



**BANQUE OUEST AFRICAINE
DE DEVELOPEMNT**

MANUAL OF POLICY DIFFUSION AND ACCESS TO INFORMATION

APRIL 2014

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List of acronyms

BCEAO: Central Bank of West Africa States

BOAD: West African Development Bank

CSFC: Fraud and Corruption Monitoring Committee

ESIA: Impact assessment environmental and Social

AR: Appraisal report

UEMOA: Union monetary West African economic and

MPPCF: Manual of policy and Procedures for the prevention and fight against
Corruption and fraud

I. INTRODUCTION

The West African Development Bank (BOAD) considers that the dissemination of information on its operations promotes openness and transparency, which are essential for its mission as defined in the [Statute of the Bank](#).

The development of the dissemination policy information by BOAD responds in order to satisfy the requirement for transparency, the needs of the shareholders of the Bank and other stakeholders, as well as to be consistent with international best practices. It shows that transparency, accountability and the exchange of information are essential for the response of the BOAD to its clients, enhancing the effectiveness of development and, more generally, the reduction of poverty. Also, the Bank estimates that with more transparency, parties are able to track the results of the operations of the Bank and, therefore, to help ensure that the benefits reach target populations.

This policy gives the Bank a conducive framework for the dissemination of information on policies, strategies, procedures, directives and the main decisions taken during the preparation and implementation of projects.

The Bank is aware that as a beneficiary of funds and public and private trust the transparency of operations is an essential element for fulfilling the obligation to account. Maximize the dissemination and access to information will increase the support of the public and partners in the mission of the Bank and will improve the effectiveness of development of its operations. Also, this policy allows for external agencies to better monitor the use of public funds and the projects of the Bank.

II. OBJECTIVES OF THE POLICY

The policy aims to enhance transparency and accountability by BOAD.

III. GUIDING PRINCIPLES

3.1. Maximum dissemination

The policy is based on the principle of optimal distribution. BOAD is aware that efficiency in engagement with key stakeholders is essential to accomplish its mission of Development Bank. Greater responsibility based on the dissemination of information will enhance the credibility and effectiveness of the Bank, as well as its attractiveness as a partner.

3.2. Increased access to information

By implementing this policy, the Bank will further inform States, capitalizing on its sub regional character, and its presence in the field, and by using existing communication channels in its resident Missions to the maximum.

3.3. Limited list of exceptions

As a general rule, restrictions on the public release of categories of information of the Bank will be limited. These restrictions are indicated on the exceptions list.

3.4. Consultative approach

The Bank will work actively with its stakeholders and will make the dissemination of information to them an obligation. The dissemination of information will be, in principle, systematically integrated into all operations of the Bank.

3.5. Proactive dissemination

The Bank will broadcast, proactively, the documents which may be made public, through various channels of communication. The Bank is aware that the effectiveness and sustainability of its projects and programs in the Member States will be strengthened if it communicates proactively, information to populations affected by its operations. In accordance with this policy, the Bank will increase, over time, the volume of information available to the public, especially those that relate to running projects and the

decisions of the Governing Council (see types of information to disseminate proactively, part IV).

3.6. Right of appeal

The policy shall provide, for people with legitimate concerns about the level of dissemination of information by the Bank, legal remedies against decisions of refusal of access to information, accompanied by a specific deadline for response in the context of an appeal mechanism.

3.7. Backup of the deliberative process

The policy will establish a balance between the need to guarantee to the public maximum access to information held by the Bank and the requirement for it to respect the confidentiality, in particular, during the deliberations.

3.8. Review clause

The policy will be monitored and reviewed to ensure the application of best practices and to ensure that policy remains relevant for stakeholders compared the evolution of practices in the field.

IV. TYPES OF INFORMATION TO DISSEMINATE PROACTIVELY

BOAD endeavors:

- to maximize the dissemination of information held by the Bank and limit the list of exceptions, to demonstrate the willingness of the Bank to make public this information;
- to facilitate access to information about the operations of the Bank and its sharing with a broad spectrum of stakeholders;
- to promote good governance, transparency and accountability;
- to improve the effectiveness of the implementation and better coordinate the process of dissemination of information;
- to better publicize the mission, strategies and activities of the Bank;
- to support the consultative process of the Bank in the context of its activities and the participation of relevant stakeholders in the implementation of the projects it finances.

