International Organisations Climbing on a Ladder of Public Participation – a Case Study of the World Bank Instruments

JAN DOSTÁL	Faculty of Social Sciences, Charles University, Prague, Czech Republic
E-MAIL	jan.dostal@fsv.cuni.cz
ORCID	https://orcid.org/0000-0001-8738-581X

ABSTRACT

Despite that a lot of attention has been paid to the legitimacy of IOs and the "transnational turn of global governance," an in-depth analysis of access to information and public consultations as fairly new elements of public participation has not been conducted before. This article brings evidence from the World Bank (WB), its instruments of public involvement, and their practical usage in the last 10 years. The results show that in each of the "rungs" on the "ladder" of public participation, the WB designed a tool that is particularly used when a local aspect is involved. Therefore, I argue that the need for implementation of the IO policies on the ground might also drive their legitimation practices and the public participation in these instruments. Furthermore, the paper suggests that an exchange of resources between IOs and non-state actors can work both ways and their cooperation can thus be mutually beneficial.

KEYWORDS	public consultation, international organisations, World Bank, legitimacy, non-state actors, implementation
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INTRODUCTION

The "transnational turn in global governance" (Jönsson & Tallberg, 2010) has not escaped the attention of scholars, who claim that states and IOs increasingly involve various stakeholder representatives, including both non-profit actors, like NGOs, political parties and associations, labour unions or otherwise noted civil society organisations (CSOs), and for-profit companies like transnational corporations (ibid.). The existing research offers numerous in-depth single case studies of the relationships between individual IOs, especially the EU and the UN, including some of its specialised agencies, like the WTO and NGOs/CSOs, and private or other external actors (Charnovitz, 1996, 2000; Gornitzka & Sverdrup, 2013; Saurugger, 2010, Steffek et al., 2007; Weiss & Gordenker, 1996). Besides that, several comparative analyses have examined the mutual connection of these players in a particular issue area, such as environmental politics (Green, 2010; Raustiala, 1997), economic governance (O'Brien, 2000), human rights (Hawkins, 2008) and development (Reimann, 2006). A few authors have also included cases from different areas in their comparative studies of this topic: for example, Steffek et al. (2007), who focus on civil society organisations, Scholte (2011) and Alter (2014). The broader involvement of non-state actors (NSAs) in global politics has also been analysed by various authors – for example, by Willetts (2010). Moreover, the rise of the internet and social media also changed the world of relations between organisations and the public. Many IOs are also now "going digital," setting up social media accounts, and thus bringing the process of opening up to the public to a new level. This is sometimes referred to as the rise of digital diplomacy, broadly defined as the use of social media for diplomatic purposes (Bjola & Holmes, 2015; Bjola & Zaiotti, 2020).

The existing literature has also extensively covered the issue of the legitimacy of IOs (e.g., Dellmuth et al., 2019; Hurd, 2019; Tallberg & Zürn, 2019), including the legitimation strategies developed by the organisations in their attempts to overcome the "democratic deficit" of IOs. One of the ways to legitimise, i.e., to implement strategies with the intention to bridge the distance between the individual and the international level, could be the increased involvement of non-state actors. In the last 10 years, several IOs (like the World Bank, which is analysed here) have adopted or significantly updated their public information policies, accountability mechanisms, and procedures for civil society interaction in line with this expectation.

Furthermore, new digital platforms (such as social media) have emerged and IOs started to use them to communicate with the public as well. The recent literature has interpreted these attempts by IOs to strengthen their legitimacy mainly by arguing that the new strategies lead to a better correspondence with democratic norms (ECKER-EHRHARDT, 2018; GRIGORESCU, 2007, 2015; HEUPEL & ZÜRN, 2017; TALLBERG ET AL., 2014; TALLBERG & ZÜRN, 2019).

Nevertheless, the participation of the public in IOs is still quite limited. The literature explains that mainly by referring to the great distance between citizens and IOs, and the high information cost connected with that (LAKE, 2007; VAUBEL, 2006). However, so far there has not been an in-depth case study at the level of individual organisations to see when the public participation mechanisms are used, despite the high information costs connected with them. We know in general terms from large-N studies (ESPECIALLY TALLBERG ET AL., 2013, 2014) what factors can influence the access of transnational actors (TNAs) to IOs, but what has been missing is attempts to connect the formal access rules with the actual demand for involvement from the side of the public and the practical usage of the public participation instruments. The main interest of this paper is therefore to answer the following questions: What can overcome these information costs? Or more generally, under which circumstances do the public and IOs work with each other most closely?

The main aim of this paper is to build an explanation for when the distance between citizens and IOs could be the lowest. The paper suggests, on the basis of the empirical evidence from the case of the World Bank, that IOs' openness to the public, especially in cases of global economic institutions, could be seen as dependent on the regional or local dimension of their activities. The more involved an IO is, the higher the need for inclusion of the public in the activities of the institution, greater transparency, more access to information, more frequent consultations, etc. should be. The information demand from the public is also expected to be highest when it comes to requesting data for individual countries, or specific projects run by the organisation. Based on this assumption, it is expected that developmental institutions designed to carry out specific projects in individual countries need to engage non-state actors at various levels. The results show that in each of the three rungs of the public participation ladder relevant to the WB – information, consultation and placation – it designed a participation instrument that is particularly used when a local aspect is involved. Furthermore, it suggests that insufficiencies in terms of resources of the NSAs might be found especially in expert data statistics. In the case of IOs, such insufficiencies are found particularly in data about non-compliance and the impact of individual projects and policies. The implication of this analysis for the existing literature can be that the exchange of resources between IOs and non-state actors can work both ways and their cooperation can thus be mutually beneficial. Last but not least, I argue that the need for implementation of policies on the ground might also drive legitimation practices of international organisations and also the participation of these actors in the instruments.

