



## CAO APPROACH TO THREATS AND REPRISALS: Consultation Inputs and CAO Responses

Section	Consultation Inputs	CAO Response
<p><b>Title:</b></p> <p><b>CAO Approach to Responding to Concerns of Threats and Incidents of Reprisals in CAO Operations</b></p>	<ul style="list-style-type: none"> <li>Use the word reprisals in the title.</li> </ul>	<ul style="list-style-type: none"> <li>Agreed. Title was adjusted.</li> </ul>
<p><b>Introduction</b></p> <p>The Office of the Compliance Advisor Ombudsman (CAO) is the independent accountability mechanism for the International Finance Corporation (IFC) and the Multilateral Investment Guarantee Agency (MIGA), the private sector arms of the World Bank Group. CAO reports directly to the President of the World Bank Group, and its mandate is to assist in addressing complaints from people affected by IFC/MIGA supported projects in a manner that is fair, objective and constructive, and to enhance the social and environmental outcomes of those projects.</p> <p>CAO's mandate and role reflect the reality that many development projects carry social and environmental risks. In this context, an impacted person's ability to speak up about impacts of development projects freely and without fear, particularly if the person belongs to a community that is already vulnerable as a result of its status in society, is essential. People who come to CAO are often vulnerable and may fear that submitting a Complaint to CAO puts them at risk of reprisal for doing so. This Approach seeks to address these concerns and risks.</p> <p>This approach should be read together with CAO's Operational Guidelines, as well as World Bank Group policies and staff rules.</p>	<ul style="list-style-type: none"> <li>Include language to support the creation of a safe environment to allow people to use the mechanism without fear of reprisals.</li> <li>Emphasize the roles of the IFC and IFC clients. In the Approach, commit to press IFC on reprisals, to prevent reprisals at a systemic level.</li> <li>Make reference to other relevant policies and guidelines that CAO follows.</li> </ul>	<ul style="list-style-type: none"> <li>The introduction sets out the importance of being able to speak up about impacts of development projects, and seek remedy, particularly if the person belongs to an at-risk community.</li> <li>CAO elected to focus this approach on CAO's own operations. CAO will seek to support efforts of IFC/MIGA to develop their own operational response to the issue of threats and reprisals affecting people impacted by IFC/MIGA projects.</li> <li>A reference to other applicable policies and guidelines was included.</li> </ul>



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<p><b>Applicability, Scope and Limitations</b></p> <p>This Approach is applicable to all CAO functions and sets out how CAO staff and consultants, within CAO's mandate, are expected to handle situations that may arise in the course of CAO's work, which involve threats and incidents of reprisals targeted at individuals that have engaged or are seeking to engage in a CAO process.</p> <p>The types of threats of reprisals against complainants and others engaging or seeking to engage in a CAO process, which this approach aims to address, can range from fears for a person's job or standing at work, to future job prospects being adversely impacted, or loss of reputation in community or workplace, to threats of physical violence to people themselves or their family members, and even criminalization or incarceration as a result of speaking out against the impacts of a project. People's concerns for their and their families' safety and wellbeing can prevent affected people from filing complaints to seek redress for anticipated or experienced social and/or environmental impacts associated with IFC/MIGA projects.</p>	<ul style="list-style-type: none"> <li>• Consider including consultants</li> <li>• Provide clarity on who is covered by the CAO approach, and ensure that all linked to CAO process are covered. Broaden the language and cast the net wide. Ensure that CAO will act even when the link to the complaint is unclear or the person or organization making the threat suggests that it is unrelated to the CAO complaint.</li> <li>• Define reprisals more clearly.</li> <li>• There are concerns/problem projects that are never raised because complaining is not safe.</li> </ul>	<ul style="list-style-type: none"> <li>• Consultants included</li> <li>• Language clarified to confirm that applicability is not restricted to complainants but addresses also others who engage or are seeking to engage in a CAO process.</li> <li>• For clarity, this section sets out examples of the types of situations of threat that have been reported to CAO in the past and that this approach aims to address. This approach (i.e. giving a non-exhaustive list of examples rather than a definition) aims at casting the net wide. CAO decided against giving a definition of retaliation which can vary widely depending on context.</li> <li>• CAO has tried to strike a balance between assuring people that CAO takes these issues seriously and responds to them consciously, with being transparent about the real limitations as to what CAO is able to do to prevent or respond to retaliation. (See also next section:</li> </ul>
