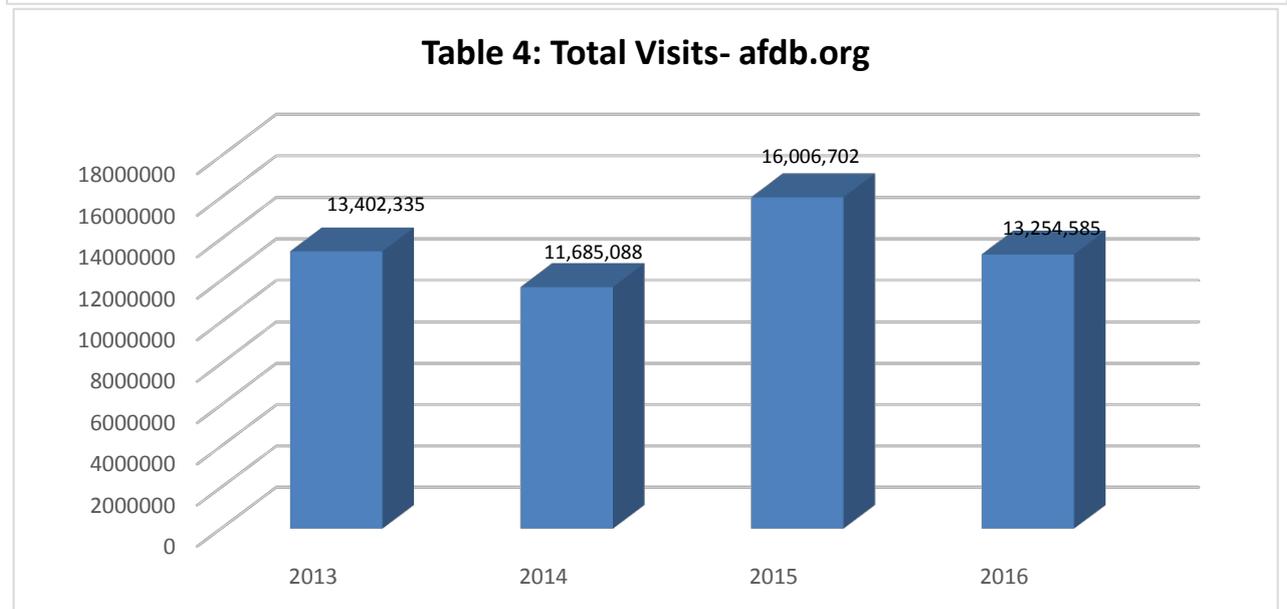
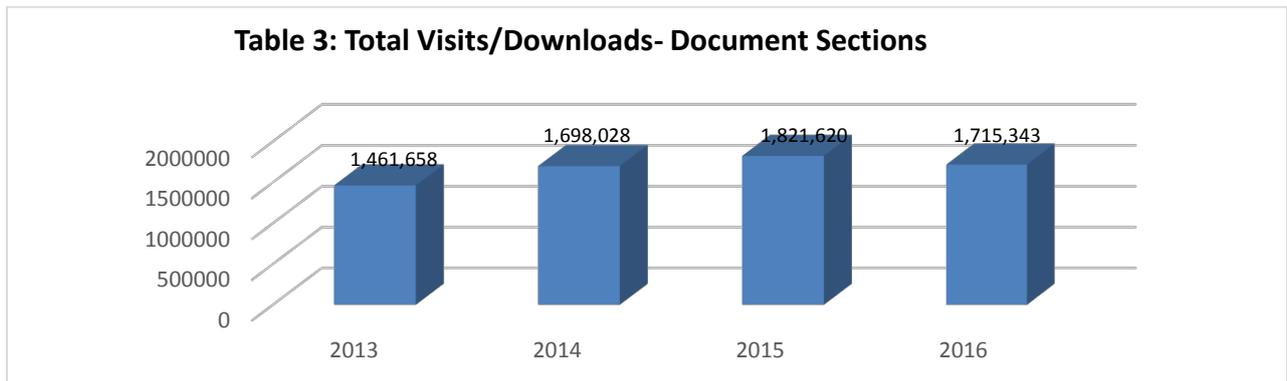
3.3 Access to Information

The other key pillar of the DAI policy is access to information. The disclosure policy only achieves its full potential if information is made available and can be accessed by the public. However, it is not in all cases that the public has the means to search, browse and access Bank documents. For this purpose, AfDB also supports mail requests from the public through a provision on the website 'Request for Documents' on the DAI page. Also, AfDB staff and DAI focal points in the country offices or regional hubs can receive and respond to local requests for information.