Thus, the types of information to disseminate proactively are, among others:

- informations related to operations as:
 - Policy documents, procedures, guidelines for operations;
 - sheets to projects;
 - summaries of evaluation of project and operations evaluation reports;
 - the summaries of reports on the State of progress of the projects;
 - economic and sector studies;
 - documents of the poverty reduction strategy;
- Environmental and social assessments in the case:
 - environmental and social impact assessment (ESIA).
 - summaries of ESIA
 - management environmental and social plans;
 - environmental audits and other environmental analyses;
 - strategic and regional environmental assessments.
 - the information on the acquisition of goods and services such as the award of contracts and disbursements.
- the financial information of the Bank, including:
 - financial policy documents;
 - financial statements and financial data;
 - the situation of banking operations;
 - Special funds;
- The information relating to the economy and research, as:
 - the development in UEMOA reports;
 - the annual report of the Bank;
 - reports on competitiveness in UEMOA;
 - economic perspectives in UEMOA.
- Legal information, such as:
 - the Statute of the Bank;
 - the code of ethics;
 - the policy manual of prevention and fight against corruption and fraud;

- Policy investigation and sanctions;
- whistleblower protection policy
- the grievance procedure;
- the policy manual and procedures for verification of compliance.

V. LIST OF EXCEPTIONS

While this policy made the effort to maximize the dissemination of information, the effective functioning of the Bank necessarily require a deviation from a complete opening to protect its relations with its stakeholders and partners. The categories of information which will be subject to public dissemination restrictions are described below.

5.1. Deliberative information and incomplete reports

Information of a deliberative nature will include all those classified "restricted", namely: the information provided by the messaging system electronic bank and classified in the system of management of the Bank, notes or memoranda documents, statistical analysis intended to inform the decision-making process of the Bank and the internal and external audit reports.

During the decision-making process, the Bank operates in a participative way, consults stakeholders and takes into account their contributions. It is as well as documents exchanged with stakeholders and clients on questions of common interest relating to the decision-making process, to internal deliberative processes of the Bank, will not be disseminated. Although the Bank will be able to make public the results, agreements and decisions emanating from its deliberative processes, it must preserve the integrity of the deliberative process, to promote and protect freedom of speech and the frankness which characterized the exchange of ideas between the Institution, its members and its partners as any other financial institution. Therefore, the following information will not be broadcasted:

- all of the correspondence, draft report or other documents prepared for the deliberations of the Bank or exchanged in the same discussions with Member States or other entities cooperating with the Bank;
- all correspondence, draft report or other documents prepared for own internal deliberations of the Bank or exchanged during the same discussions, including documents relating to the deliberations of the Council of Ministers, the Board of Directors, internal working groups;
- prepared statistics or only analyses to guide;
- the internal decision-making processes of the Bank (such as the solvency of the States, the credit assessments and risk analyses);
- audit reports prepared by the internal and external audit services.

5.2. *Communications* in which intervene the President of the Bank and the Board of Directors

Communications in which occurs the President of the Bank are:

- communications between the President of the Bank and the resident missions or other entities, except for cases where the President, the resident missions and other entities, as appropriate, authorized dissemination;
- communications between the directors and the President of the Bank, except for cases where administrators or the Board of Directors and the President authorized the release;
- minutes of the deliberative processes of the Council, including statements, documents and reports of the Board are protected by confidentiality, unless the statutes applicable to the BOAD or the Board of Directors authorize their dissemination.

5.3. Issues legal, disciplinary or related investigations

The Bank will not access to information covered by lawyer-client privilege, is, inter alia, communications issued and/or received by the legal advisers within and outside the Bank, and other legal advisors.

The Bank won't provide access to disciplinary or information related to investigations that are produced internally or on its behalf, with the exception of the extracts obtained for interested parties at the discretion of the organizational unit responsible for the integrity and the fight against corruption from the Bank.

The Bank won't provide access to information that the source should be protected, just as it will reveal not the identity of whistle-blowers or individuals cooperating with the Bank regarding the investigation of cases of fraud, corruption or misconduct in the activities it funds, including the information subject to protection and remedies granted to whistleblowers suffering retaliation. To encourage whistleblowing and ensure the safety of whistleblowers, the Bank will maintain the confidentiality of such information unless denunciation of reprehensible practices and complaints policy does allow the dissemination.

