Increasing Transparency for Greater Accountability
Note to Executive Board representatives

This document is submitted for review by the Executive Board.

To make the best use of time available at Executive Board sessions, representatives are invited to contact the following focal points with any technical questions about this document before the session:

**Bambis Constantinides**  
Director  
Office of Audit and Oversight  
Tel.: +39 06 5459 2054  
e-mail: c.constantinides@ifad.org

**William Skinner**  
Officer-in-Charge  
Office of the Secretary  
Tel.: +39 06 5459 2974  
e-mail: w.skinner@ifad.org

**Cassandra Waldon**  
Director  
Communications Division  
Tel.: +39 06 5459 2659  
e-mail: c.waldon@ifad.org

**Ruth Farrant**  
Director  
Financial Management Services Division  
Tel.: +39 06 5459 2281  
e-mail: r.farrant@ifad.org

**Advit Nath**  
Director  
Accounting and Controller’s Division  
Tel.: +39 06 5459 2829  
e-mail: a.nath@ifad.org

**Matthias Meyerhans**  
Director  
Administrative Services Division  
Tel.: +39 06 5459 2492  
e-mail: m.meyerhans@ifad.org

**Pierre Moreau-Peron**  
Director  
Human Resources Division  
Tel.: +39 06 5459 2820  
e-mail: p.moreau-peron@ifad.org

**Luis Jiménez-McInnis**  
Director  
Partnership and Resource Mobilization Office  
Tel.: +39 06 5459 2705  
e-mail: l.jimenez-mcinnis@ifad.org

**Lisandro Martin**  
Chief  
Operational Programming and Effectiveness Unit  
Tel.: +39 06 5459 2388  
e-mail: lisandro.martin@ifad.org

**Emmanuel Maurice**  
Interim General Counsel  
Tel.: +39 06 5459 2457  
e-mail: e.maurice@ifad.org

**Thomas Bousios**  
Director  
Information and Communications Technology Division  
Tel.: +39 06 5459 2288  
e-mail: t.bousios@ifad.org

Queries regarding the dispatch of documentation for this session should be addressed to:

**William Skinner**  
Chief  
Governing Bodies  
Tel.: +39 06 5459 2974  
e-mail: gb@ifad.org
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Increasing Transparency for Greater Accountability

I. Introduction and scope

1. IFAD’s main stakeholders are the beneficiaries of its programmes, providers and recipients of IFAD financing, development partners, staff, host governments and communities, and Member States. Governing bodies and Management share accountability for the delivery of the Fund’s programme outcomes and the proper management of financial and human resources.¹

2. Accountability calls for adherence to high standards of transparency. In presenting IFAD’s business model² to the second session of the Consultation on the Eleventh Replenishment of IFAD’s Resources (IFAD11), Management stated: “Considerably more weight will be given, organization-wide, to transparency. Transparency is a commanding incentive for better data quality, more efficient use of resources, more careful monitoring, better policy compliance and benchmarking”. IFAD recognizes that transparency is perhaps the most transformational of all the elements of a results culture. The availability and accessibility of the right information at the right time has the potential to change the accountability relations between stakeholders, for instance by providing rural smallholders with the information they need to hold decision makers to account for the use of IFAD resources.

3. IFAD’s policy on disclosure has evolved gradually over the past several years. In 2010, the Fund embraced the principle of presumption of full disclosure to ensure greater access to documents and information on IFAD’s activities. As outlined in the revised IFAD Policy on the Disclosure of Documents (2010),³ the Fund may disclose publicly any information in its possession that is not on its list of exceptions, to ensure compliance with best practices to safeguard confidentiality followed by other international financial institutions (IFIs). In the spirit of the presumption of full disclosure, IFAD is committed to further expanding access to information related to its activities. Aspects of transparency are also inherent in other governance and policy documents such as the IFAD Evaluation Policy, the Social, Environmental and Climate Assessment Procedures of IFAD and the IFAD Policy on Preventing Fraud and Corruption in its Activities and Operations.

4. Changes in stakeholders’ expectations and the external environment in which IFAD operates, developments in international standards – including those of the International Aid Transparency Initiative (IATI) of which IFAD is a member – and best practices, changing practices among comparators, the organization’s changing financial architecture, and the emergence of new modes of communications, have led to further demands and opportunities with regard to the disclosure of information and enhanced transparency.

5. This paper presents an overview of IFAD’s current policies and explores potential ways of ensuring that the right information is provided at the right time to IFAD’s stakeholders. Separate sections are provided on specific institutional aspects, as follows: (ii) operations; (iii) management of financial resources and internal oversight; (iv) management of human resources; and (v) information to governing bodies. The sixth section presents a summary and next steps. The ultimate objective is to facilitate a results culture.

6. Guided by input from the Audit Committee and the Executive Board in September 2017, a proposal will be submitted to the Executive Board in December 2017. This paper will outline proposed actions and the findings of further analysis of potential

¹ An Update on IFAD’s Accountability Framework (EB 2013/110/INF.5) was presented to the Executive Board in December 2013, which provided a detailed description of the components in IFAD’s governance and institutional setup that ensure that the organization is accountable to its stakeholders for the achievement of institutional objectives.
² See IFAD11/2/R.3: Enhancing IFAD11 business model to deliver impact at scale.
benefits and risks, staff and financial resources needed, legal implications, comparators’ practices, and privacy and confidentiality obligations.

II. Increasing transparency: Operations

A. Current disclosure practices and restrictions

7. The achievement of operational objectives is measured and publicly reported through the Results Measurement Framework agreed with Member States, the Development Effectiveness Framework, the Report on IFAD’s Development Effectiveness, the Annual Report on Results and Impact of IFAD Operations, IOE evaluations, progress reports on the strategic and medium-term plan and a report to the Audit Committee on project audit reports. Furthermore, detailed information on project cycle activities is made available to the public and to governing bodies on design, implementation, supervision and evaluation of individual projects and programmes. Information on investigation and corruption prevention activities including case-specific summaries is posted annually on the public website.

8. According to the Disclosure Policy, the following information may not be disclosed to the public: 4
   - Information provided by Member States or third parties in confidence;
   - Deliberative processes or information that has been identified as sensitive by the government of the country concerned; disclosed documents shall be limited to the results of deliberations, and shall not include the deliberative processes that took place before the results or decisions were reached, unless otherwise decided;
   - Procurement processes involving prequalification; and
   - Analysis of country creditworthiness and credit ratings.

9. The policy also established eligibility criteria for public disclosure: 5
   - “… due consideration shall be given to protecting the confidential nature of information that, if disclosed, could be potentially detrimental to the interests of others or the Fund, as well as to safeguarding proprietary and financial information whose disclosure could interfere with IFAD’s ability to carry out its activities.
   - “… before disclosing documents, appropriate attention shall be paid to identifying text or data that is confidential or may adversely affect the relationship between IFAD and the borrower and/or recipient, if disclosed. If appropriate, IFAD may consult with the borrower and/or recipient and/or other third parties, and/or make adjustments to documents to address issues of concern to the borrower and/or recipient, before the documents are disclosed.
   - “In the event that IFAD is not the sole owner of the documents or information, authorization shall be sought before disclosing such documents or information.”

10. Accordingly, some project-related documents that are not authored by IFAD are not publicly disclosed. Similarly, information pertaining to individual borrowers such as specific lending terms or assessment ratings is not shared with other parties.

11. IFAD disclosure practices with regard to programme management are aligned in many areas with those of other IFIs that have a similar operational business model. Differences are highlighted in discussing potential opportunities in the following section.

