DEVELOPMENT BANK INVESTMENTS: A GUIDE FOR EDUCATION AND HEALTH ACTIVISTS IN INDIA

CONTENTS

BACKGROUND TO THE GUIDE

International Financial Institutions (IFIs) including the World Bank (WB), the Asia Development Bank (ADB), Asian Infrastructure Investment Bank (AIIB) and New Development Bank (NDB) have been actively funding projects on education and health in India. At the same time, the WBG and ADB have had a particularly critical role in shaping the national and state priorities of respective governments. There is accordingly a need for civil society activists to understand the functioning of these institutions to strengthen advocacy on these issues.

While training materials for activists working on environmental issues exist, there is a paucity of materials for those working on education and health. The present manual is an effort to guide activists in understanding the functioning of International Financial Institutions (IFIs), navigating the process of obtaining and analysing project documents and developing strategies for advocacy.

This document arises from the efforts to influence the WB and ADB on education and health issues by Oxfam India during 2020-2022. As such, it uses some of the experience gained in analysing the support by IFIs to India during this period and tracking the IFC investments in education and health. The exercise revealed the need for activists to better understand IFI operations in the country, prompting the development of this document.

This manual is aimed at the following target users:

- Activists seeking to understand IFIs working on education and health in India.
- Organizations and leaders doing lobbying and advocacy on IFI operations in India with a focus on education and health.

This manual is accompanied by an outline for a one-day training workshop and a set of PowerPoint slides that can be used by interested activists to share this learning widely. We hope that this guide proves useful.

CHAPTER 1: INTRODUCTION

This manual is prepared for civil society groups, activists, and health and education networks to inform and influence International Financial Institutions (IFIs) lending to India including the World Bank (WB), the Asian Development Bank (ADB), the Asian Infrastructure Investment Bank (AIIB), and the New Development Bank (NDB), hold them accountable for the realization of the right to education and health, and to ensure transparency and accountability. The intention is to enable civil society activists in these sectors to track, monitor, and influence IFI policies and investments in these two sectors. The document is, therefore, not aimed at seasoned IFI watchers, but rather at education and health activists interested in understanding the work undertaken by IFIs in India.

1.1 WHAT ARE IFIS, WHY WERE THEY CREATED AND WHAT DO THEY DO?

An international financial institution (IFI) is a financial institution that has been established (or chartered) by more than one country. A multilateral development bank (MDB) is an IFI, created by a group of countries, that provides financing and professional advice to enhance development. The present document focuses on MDBs lending to India, but many of the similar principles will apply for bilateral Development Financial Institutions (DFIs).

The World Bank was created in 1944 at the UN Monetary and Financial Conference, also known as the Bretton Woods Conference. It was established to stabilize the global financial system and help countries rebuild after the Second World War. ADB was established in 1966 and NDB (established by the BRICS countries) and AIIB (improve economic and social outcomes in Asia) were established in 2014 and 2016, respectively. They now lend to countries to promote economic and social development and address financial gaps to respond to national, regional and global challenges. They also give technical advice and support policy reforms to address developmental challenges and strengthen governance and accountability.

India is ADB's and AIIB's top borrower and is one of the largest borrowers from the World Bank Group receiving loans and grants for various development projects. It is also critical to remember that the Indian government has its stake within these IFIs as a shareholder. Thus, it is a founding member of all four MDBs. At the time of writing, it is the seventh, fourth and second largest shareholder of the WB, ADB and AIIB respectively and holds equal shares with other founding members in the NDB. In the World Bank, it also leads a constituency of four South Asian countries that includes Bangladesh, Sri Lanka and Bhutan[1].in AIIB it holds its own Executive Director seat, the only country to do so.

1.2 WHY ENGAGE WITH IFIS IN HEALTH AND EDUCATION SECTORS?

Activists from the education and health sectors must engage with the IFIs since they

- Are major funders of government initiatives, nationally and at the state level. It is important to keep tabs on how this financing is being used and whether it is being directed towards improving education and health outcomes for the poor and vulnerable populations. This is particularly important given that many of these projects are loans which will need to be repaid by the government with interest and wastage of these scarce resources must be avoided.
- Play a significant role in shaping national, regional, and global policy, including shaping key institutions. This can have a significant and long-term impact on individuals and the nation. Keeping an eye on their advice is important to ensure that it aligns with the needs of India's population.
- Advocating for key specific system reforms such as increased private sector involvement and the use of performance-based financing. An activist may want to monitor the impact of these

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[1] https://www.worldbank.org/en/about/leadership/directors/eds12

reforms on access to and quality of public services in India. In some countries, civil society groups have been able to use donors as a lever of influencing governments.

- Undertake research and are a repository for data These can provide valuable information for use in advocacy efforts for example data on health and education outcomes via the Human Capital Index or a range of reports on health financing.
- Shape overall development outcomes like poverty and women's empowerment, that influence health and education work.
- Provide space for engagement with civil society which should be utilized.

As such, it is critical to scrutinize the role of the IFIs in the education and health sectors particularly from the lens of ensuring the realization of the right to education and health, strengthening the public systems of delivery, addressing wealth, social and gender inequalities, and ensuring transparency and social accountability in the implementation of these projects and investments. In so doing, it would be critical to ensure that the voices of women, marginalized communities are the poor are heard in the spaces where the decisions around the loans are taken.

1.3 WHAT DO THEY DO IN EDUCATION AND HEALTH?

Education and health have been a focus for IFI lending to India, particularly by the ADB and the World Bank. Compared to the WB and ADB, the AIIB and NDB do not spell out clear health and education strategies but had leveraged emergency loans during COVID-19 or supplemented existing loans of the World Bank and ADB.

In the last decade, the World Bank and ADB have cumulatively lent USD 9.6 billion via sovereign loans[2] (INR 60,000 crores) for the two sectors. Much of the funding is given to the central or state government in support of national or state schemes. One of the key World Bank-funded initiatives in India was the Sarva Shiksha Abhiyan (SSA), which aimed to provide universal primary education. In health, it supported the National Rural Health Mission (NRHM). Similarly, ADB also supported many national and health initiatives. In addition to funding governments, IFIs also invest in the private sector which they see as a partner in development. A summary of the support provided by the IFIs for education and health in India is included in the list of references.

These institutions play a critical role in shaping the terms of the debate on controversial issues such as what constitutes best practice in development. Critics have argued that the WB's focus on expanding access to education without an adequate focus on financing has come at the expense of quality, as many schools lack the resources and infrastructure needed to provide high-quality education[34]. Additionally, its emphasis on market-oriented reforms, such as promoting private sector involvement in the delivery of essential services, has been shown to exacerbate inequality in the education and health systems[5].

BOX 1: ADDITIONAL READINGS	
IFIs and Education and Health	
IFI's work on education	https://www.academia.edu/26352621/The_World_Bank_and_Educational_Assistance_History_Theory_Research_In_Oxford_Research_Encyclopedia_of_Education
	https://www.oxfam.org/en/research/false-promises
	https://www.researchgate.net/publication/262757673_The_2020_education_strategy_or_the_limitations_of_the_World_Bank_to_promote_learning_for_

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[2] Data compiled from World Bank and ADB annual reports.
[3] https://link.springer.com/book/10.1007/978-94-6091-903-9
[4] https://unesdoc.unesco.org/ark:/48223/pf0000380064
[5] https://www.jstor.org/stable/10.1086/676329

	all#:~:text=The%20World%20Bank's%202020%20Education,schooling%20invo lves%20positive%20learning%20experiences.
IFIs' work on health	https://www.wemos.nl/en/improving-healthcare-but-for-whom/
IFIs' own evaluations of past work or education and health	
WBG and IFC-Education	https://ieg.worldbankgroup.org/blog/6-lessons-aligning-investments-k-12-private-schools-goal-quality-education-all IFC Investments in K-12 Private Schools https://ieg.worldbankgroup.org/evaluations/evaluation-international-finance-corporation-investments-k-12-private-schools https://ieg.worldbankgroup.org/evaluations/drivers-education-quality
WBG and IFC-Health	https://ieg.worldbankgroup.org/evaluations/world-bank-group-health-services https://ieg.worldbankgroup.org/evaluations/public-private-partnerships-health
ADB	India's Urban Health Mission evaluation: https://www.adb.org/documents/india-supporting-national-urban-health-mission
Civil society reviews of IFIs' Work in India	
Education and health	Overlooking the fundamental: An analysis of International Financial Institutions' COVID-19 era health and education projects in India https://www.oxfamindia.org/knowledgehub/workingpaper/overlooking-fundamental-analysis-international-financial-institutions-covid-19-era-health-and
Education	Digital Dollar? An exploratory study of the investments by IFC in the Indian educational technology sector https://www.oxfamindia.org/knowledgehub/workingpaper/digital-dollar-exploratory-study-investments-ifc-indian-educational-technology-sector
Health	https://www.oxfam.org/en/research/first-do-no-harm-examining-impact-ifcs-support-private-healthcare-india http://policy-practice.oxfam.org.uk/publications/sick-development-how-rich-country-government-and-world-bank-funding-to-for-prof-621529 https://www.researchgate.net/profile/Indranil-Mukhopadhyay/publication/321212432_Investing_in_health_Healthcare_indu stry_in_India/links/5b07ea1c0f7e9b1ed7f27624/Investing-in-health-Healthcare-industry-in-India.pdf

1.4 WHAT ARE THE VARIOUS SHAPES THAT IFI SUPPORT TAKES?

IFI financing includes sovereign loans to national and state governments; grants and technical assistance. Support to the private sector takes the form of non-sovereign loans (which the company must repay), private equity investments in the company (either directly or indirectly through intermediaries) or consultancy projects, where the IFI (largely the IFC) provides consultancy support to its client government on how to undertake projects (mainly public-private partnerships). In addition to funding, IFIs also undertake research, compile data, build alliances, set standards in health and education and disseminate information through conferences and other modes. While most projects tend to be funded by single IFIs, some are co-financed from other sources including two or more of the IFIs.

BOX 2: FORMS OF IFI SUPPORT

BOX 2: FORMS OF IFI SUPPORT
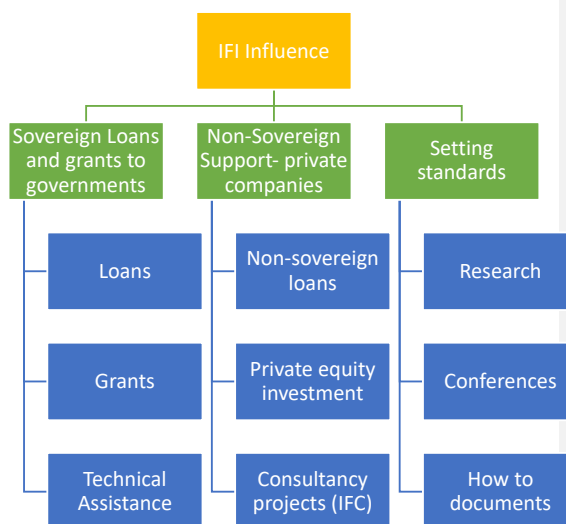
BOX 3: A GLOSSARY OF BASIC TERMS

Public Sector/Sovereign

Loans: Loans are financial assistance provided to the government that would need to be repaid, often with interest.

Grants: A grant is a form of financial assistance that does not need to be repaid.

Technical Assistance: Non-financial assistance which can be in the form of expert advice, training, or capacity building to help countries develop policies, programs, or projects.

Private Sector/Non-Sovereign

Loans: The IFI provides a loan for a project, company, or other financial institution either directly or for on-lending. On-lending is lending borrowed money to a third party.

Equity investments: The IFI invests in a company or financial institution either directly or through a private-equity fund (an intermediary). In a direct investment, the IFI buys a stake in the company. In an investment through an intermediary, the IFI invests in a special fund or company, which in turn, invests in and maintains direct relationships with specific companies.

Advisory Projects: The IFI provides advice to companies on how to enter new markets or adopt good practices or governments in how to structure public-private partnerships or implement reforms that encourage private investment.

1.5 WHAT STRATEGIES INFORM IFIS' WORK IN EDUCATION AND HEALTH SECTORS OVERALL AND IN INDIA?

Support to these sectors is delivered in line with the overall strategies of the ADB and World Bank, their education and health strategies and are also shaped by their specific Country Partnership Framework/Strategies. AIIB and NDB currently do not have dedicated education/health or national strategies, although the AIIB has identified some social sector priorities.