The Bank disclose no information about an investigation by executives of organizational units responsible investigations and sanctions, such information to be disseminated or published in accordance with the rules of the [manual of policy and Procedures for preventing and Combating Corruption and the fraud](#) (MPPCF), whistleblower [protection policy, Procedures, investigations and sanctions in the fight against corruption and fraud](#) in force.

5.4. Information provided in confidence by Member States, entities of the private sector or third

While respecting the terms of the commitments of the Bank towards developers, under confidentiality agreements, protection or broadcast information, publication following requirements will apply to the entrance for private-sector investment projects:

- the publication of projects with non-sensitive key information briefing notes, at the same time that the distribution of project Appraisal Report ("AR") to the Board ('IR' however is a limited distribution document that cannot be made available to the public);

- the publication of the study reports environmental and social impact of projects classified in categories A and B - which must be in accordance with the environmental safeguard system of the Bank.

For private running projects: the Bank will update certain information contained in the note of synthesis (e.g. signature, date of investment, etc.) to reflect the status of the implementation.

The Bank will not access provide information received from a Member State, an institution or any third party who has indicated in the terms of a confidentiality agreement, protection or non-disclosure or in writing that such information should not be disclosed.

The Bank will not make nor public documents containing proprietary information, such as trade secrets or price information, without the express permission of the owner of such information. Documents held by the Bank and whose copyright is shared with other parties may be made available for consultation, but their reproduction or distribution may be limited to comply with copyright and intellectual property rights.

The Bank won't provide access to financial, commercial information or exclusive nature of private entities it has received as part of the analysis or the negotiation of loans, unless private subject entities give permission to disclose such information.

5.5. Internal administrative information

The Bank will not access provide information relating to the administrative institutional issues of the Bank, including those related to institutional expenditures and the budget.

The bid evaluation process will be confidential until the publication of the award of the contract, in accordance with the rules of procedure of the Bank for the procurement of goods and works, as well as the rules of procedure of the Bank for the use of consultants.

5.6. Financial information

5.6.1. Not accessible to the public financial information

Will the Bank not provide access to financial information below:

- estimates of future borrowings of BOAD, details in terms of slices of payment, profiles of cashing and periods of payment of contributors, financial forecasts and credit assessments, as well as data on investment, hedging, borrowing, cash management operations generated by or for cash transactions for its own account, as well as on behalf of the entities of the Bank and other parties;
- documents, analyses, correspondence or other information used or produced to perform financial and budgetary operations or to support the preparation of internal and external financial reporting;
- the details of every operation carried out under loans and trust funds, information concerning the amount of borrowers in the short-term or measures taken before a loan is declared unproductive;
- banking information or on the billing of the entities of the Institution, Member States, clients, donors, recipients or providers of goods and works and services providers.

5.6.2. Conflicts of interest and publication of financial interests

The management of conflicts of interest in the BOAD is governed by several texts which: i) [the statutes of the BOAD](#). II) [code of business conduct and ethics governing the President and Vice President](#); (iii) the [staff regulations](#); IV) the [staff rules](#); v) [Regulation establishing the values of the BOAD](#); VI) [code of ethics](#) governing the behaviour of the staff; (VII) the [Charter of the](#)

[representative of the BOAD in the boards of Directors of banks](#)).

In accordance with the provisions of those texts, the financial statements of the Bank indicated the remuneration of the primary responsibility of the Bank, in accordance with the requirements of the IFRS international accounting standards adopted by the Bank since fiscal year 2010. Those States are published not only in the official Bulletin of the Union and, where appropriate, with the authorities or in the newsletters of the financial markets where the Bank operates (Article 48, paragraph 2 of the Statute of the BOAD) but also and above all on the website of the Bank. In addition, the financial statements are communicated to all partners at their request. The financial statements are published both in English and in French to enable their farms by a wide range of investors including.