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4 The full list of exceptions is contained in annex III of the Disclosure Policy.
5 See Disclosure Policy, annex V.
B. Potential opportunities for increasing transparency

12. The following opportunities to enhance transparency have been identified, however, further review may be needed for some of the actions, including a more detailed assessment of resource implications:

(i) **Full compliance with the International Aid Transparency Initiative:** IFIs, including IFAD, show consistently high levels of commitment to IATI. They provide considerable financial support to the IATI Secretariat and are the highest performing group of IATI publishers. Nevertheless, the frequency and scope with which IFAD publishes data to IATI lags behind that of its peers and needs to be stepped up. IFAD is taking concrete steps to improve compliance with the IATI standards. One of these is automated reporting, which will enhance data quality and increase reporting frequency. Current manual data handoff will soon be available automatically from IFAD’s systems to the IATI Registry and in a subsequent phase, disbursement transactions; geographic information system (GIS) data on project areas and links to project documents disclosed on IFAD’s website will be added. In promoting broader adherence to the principle of transparency, IFAD will proactively encourage governments and implementing partners to publish financial and results data related to the programmes it supports to IATI. Henceforth, agreements to this effect will be recorded in country strategic opportunities programmes (COSOPs). IFAD is hosting the IATI Members’ Assembly in October 2017, which should provide an opportunity for further benchmarking with comparators around transparency.

(ii) **Public disclosure of all project completion reports:** This practice is already in place at other IFIs and, if adopted by IFAD, would strengthen its accountability around programme outcomes. There are no significant risk implications or technological challenges involved. However, new procedures may need to be introduced to obtain authorization from document owners and authors, in this case the recipient governments. Some additional resources would be required to adapt internal tools, workflow and operational guidelines. Furthermore, the legal feasibility of a retroactive application of such disclosure will need to be carefully assessed as well as resource implications.

(iii) **Public disclosure of project external auditor’s reports:** This practice is already being followed by many other IFIs and would strengthen the transparency and accountability of the use of IFAD financing if adopted. Resource implications are not expected to be significant. However, the requirements for the initial development of the workflow into the corporate site and adjustments required to the existing audit report tracking system need to be further assessed. In terms of risk implications, one mitigating action will be to ensure authorization by the document author and confidentiality of any sensitive contents. IFAD will seek to mitigate associated risks as other IFIs have done, without time-consuming follow-up actions by all parties involved. Appropriate legal provisions and revisions to the IFAD Guidelines on Project Audits and the Operational Procedures for Project and Programme Audits may need to be introduced to permit such disclosure. An approach paper for revision of the IFAD Guidelines on Project Audits and the Operational Procedures for Project and Programme Audits will be presented to the Audit Committee in September detailing the roll-out process for the new guidelines in 2018. Furthermore, the legal feasibility of retroactive application will need to be assessed.

(iv) **Additional reporting to the governing bodies on project financial management and fiduciary mechanisms, developments and results:** Reporting to the Audit Committee, which at present covers project audits, audit findings, timeliness of report submission and comparative trends, will
take a broader and more holistic approach to include financial management developments, harmonization efforts with other IFIs and results achieved. Salient elements of such reports may also be disclosed to the Executive Board where relevant to the Board’s mandate. This will enhance transparency over the application of financial management assurance policies and adherence to international standards and best practices. There are no risk implications and any additional resource requirements are expected to be low if current platforms and existing reporting processes are used; the groundwork has already been laid to equip the Financial Management Services Division with enhanced reporting capabilities to assist in the preparation of the broadened reporting.

(v) Public disclosure of lending terms classification of borrowers: Most IFIs publish substantially more data than IFAD in this area, including country income categories. This would strengthen the transparency and accountability of the use of IFAD financing if adopted. Although the resource implications are not expected to be significant, the effort required for initial data development and associated reporting and publishing on the website will need to be assessed. There are no expected significant risks, as IFAD will adhere to underlying procedures in establishing the lending terms; indications have already been given to the IFAD11 Consultation as to Management’s intention to strengthen related reporting.

