Engineering Policy Norm Implementation: The World Bank's Transparency Transformation

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Open data is arguably the most prevalent policy norm today shaping the rules and practices of international aid organizations. Since the 2005 Paris Declaration on Aid Effectiveness, the 2008 Accra Agenda for Action and launch of the International Aid Transparency Initiative (IATI), and the Busan Partnership for Effective Development Cooperation in November 2011, aid donors have committed themselves to the principle of opening access to information on their activities. Advocates view this as a right of citizens and key to aid accountability and effectiveness. Transparency empowers citizens to hold donors and governments accountable for the use of aid funds, reduces information asymmetries that hinder coordination between donors, and improves the predictability of aid flows (Publish What You Fund 2009; Collin *et al* 2009; Mulley 2010; McGee & Gaventa 2010 and 2011). Aid transparency promises much for a global industry beleaguered by crises of legitimacy, relevance and effectiveness.

In this chapter, we seek to understand the evolution of the *international aid transparency policy norm*, defined as the shared expectation in the global development aid regime complex that donor agencies make public comprehensive, timely, comparable and accessible information on their activities, budgets and other relevant data. We unpack the causal mechanisms of *norm implementation*, defined here as the process through which aid organizations translate the principles of transparency into organizational policies and practices to not only ensure compliance with new rules, but also to engender the internalization of the policy norm's precepts and to incite meaningful and sustainable changes in organizational behavior. Analyzing the opportunities and constraints on policy norm implementation enables us to examine pervasive cynicism about the capacity and willingness of international organizations to change, or more simply to determine if aid institutions are just talking the transparency talk or walking the transparency walk.

We are thus interested in teasing out the reasons why aid organizations have now - after many decades of incremental steps towards openness - signalled a strong commitment to transparency norms. More critically, we seek to understand the conditions under which aid agencies are willing and able to *implement* policies that uphold this norm. This requires going beyond a story about the agency, institutional processes and structures that converged to produce the 'donor transparency norm cascade' that we have recently observed and beyond a checklist or scorecard of agencies' compliance with transparency norms.[1]

As Betts and Orchard argue in their framework chapter, the process of implementing policy norms in states or international organizations often opens up opportunities for the reinterpretation, fragmentation and even rejection of the underlying norm. At the same time, policy norm implementation may unfold in a fairly rapid and uncontested manner. This may result from effective advocacy and policy

[1] See Publish What You Fund's *Aid Transparency Index* (2011) and the Center for Global Development and Brookings Institution's *Quality of Official Development Assistance* (QuODA) (Birdsall et al. 2011).

design, which strategically addresses issues of norm imprecision, contestation, and capacity constraints prior to implementation. Such issues can be effectively sorted out during the "policy norm negotiation phase", wherein the nature of negotiation (particularly, decisions regarding who is consulted or included in defining the scope of the policy) matters. Also significant is the preparation period between the signalled commitment to a policy norm and the formal operationalization of those policies. Careful preparation for the implementation phase can even lead to unanticipated *expansion* and *diffusion* of the underlying norm beyond its original objectives.

Indeed, quite to our surprise, we observe the latter instance of negotiation, implementation and subsequent policy norm expansion in the case study we present here of the implementation of the transparency agenda at the World Bank (hereafter Bank). In late 2009, the Bank was the first organization in the international aid regime to overhaul its information disclosure policy and to take the dramatic steps of publishing extensive information on its projects, development data and budgets. While previous incremental steps towards transparency were certainly present, in 2009 the Bank shifted from a "positive list" of limited materials available for disclosure to a "negative list" resting on the presumption of automatic access to all materials except those on a carefully defined list of exceptions. This represented a "transformative change" in the Bank's culture and approach towards organizational transparency.[2] According to

[2] Interviews with Caroline Anstey, World Bank Managing Director (2012); Jeff Gutman, former World Bank Director of Operational Policy and Country Services (2011), Chad Dobson (2011), Director of the Bank Information Center; and Owen Barder (2011), Senior Fellow at the Center for Global Development.