The management of the financial interests of the various actors as well as conflicts of interest occurs at different levels. For administrators, the Charter of the directors to the Board of Directors of the BOAD, under development, provides a provision on the duty of declaration of financial interests and potential conflicts of interest. The President of the Board of Directors will take the necessary decisions in the event of identified incompatibilities and advise constituents to find appropriate solutions. For senior management, the provisions of the statutes (article 29) and the Code of conduct and ethics approved by the Council of Ministers of WAEMU/UEMOA regulate the issue of conflicts of interest and financial interest in what concerns the President of the Bank and the Vice-president. In addition to the statutes of the Bank (article 30) and the various texts governing the staff (the staff regulations, staff rules), the question of financial interests and conflicts of interest relating to staff is treated in reference to the regulation establishing the values of BOAD (professionalism, integrity, loyalty, team spirit and discipline) and especially to the code of ethics applicable to staff BOAD which each staff member is solemnly committed to respect the relevant provisions (Point 3.5). An Ethics Committee ensures the strict application of the provisions of the code of

ethics by all the staff. For this purpose it collects and processes all denunciations of behaviors inconsistent with the provisions of the code of ethics.

Conflicts of interest arising from the personal financial interests of stakeholders in the Bank (directors, senior management and staff of the Bank) requiring a publication include: i) the holding of securities holdings in a company financed by the Bank; II) belonging to the team of management of a company seeking financing from BOAD; (iii) the existence of direct family links with a promoter BOAD-funded). More general, it is of all cases in which the actors of the Bank (directors, senior management and staff of the Bank) can be influenced in their judgments and assessments taking into account their interests personal financial or other.

The [Charter of administrators](#) within the Board of Directors of the Bank (in preparation), the [code of ethics](#) applicable to the staff of the BOAD and [code of ethics and ethics applicable to the primary responsibility](#) of the BOAD include repositories for different actors in the field definition inconsistencies, conflicts of interest and insider trading. The obligation of publication of financial statements and the requirements of the rating of the Bank by an international rating agency make mandatory the dissemination of all personal financial interests including those which are prohibited.

In all cases, annual reporting of financial self-interest is as follows: i) the primary responsibility of the Bank (senior management) communicate any personal financial interests to the President of the Council of Ministers; (ii) staff of the Bank made its statements of personal financial interests to the ethics or the human resources Committee; (iii) the case of administrators will be set by the Charter of administrators since its adoption.

Levels of compulsory broadcast are function of the concerned actor and the arrangements put in place at each level of responsibility are different. In the event of discovery of a cover-up of personal financial interest on the part of

an actor, the applicable penalties are implemented.

5.7. Safety and security

The Bank will not provide access to:

- information whose dissemination would undermine security or to the safety of employees or members of their families, suppliers and consultants, other partners and individuals, and the assets of the Bank;
- information on the provisions of transport relating to the assets and documents of the Bank, the transportation of the personal effects of members of his staff concerned, of the President and the Vice-president of the Bank, members of the Board of Directors;
- information whose dissemination is likely to endanger the life, health or security of staff, the President or the Vice-president of the Bank, members of the Board of Directors.

5.8. Personal informations

The guiding principles of the Bank staff employment require that the Institution establishes and maintains appropriate safeguards to ensure the respect for the privacy of staff members and protects the privacy of the personal information that it holds about them. The Bank will not access provide the following information, unless this is expressly permitted by the staff regulations and the staff rules:

- privacy, in particular, the personal files of the staff as well as health information and personal communications (including emails which are not classified as "public" in accordance with the classification system for the Bank) of the President and the Vice-president of the Bank, any other head of the Bank, staff, suppliers, consultants and partners.
- the information relating to the process of nomination and selection of staff;
- the information relating to the minutes of the internal mechanisms of settlement of disputes of the Bank;

- the information relating to investigations into allegations of misconduct of employees and conflicts between staff members.

VI. PREROGATIVE OF THE BANK IN THE DISSEMINATION OR RETENTION OF INFORMATION

The Bank reserves the right to disseminate the information on the list of exceptions in exceptional situations.

This prerogative will be exercised by the President of the Bank in exceptional circumstances, on the basis of the general rule that the overall benefits of this broadcast will be greater than the potential harm.

As a general rule, the Bank assumes that the dissemination and maximum access to information are, inherently, profitable, so restrictions on the dissemination to the public of categories of information will be limited.