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	<ul style="list-style-type: none"> <li>• Clarify expectation that CAO staff follow this.</li> </ul>	<p>Limitations of CAO’s role). The approach invites people with concerns to discuss concerns prior to lodging a complaint.</p> <ul style="list-style-type: none"> <li>• This section includes the clear expectation that CAO staff and consultants act in keeping with this Approach.</li> </ul>
<p><b><i>Limitations of CAO’s role</i></b></p> <p>CAO takes the safety of complainants and others that engage in a CAO process seriously, and seeks to exercise its mandate in a manner that maximizes its ability to respond appropriately to threats and instances of reprisal in the context of CAO’s processes. CAO is available to discuss such concerns with people prior to lodging a complaint. At the same time, CAO endeavors to be clear about the limitations of its ability to respond to such instances of threat and reprisal: CAO is not an enforcement mechanism, and does not have any direct ability to physically protect complainants or otherwise safeguard people from possible consequences of engaging in a CAO process or cooperating with CAO. As set out below, CAO may have the ability to reach out to others. In any given situation, however, other actors may or may not be able to respond to potential threats or incidents of reprisals. Given these real limitations to CAO’s ability to respond to threats or incidents of reprisals, this approach is focused on assessment and prevention as the best means to counter threats.</p>	<ul style="list-style-type: none"> <li>• Approach should be broadened to emphasize importance of CAO’s role in creating a safe environment for those seeking to work/engage with it.</li> <li>• Emphasize the reality that CAO is not all powerful/omnipotent and reiterate throughout the document where relevant.</li> <li>• Expressly state what CAO can or cannot do when there is a threat or actual retaliation to complainants.</li> </ul>	<ul style="list-style-type: none"> <li>• CAO has tried to strike a balance between assuring complainants and potential complainants that CAO takes these issues seriously, and being transparent about real limitations as to what CAO is able to do to prevent or respond to retaliation.</li> <li>• The sections on “Preventive measures” and “Response to security incidents” set out what CAO can do in cases of threat or actual retaliation. More detailed guidance will be provided to CAO staff and consultants about what other actors may be able to help in this context.</li> <li>• The text now expressly states that, due to CAO limitations, the approach is focused on assessment and prevention as the preferred means to counter threats.</li> </ul>



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<p><b>Principles</b></p> <p>CAO acts in keeping with the following principles:</p> <p><i>Peaceful resolution of disputes</i> CAO believes in the resolution of disputes through non-violent and peaceful means that promote the dignity of people and respect the rights of all. Violence or threats have no place in a CAO process.</p>		
<p><b>Confidentiality</b></p> <p>CAO's Operational Guidelines<sup>1</sup> set out its commitment to safeguard individual identities and confidential information shared by the parties. CAO will respect a party's request for confidentiality, and protect the parties' right to confidentiality for as long as they choose in a process and after it has been closed. This confidentiality protection can start as early as inquiries to the office before lodging a complaint, and carries through the eligibility, assessment, dispute resolution and/or compliance process, and any related advisory work.</p>	<ul style="list-style-type: none"> <li>• See section below in 'Approach' on confidentiality.</li> </ul>	<ul style="list-style-type: none"> <li>• See section below on confidentiality.</li> </ul>
<p><b>Concerned person participation and informed consent</b></p> <p>CAO's approach to responding to any threats or incidents of reprisals will be discussed and agreed with the concerned person or group (complainants and others that have engaged or are seeking to engage in a CAO process, as relevant) from the start and throughout the process. CAO engages with the concerned person or group throughout its involvement to discuss and reassess the risk of threats or incidents of reprisals, and to help devise an appropriate response. Before acting, CAO will always seek the informed consent of the concerned persons before taking any action in relation to</p>	<ul style="list-style-type: none"> <li>• Add informed consent as a core principle to guide CAO's approach</li> <li>• Refrain from using "affected" person which may be confused with "project affected".</li> <li>• Make a discussion around retaliation risk routine with all complainants, not only "when</li> </ul>	<ul style="list-style-type: none"> <li>• Adopted consent into the principles.</li> <li>• Using the term "concerned" person or group.</li> <li>• Discussion around retaliation now routine.</li> </ul>

<sup>1</sup> Operational Guidelines (CAO 2013): 1.4 Confidentiality and Information Disclosure, page 6



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<p>threats or incidents of reprisals on their behalf. In this context, CAO will explain CAO's limitations of its mandate and capability in this field, as CAO strives to be realistic and transparent in its description of what it can and cannot do in such circumstances, as set out in this document.</p>	<p>CAO finds that complainants may be at risk.”</p>	