BOX 4: IFIS' STRATEGIES GUIDING THEIR ENGAGEMENT IN EDUCATION AND HEALTH

Overarching information about the IFIs
- **WBG**: https://www.worldbank.org/en/who-we-are
- **ADB**: https://www.adb.org/who-we-are/about
- **AIIB**: https://www.aiib.org/en/about-aiib/index.html
- **NDB**: https://www.ndb.int/about-ndb/

India Strategies
- **World Bank Country Partnership Framework**: https://www.worldbank.org/en/cpf/india
- **ADB Country Partnership Strategy**: https://www.adb.org/documents/series/country-partnership-strategies

Global Strategies of IFIs
- **World Bank Education Strategy:** https://www.worldbank.org/en/topic/education/overview#2
- **World Bank Health Strategy:** https://www.worldbank.org/en/topic/universalhealthcoverage
- **ADB Health Strategy:** https://www.adb.org/what-we-do/sectors/health/main
- **Sector Directional Guide:** https://www.adb.org/documents/strategy-2030-health-sector-directional-guide
- **ADB Education Strategy:** https://www.adb.org/what-we-do/sectors/education/main
- **Sector Directional Guide:** https://www.adb.org/documents/strategy-2030-education-sector-directional-guide
- **AIIB Social Infrastructure priorities:** https://www.aiib.org/en/what-we-do/investment-operations/social-infrastructure-department/index.html

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The Country Partnership Framework is a four-to-six-year strategy that the IFI prepares jointly with the borrowing country government to guide its operational activities in that country. All projects and programs and broad results to be achieved in a country are shaped by this document. Further information about the CPF/S process is included in Chapter 6.

The global strategies provide an overview of what the IFI seeks to achieve in health and education across all countries where it works.

1.6. WHO ARE THE KEY PEOPLE WITH A ROLE IN THE IFIS' WORK ON EDUCATION AND HEALTH IN INDIA?

Each IFI has its own structure. In the World Bank work on health is led by the Global Director for Health, Nutrition & Population. The Global Director, Education leads the work on education. We have regional vice presidencies and subsequently country-based offices. While ADB and WBG have specific staff working on education and health in India, the other MDBs do not. The IFC has offices in Delhi and Mumbai and one can contact either the staff in these offices or the Sector Head Education and Health

who sit at the IFC Offices in Washington DC[6]. ADB has education and health thematic working groups and a relationship with the Chiefs and staff of the Education[7] and Health Sector Group[8] may be beneficial. The NDB has an office in India in Gandhinagar[9]. The AIIB has only one office in Beijing with another office in UAE being in the pipeline.

However, when it comes to starting engagement with an IFI from scratch, it may be easiest to start with the Communication officer/CSO liaison person, usually listed on the website, who can direct you to the most relevant officer. One can then move to building relationships with other relevant people within the department. However, depending on your strategy and contacts, one could also engage through bank management and shareholders or the concerned staff as well.

When it comes to specific projects, all agreements and modalities are vetted by the Department of Economic Affairs under the Ministry of Finance in India. However, concerned line departments (national education and health ministries or state departments) have a significant role to play in shaping the specifics of the interventions as outlined below. As such, the IFIs and the government are both involved in shaping projects. One can, thus, also engage with India's representatives (board or country representatives to the Banks) if one seeks to influence the functioning of the IFI from an Indian perspective. One could also engage with representatives of other board constituencies. Contact details of board members can be found on the World Bank website.

Should beneficiaries, local communities or other affected people have a complaint about a particular IFI project, may also file a complaint to an IFI grievance mechanism. The process for doing so has been explained in 5.2.

BOX 5: WHOM TO CONTACT FOR WHAT: RESPONSIBILITIES FOR PROJECTS AT DIFFERENT LEVELS:

1. **Country Office**: These are the offices directly involved in a project. CSOs should address them for raising concerns, escalating issues, submitting recommendations etc.
   - Country Director: Would be the person to reach out to regarding overall concerns regarding IFI operations in the country.
   - Project Lead/s, Task Team Leads or Lead Investment Officer: These are the staff responsible for individual projects/investments. Their names can be found on the project page and other documents.
   - Communications Officer/External Affairs/CSO liaison: IFIs try to steer all civil society contacts through their external relations staff. While these may offer a good first point of contact and information, the real site of decision-making or intel about the specifics of the work in the individual sector may rest with the country directors, task team leads or individual specialists. Civil society can bypass these officers if they are not adequately responding to concerns and not supporting the initiation/development of dialogue with management.
2. **National or State Government level (as relevant):** The government is involved in the development of the project and its subsequent rollout. As such, it would be important to engage with the concerned line department. Try to identify the line officers involved in the

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[6] https://www.ifc.org/wps/wcm/connect/REGION__EXT_Content/IFC_External_Corporate_Site/South+Asia/Contacts/

[7] https://www.adb.org/what-we-do/topics/education

[8] https://www.adb.org/what-we-do/topics/health

[9] https://www.ndb.int/contact/

project to get a sense of how it is progressing. In case of any concerns, it is suggested to also write to these ministries to share the same and provide them with any recommendations.

- Ministry or Department of Health and Family Welfare and Ministry of Education. Line departments have individuals tasked to liaison with IFIs that could be a good point of contact. Individual projects also have nodal persons in the Ministry.
- The Program Management Units of the line ministry for the project (if established under the conditions of the project) or for the education/health work of the ministry more broadly (e.g., EdCIL[10] for education) can be another source of information.

3. **Global HQ and Regional Level:**
   - Board Executive Director Representing Country, and Regional VP (WB)/Director General (ADB): Concerns about a proposed strategy, policy, or project.
   - HQ level education and health staff: Highlighting concerns if adequate hearing is not given nationally.

4. **Accountability mechanisms:**
   - Grievance or complaints mechanisms for reporting harm resulting from an IFI project or policy and corruption such as the World Bank Accountability Mechanism, for World Bank projects, the Compliance Advisor Ombudsman (CAO) for IFC investments or the Accountability Mechanism for ADB-related projects. These are covered in more detail in Section 5.2.

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[10] https://www.edcilindia.co.in/Home/VS/10100

CHAPTER 2: UNDERSTANDING AND TRACKING SOVEREIGN PROJECTS
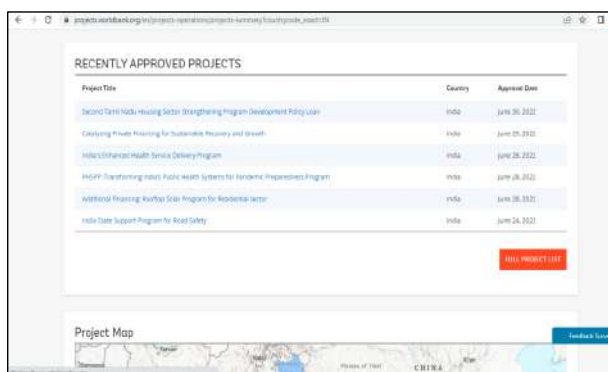
The most visible role that IFIs play in India is the programmes that they fund. India being a middle-income country has largely graduated from receiving concessional loans. This means that interest charged on loans provided to India are mainly based on internationally determined market rates.

2.1 LOCATING THE KEY PROJECT DOCUMENTS

Information related to sovereign projects of all IFIs tends to be made available on their respective websites. Contacts in the government (either the Ministry of Finance or the concerned line ministry), the UN system (UNICEF, UNESCO or WHO) or civil society groups that are close to or track the functioning of the IFIs in India are other sources of information. This section explains how to find project documents while the next section explains the project information provided on the website.

1. For World Bank
- Visit https://www.worldbank.org/en/home.
- Hover your cursor on the 'What We Do' tab.
- Below this select Country under the headline 'Projects by.'
- Once the page opens (https://projects.worldbank.org/en/projects-operations/project-country?lang=en&page), scroll down to South Asia and select 'India'.
- Once you click 'India' a page opens which shows a list of projects by the most recent date. Click on the Full project list to navigate all projects (as provided below).
- Users can also filter through the pipeline and active projects which are available on the left side once the full project list is opened. Pipeline projects are those that the WB intends to implement in India, but have not yet been rolled out.
- Once you click on a particular project, its home page will appear. This is divided into various sections including documents, financing mode and other sections.

2. For ADB
- Visit https://www.adb.org/
- Hover your cursor on "Where We Work."
- Select India and the page opens to the India section, where on the right side is an 'ADB Projects In India' tab.
- Clicking this section opens the list of recently approved projects.

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- Use the filter to the left to select the education/health sectors respectively to extract relevant information for particular projects.
- Remember that ADB lists technical assistance grants and loans. One has to click on a particular project to view whether it is a grant or not.
- Clicking on a project will open its webpage which has the relevant links to navigate through project documents and other resources.

3. For AIIB
- Visit https://www.aiib.org/en/index.html
- Hover over 'What we do' in the menu, find 'Project status' in the second column and click on 'Approved projects.'
- This takes you to the 'Our projects' page, which lists all approved projects. You can filter the projects by member country, year, sector and/or financing type or use the search function. You can also change from viewing approved to proposed projects.
- Once a particular project is selected its webpage presents a summary of key project information and links to documents available.
- There is also a Special Funds page. This is for smaller grants that are used to get projects into a shape that they can be submitted, so it can be an early warning of projects that may be in the pipeline[11].

4. For NDB
- Visit https://www.ndb.int/
- Click on projects given on the homepage.
- A list of projects will appear according to the most recent.
- One can either filter or scroll through the projects because NDB does not roll out many projects.
- NDB uploads negligible information compared to others.

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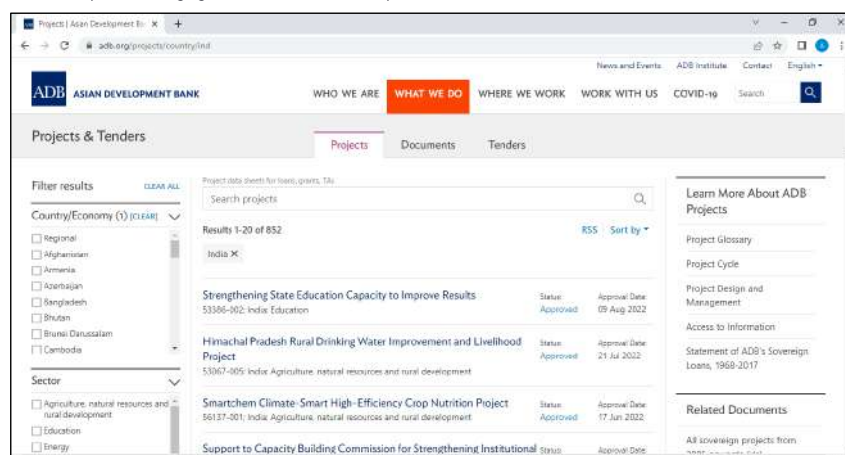
[11] There is also a Special Funds page. This is for smaller grants that are used to get projects into a shape that they can be submitted, so it can be an early warning of projects coming.

2.2. UNDERSTANDING PROJECT DOCUMENTS

IFIs provide detailed information on the projects supported by them. The following table provides a snapshot of where necessary information can be found. A detailed description of the individual documents is provided later. If a project is co-financed, one should also refer to the websites of all IFIs involved to form a comprehensive picture of the project.

	Information sought	WB	ADB	AIIB
1	What does the project seek to achieve?	Project Appraisal Document (PAD) (usually after approval by the board) and Project Information Document (PID) (before approval)	Project Administration Manual (PAM, usually after approval by the board)	Project Summary Information (PSI) (when a project is proposed)/Project Document (after it is approved)
2	How would the project be implemented?	PAD, Fiduciary system	PAM, Project Agreement	The section covered in the Project Document
3	What risks related to the project does the IFI itself recognize? How does it intend to mitigate it?	Environmental and Social Systems Assessment (ESSA)	Program Safeguard Systems Assessment. Integrated risks and mitigation measures section of PAM	Environmental and social impact assessment (ESIA)
4	Which non-government actors do they intend to engage with during the project implementation? Who have they talked to already?	Stakeholder engagement plan; parts could also be found in the PAD/PID and ESSA	The section on Stakeholder engagement under PAM	The section on Stakeholder engagement under Project Document/Summary
5	How does the project aim to ensure gender and social inclusion?	PAD/PID, ESSA	Gender Action Plan and Poverty Analysis	The section covered in the Project Document
6	What progress has been achieved during the project implementation?	Implementation Status and results report (ISR)/ Results framework (on page)	Project data sheet on the website	Project Implementation Report
7	What was achieved by the project on its completion?	Implementation Completion and Results Report, Implementation Completion Report Review, Audited Financial Statement	Technical Assistance Completion and Program Completion reports. Audited Project Financial Statements	

The section below provides a detailed description of the various documents mentioned above that are available on the IFI websites.

World Bank

The details of the project may be ascertained on the Project Summary and Documents tabs.