The Bank will refrain from disseminating information only if it considers that such dissemination would result in material, financial or reputational harm to the Institution, its senior management or its staff, and could affect the interests protected by the exceptions to this policy or the ability of the Bank to fulfill its development mandate.

The early dissemination of information by the head of classification of such a document will require various levels of approval, as follows:

- the proposal for the early release of any other document on the negative list to the President of the Bank by the Committee dissemination of information appointed by Decision of the President of the Bank;
- the authorisation, by the President of the Bank of the early dissemination of relevant documents or records;
- the written consent of the party concerned in the early dissemination of information provided in confidence to the Bank.

In addition, the Bank has the right to broadcast certain administrative information, deliberative and financial nature on the negative list, if it considers that the overall benefits of such a broadcast exceed potential nuisances. This prerogative will be exercised by:

- the President of the Bank, on the proposal of the Committee on information dissemination;
- a consent in writing of the Member State or the third party for what concerns the information provided by the Member State or a third party on a confidential basis.

The Bank also reserves the right not to disseminate information they would otherwise have made public in exceptional circumstances. This prerogative will be exercised:

- on a proposal from the Committee on dissemination of information by the President of the Bank for the documents or records concerned;
- on the consent in writing of the Member State or such third party with regard to the information provided by the Member State or a third party.

VII.THE POLICY IMPLEMENTING

7.1. Decisive factors of success

For policy is bearing fruit, the dissemination of information must remain with each Member of staff. Should systematically integrate the dissemination of information in all the Bank's operations. In other words, all members of staff must be kept in their daily operations, to the dissemination of information.

The development of a guide to dissemination of information is relevant for the implementation of this policy. The collaboration between the organizational units, a greater reliance on partnerships, capacity-building, effective systems of Technology Information (TI) and the allocation of resources to the needs will be also essential to the success of the implementation of this policy. In

addition, it will take place to align on policies, strategies, related administrative rules, procedures and the existing directives of the Bank.

The success of the policy also depend on the effectiveness of the Bank to disseminate information to its stakeholders, in particular Member States. The Bank will use sub regional character, and its decentralized structure, its partnerships with the national media and the development partners, local information channels to regularly reach its primary audience. In this regard, the Bank will use to facilitate the dissemination of information among the Member States in the implementation of this policy, its resident missions. In particular, the Bank will explore, through its missions resident, approaches and channels of communication to disseminate information effectively, including in collaboration with other partners in development, civil society organizations and the Member States. This will include, inter alia: the Organization of information sessions with the press, to support the creation of information relays, linkages with relevant web sites/pages, and the promotion of population information/awareness-raising activities.

The Bank mandate to heads of mission resident to enhance the brand image of the Bank on the covered area and in the world, with the deployment of an adequate program of communication designed to inform the media, the business community and civil society on the activities of the Institution in each State, to improve the visibility and image of the Bank and to keep relevant stakeholders informed

7.2 Institutional arrangements

The expansion of the access to information will require an institutional device providing that all departments and units take responsibility and are held accountable for the implementation of the policy.

The organizational unit responsible for the communication and information plays a leading role in implementing the policy of dissemination and accessibility of information. His responsibilities include, inter alia:

- follow the dissemination of documents in accordance with the policy;
- integrate and popularize the obligation of dissemination of information;
- ensure respect for the policy.
- reporting on the implementation of the policy;
- receive and process requests for information dissemination;
- manage the library and other services responsible to generate and present to the public the work of the Bank;
- consult the President of the Bank on issues related to the dissemination of documents;
- serve as secretariat to the Committee on information dissemination.

In the exercise of these responsibilities, the organizational unit responsible for the communication and information will be assisted by other departments of the Bank, in particular the following:

- UO responsible for external relations: she will be responsible for giving guidance and support to the selection and optimal use of the instruments of communication to implement the policy, in accordance with the communication strategy of the Bank;
- UO responsible for the security of the information system will give guidance on issues relating to the security of the information;
- charged UO of Legal Affairs will provide consulting services and assistance for the interpretation of the policy in connection with its application;
- the public information Centre will receive organizational units to disseminate documents and submit them to missions resident for purposes of wider dissemination;
- the resident missions will play an essential role in the dialogue on policies, knowledge management and the dissemination of

information, and will serve as a first point of contact in the Member States.