(vi) Additional information on products and terms to borrowers and recipients: IFAD is preparing a series of information notes on products and terms, including loan pricing, single current lending, to facilitate the understanding of borrowers of IFAD specific financing terms and conditions. Such product notes are already disclosed by other IFIs.

(vii) Public disclosure of the geographic location of all IFAD operations through easily accessible maps: Similar initiatives have been carried out by a number of other IFIs, not only as a means to identify project locations but also to have an online platform enabling citizens, governments and donors to view the locations of their investments, and improve aid targeting, coordination and evaluation. IFAD is working on the development of a geo-portal with a robust GIS infrastructure and database for the central management of spatial data related to IFAD operations. As part of this project, project area data will be exported and displayed on the IFAD website in an interactive and user-friendly interface, with near to real-time updates. A test phase of system setup and preparation of the data for migration is currently under way, to be followed by a 2018 rollout on IFAD’s corporate website. This practice will contribute to boosting IFAD’s visibility and further enhance access to data.

(viii) Additional reporting to the Executive Board on key elements of the performance-based allocation system (PBAS) methodology: Management will continue to enhance reporting on the implementation of the PBAS. To this end, it will provide the Executive Board with a summary report, on a country-by-country basis, with data on actual programme of loans and grants (PoLG) commitments approved by the Executive Board during a replenishment period.

13. Further actions being assessed include the public disclosure of corporate reports on performance and results of IFAD-supported operations and the disclosure of responses to the beneficiary client surveys. The first action would increase IFAD’s ability to share data related to its activities. There are no significant risks as most of this information is already available in publicly disclosed documents. However, it will have an impact on resources in terms of developing content, enabling automation and maintaining tools. The disclosure of responses to
the beneficiary client surveys would strengthen IFAD’s capacity to achieve operational excellence by ensuring regular feedback loops from governments and recipients. It would also strengthen IFAD’s partnerships with stakeholders by promoting timely follow-up on the feedback provided. There are some resource implications to make this content available on the website, and to develop and implement workflows to establish two-way communications with beneficiaries and mitigate any reputational risks in a timely manner.

III. Increasing transparency: Management of financial resources and internal oversight

A. Current disclosure practices and restrictions

14. Financial performance is reported through annual and periodic financial, investment and budgetary reports to the governing bodies, most of which are publicly accessible, as well as through the public website. The list of exceptions stipulated in the Disclosure Policy is in line with the approach of other United Nations agencies and IFIs. Current restrictions relevant to financial and oversight information apply to:

- Information, decisions and/or recommendations originating from the Sanctions Committee or any other internal body established in IFAD that makes decisions or recommendations on confidential issues;
- Confidential legal advice provided by the Office of the General Counsel (LEG) to the governing bodies and to Management;
- Documents related to security and safety arrangements for IFAD and its staff;
- Internal financial information;
- Documents related to deliberative processes; and
- Procurement processes involving prequalification.

15. Accordingly, IFAD internal administrative and financial procedures are not normally disclosed; nor are records of deliberative processes or information such as minutes of committee meetings, internal communications and instructions and corporate risk assessment considerations.

16. A general benchmarking of the practices of United Nations agencies and IFIs based on information readily available indicates that IFAD information disclosure practices in this area are generally aligned with peer practices. However, opportunities for further alignment exist and are noted in the context of the specific proposals.

17. With regard to internal oversight information, some United Nations funds and programmes post internal audit reports (IARs) on their public websites, a practice that is not generally followed by United Nations specialized agencies or any of the IFIs. United Nations agencies and IFIs generally issue annual internal oversight reports to their governing bodies but only some of these are accessible on their public websites. IFIs generally do not disclose publicly any information on the results of internal audit activities. IFAD has been submitting an annual report to the Audit Committee with an overview of significant results of audits, the implementation status of audit recommendations, and information on investigation and corruption prevention activities including case specific summaries. The part of the report relevant to investigations and anticorruption is posted to IFAD’s website.