The Project Summary provides a snapshot of the project including:

- Abstract: One sentence about the development objective of the project.
- Key Details:
  - Last Stage Reached: Status on which the current project approval is (relevant during the stage of finalization).
  - Team Leader: Who, within the Bank, is leading the work concerning the project.
  - Fiscal year and closing date.
- Financing:
  - Commitment amount (quantum of funds committed by the Bank) and the breakdown of the same.
- Ratings and Results Achieved: Status of implementation including ratings of the progress and results achieved.
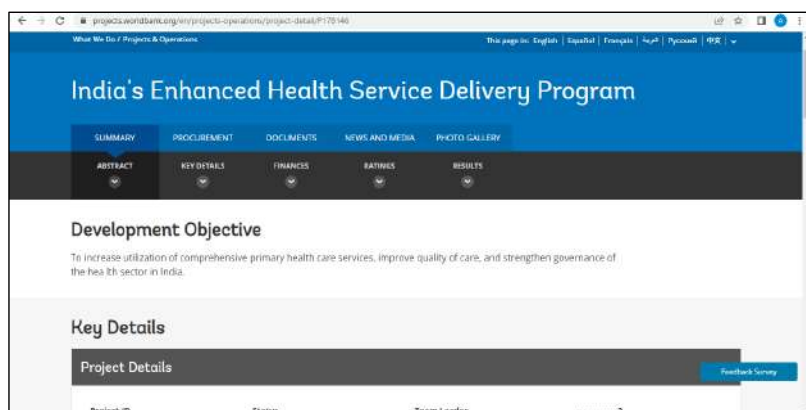
Other key project-related documents are outlined below:

World Bank documents for projects	Purpose	Uses
Project Appraisal Document (PAD)	A final project narrative that provides the rationale, problem analysis, change model, scope of intervention, gender analysis, indicators, risks, an outlay of project management unit (PMU), results-based framework, and general project overview.	Understanding project objectives, design, and structure.
Project Information Document (PID)	The preliminary document disclosed when the project is being finalized and then upgraded as PAD. It covers the rationale, problem analysis, interventions, and financing segments.	Understanding project objectives and anticipated results while it is under development.

Fiduciary Systems	Budgeting, planning, disbursement, and administrative responsibilities for managing the project.	Understanding the administration of the project.
Loan Agreement	Commitments and agreements entered by both parties and the repayment and annuity schedule for the duration of the project.	Understanding the repayment schedule.
Implementation and Status Report (ISR)	Regular updates of the progress against the agreed indicators, even if it does not provide a detailed narrative report.	Provides pulse of the project progress.
Environmental and Social Safeguards Report (ESS)	Assessment of project social and environmental risks/impact and steps to be taken for their mitigation. Includes impact on Indigenous people/tribal population. Some projects also provide a summary of discussions with communities and civil society.	Understanding the risks recognized by the Bank and how they intend to mitigate them. Sometimes gives a glimpse of consultations undertaken.
Stakeholder Engagement Plan (SEP)	Mapping of potential stakeholders impacted by the project, details of consultations held, and plans for engagement with relevant stakeholders. SEPs may not be disclosed for projects using a PforR[12] methodology.	Provides information on the stakeholder strategy followed in the project.
Procurement Report	Released periodically on the procurement undertaken in the project authorized by the PMU.	Helps track procurement from different vendors.
Audited Financial Statement	Published periodically during the project life cycle.	Helps track receipts and expenses made by the PMU.
Disclosable Restructuring Paper	Tracks the changes made to the project during its life cycle.	Assists in understanding major changes made to the project.
Disbursement and Side Letter	Lists the periodic disbursement made by the bank to the Ministry.	Helps track the finance disbursement.
Program-for-Results Technical Assessment	Document covering the indicators used for project goals for PforR projects.	Provides information on project indicators.
Implementation Completion and Results Report (ICR)	Evaluates the project in achieving the project objectives. Provides the final closure report of the project[13].	Listing achievements and limitations of the project.
Independent Evaluation Group (IEG) report	The WBG undertakes an independent assessment of some of its education and health projects and sectors. This document acts as the report of the same.	Helps to identify the impact of or any problems with WBG strategies.

ADB

Each project website provides:

- Project Overview: Purpose of the project, the project details (including the name of the Project Officer within the Bank responsible from whom additional information may be obtained).

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[12] PforR or Program for Results is a project tool used by World Bank wherein specific project goals are used for assessing project success. Disbursements are linked to the achievement of a specific goal. One can find out whether the project is a PforR in the project description of the PAD.
[13] https://ieg.worldbankgroup.org/ieg-search

- Project Data Sheet: including the project number, project type, the source of funding (including any back donors for the same), anticipated outcomes and impact, and the summary of environment and social aspects. At the same time, the status of implementation including the delivery of outcomes is also provided here.
- Documents: Provides the details of the various project documents which are uploaded. These include:
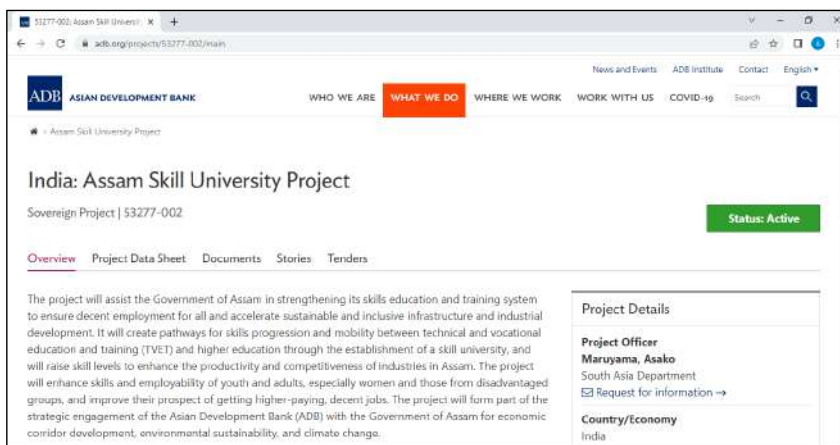
Asian Development Bank documents for the project	Purpose	Uses
Project Administration Manual	A project narrative that includes the rationale, problem analysis, change model, scope of intervention, gender analysis, indicators, risks, an outlay of project management unit (PMU), results-based framework, fiduciary responsibilities, stakeholder engagement plan and procurement plan.	Understanding the project's objectives, design, implementation, and structure.
Loan or Grant Agreement	Agreement between the Bank and the national/state government. It covers the agreements entered by both parties and provides the repayment and annuity schedule over the duration of the project.	Understanding the repayment schedule.
Initial Poverty and Social Analysis	Provides brief analysis of social safeguards for the project, assessing the impact on vulnerable communities. The document is very brief and often does not include substantial analysis.	Assessment of social areas which will be addressed by the project.
Gender Equality and Social Inclusion Action Plan	Constitutes a plan with targets for gender actions planned within a project.	Provides information about the action for gender inclusion.

Procurement Plan	Describes the procurement of major goods, works, and consulting services under the project.	Helps track procurement undertaken.
Program Safeguard Systems Assessment	Lists various environmental and social safeguards after conducting the necessary examinations.	Understanding the risks and safeguards associated with the project.
Technical Assistance Reports	Project documents for grants.	Understanding the grant's objectives, design, implementation, and structure.
Related Publications	Link to the strategy, papers, and documents related to the project.	Accessing any additional relevant information about the project disclosed by the Bank.
Audited Project Statements	Published periodically during the project life cycle,	Tracking receipts and expenses made by the PMU.
Completion Reports	Final project report.	Listing achievements and limitations of the project.

AIIB

The project website provides the following information:
- Summary: Project number and E&S Category
- Financing: Commitment amount (quantum of funds committed by the Bank) and the breakdown of the same.
- Timeline: Project duration
- Project Objective, description, and environmental and social information
- Focal Points: From AIIB (and any co-financing entities), the Borrower (Department of Economic Affairs), and the Implementing Entity.

AIIB documents for the project	Purpose	Uses for an IFI watcher
Project Summary	Brief profile of the project.	Understanding the project's objectives. Published before the project is approved, so can alert groups to projects that may be of concern.
Project Document	A final project narrative that provides the rationale, problem analysis, change model, scope of intervention, gender analysis, indicators, risks, an outlay of project management unit (PMU), results-based framework and fiduciary responsibilities.	Understanding the project's objectives, design, implementation, and structure.
Project Implementation Monitoring Report	Reports are generated periodically during the project and track the progress on indicators.	Provides pulse of the project progress.
Environment and Social Documents	Covers the gamut of environmental and social concerns in the project by	Helps identify the outreach to affected communities,

	providing necessary grading, and describes how risks will be managed.	mitigation, and risks involved in the project.

2.3. TRACKING FINANCIAL INFORMATION

For tracking financial information of IFI projects the first step is to view the landing page of the project where information is provided. This is done by clicking on the project and then scrolling down to the section where a financial breakdown is provided. Similar information is also provided in the at the very beginning of the PAD/PAM and other IFI Project Document. For AIIB, this information is included in the project summary,

While ascertaining the total financing from IFIs, one would have to understand the following:
- Total Project Cost: The total IFI financing + government share represents the total project cost.
- Government share/financing: The Indian/state government share of the spending which usually tends to form the majority of the spending on the project.
- Co-Financing: Financing provided by another IFI/ Development Fund/ Agency for a project.
- Nature of financing: For the World Bank, spending tends to be either IDA (concessional lending-"credits" or grants) or IBRD (market rate loans). Most lending to middle-income countries, like

India, tends to come from the IBRD.
- Lending Instrument: Provides information on whether this is a grant or loan and the quantum of funds to be disbursed through PforR methodology, if any.

2.4 HOW DO IFIS MONITOR THEIR EDUCATION AND HEALTH WORK? WHAT KIND OF DOCUMENTS ARE USEFUL FOR OUR WORK?

The World Bank and ADB undertake regular monitoring and evaluation of its projects (including project appraisal documents, ongoing monitoring reports and end-term evaluations), national operations (midterm and end-term review of the country program) and portfolios (health and education). All these reports are available in the public domain. Lastly, global reviews are also undertaken that cover the overall support of the IFI across sectors or of their internal policies. It is useful to not only look at individual projects but also read any national and portfolio reviews that may offer additional support for overarching arguments. Information about this tends to be in the public domain and the recommendations made can be particularly useful for advocacy. For instance, the WBG's IEG independent reviews of the Pre- and In-Service Teacher training[14] and the WBG Health Services[15] are available online. Similarly, reviews were undertaken of the IFC's support for K-12 Private Schools[16] and the WBG' work on public-private partnerships in health.[17]

2.5 ANALYZING SOVEREIGN HEALTH AND EDUCATION PROJECT LOANS

The starting point for engagement is a solid analysis of the project.

- Prepare an analysis of the concerns identified in the project to identify gaps in the project design (and/or implementation), if any, and make clear actionable recommendations.
- Discuss the analysis within your network and with experts: The analysis must be thorough and evidence-based. It would be strongly advised to get it peer-reviewed, and it would be desirable to have it endorsed by credible education and health experts from academia and development organizations, think tanks and by ex-IFI staff/others that the IFI concerned may consider influential and credible. Peer review of your document is important for lending it credibility and bestowing legitimacy to your concerns. Similarly, consultations within networks and with experts should be prioritized for fostering inputs that can be incorporated into the document. However, the absence of such a document should not prevent affected communities from raising concerns.

The nature of the project would shape the analysis, but this framework can be customized to undertake an analysis of individual projects. This is based on the framework used by Oxfam India for its analysis of COVID-period education and health loans to India.

Analysing Health projects

Focus Area	Guiding questions for the analysis
Strengthening public system delivery	• How does the project strengthen state capacities? Does it provide for any new planned policy frameworks, steps to strengthen planning and management capacities, financial management or monitoring? • What kind of support is provided for Health Wellness Centers (HWCs)/ PHCs/sub-centres? Will new HWCs/PHCs/sub-centres be established? Will the package of services be increased? Would the HWCs/PHCs be better equipped?