Barbara Lee, Manager of the Aid Effectiveness Unit at the Bank, the Bank shifted "from a hush-hush place to an era of openness" as the result of this policy.[3]

The Bank's embrace of transparency was by no means spontaneous, but rather the result of a protracted debate over its information disclosure policy that surfaced in the early 1990s. The timing of the Bank's long awaited reversal of its information policy reflects, in some sense, a dramatic alignment of ideational and material pressures for greater transparency in the mid-2000s. But it also reflects the fact that those championing transparency at the Bank were well aware of the potential pitfalls of pushing transparency too far, too fast. Advocates inside and outside of the Bank aligned and worked to ensure the passage of an "airtight [access to information, or AI] policy"[4] by the Bank's Board of Executive Directors that would minimize internal and external resistance to the AI policy. They also sought to cultivate an environment for nervous staff wherein compliance would be strictly enforced, while recognizing that "mistakes will happen."[5] Likewise, they pushed for sufficient time for Bank management to establish operational policies, in-house resources for managing public access to and requests for newly released information, and oversight and compliance measures to ensure the policy was quickly mainstreamed into the daily routines of Bank staff.

As a result, we discover here that the effective implementation of the AI policy can be attributed to the careful manner in which the new policy was negotiated, prepared and executed. Specifically, what strikes us as significant to this outcome is the

[3] Quoted in Harris 2011.
[4] Interview with Gutman (2011).
[5] Interviews with Anstey (2012) and Gutman (2011).

participatory design of the AI policy and implementation plan; which included the extensive involvement of key actors inside the Bank as well as some of its most vocal external critics. Second, we note the importance of the management of the seven-month implementation preparation period between the end of 2009, when the Board passed the new AI policy, and July 2010, when the policy went into effect. During this preparation period, there was a conscious effort to identify and pre-empt capacity constraints and potential points of political resistance. The ensuing integration of the AI policy into Bank standard operating practices was both more rapid and smooth than its architects, advocates and even critics expected.[6]

Furthermore, we find evidence that the successful engineering of the implementation process of the AI policy led to an unexpected expansion of the transparency agenda from a narrow focus on increasing access to information to a broader set of principles now embodied in the Bank's prominent Open Data and Open Development agendas: initiatives that strive to make the Bank's vast storehouse of development data, analytical tools, and research production open, free, and easily accessed by a wider public. From the perspective of many Bank staff and managers we talked to, the surprisingly unproblematic implementation of the AI policy "opened the door" for a broader transparency agenda and "set the ball rolling down the hill"[7] for the "democratization of development" (Zoellick 2010). In turn, the Bank's transparency agenda has started to diffuse to other aid agencies, which are now seeking to adopt similar AI and open data policies in response to changing public expectations regarding

[6] Interviews with Anstey (2012), Gutman (2011), Dobson (2011), and Barder (2011).
[7] Interview with Gutman (2011).

aid transparency (Mulley 2010). In other words, the AI policy seems to have spurred, or at least set the stage, for a host of other policies and initiatives that we can broadly construe to constitute an aid transparency norm complex in the international aid regime.

In this chapter, we draw insights regarding the dynamics of policy norm implementation by focusing on what we see as the *successful* story of the AI policy at the Bank. We do not do so naively. We recognize that the AI policy itself is not free of criticism. Some may dispute our view that this is a successful case of policy norm implementation, pointing to instances where the Bank has resisted releasing information or put limits on the scope of disclosure. Watchdog organizations, for example, lament the rules against simultaneous disclosure of important Board documents (such as transcripts of Board meetings) and other areas of exceptions in the new AI policy. Moreover, the policy is also quite new. It may well be that as vigilant oversight of implementation and enforcement of the AI policy wanes, behavior in the Bank may "revert to the mean." But most experts with whom we have spoken confidently assert (and we agree) that "this is one genie you cannot put back into the bottle."[8]

More provocatively, what we also note in our case study is a more critical discussion of the transparency agenda and what "implementation" actually means. As we will discuss in the conclusion, transparency is embraced not just as a goal in itself, but as essential for improving aid accountability and impact. As such, much attention

[8] Interview with Anstey (2012).

has now shifted from "Phase I" of the transparency agenda (the supply and implementation of aid transparency policies) towards "Phase II", which entails demonstrating how and when more open information actually leads to enhanced aid accountability and effectiveness. For many involved in the Bank's open development initiative and the global aid transparency movement, full implementation of the transparency agenda requires evidence that transparency policies are in fact facilitating the achievement of this deeper objective. As norm implementation progresses, the goal line appears to be shifting.

In this chapter, we use qualitative process tracing and draw extensively on primary and secondary materials from inside and outside the Bank. We also use evidence from interviews with several key actors central to the design and execution of the Bank's new AI Policy and the subsequent Open Data initiative. We further draw insights on aid transparency from over 100 interviews we conducted in Africa and the US in 2011 as part of our working tracking and mapping climate change aid. Finally, we also benefit from both non-participant and participant observation in aid transparency efforts, facilitated by our ongoing collaboration with AidData, Development Gateway and the World Bank Institute's Open Aid Partnership.