Firstly, the paper will define the concept of public participation, introduce the theoretical background for the analysis, discuss the expectations connected to it, and suggest a general framework for the analysis. Secondly, a case study of the instruments of public participation of the World Bank, its rules and their development in the last 10 years (2012–2022 respectively) applying this framework will be done. The choice of the start year is based on the creation of the participation instruments by the World Bank (online public consultations) in that year, and the timespan of 10 years allows for providing an overview of the development of these instruments in the context of an article. The World Bank and its processes designed to provide access to information to the public, the public consultations, the accountability mechanism and other instruments will be examined in an attempt to test the main expectation of the paper on a case where most of the practices are expected to be implemented. Finally, the conclusion will summarise the limitations of the study and prospects for future research.

THE STATE OF THE ART, THE CONCEPTUALISATION

The participation of non-state actors in the decision-making processes of IOs is still very much limited. It is employed only in some areas or in regard to some issues, as not many IOs provide the same amount of space for them to influence their policies. In this regard, the work of Tallberg et al. (2013, 2014) stands out mainly in terms of its generality, being the first large-N study to explain the variance in transnational actors' (TNAs) access to IOs. The work by Grigorescu (2007, 2015) can also be mentioned in this regard, though it is more concerned with the transparency of IOs. This paper builds on this literature, but instead of limiting non-state actors to only CSOs, NGOs, or private companies, it intends to widen the net to include the entire general public, whereas here, the term "public" denotes any actor not affiliated with the government (and is thus used interchangeably with the term "non-state actors"). It aims to show the existence of various levels of public participation in IOs.

Bonzon (2014) has offered a definition of the term public participation, which is also used here: "all institutionalized forms of interaction in the decision-making process between organs of a public institution and external actors who are formally independent of any government" (p. 23). In this article, the concept of public participation will be connected to the Policy Studies literature and its focus on local and national actors, mainly Sherry Arnstein's "Ladder of Participation" from 1969, in which she develops eight levels ("rungs") of citizen participation (Arnstein, 1969). It should be noted, however, that neither this nor any other later typology is universally accepted (WEBLER, 1999). The proposed framework, the ladder of public participation, which is based on Arenstein's (1969) ladder, will be applied to the case of IOs with the help of schemes developed by Bonzon (2014), Börzel and Risse (2005), Grigorescu (2007), Steffek et al. (2007) and Tallberg et al. (2014). It consists of four main parts (levels of public participation): from the lowest to the highest, information, consultation, placation and partnership (lower and higher rungs are considered not relevant here). I consider public participation as conceptually different from transparency (as demonstrated in the case of IOs, which was mainly studied by Grigorescu [2007]), as transparency is one of the tools for achieving participation. Transparency is necessary for public participation, but IOs can use other instruments to involve the public on different levels, as shown in the next section.

Firstly, as for informing, it may be argued that for maintaining relations with actors outside the organisation, the first key instrument is to internally agree on what information may (not) be given; a codification of access to information thus serves as the first component. The next rung on the ladder, consultation, involves granting public representatives access to the IOs' bodies. As a form of ensuring the public's participation in decision-making processes, NGOs and other actors are granted access to meetings of the IO's main bodies. Furthermore, this article presents the practice of public consultations in IOs as the other part of this rung in the participation ladder. This concept denotes meetings of the staff with various stakeholders, where any new policy development process, including proposed new policies or changes to regulations, are discussed.

As for the placation level of the ladder, the IOs may develop accountability mechanisms which include the possibility for individuals to file a complaint against a specific project run or financed by the given IO on the grounds of it impacting their livelihood. That is expected to occur especially in agencies active in the area of development or with a need for a wider implementation of their policies. Another option is providing means for directly proposing a specific policy that the IO should adopt, like through a citizen initiative, but in the case of IOs, this is probably only applicable to the EU. If the public should be really involved as equal partners, voting rights should be given to the representatives of non-state actors. That could be demonstrated only on one example, however: the International Labour Organisation (ILO). The components of the framework are summarised in Table 1 below:

TABLE 1: FORMAL PUBLIC PARTICIPATION LEVELS

Levels	Components	Indicators/Characteristics
Information	Procedural Codification	Rules, provisions for access to information + a specific policy's existence and completeness
Consultation	Access	Access of non-state actors to the meetings of IO's bodies
	Consultations	Codification
Placation	Accountability Mechanisms	The possibility for individuals to file a complaint against a specific project run or financed by the IO
	Citizens' Initiative	The possibility for the public to propose a policy
Partnership	Voting Rights	The public is granted a right to vote in the IO's main body

Prepared by the author.

However, the practical usage of these instruments can vary, as demonstrated mainly by Vikberg (2024) – IOs provide different ranges of information to the public via different channels (websites, social media, etc.), access to IOs' meetings can also vary in terms of the accreditations granted to observers, consultations can be more frequent or less and initiatives or voting rights can be exercised differently. As for the first point, the range of the infrastructure designed for informing the public relative to the area in which the IO is active (i.e., its Member States) also has to be taken into account when analysing this rung of the ladder. Besides official mechanisms for acquiring information, we also have to look at online platforms, like websites and social media, where especially the reach of activities is important for gaining an understanding of how the public and IOs interact in the current world, as their general usage by IOs tends to be more unidirectional than dialogical (ECKER-EHRHARDT, 2020). For consultations, non-state actors may access IOs' bodies to various degrees. Similarly, public consultations can be more or less frequently employed. The number of complaints against a specific project by an IO or initiatives to change a policy can also vary over time. Voting patterns of government and non-government actors can also differ, signifying the practical utilisation of the formal setting. Therefore, a different measure can be developed for the scope of using the individual levels. The components and their indicators are summarised in Table 2 below:

TABLE 2: PRACTICAL PUBLIC PARTICIPATION LEVELS

Levels	Components	Indicators/Characteristics
Information	Infrastructure	Offices, departments for communication with the public
	Range	Information on web pages and reach on social media
Consultation	Using Access	Accreditation of non-state actors to access IO's bodies
	Frequency of Consultations	Usage of the consultation procedure
Placation	Using Accountability Mechanisms	Number of complaint
	Citizens' Initiative	Number of proposed policies
Partnership	Voting Rights	Differences in voting in the IO's main body

Prepared by the author.