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[14] https://ieg.worldbankgroup.org/evaluations/drivers-education-quality
[15] https://ieg.worldbankgroup.org/evaluations/world-bank-group-health-services
[16] https://ieg.worldbankgroup.org/evaluations/evaluation-international-finance-corporation-investments-k-12-private-schools
[17] https://ieg.worldbankgroup.org/evaluations/public-private-partnerships-health

	• What is the modality to be adopted to improve HWC/PHC capacity? Would it be a PPP or would the public system itself be strengthened? • What steps are being envisaged for reaching out to communities for screening or other actions? • Does the project support Jan Aushadhi Kendra's (JAKs) or other modes for providing access to free and/or generic medicines? • What steps are being taken to ensure access to free healthcare or regulate rates? Would delivery of secondary and tertiary care delivery be improved? In what way? • How would improvement in the quality of healthcare be measured? Would it be through reliance on external verification/certification alone or would social accountability mechanisms be strengthened? • How would patient experiences be captured?
Equity	• Are any of the indicators or targets set disaggregated by gender/social identity? • Does the project recognize the existence of wealth and income inequality/ unequal opportunities between the rich and poor and provide steps to equalize them? How is this being addressed? Are any of the indicators disaggregated by income quintile? • Does the project recognize the specific challenges of women, LGBTQ, Dalits, Muslims, Indigenous people, and persons with disabilities? • What remedial interventions are planned for Dalits, Adivasis, Women, Muslims, Persons with Disabilities, and LGBTQ? • What steps are being taken for the reduction of user fees? • Are any tangible steps being visualized to equalize opportunities between rich/poor and/or developmentally lagging/progressive states/districts and rural/urban areas?
Human Resources	• Would the project address shortage of human resources in healthcare? How? • Would the project address the informalization of the healthcare sector including addressing contractual working arrangements? What are the safeguards planned for ASHA workers? • Does the project provide for capacity building of existing or new personnel? • Is there any planning for a career path for health workers, particularly women and those from marginalized communities? • Will the project contribute to strengthening pre- or in-service training of health personnel in the public system? How so?
Role of the private sector and its regulation	• Does the project explicitly include any activities to be done by the private sector? Which activities? Could they be feasibly and effectively done by the public sector? • If the private sector is promoted, does the project emphasize its regulation and the enforcement of patient rights, including the adoption of the Clinical Establishments Act and Patient Rights Charter? • Are there any concerns or negative impacts emerging from private actor operations or practices within the sector? • What steps are being envisaged to address the variation of quality and costs of services provided in the private sector?

Focus Area	Questions for guiding the analysis
	• Is the process of strengthening the public system envisaged as a PPP? • What safeguards are being put in place for ensuring accountability?
Strategic Purchase/ Health Insurance	• Does the project include an emphasis on health insurance? If yes, what is the project's role in this regard? • Does the project support enrolment in insurance schemes? Are there any concrete steps taken to address gender, and social gaps in access? Are any steps being envisaged to address denial of claims etc? • What steps are envisaged to address out-of-pocket expenditure in outpatient care? Is price capping envisaged? • Given how the project is designed, is there a risk that the expansion of insurance may result in the weakening of the public system? What mitigation measures are envisaged to address this?
Community participation	• Were communities or project stakeholders and beneficiaries meaningfully engaged or involved in project design or inception phases? If so, how? • Any concrete measures being considered to strengthen community-based monitoring of health? • Are there any tangible steps to strengthen local self-governance institutions with a mandate on health? (e.g., Jan Arogya Samitis) • Whether health workers and their unions provided space in the project? If yes, what role? • Are the grievance redress mechanisms for patients available, accessible and/or being strengthened? Are they approachable to communities?

Analysing Education projects

Focus Area	Questions for guiding the analysis
Ensure Equity	• Are the specific issues of India's marginalized communities (Dalits, Adivasis, Muslims, Persons with Disabilities, LGBTQ and women), recognized in the social impact analysis? • What remedial action is planned to address them? • Are any of the indicators disaggregated by social group? • Does the project recognize the existence of wealth and income inequality/ unequal opportunities between the rich and poor and provide steps to equalize them? How is this being addressed? Are any of the indicators disaggregated by income quintile? • Does the project contribute to educational inequality by creating a new layer of elite or inaccessible public schools or involve working with existing elite schools like Kendriya and Navodaya Vidyalayas? • How does the project address issues of dignity and Identity of marginalized communities? What steps are envisaged to address discrimination and, if relevant, promote mother tongue-based multi-lingual education? • How is the project supporting re-enrolment and accelerated learning for out-of-school and child labour populations? • Does the project support the development or enforcement of any regulations or guidelines on equitable access to quality education?
Strengthen the Public	• Would the project involve setting up new public schools? How many new schools? What is the growth in enrollment that is anticipated?

Education System	- Is there a possibility that some of the existing government schools may be closed in the process? - Will the project enhance infrastructure and facilities in schools to ensure that they fully comply with the Right to Education Act norms? - Will any specific individual indicators of quality be enhanced? - What is the balance between supporting standardized learning assessments or supporting formative assessments (Continuous and Comprehensive Evaluation) in classrooms? - Is the modality for strengthening the system looking to be a PPP or is there a process for building a system visible to building the capacities of personnel and leadership from within the system? - What steps are planned for strengthening monitoring and fiduciary systems? - What steps are visualized for strengthening middle management in the education administrations?
Addressing the needs of early childhood and secondary education	- What steps are being taken to strengthen early childhood care and education provision? Which institution would be strengthened- preschools, co-located Anganwadi centres, all Anganwadi centres or all of the above? Does the project envisage any mechanism to ensure parity in the quality of services delivered by these systems? - If the focus is on foundational learning, what steps are being envisaged to ensure that the implementation of literacy and numeracy in grades 1-3 is not at the expense of a holistic definition of education? - What steps are considered to address out-of-pocket expenditure/ensure secondary schools are fees-free? - Would the project involve strengthening Vocational Education at the secondary level? If yes, what safeguards have been provided to avoid premature streaming of children, to ensure that marginalized communities are not encouraged to join vocational education (or steered towards caste or gender-stereotyped occupations)?
Support to teachers	- Will the project involve hiring new teachers? - Are additional teachers being hired to address any shortages that may exist? - What steps are being envisaged for building the capacity of educational personnel across levels? Would there be any needs assessments of teachers, steps to enhance professional development or to address specific issues like School-based Gender-Based Violence, Gender and Social Inclusion? - Are there steps visible to free them from non-teaching work, including building administrative capacities to take up responsibilities at the cluster level? - What kind of interventions are planned for strengthening teacher training institutions and mechanisms for teacher on-site support like CRCs, BRCs, and DIETs? Are the vacancies in these structures being filled?
Role of the private sector	- Does the project involve engagement with non-state actors? What kind of engagement e.g., school vouchers? Outsourcing of key services? PPPs? Support to private schools? Something else? - Is any kind of support intended to be extended to private schools? If yes, what kind? - What steps are being considered to strengthen the regulation of private schools? Is there any support for parent participation, including the

	formation and training of school, district and state regulation committees, especially in states with existing fees regulation legislation? • Are there any specific safeguards to ensure schools are not-for-profit in practice? Is there a provision for an audit of all private schools? Is this requirement funded? • If PPPs are being considered, what steps are being considered for their regulation?
Community participation	• What steps are being taken to strengthen the capacity of School Management Committees and local self-governance structures for community participation? • Does the project involve improving the process of preparation of Annual Work Plans and Budgets including strengthening them to provide space for School Development Plans? • Would there be a process for strengthening social accountability including processes like social or equity audits? • Would the project strengthen Grievance Redress mechanisms for parents and children? • Were communities or project stakeholders and beneficiaries meaningfully engaged or involved in project design or inception phases? If so, how? • Whether education personnel and their unions provided space in the project? If yes, what role? • Are the grievance redress mechanisms for patients available, accessible and/or being strengthened? Are they approachable to communities?

Cross-cutting metrics

Focus Area	Questions for guiding the analysis
Sustainability	• Are the processes initiated under the project likely to be sustainable?
Risks	• What is the level of risk associated with the project? • Are the mitigation measures adequate and appropriate?
Information in the public domain	• Are the necessary documents available in the public domain? • Are they disclosed in a timely manner? • Are they thorough and address all relevant issues?
Extent and nature of consultations	• Does the project include a stakeholder engagement plan? • What is the extent of consultations undertaken during the conception phase and finalization of the project? Were civil society and teachers/health workers and their unions consulted? • Are there regular mechanisms for engagement with civil society during project implementation?
Grievance mechanism	• Does one exist? Is it publicized, accessible and adequate? • How is remedy for harms caused approached or addressed?
Metrics of success and progress	• Is information about the metrics of success in the public domain? • Is there information about the progress achieved available? Are there any omissions in the information disclosed?
Program-for-Results Financing (PforR)[18]	• Does the project adopt result-based financing? • What impact would the design of the incentives have on the project implementation?

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[18] https://www.worldbank.org/en/programs/program-for-results-financing

2.6. THE PROCESS INVOLVED IN PREPARING AND IMPLEMENTING SOVEREIGN LOANS

Broadly speaking, each project will have a "task team" that will work with the borrowing government (usually the national or state line department concerned) taking a prominent role in the preparation of the project. The team will have a Task Team Lead and have specialists from various Bank departments. The government is ultimately responsible for project implementation and hence also plays a significant role. NDB and AIIB have to date largely co-financed existing ADB or WBG projects and appear to significantly rely on these IFIs for technical support for these projects. It is critical to remember that this is a process that is framed through a process of negotiation between the government and the IFI and is expected to be prepared in consultation with affected parties and concerned stakeholders, including civil society.

IFIs have their own project cycles from the identification of the project to its completion and evaluation[19]. Knowing the cycle helps to know when documents become available and what scope for influence exists at a given point in time. The most significant steps in the same can be summarized as follows.

BOX 6: WORLD BANK GROUPS' OFFICIAL PROJECT CYCLE

BOX 7: THE STAGES OF IFIS' PROJECT MANAGEMENT

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[19] https://www.worldbank.org/en/projects-operations/products-and-services/brief/projectcycle

Project Identification, Preparation and Appraisal	Negotiations and Board Approval	Project Implementation	Project Review
Project identified	Final PAD and other documents	Cabinet approval (national or state)	Project completion report
Base documents prepared, put in public domain	Drafting of legal agreements	Transfer of funds	Review
Assessments: Technical, financial, institutional, social & environmental etc.	Final discussion in the Board	Progress reports	

BOX 8: PROJECT CYCLE INFORMATION OF THE IFIS	
World Bank	https://www.worldbank.org/en/projects-operations/products-and-services/brief/projectcycle
ADB	https://www.adb.org/sites/default/files/page/82563/project-cycle.pdf
AIIB	https://www.aiib.org/en/projects/process/index.html

2.7. INFLUENCING IFIS PROJECTS

i. Advocacy actions

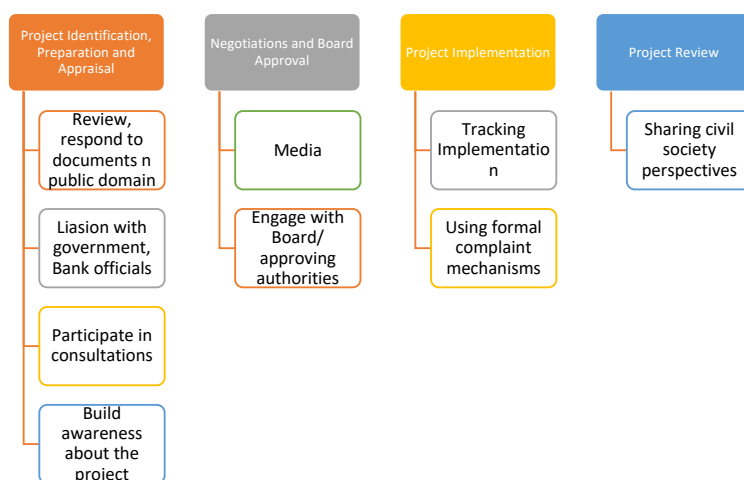Given power asymmetries between the IFIs and citizen groups, advocacy often takes time and patience is critical. Advocacy by representative networks and citizen groups can nudge IFIs into action. Experience shows that having a civil society point person or persons who is well-connected among local groups, can speak on behalf of the wider CSO group, can link to international groups experienced with engaging with the Bank and liaise with in-country and HQ-level Bank officials tends to be a huge asset. No single strategy will work all the time- one can either explore applying pressure from outside, looking for champions within the Bank or some strategy in between. Other aspects that have however proved useful have included:

- Prepare an analysis of the concerns and use it as a checklist across the project period: Highlighting the concerns about the project in the initial stages can help to guide the critique of the project going forward. This makes it important to ensure the quality of the submission by involving a range of stakeholders, including academia and Bank watchers, in its development. Be precise. IFI Staff receives a lot of information and brief communication is more likely to garner a response.
- Build a relationship with the IFIs project team: to win trust, gather important information e.g., regarding advocacy opportunities, and present a robust and evidenced critique of the work undertaken. Check what they need and identify if there is any way you can support for example co-organising community consultations are a typical win-win. Having one-to-one relationships with past project leads on other projects, communications officers and other IFI staff helps to have ready relationships that may come useful later.