3.3.1 Access to Information through the Bank's External Web

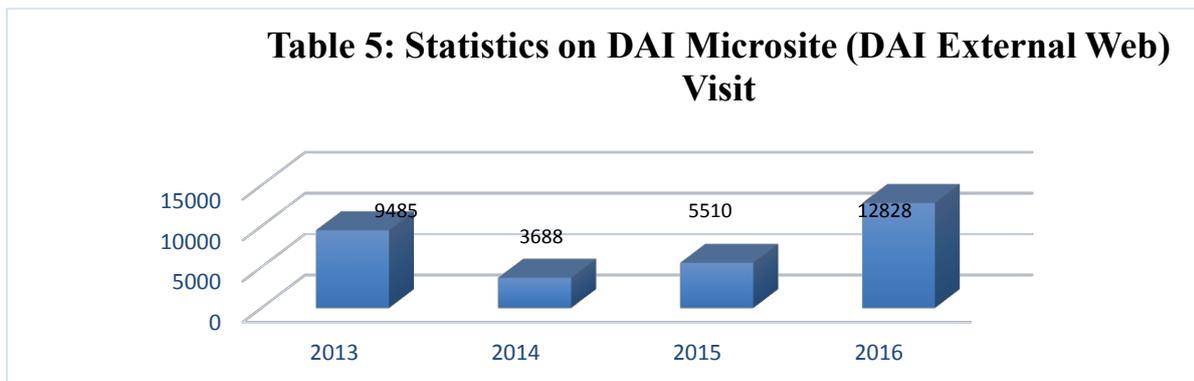
In 2013, the total number of pages viewed or downloaded from the 'Documents' section of the Bank's website was 1,461,658, reaching 1,821,620 in 2015 followed by a decline to 1,715,343. The highest peak of document downloaded in 2015 might be explained with the fact that the election of

the Bank Group’s President generated significant public interest. The breakdown in table 3 shows the number of visits and downloads of the document section on the Bank’s website. The breakdown in table 4 shows the total visits to AFDB website.