I. The Transparency Transformation at the World Bank: A Perfect Norm Storm?

In 1985, the Bank established its first set of staff guidelines on public information disclosure. This was in response to demands of activists concerned about the impact of Bank programs on the populations and environments of developing countries. In the next 20 years, three significant revisions in the Bank's information disclosure policies were made. The first was in 1994 (the year of the "Fifty Years is Enough" campaign), when the Bank established its first official disclosure policy. This coincided with the creation of the Independent Inspections Panel and the opening of the Bank's Public Information Center (Bissell 2009). The 1994 policy ostensibly worked on a presumption of disclosure. But in fact all Bank data and documents were not eligible for disclosure unless they were on a short list of permissible items - a so-called "positive list". For example, in 1993, it was nearly impossible for an interested party to obtain through official channels timely and detailed information on lending agreements, individual projects, or even announcements (much less minutes or transcripts) of Board meetings.

In response to shifting demands regarding informational disclosure, the World Bank incrementally revised its "positive list," roughly every two years. For example, in 1998, the Bank made Country Assistance Strategy papers public, albeit only with the permission of the country in questions. In 2001 the Board expanded the list quite substantially, and also revised the Archival policies to make it slightly less difficult to access historical materials (World Bank 2005).

By 2002, partially in response to mounting external pressure for greater transparency (see below), the Bank's management began to discuss deeper policy changes.[9] In 2003, the Board of Executive Directors debated the disclosure of Board minutes and other deliberative process materials. However, the "presumption in favor

[9] In 2002, the Bank also established a global network of Public Information Centers to enhance public access outside of the US, by filling requests for information when documents could be disclosed.

of disclosure" remained limited by the existence of the cumbersome positive list, which many within the Bank felt to be ambiguous and difficult to interpret.

The third and most substantial change in the Bank's informational disclosure policy – the subject of our more detailed analysis below - began to percolate in the mid-2000s. By this time, there was a near perfect storm of internal and external pressures pushing for deeper change in the Bank's policies.

i. External Pressures for Bank Transparency

The first external factor generating pressure for greater transparency was the ***iRevolution.*** The iRevolution refers to the explosion of widely accessible technological tools, such as the internet, GPS, and social media. These technological tools dramatically changed the ease of physically accessing information, as well as people's expectations regarding the availability of data (Mulley 2010). The rapid global expansion of mobile phones in particular generated new ways to reach intended aid beneficiaries, and spurred the growth of open government (or "Government 2.0") movements in both the developed and developing world.

The influence of technological change on the Bank's transparency was reinforced by a parallel movement in extractive industries, a sector that frequently involved Bank lending. In 2002, UK Prime Minister Tony Blair launched the *Extractive Industries Transparency Initiative* (EITI) to fight pervasive corruption, human and labor rights violations, and systemic incompliance with environmental and social safeguards. EITI had a notable influence on the later inception of the International Aid Transparency

Initiative (IATI) and the Bank's own efforts to be more transparent in two manners. First, member states and organizations in EITI voluntarily signed onto a transparency initiative in which their own activities were under scrutiny. Secondly, EITI provided guidance on how civil society and governments could operate together to increase transparency. The Bank, which endorsed the EITI principles in 2003, saw EITI as integral to not only its own extractive resource tracking, but also as complementary to its own Governance and Anti-Corruption Strategy (World Bank 2007; Haufler 2010). A year later the Bank assumed responsibility to oversee EITI's managed trust fund.

A third external factor was the growth in domestic *access to information policies* (or Freedom of Information Acts, FOIAs) and *open government* movements around the world. By 2007, over 70 countries had passed some form of a FOIA (Calland & Neuman 2007). The influence of this was evident in the Board's discussion of the Bank's information disclosure policies between 2001 and 2009. Both internal documents and our interviews emphasized that Executive Directors from countries with strong FOIA traditions - particularly India, Mexico and the United States - were vocal proponents of similar freedom of information policies at the Bank. At the same time, these countries advised the Bank to approach freedom of information slowly and incrementally, as if "peeling an onion," in order to build broad support and develop the institutional capacity to manage a robust freedom of information system.[10]

Overall, the evolving discussions of transparency and AI policies at the Bank took place in the context of increasing scrutiny of aid accountability and effectiveness by

[10] Interview with Gutman (2011) and Anstey (2012). See also World Bank 2012.