- **Collective letters**: IFIs provide greater consideration when there is numerical strength behind a request for a change in their programs. As such, collective letters with a significant number of signatures, particularly with influential persons involved is helpful. When undertaking such an action, civil society should keep the project lead for that specific project in the loop on any final submissions made. The list of people who have endorsed demands at the initial stages are potential supporters for advocacy across the project period, and as such should be regularly updated on any advocacy efforts.
- **Discuss your concerns with the government**: It is important to contact the concerned government to track the progress of the project. It is the implementing organization for most sovereign projects, so it is critical to talk to concerned officials to ensure that the project has the desired impact. It will also help engagement with the IFI if one can demonstrate that one has tried to address the problem with the implementing authority. Elected people's representatives may also be potential allies for an ask for IFI transparency and accountability. Remember: IFIs are likely to say that they respond to the demands of the government and vice versa. A good approach for this is to organise a high-level roundtable or dialogue with good moderation to secure specific commitments.
- **Contact IFI watchers for problem escalation**: Collaboration with IFI watchers at the international level like Oxfam International, Bank Information Centre (BIC), Accountability Counsel, and NGO Forum on ADB can strengthen contacts, strengthen the advocacy strategy and assist in navigating through 'gatekeepers' within the IFI project teams. If common interest is found, they may share contacts within the IFIs, provide strategic advice in shaping advocacy strategies, help to support engagement with complaint mechanisms or with the Bank HQs and can potentially amplify local struggles.
- **Strategic media work** (right message at the right time) throughout the project cycle can be valuable if done well.
- **Stay in touch with IFI operations in general**: Organizations may register for annual and spring meetings (for WB/IMF) or the ADB Annual meetings which can help civil society networks to better understand current discourse at the global level and to highlight their findings and research by joining conversations during these meetings, together with other well-known IFI watchers. This can be expensive; CSOs specialising in IFI advocacy may be able to advise and potentially support a trip.

ii.   Sequencing engagement with the IFIs

BOX 9: TYPES OF ACTION AT VARIOUS STAGES OF PROJECT IMPLEMENTATION

Project Identification, Preparation and Appraisal	Negotiations and Board Approval	Project Implementation	Project Review
Review, respond to documents n public domain	Media	Tracking Implementation	Sharing civil society perspectives
Liasion with government, Bank officials	Engage with Board/ approving authorities	Using formal complaint mechanisms	
Participate in consultations			
Build awareness about the project			

Different kinds of activities may be strategic at the various stages of project implementation (Box 9). For example, during the Project design phase, the IFI project team is expected to obtain institutional feedback from a range of stakeholders including CSOs.[20] In practice, the IFI and the government often select these based on their past association, so it is critical for CSOs to proactively reach out to IFIs to engage with the process. There may be space for civil society inputs during the:

- Field visits during the project design that can shape the program
- Stakeholder engagement where civil society, community organizations, unions and associations should be invited.
- Environmental and social assessment which later forms the environmental and social safeguards.

To participate in these institutional interactions emails signalling intent to participate should be sent to the project lead whose email IDs are provided in the PAD/PAM; if he/she is unresponsive, it would be prudent to escalate any queries to higher levels in the system. Often an indication that project development is underway is that procurement has started for consultants for the development of key documents. Thus, it may be worthwhile to keep an eye on the 'Business Opportunities' sections of their websites.

BOX 10: NATIONAL ADVOCACY AT BOARD APPROVAL STAGE: OXFAM INDIA ADVOCACY ON STARS

Oxfam India along with the Right to Education Forum (RTE Forum) and the All India Primary Teachers Federation (AIPTF) has been raising concerns over the World Bank-funded education project-"Strengthening Teaching-Learning and Results for States" (STARS) which had a strong emphasis

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[20] https://accountabilityresearch.org/wp-content/uploads/2022/10/bp-world-bank-and-civic-space-220922-en-1.pdf

on public-private partnerships. Project STARS seeks to reform the educational governance system in six states in India — Himachal Pradesh, Kerala, Rajasthan (high performance-Lighthouse States), Madhya Pradesh, Maharashtra and Odisha (whose performance needs strengthening-Learning States) — and support some national interventions. A risk of the intervention was its heavy emphasis on PPPs with private actors which have had a negative equity impact in the past. Oxfam India (OIN), the RTE Forum and AIPTF

- Developed a detailed critique of the Project Information Document jointly with a group of concerned academics.
- Held a series of online meetings regarding its provisions to familiarise members of the civil society networks and unions with the major provisions of the project.
- Used the critique as the basis for a collective letter listing concerns with the project which was endorsed by over 1400 academicians, researchers, practitioners, teacher union members and civil society organizations and networks across 24 states. It was sent to the Vice President of the South Asia Region of the World Bank.
- Mainstream and social media was used including OpEds in strategic publications and a Twitter storm on the issue.
- Outreach was done at the World Bank Head Quarters in Washington with allies and other stakeholders, particularly the WB Board, to highlight the potential risks arising from the project and amplify the voice of affected communities.

The ongoing engagement with the Bank contributed to the removal of the mention of a 20% earmark for partnerships with non-state actors in the final loan document and a commitment by the Bank to not engage with for-profit actors during the project implementation.

Negotiations and Board Approval

At this stage, any concerns need to be taken and presented to the Board. The date for the discussion and approval by the Board tends to be listed on the IFIs website which provides a timeline for influencing. Working with an organization with an existing relationship with the IFI is particularly useful at this stage. One can engage with the Board at any time during the project implementation, but it would be helpful to have an IFI watcher involved to navigate the space better.

Project implementation:

The nature of engagement is based on the project and the purpose of the engagement.

a) If there are concerns with the project: Independent monitoring of implementation may be undertaken which can highlight problems with project implementation and generate solutions to problems. Some changes in project design may happen during the project implementation so the government and the IFI may still be receptive to suggestions for improvement after the project is approved. This can include a number of forms including documenting testimonies of affected communities (children, parents or teachers), undertaking research looking at the outcomes of the policies on the education system or engaging with local journalists to highlight concerns.

b) If these concerns are significant and are not resolved through dialogue: These can be shared with formal IFI complaints or accountability mechanisms. Doing so can not only address the specific concern of the individual complainant, but also correct the way that this and similar projects are implemented. If no information about the status of the project is being released, one can use the provisions related to the disclosure on the part of the IFI (described in Section

5.4) or engage with the media and Members of Parliament and Members of Legislative Assembly (MLAs) to highlight emerging concerns or extract answers.

c) If there are no significant concerns: CSOs may support community-based engagement or otherwise provide advice and support if there are no significant concerns with the project, especially if the projects fundamentally support a government scheme.

At the same time, there is scope for engagement around the IFIs beyond engagement with individual projects. This could include a number of forms including:

a) Holding public hearings and citizen tribunals based on the work on education and health to interrogate the developmental priorities of the IFIs. The outputs of this must be shared with the IFIs.
b) Media work to keep citizens at large informed about the work being done by IFIs in the country
c) Keeping concerned Parliamentary Standing Committees informed about the work supported by the IFIs on the issues of concern to them. Share any research highlighting the concerns with them.
d) Undertake research to understand the impact of the interventions supported by IFIs and the effectiveness of the best practices promoted by them.

Project Completion and Evaluation:

Any evidence related to the implementation of the project can be shared with the concerned review teams.

BOX 11: PROJECT IMPLEMENTATION: ADVOCACY ON WORLD BANK'S K-12 PRIVATE EDUCATION INVESTMENTS
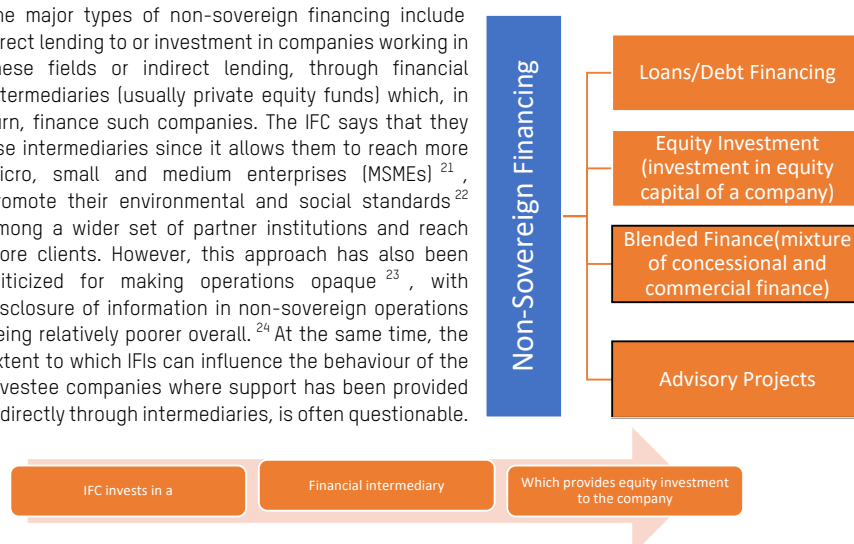
The IFC's accountability body, the Compliance Advisor Ombudsman (CAO), has received a series of complaints from communities about the IFC's investment in the commercial school chain Bridge International Academies (BIA). These were investigated and in October 2019, one of the CAO's compliance appraisal reports found "substantial concerns regarding the Environmental & Social outcomes of IFC's investment in Bridge". Other reports highlighted challenges with the health and safety of students among other issues. The final investigation reports are still forthcoming. However, these findings contributed to the decision by the IFC to divest from Bridge in 2022 after instituting a temporary freeze on all direct and indirect investments in for-profit fee-charging K-12 private schools in 2020. This freeze has since been made permanent.

CHAPTER 3: TRACKING NON-SOVEREIGN PROJECTS

IFIs also provide funding to private companies, some of which are active in education and health in India. The World Bank's International Finance Corporation (IFC) is a dedicated agency responsible for providing non-sovereign financing to the private sector, however, the ADB, AIIB, and NDB also do so. It is important to understand the nature and extent of the support provided by IFIs to private actors (non-sovereign finance recipients) in the country to get a complete picture of the role of these institutions. In many cases, these IFIs have become key drivers of the privatization agenda in LMICs. Privatization of education and health carries several risks. It can restrict access for those who cannot afford it and commercialization can lead to a focus on profit over quality of care or education resulting in lower quality service and exploitation of vulnerable populations.

BOX 12: FORMS OF NON-SOVEREIGN FINANCING

The major types of non-sovereign financing include direct lending to or investment in companies working in these fields or indirect lending, through financial intermediaries (usually private equity funds) which, in turn, finance such companies. The IFC says that they use intermediaries since it allows them to reach more micro, small and medium enterprises (MSMEs) [21] , promote their environmental and social standards [22] among a wider set of partner institutions and reach more clients. However, this approach has also been criticized for making operations opaque [23] , with disclosure of information in non-sovereign operations being relatively poorer overall. [24] At the same time, the extent to which IFIs can influence the behaviour of the investee companies where support has been provided indirectly through intermediaries, is often questionable.

The IFC also provides support in the form of advisory projects and interventions where they work with their government clients to set up projects (largely PPPs). The IFC provides advisory services in health around PPPs, Health quality assurance systems through their Health IQ tool and also on digitalisation.

3.1 TRACKING NON-SOVEREIGN PROJECTS

The section demonstrates how to find information about health and education non-sovereign projects. The focus is on ADB and the IFC given their track record of supporting non-state actors in

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[21] https://www.ifc.org/wps/wcm/connect/Industry_EXT_Content/IFC_External_Corporate_Site/Financial+Institutions/Priorities/

[22] https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/publications/publications_policy_interpretationnote-fi

[23] https://www.cgdev.org/blog/lending-practices-private-sector-window-how-effective-are-they

[24] https://www.publishwhatyoufund.org/dfi-index/2023/

these sectors in India. Note that AIIB and NDB also fund non-sovereign projects, but have so far not supported these specific sectors and not in India. This could, however, change in the future.