The main focus is therefore directed at the empirical applicability of this framework and especially on answering the question of what makes the IOs actually employ these different public participation instruments and what influences their usage. To explain how high the organisations "climb on the ladder," i.e., how much they involve the public in their activities, the paper employs the theoretical background to IO legitimacy, especially the behavioural practices of legitimation. Looking at the behaviour of IOs has been a way of identifying institutional legitimation practices (GRIGORESCU, 2015; RITTBERGER & SCHROEDER, 2016; TALLBERG ET AL., 2013). It could thus indicate a possible motive for the adoption of policies, leading to higher public involvement, and suggest the reasoning behind differences amongst IOs in this regard.

Higher public participation can address the IO's need for legitimacy, and influence its relevance in the world, and its ability to propose new rules and norms and secure compliance with them (TALLBERG & ZÜRN, 2019). The legitimation practices have been identified as a potential determinant of individual legitimacy beliefs, together with individual- and organisational-level factors such as general social trust or organisational performance (BEXELL ET AL., 2022; DELLMUTH ET AL., 2022; DELLMUTH & TALLBERG, 2023; SCHMIDTKE ET AL., 2024).

The conventional theory has been mainly explaining the usage of the legitimation practices by IOs as their attempts to apply democratic norms, claiming that legitimation using democratic narratives in global governance has been on the rise (DINGWERTH ET AL., 2020), but others argue that the spread of democratic norm shapes IOs' decision making, as it also involves policies involving public access to information and NGO participation (GRIGORESCU, 2015). This assumption is also connected to the idea of stakeholder democracy in global governance, as the related arguments claim that opportunities for the involvement of non-state actors in political decision-making enhance the democratic legitimacy of its procedures (E.G., AGNÉ ET AL., 2015; BÄCKSTRAND, 2006; DINGWERTH, 2007; SCHOLTE, 2004; STEFFEK ET AL., 2007).

However, high information costs are related to the involvement of the public in the activities of IOs due to several factors, namely physical distance, differences in languages, centralisation of policies and the lack of parliamentary control (LAKE, 2007; VAUBEL, 2006). This paper builds on an explanation for when these costs might be overcome, claiming that public participation policies in particular and legitimation practices in general are introduced mostly when IOs exercise their authority over individuals. This should be the case especially when they develop projects and programmes in the member countries and also oversee their implementation, as is the case for the IOs active in development (HEUPEL ET AL., 2018). On the basis of the empirical evidence presented here, we could claim that for the World Bank in particular and the IOs focussing on development in general, the physical distance from the citizens should be the lowest, as they often realise projects in individual countries, in cases of consultations the documents and communication from them are often translated and their policies are generally more decentralised. Except for the case of the EU and its Early Warning Mechanism (EWM), parliaments' control over IOs is very much limited.

Based on the case of the WB, this paper identifies areas related to public participation in which the organisations (IOs and NSAs) require the help of each other the most. Therefore, the cooperation between these actors might be mutually beneficial, especially when they lack their own resources. As the resource-exchange theory suggests, the IOs rely on knowing whether state and societal actors comply with regime rules but often do not have capacities for that (LEVINE & WHITE, 1961). For IOs, monitoring is usually both resource-demanding and inefficient in detecting violations on the ground (DAI, 2002; TALLBERG ET AL., 2018). The analysis suggests where the insufficiencies in terms of the resources of the IOs and NSAs might be found. The specific assumptions regarding the case of the World Bank in connection to the individual 'rungs' of the public participation 'ladder' could thus be formulated as follows:

1. In terms of information, the WB should provide the most information on the activities that are the closest to NSAs, mainly the specific projects. On the other hand, a high demand from NSAs for expert statistical data collected by the WB is expected, especially in cases of local projects and individual country statistics.

2. Regarding consultation, NSAs should mostly participate in the meetings and consultations of the WB that are related, again, to a specific project, an individual country, or a policy of the WB with a large local impact.

3. As for placation, the existence of the complaints system should itself signify that the WB requires the assistance of NSAs when it comes to detecting non-compliance and collecting on-the-ground information. The more used it would be, the more relevant the aspect of implementation of local activities should be to public participation.

Therefore, in general it is assumed that the more the IO is guided by its need for implementation of activities on a local level, the more active it is on the ground, and the higher the likelihood of its openness towards non-state actors in the various instruments the IO could use.