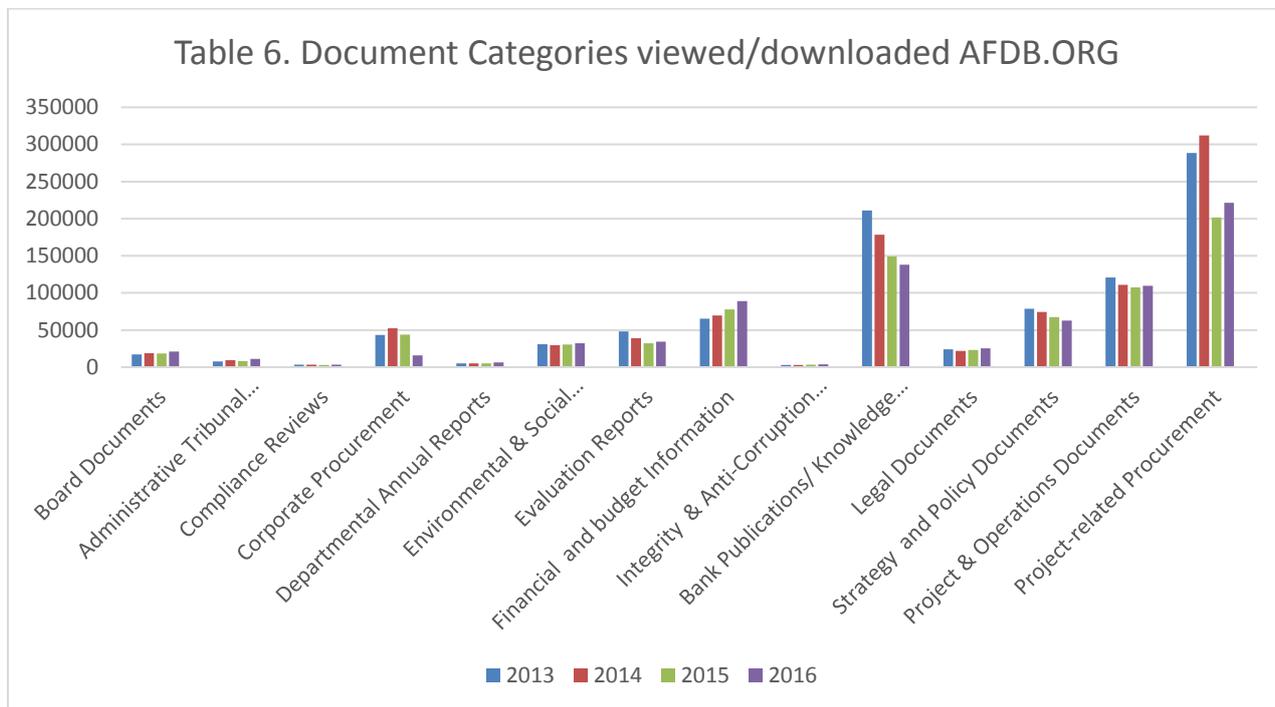
3.3.2 DAI website

The Bank’s external website includes numerous microsities, one of them being the DAI webpage. Table 5 below shows the increased interest of the public in the disclosure activities of the Bank. The strong uptake in visits during the last years is attributed to spillover effects of AfDB media campaigns on election year 2015, the Bank’s launch of High 5s, DBDM, and New Deal on Energy. The DAI website was viewed by 31,511 users.



3.3.3 Categories of Documents browsed and downloaded

The breakdown of data in table 6 below shows that the public interest in documents ranks high for project related documents, Bank publications, and financial information.