For Asian Development Bank (ADB)
- Visit https://www.adb.org/.
- Hover your cursor on "Where We Work"
- Select India and the page opens to the India section, where on the right side is an 'ADB Projects In India' tab.
- Clicking this section opens the list of the project approved most recently.
  - o Use the filter according to sectors to extract relevant information.
  - o For non-sovereign projects select non-sovereign under the 'Type.'
  - o Scrolling down the project page one can view the different compliances and disclosure tabs provided.
  - o Information provided includes
    - Overview: Quantum of financing, purpose, and project officer to contract for project information.
    - Project data sheet including safeguard categories, and environmental and social aspects.
    - Documents including the Initial Poverty and Social Analysis. Some projects also provide information for the FAST (Faster Approach to Small Non-sovereign Transactions) Report which is a pilot framework for small private sector transactions.
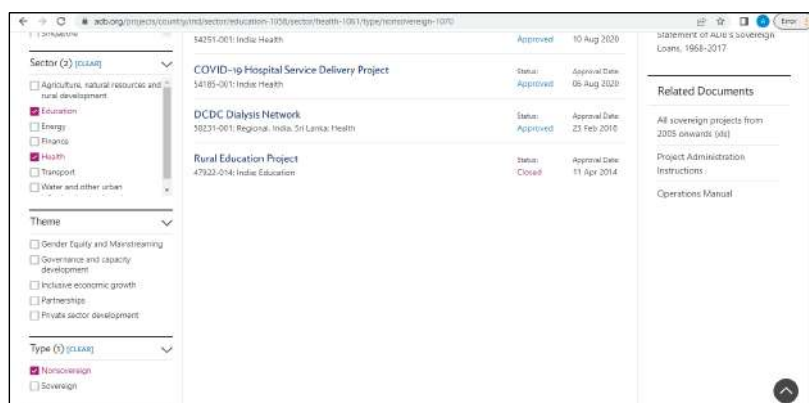
For International Finance Corporation
- Visit
  https://www.ifc.org/wps/wcm/connect/corp_ext_content/ifc_external_corporate_site/home
- Scroll down to the end of the homepage to the section "Disclosed Projects."
- Scroll to the middle of the Disclosed Projects section and click on "Recently Disclosed Projects" and click View All to see the list of projects.
- Once on the project list page, the filter will be available for refining the search for health and education projects.
- Select country (India) and industry (health and education).

- Project Information will be available once the investment is clicked. Scrolling down the project page one can view the different compliances and disclosure tabs provided. Projects include a Summary of Investment Information and Environment Documents. More details on how project information can be used are provided in the next section.
- Much of the investment by the IFC, however, is through intermediaries. Finding these is more complicated.
  o Search for IFC investments in 'private equity funds (in the menu on the IFC database) that invest in health in South Asia and attempt to understand whether they invest in health (particularly hospitals or diagnostics) or education. It may be helpful to supplement this search with further research from google, company websites and other research, etc.
  o Alternatively, one can look for IFC investments in 'funds' and 'other' (under 'Industry' on the IFC database) looking for South Asia or 'world region.'

Using project Information for the analysis of IFC investments

Project information is provided under the section 'Summary of Investment Information' (SII) which includes-

- Investment (and the overall amount sought) and project location. This is where one can find out whether the project is located in a tax haven.
- Development Impact: This includes a list of metrics that list the anticipated impact and IFC's expected role and additionality with respect to the investment for each project. This is expected to be a combination of the project (direct effects on stakeholders and indirect impact on society, economy, and environment) and market outcomes (capacity of the project to enhance market competitiveness, resilience, integration, inclusiveness, and sustainability). The impacts are expected to be derived from the Anticipated Impact Measurement & Monitoring (AIMM) frameworks which provide an overview of how expected outcomes that the investment is expected to deliver will be measured and monitored. Each project is assigned an AIMMS rating that summarizes the project's investment potential along specific dimensions and that provides a basis for monitoring the project. These AIMMs ratings are not disclosed. The list of AIMM frameworks[25] can be accessed on the link below. At the time of writing, education had a disclosed AIMM framework[26], but not health.
- Environmental and Social (E&S) Rationale/Risks and Mitigation: Identifies potential E&S impacts and mitigation plans.
- Contacts Sponsor/Cost/Location: Provides contacts for the project (within the investee company) and from the IFC.
- Performance Standards: The IFC has eight Performance Standards directed toward clients, guiding how to identify, avoid, mitigate and manage environmental and social risks. Of these PS 1 to 4 and 7 are the most applicable for investments in these sectors. The website lists the applicable performance standards for the project, the risk description and the mitigation strategies.[27]

The IFC portal does not adequately provide disclosures for constructing a reasonable analysis of its investments and one may have to supplement project information with research from other sources. A major hurdle in developing a critique of IFC investments is the lack of data disclosed on project

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[25]
https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/development+impact/aimm/measuring-impact
[26] https://www.ifc.org/wps/wcm/connect/93122a67-8062-4ea2-8635-03b45029a7a8/AIMM-SFB-Education-Consultation.pdf?MOD=AJPERES&CVID=nmTfe07
[27] https://www.ifc.org/wps/wcm/connect/8804e6fb-bd51-4822-92cf-3dfd8221be28/PS1_English_2012.pdf?MOD=AJPERES&CVID=jiVQlfe

progress and outcomes which is available for further analysis and investigation. Accordingly, information from other sources may be required to understand the true impact made by the investments.
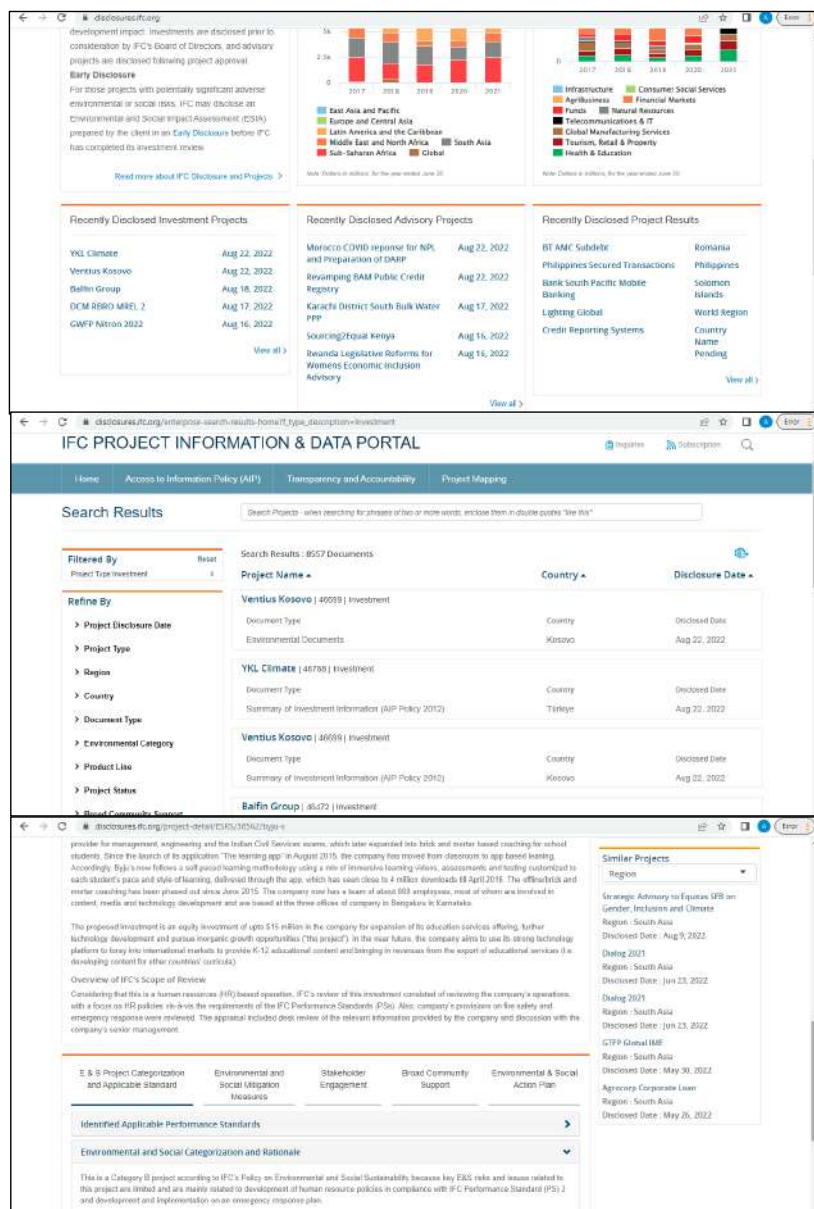
3.2 ANALYSING HEALTH AND EDUCATION PROJECTS.

Analysis of the IFI investment may include the following:

Focus Area	Questions for guiding the analysis
The extent to which intended impact is achieved and E&S risks have been mitigated	• Extent to which intended impact is achieved. • Extent to which mitigation measures are adhered to.
Impact on human rights as a result of action by the company?	• Evidence of negative human rights impacts as a result of the operation. • Evidence of violations of a child or patient rights violations or another failure to adhere to national legal frameworks.

3.3 INFORMATION EXCHANGE AND SUBSEQUENT ADVOCACY FOR NON-SOVEREIGN PROJECTS

Advocacy around sovereign and non-sovereign projects takes different routes or approaches given the difference in the mandate and focus of the institutions handling them and given that they follow different channels and mechanisms for stakeholder engagement and accountability.

At the same time, given that disclosures about non-sovereign projects tend to be more limited and more infrequent, it may be harder to track information about the investments and projects. It would therefore be important to look at additional existing research (around the IFI and the investee companies)- do your own research and engage with affected communities. Existing case law related to the investee companies may also be another source of information.

Where the IFC is concerned, it may be advisable to meet IFC representatives face-to-face in India with any concerns identified. If this is difficult, one can also seek support from international NGOs that specialize in IFC advocacy to raise the problems at the IFC headquarters in Washington. In case of specific complaints or violations, one can submit a complaint to the Compliance Advisor Ombudsman (CAO)[28] which is tasked with registering independent complaints on IFC. The CAO provides detailed guidance on the complaint submission process on its website. Given that one is dealing with corporate actors, it would be particularly important to have a power map while undertaking this advocacy to identify any additional advocacy targets that should be kept in mind.

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[28] https://www.cao-ombudsman.org/

CHAPTER 4: IFIS' ROLE BEYOND FUNDING

While sovereign and non-sovereign financing is the primary support offered, IFIs also exert influence through a number of channels that an activist needs to know about. These include

1. Advising on development projects, policies, and reforms based on their expertise and research.
2. Assisting in the implementation of development projects by providing technical assistance, capacity building, monitoring and evaluation, etc.
3. Enforcing international standards and norms such as human rights, environmental protection, or anti-corruption by making them conditions for their funding or engagement.
4. Hosting dedicated financial intermediary funds, trusts or other vehicles that further the education and health agenda.

At the same time, funding offered by IFIs also catalyses investments from other sources such as the private sector, donors, or civil society by leveraging their own funds or guarantees. This chapter briefly looks at some of these vehicles of influence.

4.1 TECHNICAL ASSISTANCE (TA) AND CAPACITY BUILDING

The ADB and the World Bank provide technical assistance to their client governments. Thus, the ADB provides two forms of technical assistance: Transaction TA and AIIB special fund projects are linked to a specific ADB and AIIB-financed project or program to support implementation readiness of a specific ensuing project (e.g., for planning projects in several sectors including education and health[29]). Knowledge and Support TAs are not directly linked to an ADB-financed project or program. They provide capacity development, policy advice, and research and development to inform government policies, strategies, and development plans (e.g., for improvement of the Pradhan Mantri Jan Arogya Yojana[30]). Similarly, the World Bank provides technical assistance to governments in the form of Advisory Services and Analytics (ASA) which are non-lending activities that help advance the development agenda. These include analytical reports, policy notes, and hand-on-advocacy and knowledge-sharing workshops and training. Reimbursable Advisory Services (RAS) are ASA provided in response to a request from, and paid for by, the recipient of the service (client), under a legal agreement and are principally targeted at middle- and upper-income countries. No recent examples of RAS support to India could be located.

4.2. SHARING RESEARCH AND ANALYSIS AND OTHER FORMS OF KNOWLEDGE

The WBG and ADB undertake research, develop how-to notes, maintain statistics, and undertake policy analysis. The WBG also specifically works to improve the availability of data on education.[31] These documents are not only sources of evidence but can provide civil society with information about the positions IFIs take on specific policy issues and offer a window into their diagnoses and solutions. Their calendar of events can also indicate the areas of emphasis of the IFIs.

