



2020

Cities and Villages Development Bank (CVDB): Public Disclosure Policy

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Public Disclosure Policy Statement

The Cities and Villages Development Bank (CVDB) is an organization committed to open access to information. Transparency is essential to building and maintaining public dialogue, increasing public awareness, enhancing good governance, accountability, and ensuring programmatic effectiveness. Openness promotes engagement with stakeholders, which, in turn, improves the design and implementation of projects and strengthens CVDB's overall outcomes. It also facilitates public oversight of operations during their preparation and implementation, which not only assists in exposing potential wrongdoing and corruption, but also enhances the possibility that problems will be identified and addressed early on.¹

CVDB's overall approach is therefore to disclose information unless there is a compelling reason for confidentiality. For limited cases where disclosure could have a negative impact on CVDB, the implementation of its programs, or deal with the legal obligations pertaining to privacy or intellectual property, information is retained as confidential.

Such exceptions generally fall under one of five main criteria outlined below. In principle, all relevant information regarding the organization, in particular its grant programs are made available to the general public with the intent of full disclosure.²

The five main criteria for exclusion are as follows³:

- i. International relations: Information that may harm CVDB's relations with other governments or institutions. This includes information received from or sent to third parties, under an expectation of confidentiality.
- ii. Security and safety: Information that may pose a risk to the security or safety of any individual, including CVDB's staff, management, contractors or Board of Directors
- iii. Personal information: Information that intrudes on the privacy of a person or could contravene confidentiality.
- iv. Commercially sensitive information: Information that does harm to CVDB or CVDBs partners, suppliers, or commercial interests.
- v. Information that is exempt from disclosure under other policies or regulations: This includes deliberative information.

Prior to publication on its website, CVDB will notify entities or persons up front that their information will be published and made available to the public. Entities or persons will have the opportunity to raise any concerns about information that will be made public and make a case for why specific information should be excluded. CVDB will assess the case based on the exclusion criteria outlined in this policy.

¹ Adapted directly from the World Bank Policy on Access to Information (54873), July 1, 2010

² Adapted directly from GEF Practices on Disclosure of Information (GEF/C.41/Inf.03), November 2011

³ Adapted directly from DFID IATI Guidelines, <https://www.gov.uk/government/publications/dfid-iati-guidelines/dfid-iati-guidelines-policy> (Last Accessed December 26, 2019).

Accessing Information

Under this policy, CVDB will significantly increase the amount of information it makes available to the public, particularly information related to any grant program. See Annex 1 for specific public disclosure procedures as they relate to CVDB's grant making.

Exclusions from Disclosure

CVDB does not provide access to information whose disclosure may pose a risk to the security or safety of any individual, including CVDB staff, Board of Trustee members, contractors and beneficiaries, including:

- Personal Information. (a) Personal information, including personal staff records, medical information, and personal communications (including e-mail) of individuals and their families; (b) Information relating to staff appointment and selection processes; and (c) Information relating to investigations of allegations of staff misconduct and personal conflicts of interest.
- Commercially sensitive information. While CVDB will publish grant performance reports, external evaluations and internal reviews, information disclosed on procurement is limited to the number of bidders and bid amounts. In addition, information marked as proprietary and/or confidential by sub-grantees, bids from contractors, etc. shall not be disclosed without the written consent of the provider of the information, except as required by national law.
- International Relations. Specifically, as it relates to information received from or sent to third parties, under an expectation of confidentiality including confidential donor information or confidential data about specific beneficiary groups.
- Deliberative Information. CVDB, like any institution or group, needs space to consider and debate, away from public scrutiny. It generally operates by consensus, and it needs room to develop that consensus. During the process it seeks, and takes into account, the input of many stakeholders; but it must preserve the integrity of its deliberative processes by facilitating and safeguarding the free and candid exchange of ideas. Therefore, while CVDB makes publicly available the decisions, results, and agreements that result from its deliberative processes, the proceedings of the Board of Trustees are held in closed sessions. Sensitive stakeholder discussions may also be kept confidential to protect beneficiaries.

