AFRICAN DEVELOPMENT BANK GROUP
OFFICE OF THE SECRETARY GENERAL AND GENERAL SECRETARIAT

2018 Annual Report

on

Disclosure and Access to Information

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LIST OF ABBREVIATIONS

AfDB	African Development Bank
ADF	African Development Fund
AHGC	Civil Society and Social Innovation Division
AsDB	Asian Development Bank
BPPS	Bank-wide Programme Processing Schedule
BRAG	Board Rolling Agenda
CHIS	Corporate IT Services Department
CHHR	Department of Human Resource Management
CSO	Civil Society Organizations
CSP	Country Strategy Paper
DAI	Disclosure and Access to Information
DARMS	Document, Archives and Records Management System
EBRD	European Bank for Reconstruction and Development
ECM	Electronic Content Management
EITI	Extractive Industries Transparency Initiative
ESIA	Environmental and Social Impact Assessment
IaDB	Inter-American Development Bank
IDC	Information Disclosure Committee
IFI	International Finance Institutions
OGP	Open Government Partnership
PAR	Project Appraisal Report
PCR	Project Completion Report
PCER	Department of Communication and External Relations
PGCL	Office of the General Counsel and Legal Services
PSEG	Office of the Secretary General and General Secretariat
PSN	Project Summary Note
RMAS	Records Management and Archives Section
RISP	Regional Intergration Strategy Paper
SNDR	Delivery, Performance Management and Results Department
SNQC	Secretariat of Operations Committee and Quality Assurance
UK-DFID	Department for International Development
UNDP	United Nations Development Programme

EXECUTIVE SUMMARY

Background

In accordance with paragraph 3.5.3 of the DAI Policy, and section 10.1 of the Records Management and Archives Policy, this combined [1] annual report has been prepared for information to the Boards of Directors. This combined report covers the period from 1 January to 31 December 2018 and describes the activities undertaken with respect to information disclosure and records management[2]. It also provides an overview of preparatory activities and lessons learned from the initial implementation steps.

Highlights of the year

Achievements
- We achieved an almost 100% compliance of official bank records shared with the public;
- All 374 requests for information were responded to within the set timeframe of 20 days;
- From a total of 45 agencies assessed on transparency, the Bank edged up from its 2016 position of 10th to 4th in 2018, just behind its peers the AsDB, the UNDP and the UK-DFID, but ahead of the World Bank, the EBRD and the IaDB;
- The number of downloads of Bank documents on the website increased by 169,126 (27%);
- Over 2 million viewers visited the document section, the placeholder of the Bank's operational policies and strategies;
- The number of views of the Bank's website increased by 205,000 viewers (1.25%).

Challenges
- **Simultaneous disclosure of documents:** The disclosure of certain records prior to Board approval continues to present a challenge. None of the 245 eligible records for simultaneous disclosure were disclosed to the public prior to Board consideration[3].

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[1] As part of an efficiency drive to maximize the resource envelope of oversight committees, the Boards of Directors concurred with the proposal put forward in the Bank's records management and archive policy, to combine the annual progress report of records management and archive (RM) with the progress report on disclosure and access to information (DAI).

[2] The section on records management has been redacted from the report as it is not subject to public disclosure

[3] This does not apply to environmental and safeguards documents. The safeguards policy prescribes the mandatory disclosure of environmental and safeguards reports prior to Board consideration. As per our review the eligible E&S documents were made public prior to Board consideration.

