

**Consultations on ADB's Draft Public Communications Policy
Hanoi, 13-14 May, 2004
Summary of Participant Recommendations**

ADB held a consultation workshop with representatives of NGOs, academe, and other development partners on 13 May 2004, and with government officials on the following day. Following are the recommendations of participants at both workshops. A list of attendees is attached to this summary.

Evaluation by Government Representatives

A. Strengths of the Draft Policy:

- ADB has made efforts toward greater transparency and relations with government so it can broaden information dissemination in line with globalization.
- This policy will align ADB policy with that of other international organizations.
- It is good that the current two information-related policies are unified.
- Relevant, updated information is to be provided regularly to affected stakeholders.
- The draft policy requires wide dissemination of information, including information about private sector projects (which is currently limited).

B. Recommendations for Improvement:

1. Project Information (General):

- *TA Reports/Feasibility Studies (para 92)* -- ADB should delete sensitive sections of these reports. Clearly state what is sensitive or confidential (ADB should decide this). Disclosing information appropriately entails costs. Reports produced under technical assistance are usually written by consultants, who must submit the documents to a higher level of authority. If such information is provided to the public, the content should be modified -- some details should not be disclosed, e.g., land prices for a road project. The financial implications may affect project implementation.

2. Project Information for Affected Stakeholders:

- The draft policy does not address stakeholders' ability to absorb information. It focuses on information *disclosure* without explaining *how* the information is to be absorbed by recipients. If the communication is only one-way, we won't know whether the target group received the information or not, and how effective the disclosure has been. Information processing should be adapted to the particular context so it can be more effective.
- The participation of relevant stakeholders, like community or mass organizations, the private sector, and NGOs, would help information dissemination, increase efficiency, and offset resource constraints. Project or investment owners are technical persons. They don't know how to provide information to the public. Women's unions and other social mass organizations have better experience in providing information to the public.
- We need to identify the affected groups. Ethnic minorities? Those resettled? Those experiencing environmental damage? Who are eligible to be considered affected groups? If a bridge or irrigation scheme is built, it is good for people, but those relocated should have new houses and schools, etc. It is important they be

informed. We agree that such dissemination should be done with the PPTA fact-finding mission.

- Access to information by affected groups in remote areas is a problem. Which means of communication should be used? In a water supply project, for example, information should be disseminated to affected groups in visible way so people can easily access it.

3. What type of Information should *not* be disclosed:

- Data that is considered business confidential, pricing information, and trade secrets should not be provided;
- ADB should have discretion in disseminating information; information should not be provided to all.
- ADB and the Government of Viet Nam should consider further harmonization of their respective disclosure policies. The Government has a regulation for providing information to international organizations that clearly states what kind of information is secret or confidential, and which information should be subject to what level or authority of approval. We recommend that ADB work closely with Viet Nam's agencies to clearly articulate the kind of information to be provided.
- "Constraints" – This word was taken to mean "impediments." Suggest changing this section title to "Exceptions to the policy of presumed disclosure", or just "Exceptions."

4. Experience of Other Multi-Lateral Development Banks (MDBs):

- The draft has yet to highlight the experience of the World Bank and other MDBs in this policy. Talk about others' experience so it can be incorporated into lessons learned.

5. Resource Implications Section:

- ADB already has sufficient capacity to train its personnel for implementation. The section on Resource Implications should be deleted because ADB can manage implementation with current staff.

6. Economic Data:

- Economic data listed in para 103 are provided to ADB by the Government of Viet Nam, but the types of economic/financial information cited in the draft policy should not be so detailed. ADB should compare the template/list of data Viet Nam provides to ADB against the categories of information listed in para 103.

7. Implementation Arrangements:

- *Accessibility* – ADB should participate in the Viet Nam Development Information Center (VDIC) in Hanoi to make information more readily accessible to all stakeholders. It is inconvenient to have information only in ADB's library.
- *Effective Date* (para 153) – The policy's effective date is 1 January 2005. ADB should not impose this effective date, but let it be after Board approval.

Evaluation by NGO, Academic and Donor Representatives

A. Strengths of the Policy and Consultation Process:

- The document is very advanced and can lead to a very good policy. It is comprehensive and well structured.
- The proposed changes are good, up-to-date, and necessary for the goal of poverty reduction. It meets the peoples' demand for information.
- The focus on disclosure – what will be publicly available -- is good.
- The participation of stakeholders – two-way communication – is taken into account.
- The explanation of what ADB will *not* disclose is good.
- Consultation has created an opportunity for an exchange between ADB and its partners and implementing agencies. This increases ADB's transparency.
- ADB has committed to implement this policy.

B. Recommendations for Improvement:

1. Operational Information (General):

- More detail is needed on the timing for posting of information. When is it useful, when is it not, to post? How will ADB make research available to the public and get feedback on documents? How will the PCP be put into operation? This guidance is not there in policy paper.
- The PCP answers the question "what?" by listing the names of documents that can be made public, but it should clarify the target group for each type of material, and indicate what channels of communication are suitable. ADB has different types of audiences, but listing them in para 67 does not provide clarity since communication methods should be different for each. In addition, the rationale for providing information to a target audience should be clear; if not, ADB may provide a great deal of information unnecessarily. (One participant suggested developing a matrix with the following categories for each type of information/document: objective of information provision, receivers/target, timing for disclosure, responsible person, and means of communication).
- The audience is unclear in the policy; who is the receiver of the information. Relates to classification of info. This type of audience needs this type of info, etc. policy should make clear which is for whom.

