



**Civil Society Forum – Focus Group Meeting
on the Review of the World Bank Group Sanctions System
*Consultation Feedback Summary***

Date: September 10, 2013, 10.00 a.m. – 12.00 p.m.

Venue: World Bank, Washington D.C.

Total Number of Participants: 1

FEEDBACK FROM TRANSPARENCY INTERNATIONAL - USA

General Comments

- Commended the Bank for publishing the transcript of the multi-stakeholder consultation meeting held on August 6, 2013 and reiterated its call for ensuring a transparent and comprehensive consultation process by making available a full text or redacted version of Phase I Report, which would allow stakeholders to better understand the rationale of some of the review team’s preliminary recommendations
- Support for the review team’s recommendation to increase the transparency of the system by publishing the Sanctions Manual and the reasoning behind SDO determinations when they become final
- Commended the Bank for its publication of the Law Digest, Sanctions Board decisions, and Advisory Opinions of the World Bank Group Senior Vice President and General Counsel

Increase Transparency of Sanctions Board decisions

- Highlighted the importance of the deterrent effect of naming respondents in Sanctions Board decisions (as is current practice in SDO determinations in non-contested sanctions proceedings) and of establishing a clear connection between the sanctions decision and the respondent

Increase Efficiency of Investigations

- Called for more investigative focus on larger corruption cases and for adopting a proactive, risk-based investigative approach to uncover corruption and other cases with the most significant impact on the Bank’s development goals.
- Support for the introduction of performance standards which should be coupled with a new incentive structure and ‘success metric’ for investigators that would favor prioritizing cases with the most significant impact on the Bank’s development goals
- Concern about the time taken to investigate small fraud and forgery cases. Understand that larger, more complex corruption cases may require lengthy investigations