7.3. Information dissemination Committee

This policy provides for the establishment of a Committee on the dissemination of information appointed by the President of the Bank. The organizational unit responsible for the Communication and information will house the secretariat of the Committee.

The members of the Committee of information dissemination are:

- the Secretary general, who will assume the Presidency of the Committee;
- the directors of the departments responsible for operations, finance, and accounting, strategy; studies and cooperation
- the Director of the OU responsible for communication;
- the Director of the responsible Finance OU;
- the Director of the OU responsible for auditing;
- the Director of the charged UO for Legal Affairs;
- the Director of the OU for the environment;
- the Director of the OU information system security.

Release Committee information will be major tasks of:

- handling legitimate appeals concerning access to information and determine the criteria of legitimacy of such appeals;
- issue procedural provisions for the implementation of the requests for information;
- advise the Presidency of the Bank and staff on the implementation of the policy, including giving guidance on the classification, declassification and information archiving;
- determine the terms of pricing for the supply of printed copies of the documents in response to requests;

- exercise the prerogatives of the Bank for the early release of certain documents on the negative list;
- make recommendations to the President of the Bank in relation to the requests for exemption under the terms of the policy.

Release Committee information will, moreover, empowered to recommend to the President of the Bank rejection any unreasonable, multiple and general information requests application which would require the Bank it develops and compiles information or data that are not already available.

7.4. Response to requests for information

The Bank will endeavor to ensure access to the information to be disseminated, including on its website, its computer system or by the resident missions and will make them available, upon request.

Applications can be done electronically, by mail or by fax, and will specify the type of information you want, and if possible, the title and the date of production of the document. The Bank will make public the channels for submission of requests for information. He will acknowledge receipt of the written requests within a period of five (5) working days and will provide a more complete answer within twenty (20) working days. However, more time will be required in the case of special circumstances and complex queries or queries requiring a review or a consultation of the departments or units of the Bank, of the dissemination of information or the Governing Body Committee.

The staff of the Bank did not investigate identity or intentions of a person requesting access to a document of the Institution, unless such an inquiry is necessary to enable the Bank to judge if there is no obstacle to the exception list to make the document public. In any case, the Bank will have the possibility to seek the identity of the applicant or the framework in which the information is requested by this one.

7.5. Appeal mechanism

The applicant may complain that the Bank violated this policy by restricting access to information that it should normally broadcast in accordance with the policy, or to defend a case in the public interest to make obsolete the policy exceptions which restricts access to the requested information so undue or unreasonable.

People with legitimate concerns about the failure or refusal by the Bank to disseminate information in accordance with this policy will have access to a remedy two-step mechanism, efficient and responsive within the Institution. The "restricted" documents specified in section ("exceptions list") not eligible to the broadcast will not be subject to the second stage of the action.

The Committee of information dissemination will be the first structure in use. Its role will include the examination and treatment of legitimate calls concerning breaches to provide or deny eligible information for dissemination. The use for the dissemination of information contained in the negative list will be considered by the Committee on Information dissemination. In this case, the decision of the Committee of information dissemination will be final.

In the event of appeal against the decision of the Committee of dissemination of information, the applicant may appeal on appeal to the Appeal Board. The Supervisory Committee of the fraud and Corruption (CSFC) provided by the manual of policy and Procedures for the prevention and fight against Corruption and fraud (MPPCF) constitutes the Appeal Board. It will work independently with regard to the Committee on the dissemination of information and directly report to the President of the Bank.

In situations where a complainant is not satisfied with the decision of the Committee of information dissemination, it can appeal in a defined period of time, at the level of the Appeal Board. The decisions taken by the President on the proposal of the Appeal Board are final and are not likely to review by any other structure or any other authority of the Bank.

All appeals must be submitted in writing to the Information dissemination Committee. Appeals must be submitted, in writing, within fifty (50) days of the initial decision of the Bank to refuse access to the requested information. The decision on calls will be taken within forty (40) days after receipt of an appeal, unless deadlines and relevant reasons are communicated in writing to the applicant, before the expiration of this period of forty (40) days.

The result of an action brought by a complainant before the Committee dissemination of information or the Appeal Board will be limited to receiving the information requested.

