



World Bank Group External Task Force
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Re: Bank Information Center's Feedback on the Task Force's Draft Report on Integration of the World Bank Group Independent Accountability Mechanisms

To the Task Force:

We appreciate the opportunity to provide input on the Task Force's Draft Report. We commend the Task Force's thorough analysis of the World Bank Group's (WBG) independent accountability mechanisms (IAMs): the Compliance Advisor Ombudsman (CAO), Inspection Panel, and Dispute Resolution Services (DRS). As the WBG continues to integrate its operations and environmental and social (E&S) policies across its public and private investments, it is more important than ever that its accountability mechanisms are effective, independent, and genuinely responsive to project-affected communities.

We agree with the Task Force that integration could, in principle, enhance accessibility, coherence, and effectiveness. However, whether integration would succeed depends far less on the specific structural model adopted, and far more on the strength of policies, the independence and quality of leadership and staff, and the broader institutional environment—particularly whether WBG management supports or undermines accountability processes.

Our comments focus on three issues we consider foundational to any successful integration:

1. No policy regression, with a preference for upward harmonization
2. Independent and credible IAM leadership and staffing
3. A community-centered system that's supported- not obstructed- by management

Structure

The Task Force outlines three structural options for integration. We recognize that discussions around IAM structure are linked to broader integration efforts across the WBG, including the merging of E&S functions across public and private operations. However, while structural questions may be the most visible aspect of this process, structural reform alone will not fix the current system's core problems.

In the final report, we encourage the Task Force to explicitly acknowledge this dynamic- for any structural change to succeed, it must be paired with strong, non-regressive policies,

independent hiring for IAM leadership and senior staff, and a genuine institutional commitment from management to facilitate accountability.

Under all options, the Task Force recommends an integrated intake function. We welcome this in principle, but emphasize that intake must remain fully independent from management, that staff must not influence complainants' choice of process, and that information provided must be neutral, clear, and complete.

We are concerned that Option 1, which would create an integrated intake function while largely preserving the existing structure, would be a continuation of a system that is not yet delivering true remedy for communities harmed by WBG investments. The Task Force itself recognizes that the current system has limitations, and several of our recent experiences confirms this. The existing structure has not given project-affected people consistent access to accountability, timely case processing, or effective follow-through on remedial actions.

On the public sector side, we are concerned with some of the eligibility decisions by the Inspection Panel and the role of management and the borrowers in these decisions. World Bank management and borrowers have not developed strong Management Action Plans (MAPs) or implemented them effectively, and the Panel lacks authority to verify MAP implementation without Board approval. Within the DRS, very few cases have proceeded, largely because its policies require eligibility for compliance investigation before dispute resolution can be accessed. We have also seen a troubling lack of independence, with partners pressured to accept dispute resolution despite stating a preference for compliance.

On the private sector side, CAO faces significant backlogs, extended timelines in which deadlines are routinely missed, and persistent failures by IFC and MIGA to develop or implement robust MAPs in response to investigation findings. While many of these issues stem from policy shortcomings and management behavior, maintaining the current structure risks entrenching these problems rather than driving the culture change needed across IAMs, management, and the Board.

Among the remaining options, we share the Task Force's concern that Option 2 would create unnecessary and counterproductive competition between dispute resolution and compliance functions. We believe that Option 3a, the pyramid structure, offers the most promising foundation given its potential to clarify roles, reduce fragmentation, and promote collaboration. Our experience from other accountability mechanisms, particularly the Inter-American Development Bank's Independent Consultation and Investigation Mechanism (MICI), suggests that such a structure can function effectively when supported by strong policies and credible leadership.

At the same time, we caution against the additional complexity introduced by Option 3b, which would add a panel of experts within the pyramid structure. This approach risks creating a hybrid

model that combines the drawbacks of both systems, including potential inconsistencies across cases.

Ultimately, any structural model can succeed or fail. The determining factor is whether it is supported by strong policies, independent leadership, and a clear mandate to prioritize affected communities.

