



**Regional Consultation Meeting  
on the Review of the World Bank Group Sanctions System  
Consultation Feedback Summary**

**Date:** October 17, 2013, 3.00 p.m. – 5.00 p.m. (+0300 UTC).

**Venue:** World Bank's country office – Nairobi, Kenya (video-connection from Washington D.C.)

**Total Number of Participants:** 20

| <b>FEEDBACK FROM STAKEHOLDERS</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
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| <b>General Comments</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <ul style="list-style-type: none"> <li>• Participants urged the Bank to disseminate more widely the suspension and debarment lists in member countries, thus raising awareness of the system, and to consolidate the lists in order to improve their accessibility</li> <li>• Participants urged the Bank to permit borrowers to apply their own debarment lists to Bank financed operations</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>Transparency, Due Process, and Independence</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <ul style="list-style-type: none"> <li>• The Bank should take steps to increase awareness of the sanctions system and provide guidance to project implementing entities on how to handle allegations of fraud and corruption, including in the case of projects and programs supported by other co-financiers</li> <li>• Participants urged the Bank to improve the 'equality of arms' between INT and respondents by providing each respondent with an opportunity to be heard before a temporary suspension is imposed</li> <li>• Call for a reduction in the number of Bank staff members of the Sanctions Board as a means to increase independence</li> <li>• Participants identified the need to introduce strict deadlines for actors in the sanctions system (i.e., INT, OSD and the SB) as a means to ensure efficiency and ensure fairness to respondents</li> <li>• Need to increase transparency for bidders in Bank-financed projects; standard bidding documents should be much clearer on the existence of Bank sanctions and the implications for bidders</li> <li>• Participants called for a more diversified use of sanctions that is proportionate to the misconduct and expressed support for the review team's recommendation to revisit the 'baseline' sanction of 3 year debarment with conditional release</li> <li>• Need to improve the Bank's efforts in reaching out to respondents in an effort to reduce the numbers of 'default' sanctions (i.e, sanctions imposed because respondents did not respond to Notices of Sanctions Proceedings)</li> </ul> |
| <b>Conduct and Efficiency of Investigations</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <ul style="list-style-type: none"> <li>• Participants underscored the need to improve information sharing between INT and country/project officials as an essential element to enable country/project officials to address a specific problem, thus avoiding paralysis in the implementation of the affected project</li> <li>• Participants suggested that the involvement of INT, as members of the project team during project preparation, would be beneficial</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |