

Global Comparative Testing of Responses to Requests for Information

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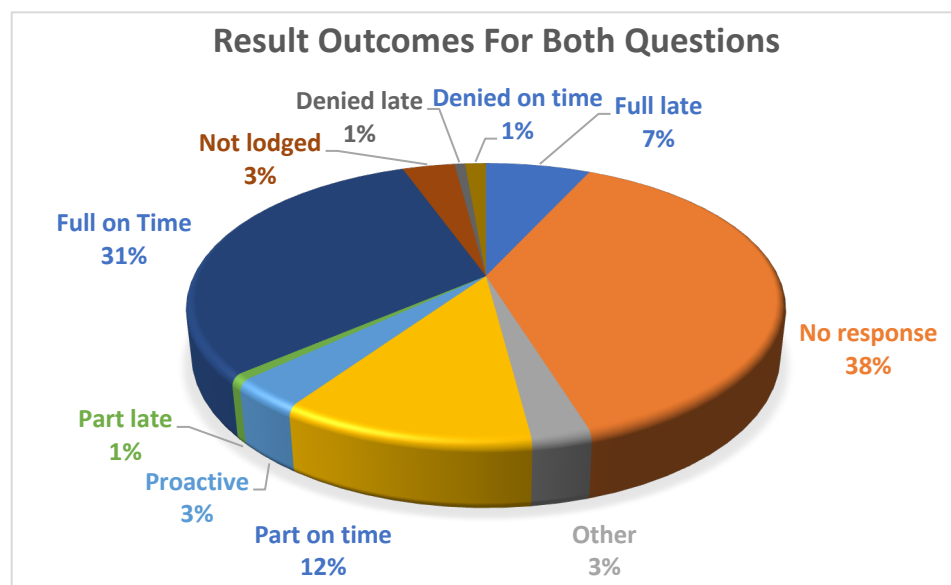


Executive Summary

To test the quality of implementation of right to information (RTI) laws, the Centre for Law and Democracy (CLD), with the support of UNESCO, lodged the same two requests for information in as many of the 140 countries with RTI laws as possible. In the end, volunteers covering 122 countries enrolled to participate in the exercise and results were obtained from 146 requests in 76 countries, in what is the first and most comprehensive RTI “stress test” ever carried out on a global scale. The results shine a spotlight on where RTI implementation is working and where it stalls.

The results at a glance

- 38% mute refusals, or no substantive reply at all, the worst possible outcome
- 54% gave some information but only 42% were full disclosures, and 8% were late
- Receipts were issued in just 57% of all cases – highlighting a basic administrative failure – but 86% of receipts were issued in 5 days or less
- Average response time: 22 days, but just over a quarter arrived after 30 days
- Fees were rarely an issue, with only three countries charging them, mostly for lodging a request
- Only 2% of explicit denials: the problem isn’t exceptions, it’s not answering



Why we should care

- Mute responses are a fundamental denial of the right to information. If requests go unanswered, the right exists only on paper. “No response” erodes trust, blocks oversight and kills stories.

- High rates of not providing receipts reflect a cavalier attitude towards respecting the law and create challenges for applicants who wish to lodge appeals.
- At the same time, the low number of explicit denials and low incidence of charging fees were more encouraging.

Overall, the results varied considerably between States, among public authorities and across regions of the world. A large volume of relevant data was obtained, but the results also show that many States need to do far more to improve implementation of their RTI laws. Only then can applicants be assured of the timely and responsive provision of information to which they are entitled.



Introduction¹

It is fairly easy to track which States and territories have laws giving individuals a right to access information held by public authorities, often referred to as right to information (RTI) or access to information (ATI) laws. It is a lot more difficult, however, to know how well these laws are being implemented in practice.