donor and recipient states, as well as a groundswell of NGO campaigns for fundamental reform of the entire international aid system. Stagnating economies in Europe and North America dampened the enthusiasm of taxpayers and politicians alike for spending on aid. Likewise, the post-9/11 era revealed a marked decline in demand for Bank loans, particular from middle income countries, such as Brazil, India and Mexico, which had high growth rates and easy access to international commercial markets. This general shift in the supply and demand side of aid spurred efforts to address underlying weaknesses in the aid system, starting with the United Nations International Conference on Financing for Development in Monterrey, Mexico in 2002.[11] The Bank and other aid organizations faced pressure to demonstrate their legitimacy and performance-based results. Internally, this was closely entangled with discussions of transparency.[12]

The final, and most prevalent external factor, was the cumulative pressure of NGO campaigns. For decades, NGOs led a concerted and sustained campaign against the Bank's secretive culture. NGO demands for greater transparency were especially prominent at the Gleneagles G8 Summit in 2005 (Mulley 2010). The following year, the Global Transparency Initiative (GTI), a network of civil society organizations promoting openness in the international financial institutions (IFIs), was established. Its focus was to "promote people's right to information from public institutions and a right to participate in the development policies and projects that affect their lives." GTI went so far as to draft a model policy for the World Bank's Access to Information Policy in early

[11] Monterrey was followed by a series of High Level Forums on Aid Effectiveness, in Rome in 2003, Paris in 2005, Accra, Ghana in 2008, and Busan, South Korea in 2011.
[12] Interview with Gutman (2011).

2009, many parts of which later appeared in the real policy adopted by the Bank (GTI 2009).[13]

The Bank Information Center (BIC), a leading NGO aid watchdog group within the GTI, was a central player running up to and during the 2009 AI policy negotiations. For years, BIC had ardently pushed the Bank to move from a positive to negative list, and also advocated for the disclosure of particularly sensitive materials such as draft country programming plans, project appraisal and policy documents, and access to Board documents (Jenkins 2009). In late 2007, the Bank reached out to BIC to help coordinate the Bank's external consultations in 33 countries of its new draft AI policy paper. Carolyn Anstey, one of the key architects of the new AI policy and (as of June 2013) one of the three Managing Directors of the Bank, argues that having an NGO partner, like BIC, as a standard bearer was helpful to the Bank's evolving stance on its own AI policy and building external support for the policy.[14] BIC later became a member of the AI Working Group, in charge of preparing for the Bank's policy implementation in 2010-2011.[15]

ii. Internal Pressures for Bank Transparency

The intensification of external pressures converged with internal pressures for reform. Foremost amongst the internal factors was the Bank's ongoing *Governance and Anticorruption (GAC) agenda*, which started under President James Wolfensohn (1995-

[13] In addition to the NGOs and campaigns already mentioned, some of the most prominent watchdog NGOs with respect to the aid transparency and accountability movement include AidInfo, Aid Watch, BetterAid, Bretton Woods Project, EURODAD, and Reality of Aid Initiative.
[14] Interview with Anstey (2012).
[15] Jenkins 2009 and World Bank 2012; Interviews with Jenkins (2009), Dobson (2011), Gutman (2011), and Anstey (2012).

2005) and gathered momentum under President Paul Wolfowitz (2005-2007).[16] The GAC agenda demanded that aid receiving countries publish information about their procurement processes, budgets, and other public spending. In 2011, shortly after the passage of the AI policy and the launch of the Open Data Initiative,[17] President Robert Zoellick gave a speech on freedom of information in developing countries, in which he asserted that the Bank "will not lend directly to finance budgets in countries that do not publish their budgets or, in exceptional cases, at least commit to publish their budgets within twelve months" (Zoellick 2011).

Such expectations for transparency and accountability on the part of borrower governments naturally rebounded on the Bank. The Bank's 2007 strategy paper on implementing the GAC agenda specified the need for more transparency and accountability in the Bank's own internal conduct in order to set an example for others and to demonstrate that the Bank lived up to its own ideals (World Bank 2007; Volcker et al. 2007; World Bank 2009 and World Bank 2012). In the words of Shaida Badiee, Director of the Bank's Development Data Group, "if we are going to support Open Data and Open Government in countries, the World Bank must not only preach it, but also do it" (Badiee 2012).

In addition to the momentum of the GAC agenda, the *role of internal advocates and leadership* at the Bank helps explain the timing and substance of the AI policy shift in 2009. The ongoing debate on the Board of Executive Directors is especially pertinent

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[16] Interview with Gutman 2011. See also Weaver 2008, World Bank 2011a and 2012.