<p><b><i>Intent to prevent harm</i></b></p> <p>Core to CAO's work is the intent/belief that people involved in a CAO process should not be harmed as a result of cooperating in a CAO process. CAO will discuss concerns with the concerned person or group, and may conclude a process as a preventative measure.</p>	<ul style="list-style-type: none"> <li>• Not clear how the 'Precautionary Principle' fits in with the text.</li> <li>• Why is it that transferring a case to compliance would make complainants safer?</li> </ul>	<ul style="list-style-type: none"> <li>• Changed to the “Intent to prevent harm”</li> <li>• Changed Approach to say CAO may conclude a process (not just DR process) to prevent harm.</li> </ul>
<p><b>Approach</b></p> <p>CAO will proactively assess, discuss and address risks of threats and reprisals as set out in this document throughout its involvement in any complaint. Recognizing that every case context is unique and different, CAO takes a flexible approach, which can be adapted to different situations, but is always guided by core principles, as noted above: peaceful resolution of disputes, confidentiality, complainant participation and informed consent, and intent to prevent harm.</p>	<ul style="list-style-type: none"> <li>• Commit to taking a pro-active approach.</li> </ul>	<ul style="list-style-type: none"> <li>• New language commits CAO to a pro-active approach.</li> </ul>
<p><b><i>Risk Assessment</i></b></p> <p>Right from the outset and throughout CAO's process, CAO will regularly assess the risk context of the complaint and incidents of reprisals, both by consulting independent</p>	<ul style="list-style-type: none"> <li>• Commit to applying risk assessment in all cases.</li> <li>• Continue to update the risk assessment and adjust the</li> </ul>	<ul style="list-style-type: none"> <li>• Approach sets out that CAO will assess risk in all complaints.</li> <li>• Approach sets out that risk will be regularly assessed and throughout</li> </ul>



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<p>sources, IFC/MIGA management, and through interactions with the parties.</p> <p>CAO pays particular attention to risk factors such as, but not limited to, the environment for public participation, the risks people in the country or region take when they protest against a development project or promote social and environmental causes, whether complainants have previously faced reprisals or threats of reprisal, and the presence of formal or informal security forces, and seeks to identify whether there are specific groups or individuals that may be at higher risk based on their status in society. CAO also assesses the safety of its digital communications, and seeks to adopt best available technologies to safeguard the digital integrity of its processes.</p>	<p>response from moment CAO is approached, throughout the process, and at its conclusion.</p> <ul style="list-style-type: none"> <li>• Monitor for reprisals throughout and following a CAO process. When there are risks of reprisals following the conclusion of the process, CAO should visit affected communities at the conclusion of its process provided that the risks of reprisal would not be exacerbated by such a visit (joint NGOs input)</li> <li>• Highlight other attributes of people that create risks/make them “vulnerable groups.”</li> <li>• Define the types of risk CAO will assess beyond presence of security forces.</li> <li>• Complainants should have the opportunity to detail current and anticipated security concerns for them and their affiliates. CAO should have an agreement with complainants on who can participate in risk assessment and security conversations.</li> </ul>	<p>the process.</p> <ul style="list-style-type: none"> <li>• CAO will discuss risk of reprisals throughout the case including at closing, if risk is present at this stage, and agree jointly with the concerned person about the preferred approach. An option open to concerned people is to involve the support of a specialized organization focused on protecting human rights defenders.</li> <li>• This approach defined at risk people by their status in society / imposed by others rather than a sense of intrinsic vulnerability. CAO decided against including a list of attributes which can vary widely depending on context.</li> <li>• The expanded language in this section gives further definition to the nature of risks CAO will assess.</li> <li>• Detailed discussions with complainants are foreseen. CAO will seek the concerned person’s consent before approaching others during risk assessment (see section on “Affected person participation and informed consent”).</li> </ul>
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<p><b><i>Preventive measures</i></b> Where asked to do so, CAO will work closely with the concerned person or group to identify preventive measures adapted to the specific circumstance, especially where security concerns are present. Where risks of reprisal are present, CAO seeks to plan possible responses (see also section “response to security incidents”) with the concerned person or group prior to any potential incident, in case the concerned person or group may be unreachable in such an event. Preventive measures can take a multitude of forms.</p>	<ul style="list-style-type: none"> <li>• CAO should work with parties in all cases (not just “where relevant”) to identify appropriate preventive measures; unless the parties make it clear it’s not necessary because the risks are negligible.</li> <li>• Preventive measures should be sensitive to gender, race, ethnicity, age, disability, sexual orientation or gender identity, or other status.