As a contribution to the body of knowledge in this area, the Centre for Law and Democracy (CLD), with the support of the United Nations Educational, Scientific and Cultural Organization (UNESCO), led a global effort to file the same two requests for information across all of the States and territories which are recognised by UNESCO as having RTI laws. The main purpose of this initiative was to provide a rough comparative assessment of how well RTI laws are being implemented, by assessing how public authorities responded to the two requests for information. As an ancillary benefit, the information which was received from the requests is also being released as a resource for researchers.² Our intention from the beginning was to launch the results as part of the 2025 celebrations of the International Day of Universal Access to Information (IDUAI).

This is the first time a testing exercise which aimed to put requests for information to all countries which have adopted RTI laws has been conducted. Although two requests are not enough to assess how well each country is doing, the exercise certainly provided a global thermometer on how well these laws are being implemented.

This initiative comes in the context of renewed global interest in monitoring the implementation of RTI laws, in part spurred on by the inclusion of Indicator 16.10.2 in the UN's Sustainable Development Goals (SDGs), looking at the number of States which have both adopted *and implemented* such laws, of which UNESCO is the UN custodian agency. The right to access public information has for some time been recognised as a fundamental human right, one which is of instrumental importance for the realisation of other human rights and various social benefits, including increased participation, government accountability,

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² This information is available online at https://drive.google.com/drive/folders/1YdnwsV4yoQIRv-kyZ-YYyMOZ8ysUs53z?usp=drive_link.

development effectiveness and economic efficiency. As of today, some 140 countries around the world have adopted RTI laws.³ Despite the widespread adoption of such laws, they often suffer from implementation gaps, although there is a paucity of widely applied, quality assessments of the extent of this issue and where the fault lines lie.

Logistical support for this initiative was provided by three international partners, namely the Freedom of Information Advocates Network (FOIANet), the Global Forum for Media Development (GFMD) and the Global Investigative Journalism Network (GIJN). In particular, these partners helped CLD and UNESCO identify local volunteers to file the requests in each country. The requests were submitted by local volunteers in the vast majority of cases. However, in a few countries where local volunteers could not be engaged and which do not have nationality restrictions on who may make a request, the requests were submitted by CLD staff and interns.

In the end, we were successful in getting volunteers who could file requests for this project in some 122 countries and territories.⁴ However, not all volunteers followed up by filing requests, some volunteers appear not to have reported their findings, and a few volunteers filed their requests too late for their responses to be included in this report.⁵ At the time of writing, data is available for 146 requests from 76 countries from all regions of the world, representing more than 50% of all countries which have adopted RTI laws. This represents a large sample which allows us to draw a number of solid conclusions on some major trends in RTI implementation.

Several initiatives have emerged in recent years to monitor the implementation of RTI laws. On an individual country-level, FOIANet, the leading global network of civil society activists focusing on RTI, has developed a civil society assessment tool designed to be able to be applied reasonably easily and on annual basis by civil society organisations with relatively

³ These may be found on the RTI Rating, maintained by CLD, at <https://www.rti-rating.org/country-data/>.

⁴ There were a number of reasons why we were unable to secure any volunteer in some countries, including that the country has a very small population or a less developed civil society or independent journalism community.

⁵ There were a number of possible reasons for this. In one case, a volunteer withdrew from the initiative out of fear that one of the questions might be viewed as sensitive within that country's political context. In some cases, issues with communications led to a failure to identify a local volunteer. Language barriers may have contributed to some volunteers failing to file the two requests while delays in filing, which only affected a small number of countries, may have arisen due to a failure to appreciate the urgency of this exercise.⁵ The fact that this exercise took place during the Northern Hemisphere's summer months, when many people take holidays, may also have caused some delays.

limited resources.⁶ A substantially more in-depth tool is CLD's Right to Information Implementation Assessment: Comprehensive Methodology, which is designed to be applied by oversight bodies or civil society groups to gain more complete insights into the state of RTI implementation in any given jurisdiction.⁷ While both the FOIANet Methodology and CLD's Comprehensive Methodology have been applied in a number of countries, allowing for some comparative data, they have not applied widely enough to provide a truly global snapshot of trends on RTI implementation.

