

IAMnet Good Practice Note: Disclosure and Outreach

NOVEMBER 2018

Since the 1992 United Nations Conference on Environment and Development in Rio de Janeiro, commonly known as the Earth Summit, International Financial Institutions (IFIs) have established Independent Accountability Mechanism (IAMs) as part of their governance structures. The Independent Accountability Mechanisms Network (IAMnet) seeks to identify and foster means for collaboration, cooperation and knowledge sharing amongst these institutions.

BACKGROUND

The goal of the working group on good practice (WG-GP) is to systematize knowledge sharing and documentation of good practice among IAMnet members. The group decided upon the preparation of a “**Good Practice Notes**” series that would elaborate on good practices among the mechanisms in the network. The objectives of these notes would be to:

- Facilitate learning amongst IAMs;
- Provide examples of good practice which IAMs can apply to their work; and
- Support improvements in practice both at the level of IAMs and in terms of the enabling environmental provided for IAMs by their respective IFIs.

The WG GP envisions that the production of the Good Practice Notes should be demand driven, based on the needs of individual IAMs to call upon insight and guidance from their peer organizations in a way that reflects the dynamic nature of this work. The notes would be drafted in such a way as to provide examples of existing and emerging good practice, not a definitive or binding best practice.

As used in this note a ‘good practice’ is an approach that IAMnet members view as supportive of the core principles of citizen-driven accountability. An ‘**established good practice**’ is positive practice or approach that was identified in five or more IAMs. An ‘**emerging good practice**’ is a positive practice or approach one which is being applied by less than five IAMs.

SCOPE & METHODOLOGY

This good practice note deals with two topics related to access to IAMs, disclosure and outreach.

As used here, **disclosure**, is the extent to which an IFI or its client makes available information that is required for project affected people to access an IAM. **Outreach** relates to the ways in which an IAM proactively provides information to stakeholders about its mandate.

This note was prepared on the basis of a review of IAM procedure and survey data collected from 11 IAMs. Additional qualitative information on good practices in this field was gathered from interviews with practitioners.

CONCEPTUAL FRAMEWORK: WHY ARE DISCLOSURE AND OUTREACH IMPORTANT

IAMs provide recourse for citizens and communities adversely affected by IFI-funded project by giving project affected people an opportunity to complain. Accessibility is important to the effectiveness of an IAM. An IAM is not accessible if affected people either do not know it exists, or are unable to access its services.¹

¹ “*Citizen-driven Accountability for Sustainable Development: Giving Affected People a Greater Voice—20 Years On*”, p.9.

Knowledge of the IAM and its mandate are minimum requirements for accessibility. This includes knowledge that:

- a) an IFI is providing financial support for a project;
- b) the IFI has an IAM that accepts complaints from project affected people.

IFI DISCLOSURE REQUIREMENTS

ESTABLISHED GOOD PRACTICE

- IFIs have policies governing disclosure of project information;
- IFI disclosure covers all business activities with potential E&S impacts;
- Disclosure of investments activities is generally made via the IFI website prior to the decision to invest;
- Disclosure includes:
 - » Project name;
 - » Client name;
 - » Project location (country and specific location);
 - » Summary of potential E&S impacts and mitigation measures;
 - » Client E&S assessment documentation (where present);
 - » IAM mandate and contact details.
- IFI discloses links to IAM in core navigation on IFI website
- Investment agreements include reference to the IAM and its mandate.

EMERGING GOOD PRACTICE

- IFI discloses project information in relevant languages other than English

CLIENT DISCLOSURE REQUIREMENTS

ESTABLISHED GOOD PRACTICE

- Clients required to disclose project information on client website.
- Disclosure includes:
 - » Project name;
 - » Project location (country and specific location);
 - » Involvement of IFIs;
 - » E&S assessment documentation (where present);
 - » Information re. project level grievance mechanism.

EMERGING GOOD PRACTICE

- Client required to disclose information in a manner that is accessible to local populations (e.g. in local languages, at the project site).
- Client required to disclose information re. the financing IFI's IAM, its mandate and contact details.

OUTREACH

ESTABLISHED GOOD PRACTICE

- IAMs have a mandate to conduct outreach with the objective of promoting awareness of the mechanism among a range of stakeholders.
- IAMs allocate funds to support outreach activities.
- IAMs provide information about their mandate to project-affected communities both upon request and as part of programmed outreach activities.
- IAMs collaborate in the organization of outreach activities.

EMERGING GOOD PRACTICE

- IAMs conduct outreach to affected communities at project-sites as necessary to ensure accessibility.
- IAMs disclose information in a manner that is accessible to local populations (e.g. in local languages).

GOOD PRACTICE EXAMPLE: OPIC DISCLOSURE REQUIREMENTS

This good practice example was shared by OPIC's Office of Accountability (OA) regarding project-level disclosures to affected communities about access to the IAM.

One of the requirements for OPIC financed projects is that both OPIC clients and project-affected parties (e.g. local communities, project workers, other relevant stakeholders, etc.) are made aware of the access they have to OPIC's Office of Accountability ("OA"). For all A-level and Special Consideration (significant social impact in terms of labor rights) projects passed by the Board, OPIC informs the client that they must inform affected communities about the existence of the Office of Accountability and its work.

Provision for this is included in OPIC's financial procedures manual. In practice, loan officers share with the client a template letter (that was prepared by OA) with information about OA and weblinks to two guides: a guide for OPIC clients and a guide for communities. The weblinks provide more complete information on the OA, the services it provides, and details on how to contact the OA to request service.

To ensure the availability of OA's services is made known to project-affected parties, clients are asked to pass on the "guide for communities" to project-affected parties and relevant stakeholders in the country of operation. The client can determine the actual approach used to pass on this information based on what makes most sense locally (including format and language). Within 30 days of receiving the guides, the client will need to provide evidence back to OPIC that it has notified affected communities. Failure to provide such evidence to OPIC a timely manner may result in the OA making an outreach site visit to relevant stakeholders. Contacts are provided for the loan officer and Director of the OA should the client have any questions.

To date, the template has been sent in over 10 instances and generated timely feedback from clients that sensitization about OA to affected communities has taken place.

GOOD PRACTICE EXAMPLE: ADB DISCLOSURE REQUIREMENTS

ADB's Accountability Mechanism Policy (para. 211) provides for ADB staff to work as conduits to disseminate information about the accountability mechanism at the project level. Staff, working with the borrower are to "disseminate information early in the project cycle about the Accountability Mechanism and its availability as a recourse in case other mechanisms for dealing with harmful project effects are not successful." The Policy acknowledges that the "intensity and format of this activity will vary with the nature of the project" with a focus on "projects with a high degree of safeguard risks, such as projects with heavy resettlement." It is envisaged that "pamphlets in national or official languages, community notice boards, audiovisual materials, or other appropriate and effective means will be used to inform people."