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6 The Disclosure Policy clarifies that disclosed documents shall be limited to the results of deliberations, and shall not include the deliberative processes that took place before the results or decisions were reached, unless otherwise decided. The release of verbatim deliberations of governing bodies or of internal administration and the deliberative process will require the specific authorization of the body concerned.
B. Potential opportunities for increasing transparency

18. The following opportunities to enhance transparency have been identified, however, further review may be needed for some of the actions, including a more detailed assessment of resource implications:

(i) **Public disclosure of important financial trends**: A review of other United Nations agencies and IFIs indicates that most disclose information on top donors, cofinanciers and spending by category. The resource implications of such reporting would be low to moderate, depending on the scope of disclosure, and no risks are foreseen. Management is in favour of disclosing such information to stakeholders and there are no legal impediments to doing so.

(ii) **Disclosure to the Audit Committee of information on corporate risks and risk management practices**: The Audit Committee is tasked under its terms of reference with reviewing the risks faced by the Fund each year, assessing risk management practices and procedures in place, and providing an opinion and comments thereon to the Board. Management will fully support the committee by disclosing information on corporate risks and the enterprise risk management process. There are no significant resource implications, and a more in-depth committee review of corporate risks will strengthen corporate governance and oversight.

(iii) **Submission to the Executive Board of summary audit and investigation information**: This practice is already followed by most United Nations agencies and certain IFIs, generally without public disclosure. In the case of IFAD this would mean the submission of the Annual Report on the Activities of the Office of Audit and Oversight (AUO) the Executive Board with an overview of significant audit findings, the implementation status of audit recommendations, and information on investigation and corruption prevention activities, including case-specific summaries. There are no significant resource and risk implications. However, this could entail some duplication since the Audit Committee already reviews the AUO Annual Report in the context of its assessment of the effectiveness of oversight mechanisms.

(iv) **Public disclosure of elements of the corporate procurement guidelines**: IFAD’s corporate procurement guidelines are broadly aligned with those of the United Nations agencies and IFIs. IFAD will take steps to make the guidelines available on its website in addition to the information already available on the United Nations Global Marketplace. A legal risk assessment will be required before taking this step, in light of differences in the legal frameworks of IFAD and peer organizations having already adopted this practice.

(v) **Disclosure of elements of the staff travel guidelines**: IFAD’s travel guidelines are broadly aligned with those of the United Nations agencies and IFIs. Staff travel guidelines are not generally publicly disclosed by comparators, although some elements are disclosed to governing bodies or the public through budgetary or other publicly available reports. Management will explore the possibility of disclosing key elements of its travel guidelines to its governing bodies or posting these on its website, after assessing any potential risks.
IV. Increasing transparency: Management of human resources

A. Current disclosure practices and restrictions

19. Information on some aspects of human resources management is provided through the budgetary process and periodic reporting on organizational and administrative matters. The list of exceptions stipulated in the Disclosure Policy is in line with the approach of other United Nations agencies and IFIs. Current restrictions on human resources information are as follows:

- Personal information such as personal staff records, medical information and personal communications of the President of IFAD, other IFAD officials, and IFAD staff; and personal communications of Executive Board members, their alternates and their senior advisers;
- Information, decisions and/or recommendations originating from the Sanctions Committee or any other internal body established in IFAD that makes decisions or recommendations on confidential issues;
- Confidential legal advice provided by LEG to the governing bodies and to Management;
- Human Resources Division files, draft documents and e-mail communications; and
- Documents related to deliberative processes.

20. Accordingly, internal human resources procedures are not normally disclosed; nor are records of deliberative processes or information such as minutes of committee meetings, internal communications and instructions. Similarly, confidential records (e.g. on investigations, recruitment and conflict resolution) are not shared internally or externally although summary results or information on trends is disclosed periodically.