CASE SELECTION

The application of the proposed scheme will now be demonstrated on the case of the World Bank. This IO has been chosen for the study because its membership is nearly universal, and it has the status of a specialised agency of the UN focussing on global economic relations. The WB as a multilateral economic institution has also been selected because it is a party to the Washington consensus, and a building block of the Bretton Woods system, and was one of the primary targets of the critique after the global economic crisis in 2008 (e.g. Best, 2014; Güven, 2018; Moshirian, 2011). The World Bank has also been a longstanding "lightning rod for criticisms of the international economic system" (Nelson, 2006, p. 706). Therefore, there should be a theoretical need to implement legitimation practices in the case of the World Bank following the contestation, especially after the global economic crises – based on the behavioral practices theory, institutions are supposed to implement more transparent policies. As is shown, the Bank has approved some documents regulating access to information, provides accreditation to non-state actors at its meetings, and has also established an online database of public consultations. That means that the majority of the rungs in the public participation ladder can be observed in this case, which includes the tracing of the usage of these instruments over the last 10 years (namely 2012–2022). The main aim connected with the chosen case selection is to show that even inside one IO, the usage of the various instruments differs and that this variance could be explained by the range of its local activities and the implementation of its policies on the ground. The WB is expected to represent the most likely case for the main explanation put forward here based on existing case studies (Bonzon, 2014; Scholte, 2019; Woods, 2001) and thus should test the empirical applicability of the proposed framework of the public participation ladder. Of course, the WB is one of many existing IOs and thus the generalisibility of the results to the entire universe of IOs is very much limited. The aim of this article is to introduce a framework of public participation, demonstrated on the case of the WB, that can be used to analyse IOs in general and their instruments of public participation in particular. The data was collected from the World Bank Annual Reports, Access to Information Annual Reports, other WB official documents, policies, the participant lists of the AM/SM meetings (obtained through an official inquiry), the Consultation Hub (the archive of public consultations) and other sources available at the WB website. The references to all the used World Bank documents and websites are provided in the annex. These publicly available sources were used because of data availability, but more importantly, as the interest of this paper is in openness to the public, they should provide an accurate picture of the issue.

THE WORLD BANK

Information

The World Bank (WB) will serve as the primary focus of this study. For an examination of the instruments of the ladder outlined above, mainly the formal setting, i.e., the basic policies and regulations of the Bank, will be analysed (see Annex I for the references to all the used World Bank documents and websites). The key documents in this regard are the Access to Information (AI) Policy, the AI Directives/Procedures of the Bank, the Open Access Policy, the AI Policies of other organisations in the World Bank Group, its interpretations and even the policies of specific offices, like the Integrity Vice President (INT) or the Independent Evaluation Group (IEG). In this area the WB may probably be considered as one of the IOs that set very clear limitations on releasing information; its documents could be counted as being among the few that explicitly set out their goals (Bonzon, 2014). The AI Policy of the Bank, rolled out in 2010, in short, expresses that anything the Bank has in its possession is available to the public unless it falls under a list of defined exceptions (World Bank Group, 2024). These 10 explicitly formulated categories of not declassified material contain, for example, personal information and security and safety information (AI Policy, Article 2).

This attitude brought a change from the original Information Disclosure Policy, from information being by default private to it being public, and from a "positive" to a "negative" definition (i.e., instead of listing the documents which are public, the AI Policy lists the private ones). Despite the label, this could be seen as a positive approach in terms of releasing information. Two amendments were made to the AI Policy in 2013 and 2015; the former pertains to the declassification of verbatim transcripts and statements of the Executive Directors and staff, and the latter aligns the treatment of the documents and records of the Board of Governors with that of the Board of Directors (ALLEN, 2020). The accompanying policy document, the AI Directive/Procedure, has become a living document; it is amended regularly to allow for adjustments that do not rise to the policy level (IBID.). The Open Access Policy primarily concerns knowledge originating internally from the Bank and research funded by the Bank to which it owns the rights. In short, it stipulates that if information is disclosed according to the rules of the AI Policy, individuals are allowed to use it freely on the condition that they acknowledge the authorship of the Bank (WORLD BANK, 2012).

The formal provisions of the IO policies were also largely analysed in previous studies, regarding the provisions in general, especially (TALLBERG ET AL., 2013, 2014); regarding the case of the World Bank (HELDT, 2018), but an often-overlooked element is focussing in greater detail on the practical application of the instruments created by the policies. One of the basic instruments that the Bank offers to the public on the basis of the AI Policy is to possibility of sending an official access to information request. That ensures the right to demand that a specific document or some other piece of information be published. Furthermore, the AI Policy also ensures the right to an appeals process when a request for information has been denied. Appeals can be filed with the Access to Information Committee (AIC), which can reverse or uphold the original decision (or render the appeal moot or dismiss the case entirely) (Articles 7 and 8). If the requester is unsatisfied, second-level appeals can be taken to the AI Appeals Board (AIAB) (Article 8). I demonstrate the practical application of the AI policy by analysing the information requests submitted and appeals made to the AIC and the AIAB to show how these rules are implemented in practice. The official AI requests and appeals to the AIC and the AIAB, as taken from the Annual Reports from the last 10 years (2012–2022; the Annual Report for 2023 is not yet available; the years are fiscal years – from July of the first year to June of the next year; for example, FY 2012 is the period from July 2011 to June 2012) are summarised in Tables 3 and 4 below. There were 2 cases in 2017 and one case in 2021 which were partly reversed and partly upheld, the numbers in brackets reflect this.

TABLE 3: WB ACCESS TO INFORMATION REQUESTS

Fiscal Year	Received new	Continued old	Responded to	Fulfilled	Denied
2012	767	116	509	94.7 %	5.3 %
2013	685	103	493	92 %	8 %
2014	420	83	296	89 %	11 %
2015	474	39	326	93 %	7 %
2016	547	31	366	95 %	5 %
2017	705	56	519	96.5 %	3.5 %
2018	675	35	494	96.5 %	3.5 %
2019	696	31	478	96 %	4 %
2020	589	32	449	98 %	2 %
2021	589	38	388	96 %	4 %
2022	445	45	329	98 %	2 %

Source: Access to Information Annual Reports.