[17] In April 2010, as a part of the Bank's new AI policy, President Robert Zoellick announced the launch of the Open Data Initiative. It is an effort to make data at the Bank, including the World Development Indicators, free and publicly available.

here. There is substantial evidence that by 2004 some Executive Directors were making the case for more open access with respect to policy and strategy papers related to operations (World Bank 2005). Of particular importance were the internal discussions over disclosure of documents related to Board deliberations. In a series of meetings between 2004 and 2005, the Executive Directors discussed the disclosure of Board minutes, drawing on the experience of other international financial institutions (such as the Inter-American Development Bank and Asian Development Bank).

Informal notes between the Executive Directors in 2005 indicate "an emerging consensus to move toward greater transparency in this respect, with the understanding that the content of Board minutes would not change from its present form" (World Bank 2005. 4). The proposal to increase the transparency of Board discussions was approved, but with several caveats: material deemed by the Board to be too sensitive would be redacted prior to disclosure, and Board transcripts, summaries of discussion, committee minutes and reports to the Board (called "green sheets") would not be disclosed. The Board also solicited a cost-benefit study of simultaneous disclosure designed to assess the possibility of further disclosure creating opportunities for "undue pressure from special interest groups" or risks of "loss of candor." Despite some evident reluctance on the part of Board to go the distance on the release of deliberative documents, the progressive discussion of disclosure reform attracted some much desired praise from external watchdog groups (Kovach et al*.* 2003). Momentum was building, ever so slowly, at the level of the Board.

Arguably, the final and most important impetus for the 2009 AI Policy shift came from Bank management, especially then President Robert Zoellick. Arriving in the wake of the Wolfowitz scandal (Weaver 2008), Zoellick signalled that the Bank's transparency and accountability would be his key priority. He quickly and quietly set about to revitalize the Bank from the inside out (Mallaby 2012).

Interviews with Bank staff reveal that Zoellick was keen to solidify the Board's support for the transparency agenda and willing to exercise his authority to overrule reticent managers and staff. During the implementation stage (described below), Zoellick made it clear that the new AI policy would be put into place quickly and effectively. Resources needed for this (and later for the Open Data Initiative) would be reallocated from existing budgets, already suffering from seven years of zero percent growth. Moreover, there would be no tolerance for noncompliance. Vice Presidents would report directly to Zoellick on the progress of the AI policy implementation and would be held responsible for lax enforcement within their units.

Zoellick was supported by a cadre of Bank managers in External Affairs (EXT) and Operations Policy and Country Services (OPCS). Carolyn Anstey was especially important in mobilizing internal resources for the AI policy reform and later the Open Data Initiative. Anstey formally served as a country director for Haiti, where she worked extensively with NGOs on the monitoring of government budget transparency. That experience made her keenly aware of the power of involving citizens in transparency and accountability movements, and is one reason she reached out to BIC and supported an extensive external consultation process during the drafting and implementation of the AI policy.[18]

II. Implementing the Access to Information Policy at the World Bank

According to the World Bank's 2009 Approach Paper, "the disclosure policy and its effective implementation rank[ed] high in the Bank's corporate agenda" (World Bank 2009, 1). The paper concisely summarizes the strong consensus that had emerged over the previous several years:

> ...the existence of such a positive list has limited the Bank's ability to implement the expressed presumption in favour of disclosure. The policy is also not clear about what cannot be disclosed, and there are many ambiguous and overlapping rules that cumbersome and difficult for Bank staff to implement, and for the public to understand. At the same time, public interest in transparency has been growing. Many countries have adopted freedom of information legislation and the transparency standards of international financial institutions are subject to increased public scrutiny. Both within and outside the Bank, many feel that the Bank's disclosure policy framework still does not go far enough. (World Bank 2009, 1)[19]

[18] Interview with Anstey (2012), Gutman (2011) and Dobson (2011).

[19] The 2009 approach paper provides extensive detail on the ambiguity of procedural rules, the lack of institutional resources to serve request for information, and general confusion over which documents and data were eligible for disclosure. See World Bank 2009, 2-6.

The resulting policy, renamed Access to Information[20], was passed by the Board in December 2009. The new policy maintained critical exemptions to disclosure that reflect continued concerns over the need to protect client confidences and preserve candour in key deliberations (see Appendix 2). Many of the exemptions, particularly related to Board documents[21], were not warmly received by external critics, but were largely seen as a necessary compromise in order to "strike an appropriate balance between the need to grant maximum public access to information in the Bank's possession, and its obligations to respect the confidentiality of its clients, shareholders, employees, and third parties" (World Bank 2009, 2).