I.   DISCLOSURE AND ACCESS TO INFORMATION ACTIVITIES

1.   Access to information

1.1   The disclosure unit has three responsibilities: monitor compliance; assess, review and prepare appraisal, policies and strategy documents for disclosure; and respond to internal and external requests to disclose documents. The unit focuses on the disclosure of Board-approved documents. Other departments such as CHGS (procurement), CHHR (human resources), the Chief Economist's Office, SNSC (environmental safeguard) post their documents on the Bank's website without interference from the disclosure unit.
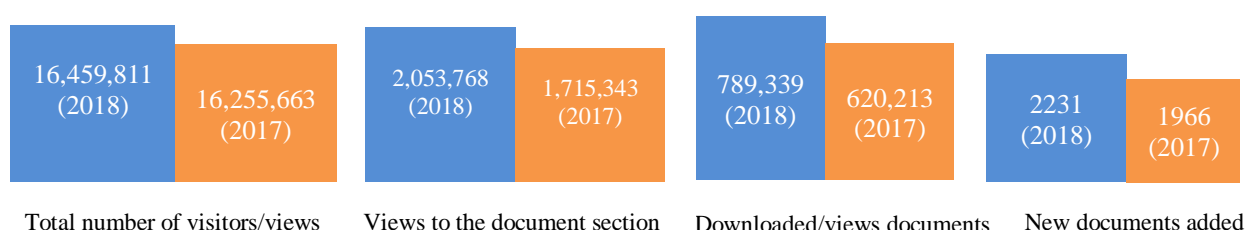
1.2   Openness and transparency are at the heart of the Bank Group's ten-year strategy. Improving access to information is also enshrined in the Sustainable Development Goal (SDG) 16 that states: *"Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels"*. This SDG goal considers access to information to be a human right.

1.3   Civil society organizations play a pivotal role in transferring Bank information to affected communities. To sensitize the public and especially civil society organizations, the records management and archives/disclosure and access to information unit agreed with the civil society and social innovation division on the need to collaborate on outreach activities. As a result, the records management/disclosure and access to information unit is now represented in the Bank's civil society committee.

1.4   To improve staff awareness and capacity on the DAI policy, an e-learning course was developed in collaboration with the e-learning division of CHHR. Course development was completed in December 2018 and has been released in July 2019.

1.5   The Bank's website is the main communication pathway for the public disclosure of Bank documents. The website recorded over 16 million views (Figure 1 below). The 'document' section is the placeholder for operational policies, strategies and project-related information. Over 2 million views were recorded for the document section and nearly 800.000 documents[4] were downloaded.

Figure 1: Selected data of visitors to the Bank's website

| 16,459,811 (2018) | 16,255,663 (2017) | 2,053,768 (2018) | 1,715,343 (2017) | 789,339 (2018) | 620,213 (2017) | 2231 (2018) | 1966 (2017) |

Total number of visitors/views   Views to the document section   Downloaded/views documents   New documents added

1.6   Figure 2 shows that project-related procurement documents is the most sought-after document type with 217,318 views/downloads in 2018, down from 223,746 in 2017. The downloads/views of publications in the document section rose to 163,892 in 2018 from 152,561 in 2017, an increase of 11,331 documents. Other noted increases in downloads/views were evaluation reports (32,449 downloads/views in 2018), an increase of 5,793 from 26,656 downloads/views in 2017.

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[4] These numbers exclude visitors and downloads from the knowledge section of the Bank's website, News, job descriptions and statistical data.