2. Project Information to Affected Stakeholders:

- *Feedback Mechanism* -- How will feedback from civil society and affected communities be managed and addressed? Use tools such as report cards to hear feedback from affected communities. In other policies, like Action Aid's disclosure policy, there are provisions that require borrowers to address feedback from the public. Enforcement is the most important thing. This policy is demand driven more than supply driven. Appendix 1 makes it appear that outsiders need information from ADB and are knocking at the door. Supply driven means that ADB wants to give out information.
- *Accessibility* -- The Internet cannot reach the poor or beneficiaries in remote areas. Internet usage is only available in urban centers and universities, and widely popular among youth. Any Internet use to approach target groups will have limited impact. The following methods are recommended:
 - leaflets/brochures

- communal cultural activists who relay information to the people in their own language and in the most appropriate way.
- civil networks such as NGOs (credible NGOs, determined through study or research) to disseminate information and get the feedback from the people.
- Radio Voice of Viet Nam – this network is efficient and people believe information obtained through it.
- Print materials should be simple, useful, and easily understandable. For remote areas, provide information on projects through posters or news bulletins.
- Affected peoples should be provided detailed project information during the pre-feasibility stage, including how people will benefit and the aims of the project. ADB should conduct a baseline survey of the demands of the people; project staff should meet and inform people so they understand. Information should not be technical.
- Information should be provided to enable the target group to participate and own the project. The information is different for each project. During project preparation, the basic research and basic objectives should be communicated to enable participation and ensure the suitability of the design. During implementation, give information on effectiveness/impact to support the monitoring process. At a project's close, disseminate lessons learned so others learn from experience and can scale up this model.

3. Structure and Organization of the Paper:

- The policy document has procedures and a strategy. This part is a little weak. It is not strategic and should include a clear goal.
- It also needs a time frame for impact assessment.
- What is the vision? This is not strong enough. ADB should develop a short, clear, strong statement that will impact the mindset and heart of the audience.

4. Audiences:

- ADB staff should be mentioned in para 67. They should be the first people to understand the policy because they interact with the public.

5. Constraints/Exceptions to the Policy of Presumed Disclosure

- The more you disclose, the better. Information is strength as it empowers people.
- More detail is needed on the criteria for confidentiality.
- There are some exceptions, like health and personnel records, copyrighted information or that which belongs to another organization, and information that is prohibited from disclosure according to a member country's regulations.
- ADB should decide which information is "sensitive" and provide criteria in the policy. Example: for SARS, non-disclosure was motivated by cost. The policy should clarify what type of information is appropriate and what is not appropriate. The current Constraints section is unclear.

6. Implementation Arrangements

- How will the policy be implemented? The paper is not clear on this point.
- The role of the InfoUnit and how it operates (who does what) is unclear. If we understand who is responsible for what, we can understand the means of communication.

- ADB staff is the only ones carrying out PCP, and thus implementation will be subjective. An external committee is needed for objectivity. The proposed PCAC is good, but another more independent body would help that. Staff dealing making decisions on disclosure are also handling complaints. An independent body could issue an advice.
- Time limits for responses – Para 145 sounds like it could take up to 90 days to fulfill a request and that is far too long. Reconsider this timing.

7. Project Monitoring and Evaluation

- The role of civil society in monitoring the policy should be strengthened. ADB proposes the policy, implements it, and monitors it – this is not so objective. NGOs should participate in monitoring.

8. Good Practices

- ActionAid has a policy on disclosure of information.

9. Internal (within ADB) Communications

- Some questioned whether the policy should it be expanded to include communications *within* ADB.

**Review of the ADB's Draft Public Communications Policy (PCP)
Hanoi Workshop, 13 and 14 May 2004**

List of Participants

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1	Ms. Nguyet Que Tran Communication Officer	ActionAid Vietnam
2	Ms. Phuong Thao Hoang Funding and Fund Raising Manager	ActionAid Vietnam
3	Mr. Van Duong Hoang Specialist in Agri and Rural Development	CECI
4	Ms. Duc Thi Hoai Nguyen Director	Center for Reproductive and Family Health
5	Ms. Thi Hanh Vuong Director	CEPEW
6	Mr. Jaime Frias Uribe Country Director	International Development Enterprises
7	Ms. Thi Viet Nga Dao Consultant	International River Network
8	Mr. Toshiyuki Doi	Mekong Watch
9	Mr. Ngoc Quang Dang Executive Director	Rural Development Services Center
10	Ms. Nguyen Thi Huong Information & Communication Officer	WWF Indochina Program
11	Ms. Minh Hong Hoang Information & Communication Manager	WWF Indochina Program

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12	Mr. Van An Dinh Director	CIEM
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14	Mr. Van Truong Nguyen Director	ECOECO

15	Mr. Cuong Nguyen	Rural Development Assistance Center (RDAC)
16	Ms. Lan Hai Duong Director	The Center for Social and Development Research

DONOR ORGANIZATIONS

17	Mr. Justin Fong Information Management Specialist	Canadian Cooperation Office (CIDA)
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19	Ms. Thanh Ha Hoang External Relations Officer	World Bank

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23	Ms. Kim Hue Nguyen	ICD, MOHA
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25	Mr. Duong Khanh Au External Finance Department	MOF

MEDIA

26	Ms. Thuy Le Reporter	The Saigon Times
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28	Mr. Truong Son Nguyen Project Manager	Power Distribution Rehabilitation
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29	Mr. Thanh Can Ngo	Public Administration Reform Master Program
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