BOX 13: IFIS' ENGAGEMENT IN KNOWLEDGE CREATION AND DISSEMINATION	
Research and other publications	World Bank: https://openknowledge.worldbank.org/browse ADB: https://www.adb.org/publications
Data	World Bank: https://datatopics.worldbank.org/ ADB: https://data.adb.org/
Blogs	World Bank: https://blogs.worldbank.org/search?keyword= ADB: https://blogs.adb.org/

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[29] 55311-001: Supporting Institutional Knowledge Development and Capacity Building for Planning of Innovative and Sustainable Projects and Programs | Asian Development Bank (adb.org)

[30] 54009-001: Strengthening Universal Health Coverage in India: Supporting the Implementation of Pradhan Mantri Jan Arogya Yojana | Asian Development Bank (adb.org)

[31] Education Data & Measurement (worldbank.org)

Events	World Bank: https://www.worldbank.org/en/events/all
	ADB: https://www.adb.org/news/events/calendar
	GPE: https://www.globalpartnership.org/events

4.3. ENGAGEMENT WITH OTHER DEVELOPMENT ACTORS

IFIs often collaborate on development interventions with concerned UN agencies with a mandate on education and health like UNICEF, UNESCO and WHO in the provision of technical assistance and project design. They collaborate on joint global initiatives and produce joint reports together. The World Bank also looks at Members of Parliament,[32] the Private Sector[33] and Foundations and Private Sector Partnerships[34] as key stakeholders. Understanding the current relationship of the IFIs in the development landscape is important for understanding their current influence and for identifying any other avenues of engagement. At the same time, senior UN staff may also be a source of intelligence regarding developments on specific technical issues within the World Bank.

4.4. CATALYSING RESOURCES

IFIs often co-finance projects initiated by bigger actors like the World Bank and the ADB. At the same time, IFIs, particularly the World Bank, also directly host several Financial Intermediary Funds (FIFs) which are financial arrangements that typically leverage public and private resources in support of international initiatives, enabling the international community to provide a direct and coordinated response to global priorities[35].

FIFs are instruments to mobilize financial support and collective action for specific development priorities. India is an active player in these institutions in health supported by the World Bank. India is both a recipient and donor of the Global Fund to Fight AIDS, TB and Malaria (GFATM created to prevent, treat and eradicate these diseases)[36], International Finance Facility for Immunization (IFFIm); immunization programmes through GAVI, the Vaccine Alliance) and is also part of the Coalition for Epidemic Preparedness Innovations (CEPI; accelerating development of vaccines)[37] and a donor and Board member for the Pandemic Fund (formerly FIF for Pandemic Prevention, Preparedness, and Response created to strengthen these dimensions). Information about India's role in these structures can be obtained on their websites. It is important to also monitor FIF project allocations particularly where these involve or have funds going to private actors.

India is not a partner country for the Global Partnership for Education (GPE)[38] which is the largest global fund solely dedicated to education in lower-income countries.

4.5 HOW DO IFIS ENGAGE WITH CIVIL SOCIETY ORGANIZATIONS IN INDIA?

IFIs engage with local communities and civil society organizations (CSOs) in India through various mechanisms, such as:

- **Consultations:** IFIs conduct consultations with local stakeholders, including CSOs, to solicit their views and feedback on project design, implementation, monitoring, evaluation, and impact.
- **Partnerships:** IFIs partner with civil society to deliver services, build capacity, raise awareness, advocate for policy change, and foster social accountability. This includes both non-funded engagements on issues of common concern and funded partnerships.

> **Commented [AT2]:** Footnotes 32-36- hyperlinks

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[32] https://www.worldbank.org/en/who-we-are/parliamentarians
[33] https://www.worldbank.org/en/about/partners/the-world-bank-group-and-private-sector
[34] https://www.worldbank.org/en/about/foundation-and-private-sector-partnerships
[35] https://fiftrustee.worldbank.org/en/about/unit/dfi/fiftrustee
[36] India - Government and Public Donors - The Global Fund to Fight AIDS, Tuberculosis and Malaria
[37] CEPI | New Vaccines For A Safer World
[38] The Global Partnership for Education and the World Bank Group: The Facts

- **Funding:** IFIs provide funding to CSOs to support their initiatives in the education and health sectors. Most upcoming opportunities are part of the tendering processes of the individual IFIs which indicate the services required by the IFIs for their ongoing projects and activities in the country. This includes both the World Bank[39] and the ADB.[40]

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[39] https://projects.worldbank.org/en/projects-operations/procurement?srce=both
[40] https://www.adb.org/projects/tenders

CHAPTER 5: ADDRESSING CHALLENGES IN IFI OPERATIONS

5.1 WHAT SAFEGUARDS DO IFIS HAVE TO ENSURE THAT THEIR OPERATIONS DO NO HARM?

International financial institutions (IFIs) must systematically take necessary measures to ensure that their activities and the projects that they support do not lead to human rights violations, including those committed by clients [41] . IFIs have defined standards that seek to minimize negative environmental and social consequences of their operations and to include marginalized communities. Their programmatic interventions, policy advice and investments should, in principle, not contradict these policies. A summary of these provisions for the WBG and ADB has been provided below. Similarly, the detailed provisions of the various policies are available on the websites of the AIIB[42] and NDB[43].

Understanding these standards can help to identify how programs or investments deviate from the IFIs' publicly stated commitments. Being able to demonstrate how education and health projects or investments violate these standards add additional weight to the moral argument and make it possible to use the grievance redress mechanisms of the IFIs. It should also be noted that the performance standards reference compliance with national laws and regulations as well and that any violations of national law can be subsumed as a violation of a particular performance standard.

BOX 14: APPLICABLE STANDARDS IN WBG AND ADB OPERATIONS

	WBG	ADB
Standards	• Performance Standard 1: Assessment and management of environmental and social risks and impacts; • Performance Standard 2: Labor and working conditions; • Performance Standard 3: Resource efficiency and pollution prevention; • Performance Standard 4: Community health, safety, and security; • Performance Standard 5: Land acquisition and involuntary resettlement; • Performance Standard 6: Biodiversity conservation and sustainable management of living natural resources; • Performance Standard 7: Indigenous peoples; and • Performance Standard 8: Cultural heritage	The ADB provides for environmental safeguards, involuntary resettlement and Indigenous people standards.
Inequality and poverty	The WBG tracks the income growth of the bottom 40% of the population in each country to monitor progress towards its goal of shared prosperity[44].	The ADB's current strategy seeks to reduce poverty and inequality in access to opportunities for it has a strategy guide[45].
Gender	The WBG has a gender strategy. It also works on issues of sexual orientation and gender identity- inclusion to identify and minimize the possibility of	The ADB does targeted work to empower women and undertakes gender mainstreaming. One of its corporate present strategies is to ensure that by

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[41] https://www.ohchr.org/en/press-releases/2020/09/international-financial-institutions-must-show-way-human-rights-and-good
[42] https://www.aiib.org/en/policies-strategies/framework-agreements/environmental-social-framework.html
[43] https://www.ndb.int/
[44] https://www.worldbank.org/en/topic/isp/overview#2
[45] https://www.adb.org/documents/strategy-2030-op1-poverty-inequalities

	discrimination against LGBTI people and ensure their inclusion in programmes.[46]	2030, at least 75% of the number of ADB's committed operations (on a 3-year rolling average, including both sovereign and non-sovereign operations) will promote gender equality.
Disability	WBG has ten Commitments on Disability-Inclusive Development.[47]	ADB has a guidance document for strengthening disability-inclusive development in its current strategy[48].
Social Inclusion	The WBG has a Social Inclusion Assessment Tool (SIAT) to assess social inclusion in projects, programs and policies[49]. It seeks to address work with Indigenous people [50] and Afro-descendants and has an anti-racism charter[51].	ADB has a policy on Indigenous people[52] and has Indigenous peoples' safeguards.

Among the environmental and social standards, labour and working conditions (from the perspective of rights of health and education personnel), land acquisition (if the land is acquired for the project) and Indigenous peoples (in tribal areas) are most applicable for education and health interventions. IFIs tend to have strong language on how the rights of women and Indigenous people need to be protected.

The existence of these standards, obviously, does not mean their full implementation. Furthermore, IFIs tend to rank education and health projects as relatively lower risk. Looking at the policies related to gender, Indigenous people or other applicable groups can help one identify the extent to which IFIs can address the needs of vulnerable communities.

BOX 15: ADDITIONAL READINGS ON THE USE OF APPLICABLE STANDARDS	
Indigenous people in WBG	http://www.forestpeoples.org/sites/fpp/files/publication/2010/09/ifcps7guideoct08eng.pdf
Gender	https://www.adb.org/documents/gender-law-and-policy-adb-operations-tool-kit https://www.genderaction.org/images/GA%20Gender%20Guide%20to%20World%20Bank%20and%20IMF%20FINAL.pdf
IFC Standards	https://www.inclusivedevelopment.net/wp-content/uploads/2020/01/community-guide-to-the-ifc-participants-manual1.pdf
Free, Prior and Informed Consent	https://oxfam.app.box.com/s/566vt6r59nzxdgqxpco3lqdquyj93092

5.2 INDEPENDENT ACCOUNTABILITY MECHANISMS (IAMS)

IFIs have independent bodies tasked with investigating complaints regarding violations and harm caused by an IFI. A complaint mechanism is provided for registering complaints, investigating them, and holding the IFI accountable. The accountability mechanisms that exist are not perfect and there

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[46] https://www.worldbank.org/en/topic/sexual-orientation-and-gender-identity#2
[47] https://www.worldbank.org/en/topic/socialsustainability/brief/world-bank-group-commitments-on-disability-inclusion-development
[48] https://www.adb.org/sites/default/files/publication/779396/disability-inclusive-development-2021-2025.pdf
[49] https://pubdocs.worldbank.org/en/478071540591164260/SiAT-Logo-web.pdf
[50] https://www.worldbank.org/en/topic/indigenouspeoples#2
[51] https://www.worldbank.org/en/news/statement/2021/11/11/world-bank-group-anti-racism-charter
[52] https://www.adb.org/sites/default/files/institutional-document/33441/files/policy-indigenous-peoples.pdf

is scope for strengthening the complaint mechanisms that exist. One can refer to this tool if you want to examine the other complaints submitted in the past: https://www.accountabilitycounsel.org/research/accountability-console/

Corruption is generally not handled by the IAMs and each IFI has a specific unit for complaints related to corruption. At the same time, implementers are usually required to establish a local-level grievance mechanism for project-related complaints.

Please note that many of the IFIs' complaint mechanism (e.g., the AIIB) requires good faith attempts to resolve grievances at the local level, by using the local complaint mechanism and discussing concerns with the implementer/ borrower. If a complainant fails to do this their complaint may be rejected. There are exceptions if there is a genuine fear that it would expose them to risk, but in general, it would strengthen the case if one can demonstrate that efforts to address the issue have been made.
IFIs are often sensitive to their reputations so media scrutiny about complaints may help the issue to be taken seriously.

BOX 16: ADDITIONAL READINGS ON IAMs

Links to IAMs of IFIs
- For the World Bank:
  https://www.worldbank.org/en/programs/accountability/overview?cq_ck=1628307493456
- For ADB: https://www.adb.org/who-we-are/accountability-mechanism/overview

Grievance Redressal Mechanisms (GRMs)
- For World Bank: https://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service
- For ADB: https://www.adb.org/who-we-are/accountability-mechanism/how-file-complaint#accordion-0-2
- For AIIB: https://www.aiib.org/en/about-aiib/who-we-are/project-affected-peoples-mechanism/submission/index.html
- For NDB: https://www.ndb.int/about-us/whistleblowing/
- For IFC:
  https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/publications/publications_gpn_grievances

Corruption
- For the World Bank: https://wbgcmsprod.microsoftcrmportals.com/en-US/anonymous-users/int-fraud-management/create-new-complaint/
- For ADB: https://www.adb.org/who-we-are/integrity/report-integrity-violations
- For AIIB: https://www.aiib.org/en/about-aiib/who-we-are/report-fraud-corruption/index.html
- For NDB: https://www.ndb.int/governance/whistleblower-procedures/

Critique of the mechanisms
- AIIB: https://re-course.org/wp-content/uploads/2021/11/The-Accountability-Deficit-How-the-AIIB-complaints-mechanism-falls-short-1.pdf

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5.3 ACCESS TO INFORMATION POLICY (AIP)
Almost all IFIs have instituted procedures that provide public access to the decisions and plans for projects. While the IFIs are expected to release information, in practice, information that is commercially sensitive, confidential, about negotiations, third party or otherwise restricted by law is not shared. This should be challenged. The AIP can be used to get information from IFIs if it is felt that PAD/PAM and other available documentation are insufficient. Below are the links for the AIPs and request for information forms of the various IFIs along with some civil society guides for the AIP processes and appealing denials of information.