</li> <li>• Outline precautionary measures that CAO will take during site visits, information gathering, and in communication with complainants.</li> <li>• Where complainants are indigenous, ensure CAO team (DR and/or compliance) includes an indigenous peoples’ expert</li> </ul>	<ul style="list-style-type: none"> <li>• Approach sets out that CAO will work with affected people on prevention measures whenever they chose (raised by CAO, driven by concerned people).</li> <li>• Preventive measures will be developed with the full participation and consent of the concerned person or group. Developing these measures jointly with the affected person helps to ensure the measures’ sensitivity to their specific status.</li> <li>• The Approach speaks to precautionary measures in broad terms – such as confidentiality protections. Further details will be included in guidance to CAO staff. CAO decided against sharing such detail widely.</li> <li>• In relation to complaints brought by indigenous peoples, mediation teams working with such cases typically include mediators with significant experience working in this context, and/or team members that are experts on indigenous peoples. CAO Compliance’s practice is to retain specialist expertise on indigenous issues for any investigation that raises substantial concerns re.</li> </ul>
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	<ul style="list-style-type: none"> <li>• Possibly develop a protection plan with concrete escalatory steps – commit to steps CAO can be held accountable to.</li>   <li>• Create and provide a list of references i.e. organizations that can provide support to people in fear of reprisals.</li>   <li>• CAO should actively work with World Bank country offices to develop an early warning system to identify threats or other security issues, particularly for those who have filed or are considering filing a complaint or are otherwise critical of a project, to analyze the risks and to promptly implement protection measures.</li> </ul>	<p>application of PS7.</p> <ul style="list-style-type: none"> <li>• The approach sets out that there may be situations where incident response needs to be planned ahead with at risk complainants that may not be reachable if they are being targeted, and thus unable to weigh in on what approach CAO may be able to take. Generally, the approach focuses on robust risk assessment and prevention, due to CAO's very limited options once retaliation has occurred, and is largely dependent on approaching others who may or may not be able to act.</li>   <li>• CAO will compile a source of possible support and reach out to specialized organizations to foster an ongoing relationship and learn from their experience and expertise. For example, CAO staff and consultants spent a day of learning with an expert from Front Line Defenders.</li>   <li>• CAO's approach is based on CAO itself assessing threat and retaliation risks for people we engage with, and to work with them to identify appropriate preventive measures, such as confidentiality protections. Further, CAO will seek to support efforts of IFC/MIGA to develop their own operational response to the issue of threats and reprisals</li> </ul>
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		affecting people impacted by IFC/MIGA projects.
<p><i>Safeguarding confidentiality</i></p> <p>CAO will safeguard individual identities and confidential information throughout a party's engagement with CAO. CAO only shares complaints, or information contained in the complaint, with other parties with the prior consent of the complainant/s. Further, CAO will not take photographs of individuals involved in a complaint without their express consent. CAO will not use identifiable images of individuals with confidentiality protection, or indications of their locations, in documenting aspects of its work through photographs, without their express consent. Photographs of parties involved in a CAO case will only be used for publication purposes when appropriate permissions have been sought and the parties are aware how the images will be used. CAO may advise against the use of recording/filming devices during meetings to protect confidentiality. Also, CAO requires interpreters and drivers it uses to sign confidentiality agreements. Wherever feasible, CAO will use encrypted mediums for communication and seek out other technology best practices to help safeguard confidentiality online and in communications. Logistical arrangements will be agreed with the concerned parties with view to minimizing risks, such as by avoiding public meetings, or meeting people at off-site locations or where they feel it is safe.</p>	<ul style="list-style-type: none"> <li>• Confidentiality should extend beyond complainants so as to protect individuals or groups affiliated with them.</li> <li>• CAO shouldn't use any photographs without express content from the subjects and not only those with confidentiality protection.</li> <li>• Outline measures that CAO will take to minimize breach of confidentiality/ revealing parties' identities during site visits.</li> <li>• CAO should develop an online secure form by which complaints can be filed, using encryption technology, and should develop protocols by which direct communications with a complainant can utilize secure communications tools.