Overall, the proposed policy was characterized as nothing less than a "paradigm shift" (World Bank 2009 and World Bank 2010a). It moved the Bank away from the infamous "positive" list to a "negative" list, consciously limited to narrow set of items exempted from automatic disclosure. The policy was intended to align the Bank with its espoused commitment to the "presumption of disclosure" and make publicly available vast numbers of hitherto closely guarded documents, including those related to ongoing aid projects (e.g., Implementation Status Reports). It was also designed to mirror disclosure policies adopted in numerous countries through FOIAs, and "put the Bank at

[20] Several people we interviewed noted that the term 'information disclosure' was considered out of fashion by 2009. "Access to information" is considered to be better aligned with democratic principles, insofar as it highlights citizen's rights to information, not only governments' (or organizations') obligations to provide information.

[21] Specifically, the old policy barred the simultaneous disclosure of confidential information pertaining to Board proceedings, verbatim transcripts of Board and committee discussions and documents prepared by staff for the Board. The new policy presumes that Board papers would be disclosed at the end of the deliberative process, but any materials classified as confidential or strictly confidential would not be disclosed unless the Board specifically provides authorization. World Bank 2009, 7-8. Classified materials are subject to disclosure after 20 years.

the forefront of other multilateral agencies with respect to disclosure" (World Bank 2009, 15).

Importantly, the background papers on the policy revisions and our interviews indicate that the ultimate scope and content of the AI policy was the result of learning from past policy revisions. It was also an exhaustive and inclusive process for designing the revised policies that gave voice and influence to critical groups inside and outside of the Bank. This participatory negotiation process generated widespread political support for the new AI policy prior to its formal adoption, while also allowing for careful consideration of where the policy might meet resistance during its implementation.

The architects of the AI policy approached the process of implementation in a very cautious and strategic manner.[22] This was actually against the preferences of President Zoellick, who wanted the policy immediately implemented after the Board approval in December 2009. Instead, the new constructed Disclosure Policy Committee insisted on a period of six to seven months to prepare for implementation.

The preparation period was consciously designed to give the Bank time to put into place sufficient institutional resources, oversight mechanisms, and compliance measures. Strategic planning for the policy implementation included extensive consultation with NGOs (especially the aforementioned BIC) and their participation in testing the new system to identify unforeseen bottlenecks in accessing the vast amounts of newly disclosed information (World Bank 2010a). In addition, the new AI policy

[22] These architects came from within the Bank's External Affairs Office (EXT), Operational Policy and Country Services (OPCS) and the Legal Department (LEG), among other units.

established an appeals process that ensured continued NGO participation in the Bank's development and initial implementation of the policy (World Bank 2010a).

The preparation period between December 2009 and September 2010 further focused on securing Board approval to declassify more than 17,000 documents. In addition, the 2010 AI Policy moved the locus of the Bank's documents from the Public Information Centers to the World Bank's external website; using the preparation period to build and strengthen its technical infrastructure and in-house information management systems.

Predictably, there was considerable anxiety regarding how the Bank staff and management would respond to the new policy. The implementation architects were quite concerned that staff would resist the new policy. This was not because staff did not believe in making the Bank more transparent, as there was very little dissent on this general principle. Instead, staff reluctance stemmed from concerns regarding resources, candour and uncertainty.

Some Bank staff feared that opening the Bank would mean a loss of revenue in instances where the Bank charged for access to information and data. This was particularly the case within the Development Economics Vice Presidency (DEC) and its Development Data unit, who used the sale of development indicators (now accessible through the Open Data Initiative) to help offset the cost of collecting, compiling, analyzing and reporting data. Zoellick, however, assured DEC that the Bank would suffer no revenue loss (and would even experience a revenue gain) by releasing the data.[23]

There was also concern that public exposure would compel staff to be less candid in key project documents like Implementation Status Reports, which were critical for mid-course corrections in lending programs. The AI policy team defended the disclosure by arguing that disclosure would *improve* candour by promoting greater accountability and access to third party information and incentivizing staff to produce higher quality reports. But more compelling was the built-in oversight mechanism:

> ...the main indicator of candour is the "realism index" which measures the extent to which the current ratings of projects in the portfolio reflect the average rating of projects at exit over the recent past. But, at any point in time, the number of operations classified as being in 'problem' status is well below the average for the projects that exit the portfolio. During the first 18 months following the adoption of the revised policy, Management [will] closely monitor the implications of the changes in the policy on candour, including the realism index. (World Bank 2009, 20)

Arguably, the most important part of the implementation plan focused on preparing staff for the policy change. This was a daunting task in an organization that