Commentary on Alternative Model (“Option 2b”)

We are aware that there are alternative proposals for structuring the WBG’s accountability system beyond those outlined by the Task Force. In particular, we note the “2b” model, which would consolidate compliance functions under the Inspection Panel across both public and private sector operations, while assigning dispute resolution functions across the institution to CAO.

While we understand the reasoning behind aligning dispute resolution and compliance functions across public and private lending, we only support this model with upward harmonization of eligibility standards. At a minimum, CAO’s eligibility standards should apply to both public and private sector investments.

For communities affected by WBG projects, the structure of the IAMs is secondary. What matters is whether an IAM accepts their complaint and whether the WBG remedies the harm. Right now, eligibility disparities mean that access to accountability depends on which part of the WBG financed the project causing harm, not on the merits of a complaint. A complaint that would go to an investigation at CAO would routinely fail to meet the Inspection Panel's eligibility requirements. This isn't coincidental: the Panel applies more restrictive eligibility criteria, Board involvement shapes eligibility and investigation decisions, and the Panel still positions itself as a "mechanism of last resort."

Any attempt to move away from CAO as a “first entry” point would constitute regression. We share the Task Force’s recommendation to align eligibility policy for the WBG IAM(s) with the leading practices among the four comparable MDB IAMs- requiring alleging harm and a good faith effort to engage with management and/or the borrower/client, or an explanation as to why this is not possible. We caution against any proposals suggesting that integrated management-led systems, including the Grievance Redress Service and Stakeholder Engagement and Grievance Redress, could fill the “first entry” role. These mechanisms lack transparency and do not reliably result in remedy. Time spent pursuing them can also count against complainants when they later seek access to IAMs.

We are similarly not persuaded by arguments regarding institutional independence. The claim that CAO leadership is uniquely vulnerable because it is “Bank staff” misrepresents how the office actually operates. The CAO Director General reports directly to the Board and is not part of, or accountable to, management. Both CAO and the Inspection Panel operate under Board

oversight, and independence depends more on selection processes, mandate, and safeguards than on leadership structure.

Taken together, the 2b model, as currently framed, risks reinforcing existing barriers to accountability. For it to be viable, it would need to include harmonized and accessible eligibility standards that meet CAO's current policy at a minimum, preserve direct access to independent accountability mechanisms, and avoid reliance on management-led systems that do not provide credible or transparent pathways to remedy.

On Resources and Capacity

We note the Task Force's cost-effectiveness analysis, but want to be direct- the budgets of these mechanisms are minuscule relative to the WBG's overall portfolio. As the institution takes on more risk, including in fragile and conflict-affected settings and through expanded private sector operations, the accountability system cannot remain under-resourced. Integration should be an opportunity to make the case for increased IAM capacity, not simply to redistribute existing constraints across a new structure. Any model that fails to address resourcing will struggle to deliver, regardless of how it is designed.

Policy Harmonization

We strongly agree with the Task Force that integration must adhere to a non-regression principle. As the report notes, there are significant differences across WBG IAM policies. For any of the structural options to succeed, the outcome must strengthen both access to remedy and institutional learning.

Policy differences across the WBG's IAMs impact accountability outcomes in practice. Higher eligibility thresholds for public sector investments limit access for affected communities, while constraints on verification weaken communities' ability to advocate for meaningful borrower and management follow-through on remedial commitments. We have observed these limitations firsthand, most recently in complaints involving a census project in Ecuador and a major road project in Bolivia. Board involvement at the eligibility stage led the Panel to find a hydropower dam project in Tajikistan, with downstream impacts in Turkmenistan and Uzbekistan, ineligible despite its initial recommendation to investigate.