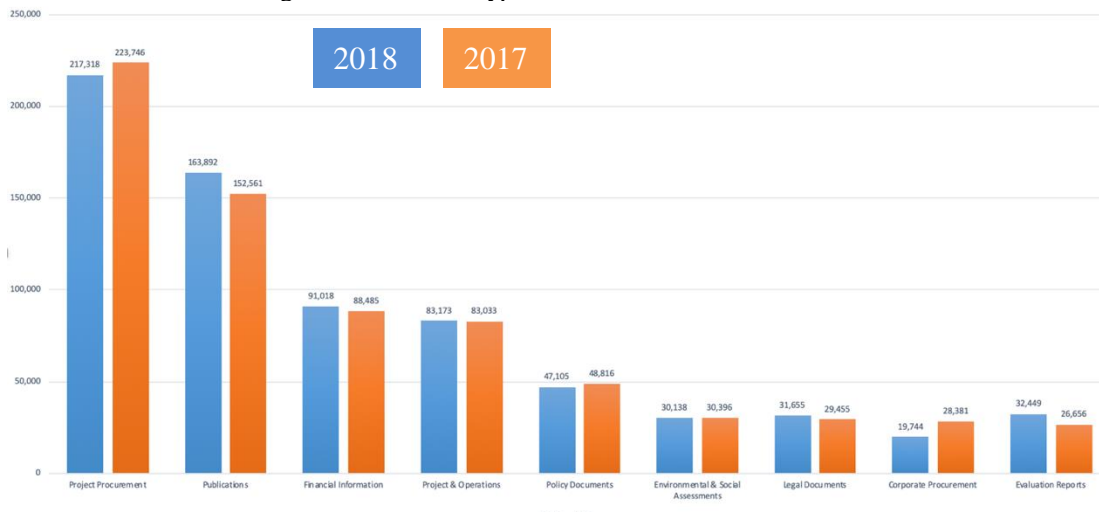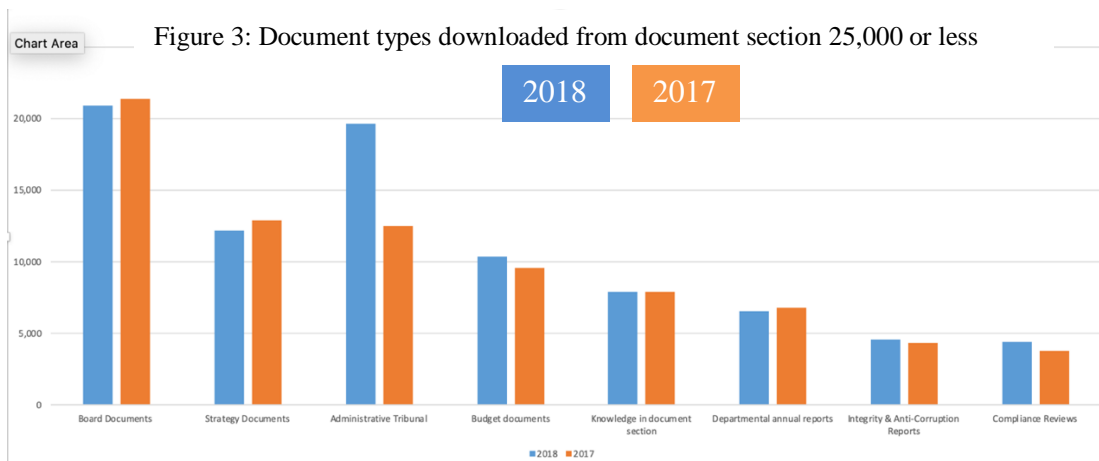Figure 2: Document types downloaded from document section 25,000 or more

Figure 3 presents the number of downloads at less than 25,000. An apparent strong interest of visitors is noted for the administrative tribunal's documents (12,533 downloads/views in 2017 rising to 19,620 in 2018).

Figure 3: Document types downloaded from document section 25,000 or less

1.7   The Bank's website offers visitors different types of information/content grouped under different navigation labels. Besides the navigation label 'document', the knowledge navigation label provides access to economic/statistical data and economic publications. Documents in the knowledge section were viewed 199,842 times in 2018[5].

2.   Disclosure of Board approved documents

2.1   In coordination with the Board documents distribution section (PSEG1) and the department for delivery, performance management and results (SNDR) responsible for the project data portal, the disclosure unit assessed and processed the following operational documents for disclosure.

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[5] No data was available for 2017.

| **66**	**179**	**51**
Strategies and Policies	**Project Appraisal Reports**	**Project Completion Reports**

