



April 24, 2026

**Compliance Advisor Ombudsman (CAO)
Statement on the Draft Report on Integration of
World Bank Group Accountability Mechanisms**

CAO thanks the Task Force for its draft report on options and recommendations regarding the potential integration of the World Bank Group's (WBG's) Independent Accountability Mechanisms (IAMs). CAO appreciates the engagements held with CAO leadership and staff by the Task Force to date and the opportunity to submit comments on the draft report during the public consultation phase to help inform the final report and consideration of its recommendations.

CAO notes that the draft report has several qualities that merit recognition. Specifically:

- The attention and consideration that the draft report gives to the core **principles** established by the Boards to guide the Task Force in developing integration options and recommendations. In particular, the principles of non-regression of policies and mandates, safeguarding independence, and improved effectiveness to serve the IAMs' project-affected communities, borrowers/clients, and the World Bank Group (WBG), including the Boards.
- The analysis of the larger institutional and global context in which the IAMs operate, including the One WBG vision and investment trends, ongoing integration of WBG environmental and social (E&S) teams and policy frameworks, and the evolution of accountability policies and arrangements in other multilateral development banks (MDBs).
- The consideration of the need to preserve the independence of the IAMs both in the structural options presented (including analysis of the risks and opportunities), and the policy harmonization proposals (for example, preservation of an independent advisory function, IAM authority to decide on investigations for private sector projects, and management of resources).
- The proposal for an integrated web portal to enhance IAM accessibility for project-affected people.
- The documentation and consideration of multiple and diverse perspectives gathered to date from IAM stakeholders, including the views of the IAMs as practitioners.

Building on these observations, CAO offers comments on specific proposals in the Task Force's draft report in the two areas listed below:



- 1. Policy Harmonization.** CAO recognizes the value of, and opportunity for, a policy harmonization process, particularly if undertaken with the ambition of developing a “third generation” IAM and in accordance with the principles established by the Boards. Such a policy has the potential to strengthen the accountability framework for the WBG and more effectively serve project-affected communities, borrowers and clients, and the World Bank Group.

CAO considers it preferable for policy harmonization to occur before any structural changes. However, pursuing policy harmonization at this time could carry substantial risks of regression and operational disruption given the complexity of the policy harmonization process and the divergent views of stakeholders on upward harmonization. In addition, initiating a policy harmonization process at this stage would divert significant time and resources from case processing, potentially generating case backlogs and delays in other areas of work.

For these reasons, CAO notes that pursuing structural changes to the IAMs alongside with a policy harmonization process may increase implementation risk. CAO also notes the Task Force’s observation that “there is no necessary correlation between the structural integration option chosen and a specific set of IAM policies”.¹ If the decision is taken to proceed with policy harmonization, one possible approach is to adopt a transitional structure (such as Option 1) and then undertake upward harmonization toward an integrated IAM policy, which could lead to a more integrated IAM structure over time.

- 2. Structure.** The Task Force’s structural proposals include measures intended to improve the integration, accessibility, and efficiency of the IAMs. In this context, CAO highlights the following considerations regarding potential structural changes:
 - a) The recommendation to develop an integrated web portal to enhance IAM accessibility, if implemented effectively, could simplify access to redress for project-affected people. This includes enhancing communication to project-affected people about the existence and mandate of the IAMs as well as other

CODE2026-0016. Taskforce on Integration of the World Bank Integrated Accountability Mechanisms Draft Report for the World Bank Group Boards. March 4, 2026. ¹ Page 41.



available grievance options to support informed choice. However, CAO would caution about the proposed protocol for cross-intake information sharing between management and IAM staff. Specifically, CAO considers that an information sharing protocol would require careful structuring to meet the core principles of “no regression of policies and mandates” and “safeguarding the independence of the IAMs”. IAM independence is grounded in their mandates, governance arrangements, and direct reporting lines outside of operational management. Management grievance mechanisms and IAM processes serve different functions, scopes, and potential remedies. Any protocol would need to ensure that project-affected peoples’ unrestricted access to IAMs is preserved, avoid creating perceptions of steering or gatekeeping by either party, address confidentiality and retaliation concerns as well as complainant agency/consent, and clearly distinguish between the roles and mandates of management and IAM mechanisms. Meeting these requirements would likely necessitate detailed safeguards, which may or may not be possible.

- b) **Option 1** presents a practical opportunity to advance integration and collaboration among IAMs without creating major disruptions to case handling or general operations. It maintains coherence of current structures, while improving efficiency and clarity for complainants. Recent enhancements CAO has made to its complaint intake and processing systems align with the proposal and point to the potential advantages of a streamlined approach to complaint intake.
- c) **Option 3** offers the potential for broader and more comprehensive integration. However, it would require substantial effort and significant commitment of time and resources to achieve the necessary restructuring and process alignments. This option entails higher transition risks, including disruptions to complaint handling and core operations in the short to medium term. Some of these risks could be mitigated by a detailed and adequately resourced and calibrated change management process with a realistic timeframe for implementation.
- d) **Option 2**, as proposed, carries significant risks in CAO’s view as outlined below:
 - ***Risks of Structural Fragmentation and Stakeholder Burden***
Option 2 may pose significant risks for IAM users and operational



effectiveness. Creating two separate IAM structures could lead to distinct institutional identities and incentives, increasing the likelihood of competition for resources and recognition in demonstrating value to the Boards and other stakeholders. Such competition may, in turn, reduce information-sharing with risks of inefficiencies, disrupt continuity of care when cases transfer between institutions (this is of particular concern where there are high levels of sensitivity and risks such as threats and reprisals, gender-based violence among others), and complicate coordination of parallel complaints in Dispute Resolution and Compliance processes. Collectively, these effects could place additional demands on stakeholders, increase the risk of “process fatigue,” and reduce confidence in the IAM as a safe and trusted forum for addressing sensitive issues, thereby undermining one of the central objectives of the integration exercise — to simplify the accountability process and improve the user experience.