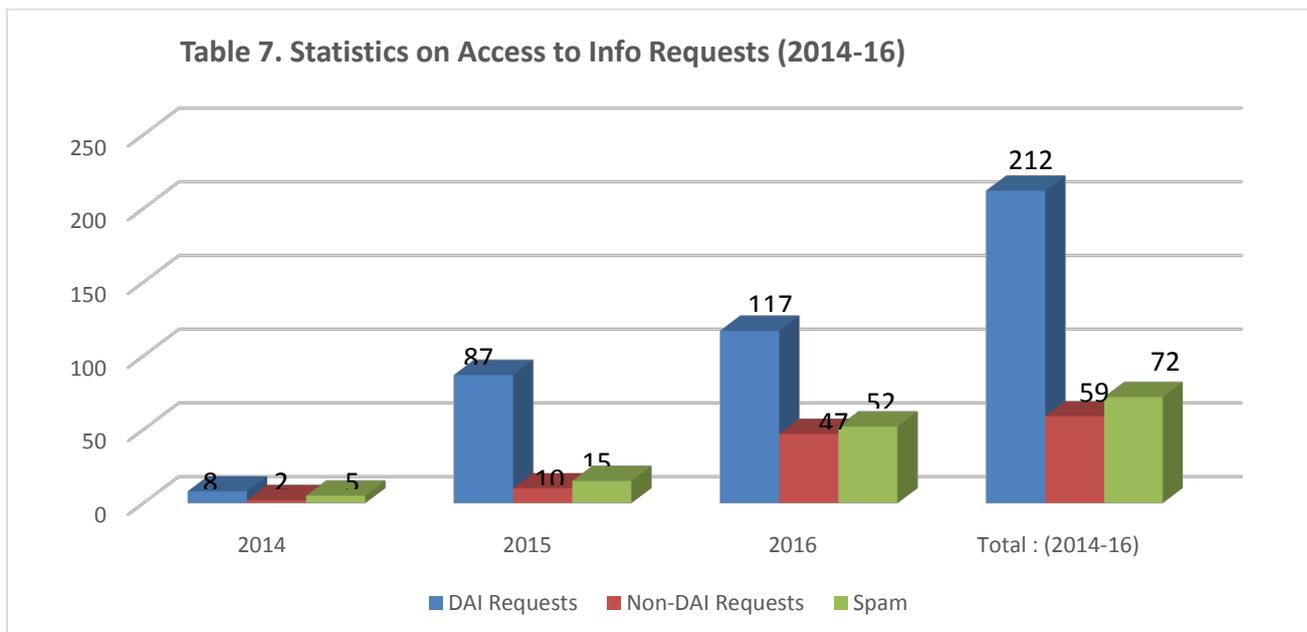
3.4 Access to Information through IRTS

The number of information requests and responses presented in table 7, reflects the number of requests received by the Bank through the online information and documents request form (IRTS) accessible through the DAI webpage. In some cases, requests for information are received by staff in HQ or in field offices. These requests are not recorded in the IRTS unless the receiver of the request has forwarded the information to the DAI Team. PSEG has requested staff to forward to the DAI team any information request they may receive for recording purposes in IRTS. The actual number of requests received by the Bank and handled directly by staff may thus be higher than the number recorded in IRTS.

3.4.1 Information Request Profile and Statistics

During the initial pilot stage of implementation of the information request system, between February 2014 and December 2015, the DAI Team received 127 requests through the IRTS system, via email and telephone. In 2016 IRTS became fully operational and recorded 216 requests. The breakdown in table 7 shows the summary of total number of DAI requests received from 2014 to 2016. It shows an increasing trend from 8 requests in 2014 to 216 requests received in 2016. The increased number of information requests can be attributed to raised awareness, workshop and communications efforts and the implementation of IRTS. The public also used the form for information requests on the website to submit non-DAI related questions such as inquiries for job opportunities, training opportunities. It was also used for unsolicited mail such as the sharing of promotion and sales materials.

Table 7. Statistics on Access to Info Requests (2014-16)



During the full implementation years (2014-2016), some of the highlights on the access to information requests is presented in the following box:

Highlights of Access to Information Requests (2013-2016)

- All valid DAI requests have been completed within 20 days as per policy requirements
- 62% of the valid requests for information have been responded to.
- 17% are various queries that are not linked to DAI. These queries were responded to and labeled as ‘Miscellaneous’
- 21% of the requests received are spam/Junk
- Less than 5% of valid DAI requests could not be granted because the requested information did not exist/could not be found or documents are in the category of restricted information.
- The highest number of requests have been received from academia (52%) followed by media (30%) and Nongovernmental or Civil Society Organization (17%) and private business enterprises (8%).

3.4.2 Timeframe for responses

The DAI policy requires the Bank to acknowledge information requests within 5 working days and respond to inquiries within 20 calendar days. In the process to respond to inquiries for documents sometimes additional time is needed to respond satisfactorily to information requests. In some cases, requestors for information do not provide sufficient or clear details of the document to be identified. Since IRTS became operational, all requests were acknowledged within 5 days. Before the implementation of IRTS, the DAI team received 2 requests for information which exceeded slightly the deadline of 20 days.

3.4.3 Appeal Cases for Access to Info Denial

The policy has a provision for requestor(s) to appeal if they believe that a request for information was denied. To date, no request has been forward for appeal. The clear disclosure guideline, the responsiveness of the DAI team, as well as the proactively process of disclosing information upfront may have resulted in the absence of appeals.

4. DAI POLICY GOVERNANCE STRUCTURE

4.1 Information Disclosure Committee

The previous disclosure policy already mandated an Information Disclosure Committee (IDC) and this Committee continued to be present in the revised policy in accordance with paragraph 4.3. The Committee comprises the following members: The Secretary General as chair of the Committee, the General Counsel, a Representative of the Vice-President, the Chief Operating Officer, the Director of the Research Department, the Head of the External Relations and Communication Unit and the Head of the Security Unit.

The main responsibilities of the Committee include advising Management and staff on the application of the policy; reviewing and deciding on appeals received from external requesters whose information requests were denied by the Bank (first level of appeals); and exercising the Bank's prerogative to override, under exceptional circumstances, the provisions of the policy.

The IDC convened 2 meetings to discuss the activities to be carried out for effective implementation of the policy, and to be apprised of progress made in this regard. The Committee has provided guidance regarding the content of the Staff Disclosure Handbook, as well as the process that should be followed in hiring the members of the Appeals Panel to be established under the DAI policy.

To date, no appeal requests has been forwarded to the Committee. The IDC continues to play a supervisory role in the implementation of the policy.