21. IFAD follows the United Nations Common System and its human resources practices are similar to those in place at other agencies. Most of the comparators public information disclosure policies reviewed provide for similar degrees of disclosure in relation to human resources matters and policies. The IFAD Human Resources Policy is public but human resources procedures and guidelines are not. Moreover, as per best practices, no staff-related information is disclosed that is likely to endanger the safety and security of any individual, violate his or her rights or invade his or her privacy.

B. Potential opportunities for increasing transparency

22. Further actions under consideration include the public disclosure of elements of important human resources guidance having a potential public interest: As noted above, comparators publish elements of human resource policy but do not generally publicly disclose human resource rules, procedures or guidelines. Management will explore the possibility to publicly disclose information on the underlying principles of human resources policies having a potential public interest. This practice would help attract a wider pool of interested candidates and contribute to information-sharing within the United Nations Common System. Some resources may be required initially for a document review and risk assessment.
V. **Increasing transparency: Information to governing bodies**

A. **Current disclosure practices and restrictions**

23. The timely submission and availability of pertinent information to the IFAD governing bodies is critical in ensuring the proper discharge of their governance role. Member States have access to documents submitted for review, approval or information in advance of sessions of the Governing Council and the Executive Board and their subsidiary bodies and working groups, through the Member States Interactive Platform (MSIP). Documents are also disclosed on the public website.

24. There are some restrictions on Member access to certain categories of corporate documents and records, primarily reflecting the exceptions and criteria set out in the Disclosure Policy. With some exceptions, Executive Board representatives have access to all Audit Committee documentation through the restricted section of MSIP. In addition, reports of the Audit Committee to the Executive Board on deliberations held at its meetings are publicly disclosed. Between 50 per cent and 60 per cent of documents reviewed by the Audit Committee are also submitted to the Board and therefore publicly available. The Comparative review of Audit Committee disclosure practices (AC 2014/131/R.7) in 2014 concluded that IFAD’s approach is in line with best practice among its comparators.

25. Audit Committee members have access to more detailed, non-public information, such as IARs, in line with its advisory role to the Executive Board on the effectiveness of IFAD financial and risk management practices and of internal and external audit mechanisms. Accordingly, access to documents submitted for deliberation by the Audit Committee is restricted and participants in Committee meetings are bound by confidentiality obligations. Currently, Executive Board representatives who are not members of the Audit Committee cannot access IARs, which may be discussed by the Audit Committee in closed session.

26. In March 2017, Management carried out a benchmarking exercise on the access by IFI executive board members to IARs. Of the six main IFIs surveyed, three provide access to IARs to board members, two do not, and one provides access at the discretion of the Audit Committee. In July 2017 the Audit Committee held a preliminary discussion on this matter. Members agreed to seek the Executive Board’s views on this topic with further discussion in the context of discussion on this paper.

27. Another set of documents with restricted access pertains to information shared with Convenors and Friends. This is mainly due to the informal nature of this group of representatives of the three Lists, whose role is to facilitate decision-making prior to formal governing body meetings, through ongoing dialogue with Senior Management and the Office of the Secretary.

28. For ease of reference, a list of exceptions from the Disclosure Policy that may be relevant to the public disclosure of governing body information is provided below:

- Confidential legal advice provided by the LEG to the governing bodies;
- Audit Committee documents, with the exception of the annual investigation reports;
- Deliberative processes or information that has been identified as sensitive by the government of the country concerned: disclosed documents shall be limited to the results of deliberations, and shall not include the deliberative processes that took place before the results or decisions were reached, unless otherwise decided; and

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7 The Policy clarifies that the release of verbatim deliberations of governing bodies will require the specific authorization of the body concerned.
Verbatim deliberations of governing bodies and verbatim deliberations of internal administration and deliberative processes. In order to protect the integrity of such deliberative processes and to encourage openness in exchanges and written submissions, the release of such verbatim deliberations will require the specific authorization of the body concerned.