[23] A similar debate occurred within the context of the Zoellick's effort to "democratize development economics" (Zoellick 2010) by not only opening public access to key development databases like the World Development Indicators, but also by supporting the creation of open source analytical tools (such as PovcalNet and ADePT) that would empower people outside of the Bank to access datasets and draft publications, and replicate the Bank's analytical work in areas such as calculations of global poverty figures. Martin Ravallion, Senior Economist at DEC, calls this the "wholesale retailing" of development economics. Bank economists feared this will interfere with their first mover advantages in publishing the results of their data collection and analysis and run up against copyright rules in peer-reviewed journals where they are encouraged to publish [Ravillion 2010; interviews with Anstey (2012) and Gutman (2011)].

includes over 15,000 staff, with high turnover, with a large DC headquarters and over 100 mission offices worldwide. To prepare staff, upper Bank management enacted a series of measures to educate and train staff on the new AI policy. For example, numerous materials were compiled and disseminated, and an internal AI website with helpdesk was created. Training sessions were held on how to classify and declassify materials. Bank Vice Presidents designated 189 staff to serve as AI focal points to provide staff support as well as provide feedback on implementation challenges.

Rigorous oversight and compliance measures were put in place. Most prominent was the *mandatory* AI e-learning program during the first few months after the formal adoption of the AI policy. Completion reports were compiled and distributed every two weeks to all the Vice Presidents, who publicized a list of those who had not yet completed the training. Severe sanctions were threatened: staff were repeatedly told that failure to complete the e-learning program would result in the loss of their email privileges.[24] This proved extremely effective. One staff member we spoke with said, "I can confirm the seriousness with which the staff awareness of the policy was approached. Within my VPU, we were regularly reminded of the need to do the training module, lists of non-complying staff were circulated on several occasions and the VPs office did pursue staff who had not done the training module. The threat to cut off email access was taken seriously. The training module was actually not bad either."[25]

Overall, the preparation for the implementation period involved an impressive amount of foresight and attention to detail. The AI Working Group (now AI Committee)

[24] Interviews with Gutman (2011) and Anstey (2012). See also World Bank 2011c.
[25] Email correspondence with Jeff Chelsky, 10 March 2012.

established vigilant monitoring mechanisms and the published detailed progress reports every quarter during the first year and annually thereafter. The progress reports, produced by the Bank's Legal Department and published online, provide extensive information on internal compliance rates with the mandatory e-learning program (now near 100%) as well as a precise list of all public access requests (with time taken for the requests to be filled) and all appeals (with data on which appeals were granted and reasons provided for those that were not) (World Bank 2010b, 2010c, 2011b and 2012).

Thus, by the time the 2010 Policy was formerly adopted, everything was in place for a smooth transition. Opportunities for policy norm contestation or rejection in the implementation phrase were effectively pre-empted. A strong consensus was built, reinforced by oversight and control mechanisms and a clear delegation of responsibilities regarding policy enforcement. The architects of the AI implementation plan were nonetheless surprised a year later to see how smoothly and quickly the AI policy took hold.[26] According to one staff member we interviewed, "change does not usually come that quickly in the Bank!"

III. Conclusion: The Diffusion - and Limits? - of Aid Transparency

When governments democratize their data, magic happens.

~ Vivek Kundra, Executive Vice President of Emerging Markets, SalesForce

(formerly Chief Information Officer of the United States)

We've seen that magic happen at the World Bank.

[26] Interviews with Gutman (2011), Dobson (2011), and Anstey (2012). See also George 2012 and World Bank 2011b (quoting Neil Fantom, head of the World Bank's Open Data Initiative).

~ Shaida Badiee, Director of Development Data, World Bank[27]

The Bank's 2011 Access to Information Annual Report opens by calling the AI policy a "radical policy shift" which "has heightened the World Bank's interaction with the public...and positively impacted the development community by broadly encouraging other development institutions to adopt similar public access policies, which has helped to push forward the objective of aid transparency and accountability" (World Bank 2012, 1; see also BIC 2010). The report goes on claim that in FY2011, the Bank's Documents and Reports database received more than one million visits, 4.5 million page view and 795,000 downloads (World Bank 2012).

Since 2010, the Bank has placed on its website almost all of its project and program documents (the first aid organization to do so). The Bank has also made a concerted effort to facilitate access to the Bank's financial data through an open access website and a mobile application (World Bank 2011b). These steps, in turn, have earned the Bank top scores on many external transparency indices and aid performance scorecards (Publish What You Fund 2011; Birdsall et al. 2011; Easterly & Williamson 2011; Ghosh & Kharas 2011). Once seen as the bastion of secrecy, the Bank is now held up as a model of best practice.[28]

The Bank's embrace of transparency through its AI policy has contributed to the growth of other major aid transparency initiatives. The most prominent of these

[27] Remarks at Putting Open Government into Action, event at the World Bank, Washington, D.C., 23 February 2012.
[28] According to Chad Dobson, Executive Director of the BIC, "the World Bank's Access to Information Policy continues to set the standard for other institutions to strive for" (quoted in George 2012).

agendas is the aforementioned Open Data Initiative, which makes available to the public - at no cost - the Bank's immense collection of development data, including the once pricey World Development Indicators. The World Bank also initiated a data visualization campaign by mapping all of its active aid projects worldwide through its "Mapping for Results" program. This is an unprecedented exercise in transparency, widely lauded in the press, and has spurred a virtual "geomapping" race between international aid agencies aspiring to attract similar accolades.

To our minds, there is clear and persuasive evidence of the diffusion and expansion of the transparency norm within World Bank, with the successful implementation of the AI policy appearing to have a catalytic role or "multiplier effect." However, it also appears to have incited a broadening of the norm itself. More critically, we observe a new discourse on transparency norms focused not on the principle or means of transparency, but rather on the relationship between transparency and accountability.

In this sense, the aid transparency policy norm is shifting from seeing transparency as the end to seeing it as a means to greater accountability. Inside the Bank, this is discussed as a shift from "Phase I" of the Open Development agenda to "Phase II," moving beyond information access to ensuring that this information enables citizens to hold their governments - and the Bank itself - accountable for the impact of development assistance. Moreover, transparency is expected to empower citizens by arming them with the data and tools to produce their own development knowledge and innovative development solutions.

It is here, in Phase II of the policy norm implementation, that norm precision starts to fall apart. Thus far, there is little evidence of transparency's causal effects on aid accountability and effectiveness (Fox 2007; Manning 2010; Mulley 2010; McGee & Gaventa 2010 and 2011). Very few studies to date test whether increased transparency results in effects such as increased aid predictability, improved coordination between aid donors and between donors and government, or more "stakeholder ownership" of the development process (Fox 2007; McGee 2010; Joshi 2011).

In Phase II, we also anticipate areas of normative contestation and fragmentation. We have already observed public discussion on whether the "supply side" of the aid transparency movement has in fact moved ahead of the "demand side." As Sarah Mulley argues, "more progress been made on transparency and accountability *of* than transparency and accountability *to*," (Mulley 2010, 5, italics added). Vivek Kundra observes: "how do you make sure we're measuring impact, and not just the number of datasets?"[29]

A final question concerns how much the transparency transformation at the Bank will be emulated by other aid institutions, leading to the policy norm's implementation throughout global aid regime complex. Pressures for adoption and implementation of aid transparency policies at other aid agencies are very similar, but constraints vary, leading to considerable differences in the degree of openness between aid agencies today. There are several factors which may influence whether and how other multilateral or bilateral organizations implement transparency agendas, including

[29] Remarks at Putting Open Government into Action, event at the World Bank, Washington, D.C., 23 February 2012.

donor state pressure, recipient state interests, bureaucratic politics, the commitment of organizational leaders, institutional structure (especially degree of decentralization and autonomy of mission offices), diffuse or focused civil society and NGO pressure, and peer pressure from other aid agencies. There are also likely to be pervasive technical and resource capacity constraints on implementation. While such material constraints were certainly present at the Bank, they were not insurmountable, and the World Bank is a relatively wealthy and well endowed institution compared to its peers.

It is also not clear that the aid transparency policy norm, while similar institutionalized across institutions, will be similarly implemented and enforced. The International Aid Transparency Initiative (IATI) tries to ensure that this does happen, by constructing a common set of rules and expectations for aid reporting. Yet getting aid agencies (or more accurately their states, in the case of bilateral aid agencies) to sign on to IATI is just the first political hurdle. The deeper challenge is getting the signatories to actually input data into IATI's platform. For many agencies with different data collection and reporting procedures, the transaction costs of adhering to the IATI standard may be quite high, requiring significant institutional investment in converting complex raw data into a simple, "digestible," form for the general public. This in turn requires reallocation of scarce staff time and resources, and a difficult culture change in the organization's reporting habits.

At this point, what we observe in terms of the rather remarkable story of the successful engineering of transparency norm implementation at the Bank may not tell the whole story of the policy norm's life cycle in the broader international aid regime complex. Yet it does seem to be the case that even in the face of implementation challenges in different international organizations, this is one policy norm whose underlying principles and practices have indelibly shaped the contemporary global governance of development.

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