4.2 Exercising Prerogative to Disclose Restricted Information

Under the DAI Policy, AfDB reserves the right to disclose, under exceptional circumstances, certain restricted information if it determines that the overall benefits of such disclosure outweigh the potential harm depending on the type of restricted information. The Information Disclosure Committee (IDC) has the authority to exercise the Bank's prerogative to disclose certain restricted information. The Committee has been established following the Presidential Directive No. 01/2013. Since no request has been received that warrant a trigger of this prerogative, this provision of the policy has not yet been exercised by IDC. Based on the public appetite or inquisitor minds, one could expect that from time to time, such public request to disclosure of classified information in the name of public interest could arise. In that event, the IDC will have to meet and examine such a request in accordance with the policy.

4.3 Appeals Panel

The DAI policy calls for the establishment of an Appeals Panel as the final recourse mechanism for members of the public who consider that the Bank Group violated its policy by denying their request for information. The Terms of Reference for the Appeals Panel, and the process for selecting the members of the Panel were approved by the IDC in October 2013. The recruitment of the 2 external members of the Appeal Panel was advertised. The third member of the Panel will be appointed by the President of the Bank. To review candidatures, the President appointed an Evaluation Committee. The Evaluation Committee has however not been able to review and finalize the list of suitable candidate's due to the unforeseen departures of committee members in 2016. PSEG will initiate a renewed call for nominations of external candidates in Q4 of 2017. PSEG expects that by the 1st quarter of 2018 a list of eligible candidates for the Appeals Committee can be forwarded to the President's office for approval of the Appeals Committee and seek appointment of candidates by the President in Q2 of 2018. At the same time, PSEG will suggest to the President members of the Evaluation Committee.

4.4 Office of the Secretary General

The DAI policy gives PSEG the overall responsibility for implementing the policy. In particular, PSEG is responsible for: (i) monitoring the disclosure of public documents as per the policy; (ii) mainstreaming and raising awareness on the obligation to disclose information; (iii) ensuring compliance with the policy; (iv) reporting on implementation, (v) receiving and dealing with requests for disclosure of information; (vi) designating a special desk to be the public face of the Bank Group's work on disclosure and access to information; (vii) liaising with the Board members on issues concerning disclosure of Board documents; and (viii) serving as the Secretariat for the IDC. During the past 4 (four) years of implementation, PSEG has taken a leadership role in the implementation of the DAI policy. Most activities undertaken by PSEG have been mentioned in Section II of this report. In addition to day-day coordination of the policy implementation, the DAI Team has been very diligent in advising, supporting and guiding staff members to discharge their disclosure obligations.

4.5 Beyond Disclosure

The Bank group understands that networking is a key foundation for effective and sustainable implementation of the DAI Policy. Since the inception of the new policy PSEG has been working with various internal partner departments and as well as with other international financial institutions. Networking with other organizations on access to information has become prudent because the new Sustainable Development Goals SDG 2030, recognizes in Goal 16.6 the development of effective, accountable, and transparent institutions at all levels and Goal 16.10 public access to information and protect fundamental freedoms in accordance with national legislation and international agreements.

4.5.1 Working with Transparency and Other Initiatives of the Bank

AfDB's progressive DAI policy is one of the avenues that demonstrate the Bank's commitment to transparency and accountability in the use of its resources. Some of the Bank Group's other transparency initiatives include the Bank's commitment to (i) the International Aid Transparency Initiative (IATI) -a voluntary initiative that seeks to improve the transparency of aid to increase development effectiveness, (ii) the Africa Information Highway - which includes the Open Data Platform and Geocoding initiatives, (iii) the Open Government Partnership and (iv) the Global Partnership for Effective Cooperation.

4.5.2 IATI/ Aid Transparency Index

The Bank Group received in 2016 for the first time the 'Very Good' remark from the Publish What You Fund organization for its progress on making data available to the IATI register. The Bank scored 80.2% on the index and as result placed the Bank Group in the top 10 of development organizations. [The page can be viewed here.](#)

4.5.3 Open Data Platform

The Bank launched furthermore in 2012 the Open Data Platform, a program to significantly improve data management and dissemination in Africa. The main ambitions of these initiatives are to facilitate wider public access to official statistics and support countries in their efforts to improve data quality and dissemination for better policy formulation, monitoring and evaluation.