7.6. Document management systems

To facilitate access to information, the Bank shall ensure that its records management system will provide mechanisms and procedures for the classification, the classification, declassification and archiving of documents. The modalities of the system will be defined in the guide of dissemination information that will support the implementation of the policy.

7.7 Classification and storage¹

7.7.1. Informations produced internally.

In the spirit of the release, most of the information will be broadcast subject to the "exception list". Information on this list may nevertheless, at some point, be subject to dissemination its sensitivity decreases. Such an approach will require the Bank adopts a classification system that categorizes information according to its accessibility over time. Such a system will require a classification and labelling clear all information produced by the Bank at the time of their creation, either as "public" or as "restricted." However, limited information may later be declassified. In this case, each document will clearly bear the date at which it can possibly be released after declassification.

¹ Dissemination Guide provide guidance on classification procedures, storage, and declassification of archive documents. The classification of the documents will be at the level of its originating department/unit. The classification process will be supported by an adequate program of staff training.

7.7.2. Informations received by the Bank

The information received by the Bank to its customers and development partners will be immediately classified according to the classification system of the Bank, on the basis of the level of classification ('public' or 'restricted') indicated by the provider of the information. If the Bank receives confidential information from a Member State or a third party, I unit organizational recipient ensure that such information should be classified properly, in accordance with the expectations of the provider, using the classification levels information of BOAD. The Bank will not publish such information without the written consent of the party concerned.

7.8. Declassification and archiving

Aware of the fact that the sensitivity of the information contained in the exceptions list can change over time, the President of the Bank, on the proposal of the Committee on information dissemination, will adopt a system of declassification to make available at a later date most of the previously classified information as "restricted."

Under the system of declassification, "restricted" information can be made public after five years, ten years, twenty years or more, depending on their sensitivity and prejudice their dissemination as well as the legal obligation of conservation of commercial and financial information. Subject to declassification information will be defined in the dissemination guide information. Some limited information will be not be downgraded.

The broadcasting guide information will provide a list of documents under each level of classification, as well as timelines and procedures for classification and declassification.

A list of restricted documents which are considered not eligible for declassification shall be also provided and release Committee the update as necessary.

In addition, the organizational unit responsible for the communication and information will develop and publish a systematic method of archiving to facilitate harmonious declassified and protect information that should not be disclosed. The archiving process will be to scan documents to ensure that the information is kept in both electronic and printed format. Retention or retention of the Bank policy will specify the type and age of documents of which copies may be destroyed after a certain period.

7.9. Electronic messages

Given that the information exchanged by e-mail may contain classified information "public" or "restricted", the policy provides the following treatment for e-mail messages:

- emails containing information on decisions or results that are classified according to the system of management of the records of the Bank as "public" can be the subject of a broadcast;
- emails that are classified according to the system of management of the Bank as "restricted" documents are not eligible to the broadcast unless their content is downgraded over time;
- access will not be provided for emails that are not classified according to the system of management of the records of the Bank (including emails not official and those containing personal information or communications from the Bank staff and other officials).

7.10. Simulcasting

The simultaneous dissemination of information to the public shall apply in the following cases:

- the documents classified as "public" under the management of the records of the Bank system and provided by the Presidency of the Bank administrators for information should be simultaneously made public at the time of distribution to administrators;
- the operational policies and sectoral strategies provided to the Board of directors or its internal committees must be made public if a version

before those documents has been examined previously by the President of the Bank and the Board of Directors. This provision allows the parties to see how their comments provided during the public consultations have been taken into account;

- country strategy documents and proposals for sovereign-guaranteed loans should be made public simultaneously at the time of distribution to the Board of Directors, subject to the objection of the countries concerned.

7.11. Dissemination of information to customers and partners in development

The simultaneous dissemination of information to the public shall apply in the following cases:

-the documents classified as "public" under the management of the records of the Bank system and provided by the Presidency of the Bank administrators for information should be simultaneously made public at the time of distribution to administrators;

-the operational policies and sectoral strategies provided to the Board of directors or its internal committees must be made public if a version before those documents has been examined previously by the President of the Bank and the Board of Directors. This provision allows the parties to see how their comments provided during the public consultations have been taken into account;

-country strategy documents and proposals for sovereign-guaranteed loans should be made public simultaneously at the time of distribution to the Board of Directors, subject to the objection of the countries concerned.