TABLE 4: WB AI APPEALS

Fiscal Year	1st level total (AIC)	Reversed/ Moot	Dismissed/ Upheld	2nd level total (AIAB)	Reversed	Dismissed/ Upheld
2012	10	2	8	0	0	0
2013	6	0	6	2	0	2
2014	10	0	10	1	1	0
2015	5	0	5	0	0	0
2016	6	1	5	2	1	1
2017	18	2 (4)	16 (14)	3	0	3
2018	4	1	3	2	1	1
2019	5	3	2	1	1	0
2020	1	1	0	1	0	1
2021	12	1	11	3	1 (0)	2 (3)
2022	1	0	1	1	0	1
2023	4	1	3	0	0	0

Source: Access to Information Annual Reports.

These tables show the practical application of the formal setting and the extent and range of the information given, not only the procedural safeguards for ensuring access to information. What is apparent in the data, especially in the percentages of fulfilled requests, is that the World Bank aims to maintain the appearance of a transparent institution with a multi-level framework and a high level of institutionalisation established in order to provide information. However, these numbers do not bear relevance without some context. As such, they only include access requests made through the Bank's main AI tracking system and not those fulfilled at the Bank's country offices and public information centres. Furthermore, the fact that we can observe only a handful of cases of appeals corresponds with the number of denied cases but, on the other hand, questions the necessity of especially the second level instance appeal (the AIAB). Interestingly, we cannot observe an increased interest in the usage of the requests or appeals over time, as we would possibly expect with a wider knowledge about the instrument. There is also no significant trend in the number of cases the WB responded to or the number of appeals; some years experience more, and some less, but there seems to be no common factor behind the changes in the frequency of information requests. We could say, based on the analysis, that in general, the instrument of AI requests seems to provide a useful avenue for informing the public, which utilises this opportunity.

Nevertheless, the number of requests alone does not tell us about their nature. To show what, in fact, the public demands to know, or, more generally, what this instrument is used for, we need to look into their content. Based on the analysis of the summaries of AI requests, which include the topics of the requests, and have been published by the Bank on its website since 2014 (WORLD BANK GROUP, 2024), it can be said that most of the requests pertain to a specific project of the WB in a given country, or ask about data or knowledge that the Bank possesses. The content of the analysed summaries for the years 2014–2022 (they have been made available since April 2014) shows three main categories of inquiries for information from the public: requests for data about individual countries, requests for information regarding projects in specific countries or reports about them, and requests for information pertaining to the Bank staff, personnel and archives. This division is based on the words that occur in the request summaries: the first type of word combination contains the word "data" in connection with a specific country's name (and mostly economic indicators, like GDP, employment, etc. in a specific country and time period), and the second the word "project" or "report," usually accompanied by a mention of a specific country. Any request related to specific people, employees of the WB or archival material not related to a specific project is put in the third category. The remaining requests that did not fit into these three groups were classified in the "other" category.

To demonstrate this, based on the codewords from the summaries of AI requests from 2014 until 2022, Table 5 contains brief statistics on the content of the requests:

TABLE 5: AI REQUESTS 2014–2022

Year	Data about individual countries	Information regarding projects in countries or reports about them	Information pertaining to the Bank staff, personnel and archives	Other requests
2014	61	54	39	45
2015	66	68	30	61
2016	59	69	15	59
2017	61	71	16	60
2018	58	61	16	79
2019	56	38	13	59
2020	67	58	15	81
2021	59	56	13	71
2022	58	53	13	63

Source: Summaries of Access to Information Requests.

This shows that the public is most interested in the expert function of the Bank and also emphasises the local aspect of its policies. As there is a higher demand for information about local policies and expert knowledge, there is subsequently a higher need for resources in these areas. A greater demand for information means that more information is given in general. The prevalence of country-specific data in the access to information instruments analysed here thus implies that the communication of the World Bank towards the public is especially active when a local aspect is involved.

As for the range of infrastructure designed to communicate with the public, the Bank now has more than 100 offices in member countries in every region of the world, and each is equipped to answer a public inquiry about the Bank's activities or documents. In this regard, the Bank offers a wide network; on its official website, there is a list of contact information for its media relations departments for 117 individual countries (WORLD BANK GROUP, 2024). That means that the physical distance between the WB and citizens is arguably low. The transparency of the website may be ascertained by the amount of available information about the IO's organisational structure, budget and other indicators, as developed by Grigorescu (2007). The World Bank scored in this evaluation 10 points out of 15, which is a very high score. I searched for the information used in his study to measure the transparency of the website in its current version and to assess if there was any change in this respect. I found that all the information remained available. Therefore, the public does not face any significant obstacles in terms of accessing the information on the website.

In terms of its social media presence, the World Bank belongs to the group of "early adopters" that also includes the UN and the OECD, as it created its pages on Facebook and an account on Twitter already in 2008 (ECKER-EHRHARDT, 2020). Moreover, to this date, the Bank has set up 25 Facebook pages, 6 official Instagram accounts and more than 40 official X accounts in different languages for its offices in various countries and specific initiatives run by the Bank (the numbers are from the official accounts of the Bank). The reach of its activities on these platforms can be seen in the fact that it has 2.6 million followers on its main Facebook page, 1 million on Instagram and 3.8 million on X, which means the World Bank can probably be counted among the most influential international organisations in terms of social media reach. It thus could be said that the online network of the World Bank is highly developed, and the organisation grants the public several rights when it comes to informing it. It can be thus said that in terms of communication with non-state actors, the WB aims to show an image of transparency to the public.