</li> <li>• Enhance language regarding</li> </ul>	<ul style="list-style-type: none"> <li>• The text now speaks to individuals or parties rather than complainants to clarify that this approach applies to all people seeking confidentiality protections in a CAO process.</li> <li>• The draft language goes further and provides for informed consent for the use of any photographs by CAO.</li> <li>• The approach sets out a series of measures: (1) advising against recording of meetings; (2) confidentiality agreements for interpreters and drivers; (3) encryption and other means to ensure security in communications; (4) logistical arrangements. Further details will be included in guidance to CAO staff.</li> <li>• The option of an online platform will be considered in the upcoming CAO website update. CAO also committed to using encrypted mediums for communication and other technology best practices to help safeguard confidentiality online and in communications.</li> <li>• CAO largely follows the informed</li> </ul>



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	<p>confidentiality, seeking informed consent from relevant party before CAO publishes or refers to information obtained during the process.</p> <ul style="list-style-type: none"> <li>• CAO should withhold names and other identifying information from internal documents.</li> <li>• Be cautious not to intentionally or otherwise encourage people to share confidential information.</li> </ul>	<p>consent standard, but was unclear whether there may be implications to signing up to this standard that it does not currently oversee.</p> <ul style="list-style-type: none"> <li>• Further details on confidentiality protections and practices will be included in guidance to CAO staff. CAO decided against sharing such detail widely.</li> <li>• It is not uncommon for people to share confidential information with CAO in the course of its work. The key from CAO's perspective is to protect confidential information, and those that have provided it.</li> </ul>
<p><i>Generating a supportive environment and addressing power imbalances</i></p> <p>In dispute resolution processes particularly, CAO may work with the parties to implement measures that help create a safer environment for engagement and address power imbalances. Such measures include the engagement of professional mediators, and provision of training and ongoing capacity building for the parties engaged in dialogue. Parties may contribute to a safer environment for engagement through actions aimed at building trust, such as cessation of activities that are of concern to the other party. Joint public statements in support of a collaborative process can also send a positive signal to process outsiders. Sometimes, it may be appropriate to approach other actors, such as government agencies or World Bank Group management, as appropriate, with the consent of the concerned person or group.</p>	<ul style="list-style-type: none"> <li>• Paragraph on addressing power imbalances could be more detailed. How are complainants protected in this context?</li> <li>• CAO to get relevant state agencies to provide guarantees to complainants that they will not be targets of retaliation.</li> </ul>	<ul style="list-style-type: none"> <li>• Mediation tools such as training and capacity building to help address power imbalances may generate an environment where people feel less intimidated and address their fears and dignity. This impact can be important in CAO's experience, where an environment that can feel threatening as a result of facing a powerful company, for example.</li> <li>• CAO will assess risks in every case, and discuss risks and possible preventive measures with concerned people. Sometimes, this may include, where appropriate, CAO approaching relevant actors that may</li> </ul>



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	<ul style="list-style-type: none"> <li>• Besides DR, CAO should also commit to addressing power imbalances in situations of compliance review, including site visits, and to outline what steps it will take to mitigate the power imbalances.</li> <li>• Capacity building to include sound understanding of CAO process so that no unnecessary risks are taken by complainants.</li> </ul>	<p>be able to contribute to a safer environment. Any actions by third parties are ultimately out of CAO's control.</p> <ul style="list-style-type: none"> <li>• CAO compliance with its focus on IFC or MIGA compliance is typically not in a position to engage with the parties on issues of power imbalances, but is mindful of this issue when interacting with the parties.</li> <li>• CAO agrees with this point, however, the approach does not go into this level of detail which will be included in guidance to CAO staff.</li> </ul>
<p><b><i>Response to security incidents</i></b>          CAO acknowledges that instances of reprisal and their consequences for individuals and groups may be of an ongoing nature and may require ongoing efforts. Should security incidents or threats occur in the context of CAO engagement, or should the CAO become aware of such security threats, CAO will discuss with the concerned person or group what the appropriate course of action for this person or group of persons in relation to the CAO engagement might be. In this context, not having any direct ability to physically protect complainants or otherwise safeguard people from possible consequences, CAO endeavors to be clear about the limitations of its ability to respond to such instances of threat and reprisal.