- **Governance gap for shared services.** Shared complaint intake, advisory, and communications staff reporting to two co-equal Dispute Resolution and Compliance heads creates a governance gap and inherent management ambiguity. There is no clear mechanism to resolve disagreements arising from this governance gap for shared functions. Prior experience both at the World Bank and the Inter-American Development Bank (IDB), where this duel-headed structure was abandoned for its accountability mechanism (MICI)², demonstrates the high risks of conflict and dysfunction associated with shared services. This includes, for example: i) conflicts over resource allocation and operational priorities; ii) increased burden on shared service teams working under dual reporting lines without clear decision-making authority; iii) reduced efficiencies in administration, including human resources (HR), fiscal and other areas; iv) decreased procedural cohesion; and v) reduced agility in decision-making, responsiveness, and staff engagement. In practice, such disputes tend to escalate to the Boards, increasing its governance burden and drawing it into arbitrating operational matters and conflict manifesting within the IAM that it should not need to manage.

² See IDB's Office of Evaluation and Oversight (OVE)'s evaluation of the MICI structure. Executive Summary page i. <https://publications.iadb.org/es/publicacion/16677/evaluacion-del-mecanismo-independiente-de-consulta-e-investigacion-mici>.



- ***Weakening of the Advisory Function.*** The Advisory function’s effectiveness depends on close collaboration with both Dispute Resolution and Compliance teams, particularly in the timely sharing of information, joint knowledge development, and the allocation of dedicated time for analysis and learning products. In a dual-reporting structure, there is a significant risk that Advisory work would: (i) lack clearly defined scope; (ii) be deprived of specific resource allocations; and/or (iii) lose a dedicated team focused on producing high-quality outputs. CAO’s experience shows that when staff are required to balance case-handling with advisory responsibilities, analytical and learning products often receive insufficient attention and follow-through, reducing the extent to which lessons learned inform institutional practice. Unlike Compliance and Dispute Resolution, the Advisory function distills cumulative learning from across cases and related good industry practices, identifying systemic issues whose resolution can benefit IFC/MIGA and the Boards.
- ***Risks of Fragmentation and Weakening of Operations and Communications Functions,*** CAO’s Strategy and Operations, and Communications functions provide essential specialized support to core activities, including case-handling. The Strategy and Operations unit is responsible for managing intake of complaints, multi-year strategic planning, work planning, budget and workforce planning, efficiency analysis, Board reporting, Monitoring and Evaluation, and digital transformation.³ Through the Communications function, CAO manages strategic engagement with stakeholders, disclosure of information and transparency of reporting to external audiences, outreach activities to internal and external stakeholders including project-affected communities, and digital presence. These functions play a critical role in sustaining operational capacity and institutional coherence. Option 2 risks downgrading these functions by assigning them as shared services to several decision-making authorities with unclear accountability. Such fragmentation could undermine their effectiveness and efficiency, introduce administrative and operational deficiencies, which could result in the inconsistent application of WBG

³ Annual budgeting, workforce planning, reporting and monitoring processes are required by CAO’s Policy (paras 21-24 and 153)



administrative policies and procedures as well as the erosion of institutional cohesion and predictability.⁴

CAO would like to take this opportunity to also encourage the Task Force to highlight how integration could inform remedial solutions in both Dispute Resolution and Compliance processes, drawing on IFC/MIGA's private sector expertise and IBRD/IDA's sovereign financing, policy, and technical platforms. A more integrated accountability framework could support a stronger "One World Bank Group" approach to remedy by systematically expanding the range of possible remedies to address unresolved harms, particularly where private sector clients are absent or unwilling to engage. This coordinated model could strengthen the WBG's ability to deliver on its "do no harm" commitment and help ensure that the long-term social and environmental costs of unmitigated non-compliance do not fall on project-affected communities.

In conclusion, CAO acknowledges that the Task Force's work to date has reflected the core principles guiding its options and recommendations, particularly: safeguarding IAM independence; ensuring non-regression of mandates and policies; improving effectiveness in serving project-affected communities; and enhancing IAM leadership throughout the integration process, and emphasizes the importance of maintaining these principles in the steps ahead. In addition, CAO stresses the importance of addressing material policy, operational, and governance risks, outlined above, to ensure the integrated IAM remains effective and cohesive.

CAO hopes due weight will be given to these considerations as deliberations move forward, with a view to ensuring that any future IAM structure and policy strengthens accountability, preserves institutional capacity, and avoids unintended consequences that could undermine access, trust, and impact of the WBG accountability framework.

⁴ For example, under MICI's shared services model, internal evaluations noted difficulties in adherence to corporate policies related to travel, contracting, remuneration and budget management, among others, and the shared services model was subsequently replaced. See IDB's Office of Evaluation and Oversight (OVE)'s evaluation of the MICI structure. Para 4.11 <https://publications.iadb.org/es/publicacion/16677/evaluacion-del-mecanismo-independiente-de-consulta-e-investigacion-mici>.