7.11 Dissemination of information to customers and partners in development

It is about:

- documents prepared jointly with the Member States, the documents prepared by the Bank in consultation with the Governments concerned and other stakeholders involved in the Member States;
- documents which highlight particular strategic objectives of the country, its challenges, its prospects for development and its areas of priority intervention for the Bank. This type of document will be shared in its preliminary version with interlocutors targeted in the country, through a consultative process. In addition, before the presentation of these business records to the Board of Directors for approval, the Bank services can proceed with its consideration of the draft, with other stakeholders, where appropriate. If, in circumstances exceptional, pre-release versions contain information considered sensitive, confidential, and commercial in nature or relating to property rights by the other party concerned and accepted as such by the Bank, these drafts will exclude such information. At the final review of these documents with your partner, the Bank and the Government of the country concerned or any other entity must agree on the legitimacy of include or extract all information deemed confidential or sensitive prior to their finalization and distribution to the Board of Directors. The non-deliberative part of the memorandum on operational missions may be broadcast, if authorized by the Bank and the country concerned;
- documents prepared or commissioned by the Member States, as a prerequisite for doing business with the Bank: in their dealings with the Bank, Member States are called upon to put at the disposal of the BOAD certain documents they were preparing. Such documents will be provided to the Bank knowing that these documents will be published by the Bank;
- Special documents not produced regularly by the Bank - these documents will be made available to the public after their distribution to the Board of Directors. The head of mission resident can visit the country in question if it considers that the document contains confidential information not eligible for dissemination. The Bank, where

appropriate, bring adjustments to the document to meet the concerns of the country;

- documents prepared by Member States and communicated to the Bank: this type of information will be distributed according to the rules of disclosure in force in the country. If the country has not set conditions of dissemination of the document, the Bank will seek to obtain permission in writing from the Member State prior to any release.

7.12. The IT system building

The existing system of the information technology (it) should be strengthened in two key respects:

- on the internal level, to take account of new processes for classification, declassification and archiving of documents;
- on externally, to ensure usability Web site as well as the orderly display and timely news.

The website should allow the public to submit requests for information.

7.13. Alignment of policy

Policies, strategies and administrative related rules as well as procedures and guidelines of the Bank, including the staff regulations, are consistent with this policy, to support the conditions for its implementation. Where appropriate, the necessary adjustments for the effectiveness of this implementation can be made.

7.14. Dissemination of information guide

To effectively implement policy, a specific framework will be developed in the form of dissemination of information guide. The Guide is essential to ensure optimal implementation of the policy to provide guidance to staff and stakeholders on all issues related to the dissemination of information.

He will describe the features relating to the operational information publicly available, in accordance with this policy. Dissemination guide information will,

therefore, be available staff and stakeholders. In addition, it will clarify classification and declassification procedures and process documents, and the mechanism of appeal. It will provide details on best practices for the systematic dissemination and timely information. Various processes and methods of dissemination of the information will be, on the other hand, described for different target groups, as regards inter alia a better use of the resident missions to disseminate information. All organizational units that will have a role to play in the implementation process and the dissemination of information, will participate in all related discussions.

7.15. Budgetary and financial implications

Taking into account the foreseeable increase in the volume of requests, subsequent provision of the documents eligible for dissemination, and the need for the Bank to invest in technologies to enhance the ability of smooth dissemination of information, it is important to implement the policy with the best possible cost-efficiency ratio. It would have implications for resources related to the development and dissemination guide update, in the archives of the Bank, its systems, to the recruitment of staff, training, dissemination of information, the alignment of policies, and other requirements for an effective implementation of the policy. In this respect, the Presidency of the Bank will ensure to include in future annual budgets needs for the implementation of this policy.

VIII. CONCLUSION

The policy of the Bank for the dissemination and accessibility of this information approach the way in which the Bank understood the dissemination of information, transparency, the accountability and the sharing of knowledge, as essential aspects of the efficiency of development and poverty reduction. It is a change of direction with respect to the information that the Bank may broadcast. It will not simply be a policy detailing the type of information that can be published, but a policy to disseminate any information available to the institution, provided that it is not

on the list of exceptions. It should therefore promote a maximum dissemination of information, increased access to information, and open and much enhanced collaboration between the Bank and its stakeholders.