</p>	<ul style="list-style-type: none"> <li>• Expressly state what CAO can or cannot do when there is a threat or actual retaliation to complainants. Indicate how CAO might exercise leverage e.g. reaching out to other organizations etc. What are the repercussions, if any, if defendants are implicated in retaliation against complainants or their affiliates?</li> <li>• Consider providing funds for human rights defenders that have been targeted, to help cover legal</li> </ul>	<ul style="list-style-type: none"> <li>• The approach reflects the reality that CAO has very limited options once a security incident has occurred. CAO's ability to help is largely by approaching other actors, who may or may not be able to assist. CAO aims to be transparent about our limitations, so that people do not take risks in a false sense of security that CAO can protect them, when we are likely not able to. CAO's limitations in response to incidents place further importance on assessing and minimizing risks up front.</li> <li>• CAO is compiling a list of organizations with specialized expertise and mandates in assisting</li> </ul>



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	<p>costs, economic impact, providing sanctuary.</p> <ul style="list-style-type: none"> <li>• CAO should work with the Board to create a fund, administered by the CAO and financed by the IFC.</li> <li>• Consider providing clarity on how CAO will remain engaged in a situation where people have been threatened until they are able to return to regular activities without fear for their lives or reprisals.</li> <li>• Consider agreeing on the appropriate response in advance with complainants and others, in case the victim becomes unreachable as a result of the threat.</li> <li>• Ensure that compliance investigations also examine any instances of retaliation for opposition to the project and/or participation in a CAO process.</li> </ul>	<p>human rights defenders as the most appropriate reference should such assistance be needed.</p> <ul style="list-style-type: none"> <li>• In the Approach, CAO acknowledges these issues may be of an ongoing nature and may require ongoing efforts.</li> <li>• Agreed. As set out in “preventive measures”, CAO seeks to plan possible responses with the concerned person or group prior to any potential incident, in case the concerned person or group may be unreachable in such an event.</li> <li>• The Compliance team is as committed as the rest of the CAO team to implementing this approach. Yet, depending on the circumstances, CAO Compliance with its focus on IFC or MIGA compliance may not be in a position to examine instances of threat in the compliance investigation itself.</li> </ul>
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<p><b>Reporting</b> CAO may reflect any significant security concerns or incidents in case related CAO reports (such as assessment reports, or compliance or dispute resolution-related reports) as appropriate, with the concerned person or group's consent, and where it is safe for the concerned person or group to do so. This way, CAO may provide a fuller picture of the context of the case, and the risks faced by affected people seeking recourse. In addition, in its annual report, CAO will report aggregate information on threats and reprisals, drawing on information received in the course of its work as the independent recourse and accountability mechanism for IFC and MIGA.</p>	<ul style="list-style-type: none"> <li>• Document cases where reprisals have occurred – highlight these in the annual report and discuss how CAO responded in each situation. Include discussion of all instances of threats, intimidation, or other reprisals in CAO reports, while respecting the confidentiality of complainants and interviewees, as well as including the steps that the CAO took to respond.</li> <li>• Incorporate language in the approach paper to express CAO's commitment to publicly denouncing reprisals/threats</li> </ul>	<ul style="list-style-type: none"> <li>• In the Approach, CAO commits to reporting in aggregate on instances of threat and reprisal on an annual basis. Reporting on specific incidents may or may not be appropriate or safe for the affected people and will be decided on a case by case basis.</li> <li>• Publicly denouncing incidents of threat and/or reprisal may or may not be appropriate or safe for the affected people and will be decided on a case by case basis.</li> </ul>
<p><b>Review of Approach</b> CAO will periodically review the effectiveness of this approach and make improvements as needed.</p>	<ul style="list-style-type: none"> <li>• Review of Approach: CAO should build in a review clause requiring the CAO to review the approach and its implementation in consultation with civil society three years after the approach is adopted. In the course of the review, CAO will consider: a) what has been effective and what has not; b) accountability for implementation - responsibilities of breaches of the approach.</li> </ul>	<ul style="list-style-type: none"> <li>• CAO committed to periodically reviewing the effectiveness of this approach and making improvements as needed. Far from being a static document, the Approach should be seen as a learning instrument and work in progress, that can be improved over time and adjusted according to new arising insights and experience. CAO acknowledges the invaluable contribution that organizations with expertise in the field can bring to the Approach, and welcomes feedback from any actor with relevant insights as to how to handle these difficult challenges.</li> </ul>