Integration presents a critical opportunity to harmonize policies upward by adopting the strongest features across the existing mechanisms, including:

- Lower and more consistent eligibility thresholds, aligned with CAO's eligibility thresholds at a minimum
- Clear authority for IAMs to initiate investigations independently, aligned with CAO policy at a minimum
- IAM authority to recommend remedial actions, aligned with CAO policy

- Robust authority to monitor and verify implementation of Management Action Plans (MAPs) without requiring Board approval, aligned with CAO policy
- Explicit recognition of complainant choice between dispute resolution and compliance pathways, aligned with CAO policy, which allows complainants to choose after eligibility
- An extended timeframe for submitting complaints after project closure, aligned with the Inspection Panel and DRS's 15-month window

While the Task Force discusses what "no regression" means, the report would benefit from greater specificity on how upward harmonization would improve outcomes for communities. It should state plainly that there is no justification for weaker accountability standards in public sector operations. Measures such as expanding community access to accountability, enabling access to dispute resolution after eligibility, recommending remedial actions, and strengthening IAM authority to verify MAPs and initiate compliance investigations would more effectively center communities in the policy framework. At the same time, these steps would strengthen the World Bank Group's own effectiveness by enhancing institutional learning and improving its ability to identify and address harm.

Independence Depends on Leadership and Hiring Practices

The Task Force rightly emphasizes the importance of independence. However, independence is also a function of who leads IAMs and how they are selected. The final report would benefit from greater specificity on what credible, independent hiring looks like in practice.

Even the strongest structure will fail if leadership is not genuinely independent from management, selected through transparent and merit-based processes that include multi-stakeholder input, and accountable to both the Board and affected communities.

At a minimum, any structural option should adopt the leadership selection standards already in place for CAO's Director General, including:

- Strict pre-employment safeguards, including requirements that candidates be external to the WBG and cooling-off periods for former staff and Board officials
- Clear qualifications, including demonstrated integrity, international leadership experience, expertise engaging with civil society and marginalized or vulnerable groups, and, under Option 3a or 3b, experience across dispute resolution and compliance functions
- An independent, transparent, and participatory selection process, led by a multi-stakeholder selection committee that includes Board representatives and civil society stakeholders, with no substantive role for management in candidate evaluation
- Board oversight of final appointment

Beyond these minimum standards, we recommend that any integration model also include transparent, competitive recruitment for senior IAM staff, clear conflict-of-interest protections,

and adequate resources to handle caseloads effectively. Without this, integration could weaken the accountability system rather than strengthen it.

The Missing Piece: The Role of Management in Accountability

A critical gap in the draft report is the limited attention given to WBG management. IAMs do not deliver remedy on their own. Their effectiveness depends on whether management engages constructively with investigations, develops MAPs that genuinely respond to findings and implements them in a timely way, and avoids actions that delay or undermine accountability processes.

Recent experience across the WBG points to persistent problems- delays and gaps in MAP implementation, limited institutional learning following compliance investigations, refusal to develop MAPs in line with IAM findings, obstruction of compliance investigations, and Board resistance to granting the Inspection Panel authority to verify MAP implementation.

While the Task Force acknowledges the importance of remedial action, it does not adequately address how management behavior shapes outcomes on the ground. In the final report, we encourage the Task Force to explicitly address management's responsibilities, recommend stronger requirements for timely and effective MAP design and implementation, and clarify how granting IAMs independent authority to monitor and verify MAP implementation would better serve affected communities.

Without meaningful changes in management behavior, structural integration, policy harmonization, and improved hiring practices will not translate into better accountability outcomes.

Conclusion

We support the Task Force's effort to strengthen the WBG accountability system and agree that integration could offer real benefits. But it will only succeed if grounded in harmonized policies that expand rather than constrain accountability, independent and credible leadership backed by robust hiring practices, a system designed around the needs and rights of affected communities, and an institutional commitment from management to support rather than obstruct accountability processes.

Without these elements, there is a real risk that integration consolidates existing weaknesses rather than correcting them, undermining the entire system. We encourage the Task Force to use this moment not only to recommend streamlining structures, but to clearly identify the measures that would meaningfully strengthen the WBG's accountability system and its ability to deliver remedy on the ground.

Thank you for considering our input.