2.2   Operational strategies, policies and appraisal documents can be disclosed to the public at the same time they are circulated to the Boards for consideration.[6] Disclosure prior to Board approval did not happen in 2018 for a variety of reasons: Team leaders are responsible for obtaining written consent from the country concerned prior to simultaneous disclosure. This process is usually, if at all, initiated shortly before the document is discussed at the Board presentation. When the outcome of the Board discussion on a proposal is not yet established, there can be some hesitancy in disclosing drafts to the public as such actions might create the wrong impression that a document has been approved as circulated.
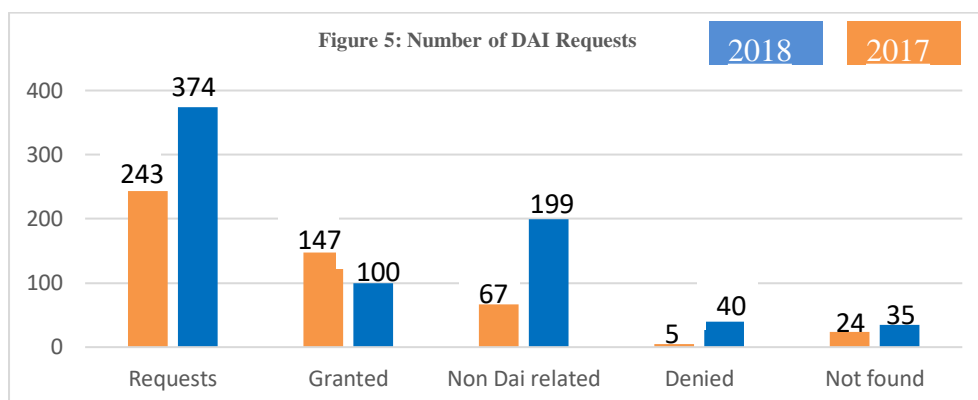
3.   Requests for information

3.1   The following section presents data on external requests received through the online DAI inquiry form on the Bank's website. The information in the graph below represents the number of external requests received since the DAI policy was implemented in the last quarter of 2013.

Figure 4: Overview of DAI Requests 2014-2018
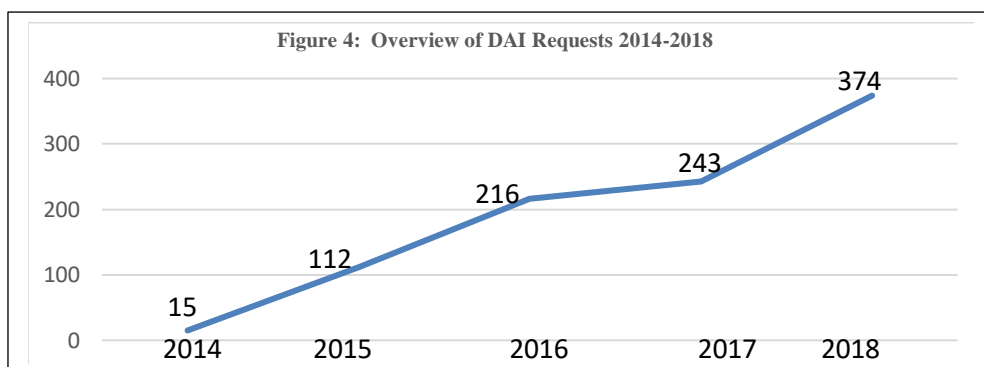
The gradual rise in information requests received may be attributed to the following factors: recognition of the Bank's position as a premier provider of development information; a growing number of people with access to the internet; the redesign and positioning of an 'information request' button on selected web pages; and the inability of visitors to the Bank website to find the information they are looking for.

3.2   In 2018, the DAI team handled 374 information requests compared to 243 information requests in 2017. The information requests received by categories are presented in figure 5:

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[6] Environmental and safeguard assessments are simultaneously disclosed with the public, prior to Board review, according to the provision in the Bank's safeguards policy. The EISA documents are published by the environment safeguards division.

Figure 5: Number of DAI Requests — 2018 / 2017

	Requests	Granted	Non Dai related	Denied	Not found
2017	243	147	67	5	24
2018	374	100	199	40	35

3.3   Requests for documents already present on the Bank's website are classified as non-DAI related. It means that the seeker of information was not able to find what was sought for. A large proportion of these non-DAI questions relate to job, internship and training opportunities. Based on the relatively high number of non-DAI related requests, discussions were initiated with the Bank's web team and the chief economist office to improve the navigation and the categories for better accessibility to the Bank's knowledge products and information. The improved website version release has occurred in September 2019 and improvements are ongoing.

3.4   The disclosure policy establishes a strict timeline of 20 days to respond to external requests for information. In most situations, the disclosure unit responded in a timely manner to external information requests. One external request for information exceeded the 20-day response time as the requestor was looking for information from specific financial sections of the Bank's various annual reports (1998-2002). An extension notification was communicated to the requestor, with an explanation that a response to that specific request would require additional working days. In the table below, we present examples of information requests received in 2018.