Public Disclosure of Evaluations

As part of CVDB's disclosure policy both self and independent evaluations will be disclosed to the public with provisions for redacting any proprietary information.

Publicly disclosed reports will be disseminated widely through print and electronic media, workshops, seminars, conferences and other knowledge-sharing events, as well as through capacity development activities, where appropriate.

Additional detail on CVDB's evaluation disclosure policy is embedded in its Monitoring and Evaluation (M&E) Policy.

*Licensing Policy*⁴

The following paragraphs set out CVDB's policy on copyright and other intellectual property (IP) rights related to the data and other information CVDB provides. It also references the specific licenses for how CVDB's information, publications, and data may be used.

Unless otherwise noted, materials on CVDB's site, including multi-media material (photographs, video), policies, and other documents are licensed under the Creative Commons – Attributions License.

Users may therefore:

- Share – copy, use, and distribute CVDB's data and other material to others
- Create – make new works with CVDB's data
- Adapt – modify or transform CVDB's data and other material, change it into different formats, or combine it with other data sources.

The main restriction is that users must: Attribute – give credit to CVDB when data or other information is publicly used. Full details of user's rights and obligations are at:

Open Data Commons – Attribution: <http://www.opendatacommons.org/licenses/by/1.0/>
and Creative Commons – Attribution: <http://creativecommons.org/licenses/by/3.0/>

⁴ Adapted directly from IATI Open Aid Information Licensing Standard. <http://iatistandard.org> (Last Accessed December 30, 2019).

Annex 1: Grant and Loan Making Disclosure Process⁵

The following annex outlines the process CVDB will take to ensure public disclosure of decisions of grants/ loan awards..

Call for Proposals

The first step in the public disclosure process is to ensure that all calls for proposals are announced on CVDB's website, Facebook page, and through its Twitter account.

The information required to be posted on the website for a call include the following:

- Overall description of the specific call (including goal/objectives)
- Eligibility criteria for accessing the grant
- Available funding amount for grant (total funding availability and funding amount per grant award)
- Criteria for reviewing the grant
- Process for decision making
- Deadline for proposal submission
- Timeframe for selection

Depending on the target of the call, CVDB will also directly communicate to relevant stakeholders about the opportunity through, newspaper announcements, mail, fax, and electronic mail, along with an official signed letter.

Project Selection

The second step in the public disclosure process is to publicly announce the decisions made for a particular call. CVDB will post the announcements on CVDB's announcement page of their website <https://www.cvdb.gov.jo/en/announcements>. Depending on the project/program CVDB may also set-up a dedicated webpage to announce the selected grantees for a particular call. The information required for posting include the following:

- Brief description of the original call which would include the purpose of the grant/loan
- Information on the grantees/beneficiaries selected for funding along with the funding amount awarded
- Link to selected proposals (any proprietary information contained in proposal can be redacted prior to posting)

Applicants not selected will be notified through electronic mail, mail, or fax. In the notification CVDB will ensure applicants are notified that they can receive feedback on unsuccessful grants.

⁵ Procurement awards outside of the grant/loan award mechanism must also be publicly disclosed on CVDB's announcement webpage: <https://www.cvdb.gov.jo/en/announcements>; Guidelines for such disclosure are included in the Government of Jordan's Procurement Bylaw as well as CVDB's own Procurement Charter.

Project Implementation and Evaluation

The final step in the public disclosure process is to ensure project performance and impact are publicly available. These will be uploaded at the following site: <https://www.cvdb.gov.jo/en/bank-library>. If a project/program has its own dedicated website, all disclosed material should be uploaded to the project/program's own dedicated website.

Reports that must be made publicly available include but are not limited to:

- Annual implementation reports
- Mid-term reviews
- Independent evaluations

Audit reports and compliance monitoring will remain confidential.