4.5.4 Geo Coding

The Bank also launched the Map Africa Platform to support easy and user-friendly access to information about Bank-financed operations and help better integrate its actions with other national open data and geospatial initiatives, principally the [Open Aid Partnership](#), [USAID](#) and [AidData](#).

Following this, the Bank is geocoding its entire portfolio of activities by mapping the exact location of the operations on the ground to help external parties understand which projects exist, where gaps are, and who is working on what to address these gaps. These important initiatives are part of the Bank's transparency agenda, which aim at empowering people on the ground with the information they need. A continued collaborative working relationship is needed to be established with these initiatives of the Bank to further the implementation of the DAI policy.

Other key internal partners in the implementation of DAI Policy has been the Bank's Civil Society initiative and the Independent Review Mechanism (IRM). All DAI regional awareness and dissemination workshops and outreach activities were conducted in close collaboration with these two Units of the Bank together with NGOs as part of the agenda of activities with civil society. Recently both the DAI and Civil Society teams of AfDB have identified possible joint areas of cooperation. In 2017-18, some joint activities are expected to be implemented.

4.6 Networking with IFIs and MDBs

One of the main drivers of the revised DAI policy was to harmonize the disclosure and access to information practices with other international financial institutions. Staff in these organizations exchange information since 2011 on an informal basis to learn from one other's experience. This informal group gathered at an AfDB hosted event. The 7th meeting of the International Financial Institutions (IFIs) Working Group on Information Disclosure and Stakeholder Engagement exchanged and discussed relevant development in Abidjan, Cote d'Ivoire, from 10 to 11 November 2016, at the Bank's Headquarters. Fifteen participants attended the meetings.

5. LESSONS LEARNED AND ACTIONS

Implementing the DAI policy in the last 4 years has brought about substantial changes in the Bank's approach to transparency in its operation and decision making process. PSEG identified some lessons based on staff feedback during workshops as well as the most significant implementation challenges and scheduled actions to address them.

5.1 Proactive Disclosure of Project Documents

The Bank is continuously disclosing project documents, yet there are still opportunities for improvement with respect to compliance with disclosure requirements. These include the categories of documents such as Aide Memoire, Private Sector project documents including the PSNs, Audited Financial Reports, and Supervision Reports. Countries and parties concerned in these cases need to be more informed and made aware about the disclosure requirements of the Bank by the responsible Operations Managers and Task Managers. It is expected that a pro-active approach of focal points in country and regional offices and focused communications to parties concerned will address this challenge. Given the sensitive nature of information, even some staff members remained to be convinced about the value of disclosing PSNs for private sector operations. However, this is not a unique challenge to AfDB as other IFIs face similar challenges. The DAI team has nominated a focal point in the private sector operations to monitor compliance regarding the publishing of PSNs. Going forward, these specific disclosure requirements under the policy will form part of the core of the compliance activity of the DAI Team.

5.2 Simultaneous disclosure

The DAI policy introduced the possibility to disclose Country Strategy Papers (CSPs), Regional Integration Strategy papers (RISPs) and Project Appraisal Reports (PARs) at the time of their circulation to the Board, which is before Board consideration, subject to the non-objection of the country concerned to such early disclosure. This is referred to as "simultaneous disclosure." The simultaneous disclosure possibility was emphasized in DAI communications and workshops, yet implementation of this possibility for CSPs, RISPs and PARs remains a challenge. Following an assessment, PSEG concluded that, in the first year of the DAI policy implementation, the above documents continued to be disclosed on the AfDB website following Board consideration. A possible reason for not yet applying the simultaneous disclosure is that AfDB regional member countries are not yet fully aware of this requirement or are still cautious on its implications. To mitigate this issue, PSEG released an inter-office memorandum to Directors of Operation Complexes to take the necessary steps in ensuring simultaneous disclosure and at the same time PSEG provided additional training to staff how the simultaneous disclosure process should function to ensure compliance with the DAI policy. A possibility to address this issue early on is to mention this aspect during loan negotiations for PAR, Opscom for CSPs and RISPs. Compliance with this policy requirement will be closely monitored and if needed recommendations for improvement suggested.