Consultation

Regarding the next rung, consultation, specifically the access of non-state actors, NGOs have not acquired control of or a formal participatory role in the Bank; instead, they are assigned the role of observers (WOODS, 2001). The Board of Governors' Annual and Spring Meetings (held together with the IMF) usually allows accreditations for several types of actors besides government delegates: observers from other IGOs, civil society representatives, press and guests (from the private sector, academia, etc.). The previous literature covered this aspect of the public participation in detail (ESPECIALLY TALLBERG ET AL., 2013, 2014). However, what has been missing is a focus on the actual usage of the formal rules of access. I thus present descriptive statistics showing the numbers of participants in the meetings from 2018 until 2022, which were made publicly available or obtained by official inquiries (data for previous years were not provided).

Table 5 below summarises the official lists of participants, demonstrating how non-state actors are taking part in the Annual and Spring Meetings of the WB and the IMF.

TABLE 6: PARTICIPATION OF NON-STATE DELEGATES IN AM/SM

Year	CSOs in the Spring Meeting (SM)	CSOs in the Annual Meeting (AM)	Guests in SM	Guests in AM	Observers in SM	Observers in AM
2018	1137	651	933	1307	1307	291
2019	1545	1268	1410 + 1992	61	1848	906
2020	188	1185	68	59	1303 + 704	759
2021	892	897	358 + 314	801	484	527
2022	708	1019	271	1476	428	719

Source: AM/SM Participants Lists.

The only significant decrease in the numbers happened because of the influence of the COVID-19 pandemic during the Spring Meeting 2020. Otherwise, there seems to be a stable interest in the WB meetings from non-state actors over the last 5 years. The World Bank distinguishes between three main categories of NSAs: civil society organisations (CSOs); guests, a category which includes mostly the private sector and parliamentarians, whereas IMF Guests are listed as a special category; and observers, which are the representatives of other international organisations. However, in practice, all the non-state actors are only granted the possibility to attend the plenary sessions of the Board of Governors or side events, such as the Civil Society Policy Forum (CSPF), without any further participatory privileges, like being able to present their position or influence the decision-making process in other ways (Bonzon, 2014). Nevertheless, it could be said that there is a high degree of institutionalisation in terms of initiatives designed to involve non-state actors in a specific part of the Bank's activities and that it could be guided by its need for policy implementation on a local level, which is more clearly documented in the case of public consultations in the next section.

The practice of public consultations in the case of the World Bank follows the Consultation Guidelines, a document lastly updated in 2019, which sets out the principles guiding the process and outlines areas where it is utilised and also presents the various types and formats of the consultations. They could be conducted, for example, as public hearings, face-to-face meetings, focus group discussions, web-based consultations, or questionnaires, or separate Advisory Groups can be formed (WORLD BANK, 2019). Typically, these consultations commence after the Management and Board approve the engagement and consultation plan and can take from 4 to 12 weeks, depending on the nature of the issue and its scope (IBID.). As in the case of accreditation in the IOs' meetings, this process is not entirely open in most cases, as a participant needs to belong to a specific group. The invitations are distributed to NGOs, private companies, academia, and/or think-tanks, depending on the type of consultation the staff is seeking (WORLD BANK GROUP, 2024). Nevertheless, sometimes the call for written comments is posted online, and the answers are supposed to be sent via email; therefore this instrument can be considered as having a quite high accessibility to the public.

The focus here is then on online consultations and their usage as an instrument of public participation, which has not received attention in previous research. The WB Consultation Hub provides statistics on the frequency and characteristics of the consultations since 2012, which is useful for determining the instrument's utilisation. In this database, we can find a total of 183 initiatives in review, out of which 110 are in English and the rest are other language variants of the same initiatives (WORLD BANK GROUP, 2024). The statistics of the numbers of meetings and their participation rates in the last 10 years (2012–2022) are summarised in Table 6 below, whereas general (open) meetings are considered to be all meetings except those with only members of government present. The numbers in brackets are those of consultations for which statistics of participation are available.

TABLE 7: WB PUBLIC CONSULTATIONS

Year (Start date)	Number of consultations	Number of general (open) meetings	Mean participation in the meeting*
2012	11 (3)	101	25.8
2013	3 (3)	19	21.5
2014	15 (8)	57	30.2
2015	24 (6)	71	12
2016	33 (5)	16	26.25
2017	36 (1)	5	22
2018	13 (1)	1	9
2019	18 (4)	75	25
2020	7 (1)	13	17.4
2021	6 (0)	N/A	N/A
2022	2 (0)	N/A	N/A

*Calculated as the average number of organisations (all types of NSAs – NGOs, CSOs, the private sector…) that took part in the public consultations in the year based on the list of participants provided on the consultations' website.

Source: Consultation Hub website.

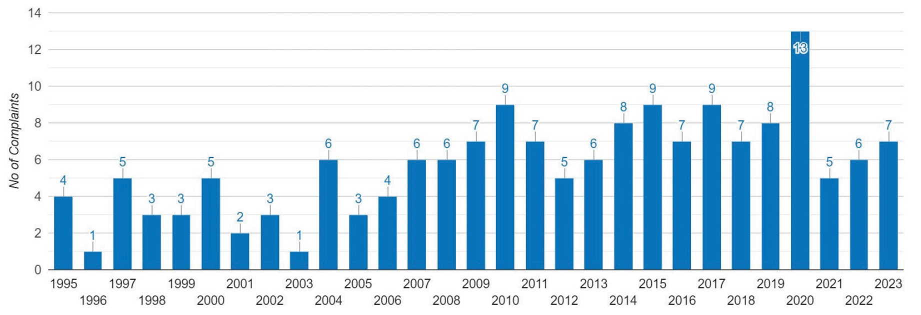
As we can see, the participant lists are scarcely put on the website, thus rendering some general observations harder. However, it can still be noted that recently, a drop has occurred in the total number of consultations in general and that of meetings in particular. There might be various explanations that may lie behind these phenomena; some consultations are probably still running, and others were not made available on the website, but the most obvious is perhaps the outbreak of the COVID-19 pandemic and, with that, the reduction of possibilities for in-person meetings.

