

6. RECOMMENDATIONS

To fulfil their obligations and commitments, to ensure the effectiveness of COVID-19 responses and to ensure COVID-19 is not used as a pretext to further restrict civic participation, clamp down on media freedom, or to lower transparency standards, IFIs should:

Take a preventative approach:

- » Carry out a comprehensive contextual risk analysis before implementing all projects, which includes the assessment of risks to journalists, HRDs and other persons who might criticize the policies and/or projects the IFI intends to support.
- » Require clients to develop a plan to mitigate risks to journalists and HRDs that includes measures based on the risk analysis to ensure journalists, HRDs, whistleblowers, and other persons do not suffer retaliations for reporting on activities IFIs support.
- » For each project, IFIs should build on the contextual risks analysis to identify points of contact and ways to use their leverage if reprisals do occur. For e.g., banks could set up mechanisms to adjust their disbursement schedule if reprisals take place and clients do not take remedial actions. Banks should also identify actions that they can take to support the victim of a reprisal.
- » Ensure stakeholder engagement includes HRDs, journalists and organizations working on anti-corruption and civic space issues. Consultations should be undertaken in such a way that they do not put participants at further risk. During the pandemic and beyond, IFIs should conduct an assessment of the risks and effectiveness for online and offline stakeholders engagement, to ensure meaningful and safe public participation.
- » Proactively engage with governments on enabling environment for civil society:
 - while developing longer-term strategies with governments for engaging in the country,
 - when negotiating loans and other kinds of support for specific projects or activities, and
 - on an ongoing basis, throughout the lifecycle of all projects and engagements.
- » Require clients to develop a plan for how to address civic space concerns around specific projects and country strategies.
- » Require client commitments against retaliations, and to support media freedom and freedom of expression.
- » Ensure full transparency and respect of the right to access to information during project development and implementation, and provide journalists and civil society organisations with the requested information to investigate corruption, mismanagement, transparency, and accountability issues.
- » Require clients to publicly report on the development or implementation of laws which might limit civic space, as well as logging and reporting to IFIs any grievances, public opposition or attacks to whistleblowers, journalists and HRDs potentially linked to the project.
- » When starting a new project, make clear to the client the IFIs commitments on retaliation.
- » Include provisions in loan agreements to respect media freedom and clear sanctions if these provisions are not upheld.
- » Include in loan agreements a requirement for clients to act in good faith (eg. help facilitate independent

investigations and mediation) in response to any allegations of reprisals that may arise.

- » Support the creation of national mechanisms to protect journalists and HRDs.

2. Respond effectively to reprisals

- » Through a process involving meaningful participation of civil society organizations and, where possible, at risk stakeholders, set up a clear and effective reprisal response protocol, which includes:
 - specific actions the bank will adopt to address cases (such as using their influence or financial leverage, publicly condemning the reprisal, convening relevant actors, accompanying the defender during key meetings, observing trials or calling for the release of detained journalists).
 - clear internal guidance to clarify who is responsible for what and how support can be best triggered in order to protect the safety of the persons affected.
 - the provision of sufficient resourcing (funding and staff time) to implement the protocol.
- » Announce the existence of a reprisal response protocol, and publicize what the protocol looks like and who is responsible for it, as well as guidance on how to access support should a reprisal occur.
- » Ensure policies expressing non-tolerance for retaliations cover all reprisals that pose a threat to the integrity of a project, regardless of whether or not there is a direct link to the project itself.
- » Investigate any threats or attacks which may be possibly linked to their projects and clients (the burden of investigation should be on the bank, not on the defender).

3. Make public commitments

- » Publicly condemn attacks to silence journalists, HRDs, medical personnel and other persons affected by reprisals.
- » Recognize the crucial importance of press freedom and civic space in order to guarantee participation in development projects and the legitimacy of the bank's interventions, and publicly commit to promoting and protecting them.
- » Provide funds to non-governmental media organizations and for development of independent media.

Governments as shareholders of IFIs and on the board of IFIs should:

- » Publicly commit to ensuring that all IFIs they fund comply with the recommendations set out in this report.
- » In IFIs in which they are shareholders, instruct their Executive Directors to:
 - advocate from within the board for compliance with the recommendations set out in this report,
 - monitor progress of the IFIs in the implementation of these recommendations.
- » Regularly report back to their respective houses of parliament, and other public fora, on progress made in the implementation of these recommendations.
- » Encourage all IFIs they support to work together to address these recommendations.