BOX 17: ADDITIONAL READINGS ON ACCESS TO INFORMATION POLICIES OF THE IFIS	
Individual DFIs	
World Bank	https://ppfdocuments.azureedge.net/3693.pdf
IFC	https://disclosures.ifc.org/access-info-policy
ADB	https://www.adb.org/who-we-are/access-information/main
AIIB	https://www.aiib.org/en/policies-strategies/public-information/policy/index.html
NDB	https://www.ndb.int/wp-content/uploads/2019/12/RFI-IGA.pdf
Request for Information forms	
AIIB	https://www.aiib.org/en/contact/index.html
ADB	https://www.adb.org/who-we-are/access-information/inquiries
WBG	https://www.worldbank.org/en/access-to-information/request-submission
IFC	https://disclosures.ifc.org/inquiries
Guide to making requests for information and appealing denials:	
World Bank	https://bankinformationcenter.cdn.prismic.io/bankinformationcenter/fdd929e2-5acb-4aa1-8413-484acc128ef3_Accessing+Information+from+the+World+Bank+Final+%281%29.pdf
IFC	https://bankinformationcenter.cdn.prismic.io/bankinformationcenter/8ba7df2a-17c4-4d8f-9d2f-acf67d3de118_Accessing+Information+from+the+International+Finance+Corporation+Final+%281%29.pdf

Using the official forms gets the communication logged in the system since if you just email a staff member, they can potentially say they never saw the email. However, it would be advisable to also contact the concerned communication staff and relevant people in management at the same time. Doing so can be helpful since they could at times also chase up slow responses from management.

5.4 CIVIL SOCIETY LIAISING AND CITIZEN FORUMS

One can participate in Annual General Meetings (AGM) of IFIs held every year and present findings of the studies and evaluation of projects or project experiences. IFIs like the World Bank and ADB have civil society forums and Annuals and Spring meetings that allow for participation and engagement with these institutions. One can register for these meetings by visiting their website. For ADB your organisation needs to be accredited first to be able to apply or you can seek to join another organisation's delegation that is already accredited.

At the same time, citizen engagement processes are part of projects[53].

BOX 18: ADDITIONAL READINGS ON CIVIL SOCIETY ENGAGEMENT WITH IFIS	
IFI's materials for civil society engagement	
World Bank	https://www.worldbank.org/en/about/partners/civil-society/civil-society-policy-forum
ADB	https://www.adb.org/who-we-are/ngos/civil-society-participation
	https://www.adb.org/sites/default/files/publication/761061/sourcebook-engaging-csos-adb-operations.pdf
AIIB	https://www.aiib.org/en/about-aiib/who-we-are/complaints-resolution-evaluation-integrity-unit/stakeholder-engagement/index.html
NDB	https://www.ndb.int/partnerships/civil-academic-societies/
Civil Society Guides for Engagement	

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[53] https://consultations.worldbank.org/sites/default/files/materials/consultation-template/engaging-citizens-improved-resultsopenconsultationtemplate/materials/finalstrategicframeworkforce_4.pdf

WBG	https://bankinformationcenter.org/en-us/update/toolkit-for-activists/
	https://www.re-course.org/wp-content/uploads/2020/02/South-East-Asia-Civil-Society-Guide-on-Influencing-World-Bank-Strategies-For-web.pdf
ADB	https://bankinformationcenter.cdn.prismic.io/bankinformationcenter%2Fb21873bc-14ee-4dd2-9487-cfaad0f19011_unpacking%2Bthe%2Badb-2008.pdf
Civic Space	
Ideas for advocacy in restricted civic space settings	https://freedomhouse.org/sites/default/files/2020-06/FINAL_COMPLETE_Lifeline_Toolkit_for_CSO_Advocacy_in_Restrictive%20Spaces_June_2020.pdf
Need for civic space monitoring as part of WBG Country Engagement	https://oxfamilibrary.openrepository.com/handle/10546/621418

5.5 INDEPENDENT EVALUATION GROUP

The WBG undertakes project evaluations led by the Independent Evaluation Group (IEG) (an independent body of the World Bank Group tasked with evaluation). Similarly, independent evaluations are undertaken of ADB operations. These evaluations provide useful evidence around the impact of WBG interventions that should be referenced alongside other findings.

BOX 19: INDEPENDENT EVALUATION GROUPS IN THE WB AND ADB	
ADB IEG Group- India-specific evaluations	https://www.adb.org/search0/country/india/type/evaluation_document
WBG IEG	https://ieg.worldbankgroup.org/ieg-search

CHAPTER 6: COUNTRY PARTNERSHIP FRAMEWORK/STRATEGY

The CPF and CPS were introduced in Chapter 1. It is critical to influencing the CPF/CPS since it provides the framing for the work to be done by the WB and ADB in education and health over a five to six-year period.

6.1 PROCESS OF PREPARING THE CPF/CPS

The CPF and CPS are an outcome of a series of consultations and inputs. The World Bank undertakes an economic assessment and the broader challenges faced by a country before preparing its CPF which is known as the Systemic Country Diagnostic (SCD). Bank staff, the government, donors and a range of stakeholders and civil society are involved in the CPF/CPS development.
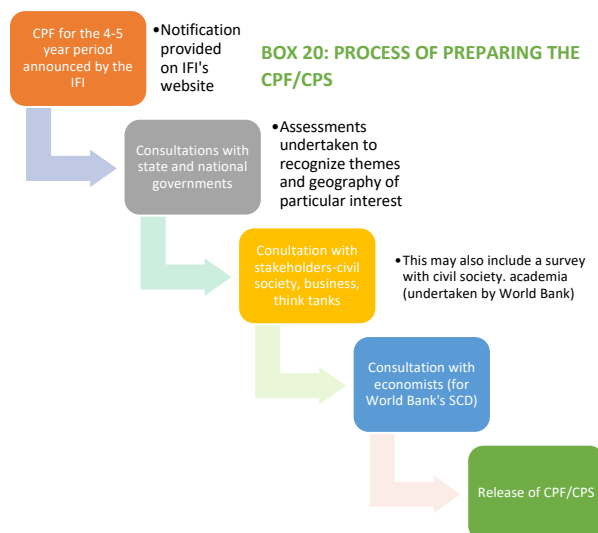
6.2 INFLUENCING THE CPF/CPS

Civil society can participate in formal consultations organized by the ADB and WBG or indirectly by attempting to influence the inputs made by other stakeholders including state governments, development agencies, think tanks and industry.

Some of the measures that could be taken to influence the CPF/CPS process could include:

1. **Outreach to the communications officer in IFIs**: CSOs, networks, and activists should build relationships with the communications team of IFIs since they will be first responders to emails querying the commencement of the process. It is also important to write to them as a network with an institutional email conveying your group/network's intent to participate in the meetings.

2. **Prepare a list of recommendations for health and education**: Prepare an overarching critique and make recommendations based on the experience of implementation during the ongoing strategy period. It is suggested to frame this document collectively with wider representative civil society networks to ensure that it serves as a representative input from the sector. One example of such a document is that prepared by Oxfam India with its allies[54].

3. **Write to the country director/Region/ HQ**: Sometimes project teams or communications officers may not take inputs from critical voices seriously. By taking matters to the top, one

BOX 20: PROCESS OF PREPARING THE CPF/CPS

- CPF for the 4-5 year period announced by the IFI
  - Notification provided on IFI's website
- Consultations with state and national governments
  - Assessments undertaken to recognize themes and geography of particular interest
- Conultation with stakeholders-civil society, business, think tanks
  - This may also include a survey with civil society. academia (undertaken by World Bank)
- Consultation with economists (for World Bank's SCD)
- Release of CPF/CPS

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[54] https://www.oxfamindia.org/knowledgehub/oxfaminaction/addressing-education-health-inequalities-country-partnership-framework-strategy-world-bank-and-adb

may be able to bypass local relationships and increase the chance that concerns are addressed. Outreach to these can be supported by Bank Watcher groups.
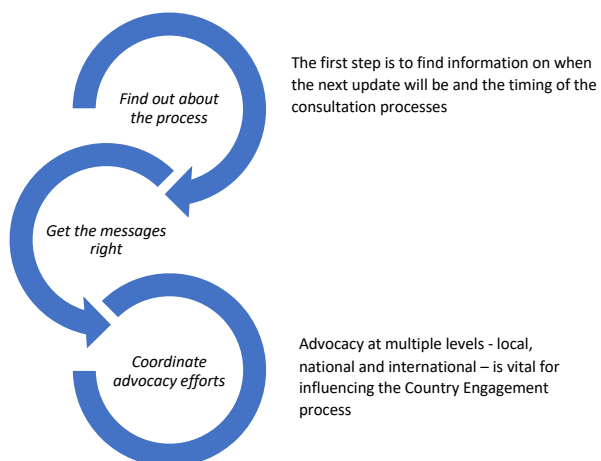
4. **Apprise and solicit the support of 'persons of public standing'**: To create an environment for IFIs to listen to CSOs, it is strategically important to solicit allies from politics, academia, think tanks, ex-bureaucracy, journalism, and other walks of life to support the asks. They can write opinion pieces in newspapers, tweet and directly reach out to the concerned IFIs in support of the recommendations which may make the IFIs more receptive to the inputs. A good power map in terms of identifying credible messengers for the asks would be important.

5. **Prepare for the consultations**: Once the dates for the consultation are announced, networks and alliances should determine the most articulate, knowledgeable and advocate voices among themselves to participate in these consultations. If consultations are also taking place regionally, ensure that there is representation in those consultations.

6. **Influencing state governments, think tanks, the private sector and other constituencies to be consulted**. The specific civil society asks may be shared with other groups being consulted in parallel. Searching online for the reports of past CSPF/S consultations may help to identify potential stakeholders and invitees. It would be particularly useful to get the support of some state officials in these consultations.

While there is official space for civil society participation that must not be abandoned, one must have realistic expectations in terms of how much could be achieved through official engagement.

BOX 21: ADDITIONAL READINGS ON CPF/CPS	
Re-Course guides to the CPF/S	https://re-course.org/wp-content/uploads/2021/11/Malawi-CPF-Guide-1.pdf
Influencing World Bank's CPF	https://bankinformationcenter.cdn.prismic.io/bankinformationcenter%2F7e4c4337-65be-41eb-aec3-56e2d7345bc0_cpf-primer-july-2017-final.pdf
ADB's review of the preceding CPS	Validation of India Country partnership strategy review, 2016-2021. https://www.adb.org/documents/validation-india-country-partnership-strategy-final-review-2016-2021
Oxfam India asks for the 2023 ADB and WBG CPF/CPS	https://www.oxfamindia.org/knowledgehub/oxfamaction/addressing-education-health-inequalities-country-partnership-framework-strategy-world-bank-and-adb

The first step is to find information on when the next update will be and the timing of the consultation processes

Find out about the process

To be effective, messages to the Banks must be clear and concise civil society can push for best practice, including asking for information and draft documents to be shared in advance of the consultations

Get the messages right

Coordinate advocacy efforts

Advocacy at multiple levels - local, national and international – is vital for influencing the Country Engagement process

BOX 21: STAGES FOR ENGAGEMENT WITH THE CPS/CPF PROCESS

ANNEXURE 1: TRAINING OF TRAINERS MODULE: OUTLINE FOR A WORKSHOP

Time allocated	Session	Tools to be used	Topics covered
10 minutes	Introductions and expectations	Plenary discussion	Introduction of participants: Area of work, background with IFIs-related work Learning needs from the session
30 minutes	Understanding IFIs	PPT, Q & A, Whiteboard or flipchart	Introduction to IFIs Why were they created and their role Main IFIs in India Their role in education and health: Historic and recent role Q& A: Why should CSOs working on education and health track functioning?
20 minutes	Understanding the relationship between the government and IFIs	PPT	Basis of IFI support Who is who in IFIs Explain the structure of subsequent sessions.
20 minutes	Navigating IFI information	PPT and website projection	How to locate health and education projects and investments- sovereign and non-sovereign
20 minutes	Sovereign Projects	PPT, website projection	Locating Key Project Documents by projecting various project documents. Introducing Key Documents and their purpose Quiz: What documents contain what kind of information
15 minutes	Rights-based approach for tracking IFIs	PPT	Introduce the framework- sovereign and non-sovereign frameworks both
30 minutes	Exercise	Group Work	Exercise in groups: Analyse outcome frameworks of a few recent projects/investments in health and education using a checklist
Tea			
15 minutes	Beyond funding	Discussion	
20 minutes	Addressing challenges in operations	PPT	Safeguards Accountability mechanisms Policies: CPF, Inspection Panels and accountability mechanisms Independent NGO forums, IFI watchers
10 minutes	Other specific spaces for national influencing	Ppt	CPF/CPS
Lunch			
60 minutes	Influencing IFIs	Activity	Groupwork: Methods of influencing IFIs. Introduction to the project lifecycle What kind of influencing is possible at various stages Groupwork: Influencing the project analysed earlier
30 minutes	Collective strategies for future direction and next steps post workshop	Discussion	Participants and trainer discuss collective efforts for influencing IFIs. Discussions should be focused on how IFIs can be approached by CSOs and the need for a forum on monitoring health and education loans.
Tea			