As for the content of the consultations, the most consulted issues were Country Partnership Frameworks (109[1]), Policy Reviews (29) and Sector Strategies (13). The Country Partnership Frameworks include objectives and development results through which the WB intends to support member states in their efforts (e.g. efforts to end extreme poverty). As for the Policy Reviews, a major Policy Review was conducted in some years, e.g. that of the Procurement Policy in 2012, with around 50 meetings in 2 phases. Two other significant policies with a lot of public consultations were updated in 2015 and 2019 respectively, namely the WB Group Gender Strategy and the WB Group Strategy for Fragility, Conflict and Violence. Based on the descriptions of the consultations on websites, their aim was mainly to gather perspectives in individual Member States, because the WB was interested in addressing the needs of the client countries. For example, the WB Group Gender Strategy has been consulted with representatives from all continents, with civil society, private sectors, donors, and development partners' representatives in Europe (e.g. London, Brussels), Africa (e.g. Kenya, Tunisia), Asia (e.g. Pakistan, China), and South America (Brazil) being involved in developing the strategy though consultations from mid-April to July 2015. It could thus be suggested, based on the characteristics of the issues under consideration in this process, that it is mostly policies with a local impact that are reviewed by the non-governmental actors. Arguably, only minor policies, mostly of a strategic nature, are consulted with the public; the executive, more significant decisions, such as those pertaining to the budget, are still taken by the Executive Board without it. It also should be noted that non-state actors' participation in meetings does not necessarily mean that the consultations had an impact on the outcome; to measure how much the comments made were really incorporated into the text of the specific policy would require further examination of the individual documents.

Placation

Regarding the placation "rung," i.e. giving individuals complaint privileges, the World Bank has established the Accountability Mechanism (AM), consisting of the Inspection Panel and the Dispute Resolution Service (DRS). The former was created by the Executive Board in 1993 as an instrument for the public to file a complaint in case of non-compliance with the Bank's environmental and social policies and procedures; it was created in response to the civil society pressures and member state demands related to their concerns about the lack of accountability of the WB (PARK, 2010). In Figure 1 I include the numbers of cases received by the Panel in the form of the official figures (WORLD BANK GROUP INSPECTION PANEL, 2024), showing that with the exception of 2020, the number does not exceed 10. The DRS was established in 2020, and it implements a voluntary, independent and time-bound dispute resolution option in the context of complaints to the Panel (WORLD BANK GROUP, 2024).

FIGURE 1: THE NUMBERS OF CASES RECEIVED BY THE WB INSPECTION PANEL (FISCAL YEARS)



Some authors would claim that the Inspection Panel is especially influential for civil society in terms of changing lending at the World Bank, especially in combination with the monitoring abilities of powerful states (BUNTAINE, 2015). On the other hand, others would counter that the myriad of accountability mechanisms set up by the WB has paradoxically made it even less accountable to the outside world (HELDT, 2018). In addition to the AM, for the IFC and MIGA, the Office of the Compliance Advisor/Ombudsman (CAO) was created in 1999 with a similar purpose. Furthermore, the Grievance Redress Service (GRS) was launched in 2015 as a complementary mechanism for submitting complaints directly to the World Bank if a concern is raised that a supported project has caused or is likely to cause harm to individuals or communities (WORLD BANK, 2024). To provide some overview, since its inception, approximately 1,500 complaints have been received by the GRS, including the 383 complaints received in the fiscal year 2022 (IBID.), hence showing a much higher interest in it than in the Panel. The GRS has seen a steady increase in the number of complaints filed since its inception. The 383 complaints received in the fiscal year 2022 across more than 70 countries have marked an uptick of 28.1% compared to the fiscal year 2021 (299 complaints) (IBID.). This demonstrated that despite the criticisms of the effectiveness of these mechanisms, they remain a tool that the public can and does use, increasingly over time, to lodge dissatisfaction with the implementation of a specific project. This thus signifies the strong local element in the instruments of public participation.

However, the World Bank does not give voting rights to non-governmental actors. Therefore, it does not make sense to analyse higher rungs of the participation ladder, namely partnership, which stands in contrast to the main argument of this paper. Nevertheless, voting rights for non-state actors in IOs are granted only to employers and workers in the ILO, but despite its tripartite structure, the organisation has not opened itself to external actors much; the social partners have even used their prerogatives to block further attempts to include external actors more as shapers of policy in fear of losing influence (BACCARO, 2015; JAKOVLESKI ET AL., 2019).

Discussion

The analysis shows that in each of the three rungs of the public participation ladder relevant to the World Bank – information, consultation and placation – it designed a tool that is particularly used when a local aspect is involved. The content of the access to information requests, the topics of the online public consultations and the usage of the accountability mechanisms all are influenced by the on-the-ground activities of the WB. Specifically, in the case of information, the NSAs/public require more information from the WB about the project details, or expert statistical data about individual countries. In the case of consultations, the most consulted policies in terms of numbers and attendance should have a connection to the monitoring activities of the WB, be related to a project, or have a strong local aspect of the policy in question. In the case of placation, the WB is the one that needs the help of the NSAs, as it needs to collect the information on non-compliance. That confirms that non-state actors are active especially in locally focussed activities of the IO because they share first-hand experience with non-compliance or because collecting on-the-ground information is their specialisation (TALLBERG ET AL., 2018). This analysis thus suggests where the insufficiencies in terms of resources of the IOs and NSAs might be found and thus brings a contribution to the existing theory stating that the exchange between them can work in both ways.