B. Potential opportunities for increasing transparency

29. Specific proposals for increased access to specific information by governing bodies are included in the previous sections. While requiring additional assessment, some potential actions that could contribute to increased transparency in this area are:

(i) **Issuance of a note to IFAD Members detailing publicly available information:** Feedback from Member States has made it clear that publicly disclosed information is often not readily available due to limited knowledge, difficulty of access and timing of posting. The note will be an initial step to enhance accessibility and further actions will be taken in specific areas to improve access based on further feedback from users.

(ii) **Access by Executive Board representatives to restricted Audit Committee documents such as internal audit reports:** IFI practices with regard to access by board representatives to IARs are mixed – several do not allow such access, others do, and one IFI requires express authorization each time by the Audit Committee. In all cases, IARs are not publicly disclosed. It is to be recalled that other IFIs have resident boards and designated board members have slightly different obligations than those of IFAD Executive Board representatives. The decision to allow access to restricted Audit Committee documents should be based on a careful consideration by the Board of: (i) the need for access to specific information; and (ii) the confidentiality regime that applies to the information in question.

(iii) **Wider access to Convenors and Friends documentation.** Most documents shared with the Convenors and Friends are informal drafts provided in English only and without official codification as governing body documents. They are intended for use in discussion and to seek feedback from Convenors and Friends on a variety of issues, some of them of a sensitive nature. In their capacity as representatives of the three Lists, however, Convenors may share these documents within their respective lists. Broader access to this documentation would need to be assessed against these considerations. Potential risks relate mainly to a loss of the confidentiality inherent to the function of the Convenors and Friends meetings.  

VI. Summary and next steps

30. Management is committed to improving the availability, relevance, accessibility and timeliness of information to IFAD’s stakeholders. To this end, it will undertake the following steps – with the timing of actions determined by resource availability, any legal prerequisites and required system improvements:

- Automate the current data upload to the IATI Registry and subsequently add data on disbursement transactions and project areas, with links to project documents;
- Encourage governments and implementing partners to publish to IATI financial and results data related to the IFAD-supported programmes;
- Provide additional reporting to the Audit Committee on project financial management and fiduciary mechanisms, developments and results;
• Issue a series of information notes on IFAD products and terms, including on loan pricing and single currency lending;
• Disclose the geographic location of IFAD operations through easily accessible maps on the IFAD website;
• Provide additional information on the PBAS, including on actual POLG country commitments, to the Executive Board;
• Provide information on corporate risks and risk management practices to the Audit Committee;
• Publicly disclose additional information on important financial trends; and
• Issue a note to IFAD Member States restating information publicly available from IFAD sources.

31. Management will take steps to publicly disclose the information listed below, following an assessment of legal and resource implications and determination of any required preliminary steps as well as scope and timing.
• Information on the lending terms classification of borrowers;
• Project completion reports and project external auditor’s reports;
• Corporate reports on performance and results of IFAD-supported operations and responses to the beneficiary client surveys; and
• Elements of policy on corporate procurement, travel and important human resources guidance having a potential public interest.

32. Management will be guided by feedback from the Audit Committee and the Executive Board in taking further steps as follows:
• Provide the Executive Board with summary information on audits and investigations, to the extent currently provided to the Audit Committee;
• Provide Executive Board representatives with access to restricted Audit Committee documents such as IARs; and
• Provide wider access to Convenors and Friends documentation.

33. This paper is being presented to the Audit Committee and the Executive Board for review. Based on the resulting feedback, actions to increase transparency will be prioritized and further developed, building on an analysis of potential benefits and risks, staff and financial resource requirements, IT and legal implications and comparators’ practices.

34. The paper to be submitted to the Executive Board in December 2017 will provide an update on actions taken by Management, present final proposals requiring approval by the Board and, if necessary, propose revisions to relevant IFAD policies.