Table 2: Information Request, Affiliation, Country and Outcome

Request	Affiliation	Country	Response
Appraisal report of a project approved in 2005, the PCR of 2010	Research	Cameroon	Provided
Full text disclosure of ESIA	NGO	Benin	Provided
Terms and conditions for a Bank bond issuance	Media	Hongkong	Denied
Approval to incorporate Bank publications in 3rd party website	Media	United Kingdom	PCER provided relevant links to access the documents
Guidance document for mainstreaming climate change in CSPs and RISPs	NGO	Cape Verde	After consultation with the Task Manager, an outline of the documents was shared.
2001 report from the Bank on a globalized market	Academia	Senegal	Provided
PAR water supply and sanitation 2015	NGO	South Africa	Provided
African Integrity Fund	Government	Norway	Provided
Procurement EOI	Consultant	France	Provided
Renewable energy projects the Bank funded	NGO	Kenya	Provided instructions on how to select the information.

3.5   The geographical map below shows the countries where information requests originated. The highest number of information requests came from regional member countries: Nigeria (50), Cote d'Ivoire (29) Cameroun (20) Kenya (20), Chad 16, Ethiopia (16) and South Africa (16). With the exception of South America, the Bank receives information requests from all over the world.

Figure 6: DAI requests from countries

3.6   The DAI information request form also gathers data about users' affiliation. Academic institutions account for the largest proportion of information requests. We also noted the interest of private sector and consultants in procurement and consultancy documents. As the recording of affiliation and country is a voluntary checkbox on the form, caution needs to be exercised in interpreting this data.

Table 3: Number of information requests per affiliation

Affiliation	Number of documents
Academia	113
Private sector	68
Consultants	64
NGO/CSO	64
MDB/IFI	14
Government	9
Media	4
Not specified/other	30

4.   Challenges in the implementation of the disclosure and access to information policy

4.1   The simultaneous disclosure of certain Bank documents such as PCRs and PARs remains a challenge. Consultations with team leaders revealed that simultaneous disclosure is hindered by: the timeline of seeking a written consent from the country concerned; the short time gap between circulating the document to the Board and the Board discussion; and a reluctance to release draft appraisal reports, strategies and policies to the public prior to Board discussions. Work is scheduled to improve the business process, including a feature that triggers the team leader to obtain consent for early disclosure.

4.2   Some task managers also expressed the concern that the whole purpose of simultaneous disclosure is not being met, because it is not disclosure for disclosure's sake, but disclosure to receive and incorporate feedback to improve the project or take into account civil society concerns. The main

reasoning is that project documents are often behind schedule and therefore it is not feasible to add more processes to the task manager's list. They suggest a community manager's role and a review of the project cycle to include these activities in a way that benefit the project and the process.

4.3   A majority of the information requests received by the disclosure unit are not DAI-related. The information is available on the Bank's website, but users encounter difficulties finding the documents. Accessibilty can be improved through designing a more intuitive interface and organizing awareness campaigns in regional member countries. To this end, the disclosure unit has connected with the civil society and community engagement division to coordinate outreach activities in regional member countries.

CONCLUSIONS

Lessons learned and recommendations

Disclosure and access to information: the DAI policy governs the Bank Group's information and document sharing with external stakeholders. The policy sought to promote improved access and engagement of stakeholders on the Bank Group's operations, and requires an evaluation within 5 years of its implementation. This review is planned for the 4th quarter of 2020. Based on lessons learned, it is recommended that the evaluation should, among others, address the following aspects:

- The policy's effectiveness with regard to the Bank's commitment to transparency, accountability, and stakeholder participation[7];
- Compare and update the Bank's disclosure policy in line with the revised access to information policies of other MDBs;
- Access and reusability expectations of Bank information by internal and external stakeholders, in particular the perceived barriers by internal stakeholders to early disclosure; and the accessibility and reuseability of Bank information by external stakeholders.

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7 The proposed DAI policy review must be aligned with outreach activities in the region as set out in the new communications and outreach strategy (PCER). Consultation rounds with stakeholders must be done in collaboration and with the assistance of the Bank's civil society and social innovation division (AHGC), as well as with the Bank's governance unit.

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