For a future relevant analysis of public participation, it might make sense to include statistics on the numbers of the related social media posts, likes and especially comments and the subsequent reactions to them, which are left out here due to spatial limitations. Researchers can also focus on the content of the posts to see which topics are the most covered. It also remains to be answered why the COVID-19 pandemic did not lead to a rise of online public consultations. Furthermore, it should also be noted that the descriptive statistics presented here do not say anything about the impact of the consultations on the outcome. Measuring how much the comments were really incorporated into the text of the policies would require further examination of the individual documents.

We also have to consider other alternative explanations for the higher usage of public participation instruments in the World Bank besides the local aspect of the projects of the organisation. As for the conventional answer to this puzzle, which is that the public participation mechanisms were set in order for the Bank to correspond with democratic norms, there are a few possible counterarguments to this. Firstly, despite that the Western countries still hold the highest voting shares in the main executive organ, the Board of Directors and also the Board of Governors, and a significant percentage of the staff are US citizens (CLARK, 2021), the World Bank is still an organisation with a nearly universal membership. Moreover, there is no publicly available evidence confirming that the Western states would be pushing the staff to implement the public participation mechanism. Still, future research might focus on a possible link between the background of the IO's staff and the nature of the policies they put in place. In addition, online public consultations were introduced by the European Union already in the 2000s; it is seen as improbable that it set an example for the introduction of online consultations in the World Bank in 2012, not to mention that the organisations do not cooperate with each other much (IBID.). The WB could also still be counted as one of the few IOs using online public consultations, which would suggest that it is not entirely considered the "right thing to do"; the norm of using it has thus not been fully internalised.

The need for ensuring popular legitimacy could also be especially important when facing crises because when IOs lack legitimacy in society, it contributes to a democratic deficit in global governance (DAHL, 1999; ZÜRN, 2000; HELD & KOENIG-ARCHIBUGI, 2005). Therefore, it might be the case that the World Bank reacted to a visible scandal in an attempt to increase its legitimacy by opening itself to non-state actors and employing instruments of public participation. The other relevant studies (GRIGORESCU, 2007; TALLBERG ET AL., 2014) did not find significant support for this hypothesis in general, however. In particular, I also did not find any significant scandal the World Bank had been facing before its decision to use online public consultations in 2012. This argument could account for the introduction of the accountability mechanisms, which the WB set up in response to the pressure of the demands of civil society groups, but is not convincing in terms of providing information to the public, access to meetings, or public consultations. If the argument were true, one would expect some more controversial policies to be more consulted; for example, the consulted procurement review is not as controversial as some other initiatives by the World Bank which are not consulted with non-state actors.

CONCLUSION

This paper has shown that even the general public can participate in the activities of IOs in various ways. It has demonstrated the different levels of public involvement through the suggested framework of a participation ladder that is applied to the specific case of the World Bank. The analysis shows that in each of the three rungs of the public participation ladder relevant to the World Bank – information, consultation and placation – it designed a tool that is particularly used when a local aspect is involved. In addition, it also suggests that insufficiencies in terms of resources of NSAs might be found especially in expert data statistics, and in the case of IOs, such insufficiencies are found in data about non-compliance and the impact of individual projects and policies. Therefore, the implication of this analysis for the existing literature might be that the exchange of resources between IOs and NSAs can work both ways and their cooperation can thus be mutually beneficial. The main argument was that the need for implementation of IO policies on the ground might also drive IOs' legitimation practices and approach towards involving non-state actors. The obvious limitation of this contribution is that a single case study cannot be considered representative of the entire reality; detailed comparative analysis should thus be conducted to validate or contradict the evidence from the World Bank case.

Can politicisation of issues play a role in this respect? Do controversies make IOs open up to NSAs (ZÜRN, 2014), or is the opening up rather driven by the regime types of some Member States, as a democratic membership should mean that the organisation has a higher public participation? This paper, in contrast, suggests that a higher need for implementation presupposes using instruments to ensure direct contact between citizens and the IO. Furthermore, it claims that specific criteria for assessing the level of public participation can be developed and used on a greater scale based on the proposed framework; for example, the existence of institutionalised mechanisms for access to information, accountability, relations with NGOs or other non-state actors, public consultations, etc. can be used as such. This paper has further argued that formal provisions often do not tell the whole story and that an independent measure for the range of using them could contribute to our understanding of the phenomena of public participation in IOs.

It should also be noted that this does not necessarily mean that the more information is provided or the more open the organisation, the better. Total transparency would probably not be in the interest of an efficient decision-making process, and it also involves the additional costs of collecting, editing and publishing information (WOODS, 2001). The issue of the suitability of the information policies and other instruments of public participation for the goals of the organisations as such should be also taken into account. In addition, the topic of the accountability of NGOs in terms of representing the interests of the citizens could be raised in order to question their greater involvement. Moreover, the willingness of non-state actors to participate in consultations, even if they are invited, can be limited, as this analysis did not cover cases in which NSAs declined invitations to public consultations. Further research might also focus on the characteristics of the actors involved in the public consultations and their contributions, and especially on the question of whether NSAs are representative of the whole world population.

IOs also aim to adapt to the digital era and adopt new possibilities for direct communication with the public; the instruments of public participation can thus serve as a tool to achieve the goals of public diplomacy; i.e., they can help increase the IO's soft power by spreading culture and values, carefully explaining policies, and providing credible messages (NYE, 2008). Hopefully, this paper has added some ideas for consideration in these areas. In any case, the topic of public participation in IOs remains an important line for further research inquiries.

ENDNOTES

1 The number of public consultations that were related to this subject.

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AUTHOR BIOGRAPHY

Jan Dostál is a PhD candidate at the Institute of Political Studies, the Faculty of Social Sciences, Charles University, Prague. His research interests include public participation in international organisations, online public consultations and non-state actors' involvement in the climate change regime.