5.3 Information Classification, Declassification and Labeling

The DAI policy mandates that staff creating official documents must determine a classification category for the documents they produce. The classification ensures that the labels "Public", "Confidential" or "Strictly Confidential" are added to determine if and when a document can be disclosed. In practice, it is found that not all staff comply with adding these classification categories. Standard templates of documents with classification labels and associated guidelines have been developed to assist staff in this matter. It is expected that continuous communications on the issuance of the staff guide on classification will lead to an increased compliance. In a concerted effort between DAI team and the Board Document Section of the Secretariat, the proper application of classification of documents

will be reviewed before they are distributed to the Board. It is furthermore expected that the new revamped IT platform will be able to integrate checks for DAI mandatory fields.

5.4 Enhanced Records Management and Archiving Capability

The DAI policy implementation is linked with the Bank Group's records management and the Bank's information management environment. The absence of a records management policy, retention schedules and instruction to staff makes it difficult for the Bank's departments/units to comply fully with the disclosure requirements. To address this issue Management directed PSEG to form a working group to draft a Policy on Records Management and Archives. The draft Policy, currently under review, will be submitted through the Secretary General to SMCC for review and clearance ahead of its submission to a joint Board's Committee on Operations and Development Effectiveness (CODE)/Committee on Administration and Human Resources matters (CAHR) for consideration during Q4 2017. The policy is expected to be implemented in Q1 of 2018 once it received necessary clearance and approval by the Board. The Bank wide implementation of the Records Management Guidelines, Records Retention Schedules, File Plans and improving DARMS is expected to start in conjunction with the effectiveness of the Records Management and Archives Policy by Q1 2018.

5.5 Training and E-Learning

Training activities tailored to the specific needs of each complex or departmental unit will continue to be conducted in 2017 once the new DBDM (Development and Business Delivery Model) structure of the Bank is operational. To complement face to face trainings, PSEG in collaboration with the e-learning team of HR, is finalizing an interactive e-learning module. The module will provide staff with an attractive platform to learn the implementation details of the policy at their own pace and time. It is expected that the DAI e-learning module will be available towards the end of 2017.

5.6 Focal points

Focal points have proactively supported the implementation of the DAI policy and their contribution to the success of operationalizing DAI is acknowledge by PSEG. It is observed by PSEG that the Focal Points attention to support the implementation of DAI is declining. It is noted that their contribution is not accounted for nor valued in the Bank's performance assessment reviews. This concern has been discussed with Management and agreed that DAI focal point activities must be recognized as part of their work and as such discussed in the performance evaluation reviews. This has not yet resulted in a satisfactory outcome. Due to the active application of the Bank's professional development plans, staff changes positions frequently. Also, existing focal points have changed position in the last few years requiring DAI team to nominate new focal points and train them to act as DAI focal points. The issue of acknowledging DAI focal activities in yearly performance reviews a challenge. The topic will be discussed in the Information Disclosure Committee (IDC).

5.7 A more user-friendly website

The AfDB website is the main platform to share information widely. Browsing and finding information in a few clicks is however cumbersome. For instance, it's not easy to find all project related information on a transaction in one place. Users often must browse through many widows to access portions of the project document. The lack of inadequate classification and packaging of information of the website is one core problem, the other one is the technological architecture of the website. In a collaborative effort, PSEG, CHIS and PCER will address this issue and propose to the concerned department recommendations for improvement.

5.8 Automated Process for Document Disclosure

The DAI/BPPS platform was made operational in late 2013. After the initial release, staff forwarded suggestions to improve the user interface. Subsequently a team of representatives of PCER, OPSCOM, PSEG and CHIS reviewed and discussed the functioning of the platform and improved the overall functioning of the platform. Demonstration sessions were organized to make staff familiar with the new DAI/BPPS. It is projected that the DAI/BPPS ultimately will be the single-entry point to classify, file and send documents for information disclosure in AfDB's website.

5.9 Automated Data Capturing and reporting on Compliance.

PSEG and CHIS will also improve the monitoring features of the DAI/BPPS system. To provide a full analysis, it is expected that the new automated data capturing feature will allow the system to generate disclosure compliance reports by document types, complex and departmental unit.

5.10 Quality of Information Requests

Many requests posted through the DAI system are not always related to DAI. As outlined before, the inbox receives several requests labeled as spams or junk mail. In some cases, it is difficult to identify the requester and the nature of the request. To address problem PSEG is working with CHIS to create an additional feature that will detect and discard non-DAI related requests.

5.10 Policy Review

The DAI team is still learning from the policy implementation experiences. By experience, a meaningful policy review should be based on adequate period of implementation on the ground to gather necessary experiences. The Bank's new policy has just passed the initial phases and has been slowly implemented since 2013. For an effective policy review, it's been recommended that the Bank allows ample time to learn lessons on the implementation to identify possible areas of revisions. Thus, the proposal is to start policy review exercise by Q4 2018.

6. LOOKING FORWARD

Overall it is found that the Complexes maintained a high level of compliance in disclosing documents. A slippage occurred in documents eligible for simultaneous disclosure and some documents from private sector operations. The main causes of delayed disclosure can be attributed to cautiousness of departments, unfamiliarity or lack of understanding of staff on procedures and systems, lack of time and delay in obtaining disclosure clearance.

PSEG will continue to improve staff's understanding of DAI through training and information sessions. At the same time, it is expected that the DAI e-learning module will propel an improved understanding of DAI and provide sufficient guidance to staff to understand how eligible documents must be classified for disclosure. The upgrading of the IT tools, renewed improved records management and archiving capacity and amplifying outreach to stakeholders, both internally and externally through regional and country offices remain high priorities of PSEG. In the year ahead, PSEG will also review the effects of social media tools on advancing the disclosure and access to information agenda. This analysis will be done in close collaboration with PCER and CHIS including recommendations to improve AfDB website.

7. CONCLUSION

The new principle based information disclosure requirements has put an onus on staff, systems and procedures to ensure the timely accessibility and availability of documents for public use. AfDB made significant investments to implement the DAI policy and to ensure that staff and external stakeholders were well informed on the intentions of DAI.

This report shows that the Bank follows the DAI policy but continuous time and effort are needed to strengthen staff engagement to comply with the policy and their responsibilities associated with it. Engaging external stakeholders in this process is just as critical as some documents drafted by the Bank need consent for disclosure from regional member countries.

The Bank is aware of these challenges and is taking appropriate steps to address these. To this end, continued awareness, training, outreach, enhanced monitoring on compliance, issuance of simplified guidance, deployment of automated tools will be high priorities in the following years.

8. Implementation Action Plan (2017-2018)

To address the key challenges mentioned in the Section V, PSEG has prepared a two (2) year Implementation Action Plan.

Disclosure and Access to Information (DAI) Policy Implementation Action Plan (2017-2018)

CRITICAL ITEMS	Year 2017				Year 2018			
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
1. Disclosure Compliance Monitoring and continuous follow with the internal departments and units								
2. Submission of DAI Report for 2016 to the Board								
3. Formation of IDC (Information Disclosure Committee)								
4. Formation of External Appeal Panel								
5. Launch of E-learning Platform								
6. DAI Training to HQ staff and focal points								
7. DAI Training to staff and focal points in the Country and Regional Offices								
8. DAI training to ministries and agencies in the Bank's Borrowing Member Countries								
9. Revamping governance relationships with internal partner departments (CHIS, PCER, CSO, etc.)								
10. Classification and Declassification of Information (a complete guide)								
11. Revision of the DAI Handbook								

CRITICAL ITEMS	Year 2017				Year 2018			
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
12. Reconfiguration of IT Systems (DAI/BPPS & IRTS workflows, templates, reports etc.)								
13. Revamping of the external and internal websites and outreach activities via social media (bulletin, blog, Facebook, twitter etc.)								
14. Management of Access to Information (ATI) Request								
15. Submission of DAI Report for 2017 to the Board								
16. Submission of Policy on Records Management and Archives to the Board								
17. Drafting of Records Retention Schedules (RCRS)								
18. Preparation of Records Management Handbook								
19. Preparation and Approval of File Plans by units/departments								
20. Revision of DARMS to comply with Policy								
21. Records Management Training and Awareness Sessions –HQ								
22. Records Management Training and Awareness Sessions –Country & Regions								
23. Development of a Monitoring, Evaluation Framework and KPIs for Records Management and Archives (to be done in conjunction with the Office of Independent Evaluation)								
24. Capturing of data for DAI and Records Management Reporting								
25. Digitization of Records Archival Materials								