UNESCO, which is the "custodian agency" for SDG Indicator 16.10.2 (i.e. the UN body which monitors implementation of that Indicator), has also developed a self-reporting, survey-based methodology to assess progress on Indicator 16.10.2. Initially, the methodology was based on two different and more in-depth surveys, namely a National Questionnaire (for central oversight or support bodies) and an Institutional Questionnaire (aimed at different public authorities).⁸ However, by 2021, the survey had evolved into a single eight-question version, ideally to be completed by the body which is responsible for oversight of the RTI law (such as an information commission) or another central body with responsibility in this area.⁹ The UNESCO survey, unlike the two other methodologies, has been applied widely, with 125 countries completing it in 2024 and 126 in 2023. As such, it is a useful tool to gain a more global perspective on the state of RTI implementation. At the same time, since it relies entirely on self-reporting with no verification of the answers received, it does not represent an independent assessment of RTI implementation.

This initiative thus helps to fill a gap by providing for an independent review of RTI implementation covering many of the countries which have adopted RTI laws. Unlike the other methodologies listed above, it focuses exclusively on performance in the area of reactive disclosure (i.e. how public authorities respond to requests for information). It thus does not look into other issues, which are also key elements of RTI regimes, including the effectiveness of appeal systems and the extent of proactive disclosure (i.e. the practice of publishing categories of information without having received a specific request for them),

⁶ The FOIANet tool is available at: http://foiadvocates.net/?page_id=11036.

⁷ See <https://www.rti-evaluation.org/methodology/>.

⁸ The Instruction Manual for the 2019 survey is at https://uis.unesco.org/sites/default/files/documents/sdg_16.10.2_survey_instructions-manual-full-en_web.pdf.

⁹ UNESCO's general page for its RTI work is <https://www.unesco.org/en/right-access-information?hub> and the URL for the Instruction Manual for the current survey is at <https://www.unesco.org/reports/access-to-information/2021/sites/default/files/medias/files/2022/02/EN%20-%20Instruction%20Manual%20SDG%2016.10.2%20FINAL.pdf>.

except to the extent that a small number of countries happened to have proactively disclosed the information requested in this initiative.

1. Methodology

Only countries and territories which have been recognised by UNESCO as having a legally binding RTI law were included in this initiative. The full list of countries which were covered – both as to having a volunteer and as to having reported results – is available in Annex 1 to this report. Volunteers were provided with a simple Protocol for IDUAI Testing Exercise for the request-making procedure, which also contained a Request Tracking Sheet in order to keep track of relevant data so as to be able subsequently to fill in a standardised online form to report their findings. The Protocol and Tracking Sheet are provided in Annex 2 of this report.

The two requests provided to volunteers are as follows:

- 1) Please provide a list of the vaccines against COVID-19 which your department (ministry – select appropriate name) purchased in the three fiscal years 2020-2022 inclusive (name and number of individual doses of vaccines) or any record which includes this information. [NOTE: adapt to the relevant fiscal year in your country]
- 2) Please provide information on the five environmental incidents over the three fiscal years 2021-2023 which were the most costly for your department (ministry – select appropriate name) in terms of the remediation measures they led to which your department paid for, or records containing that information. We are looking for the total cost per incident of the remediation measures and any report you prepared on each incident. [NOTE: adapt to the relevant fiscal year in your country]¹⁰

We developed the questions in consultation with a number of experts, with the aim of having questions which were universally relevant (i.e. for which every country would likely have data at the national level), as well as for relative simplicity to answer (so that delays should not have been necessary).

As relevant, volunteers were asked to translate the two requests from English into their local language, and then file them in the most efficient manner possible (which would depend on

¹⁰ These requests were provided to volunteers with the bits highlighted in yellow, so that they would be sure to fill in the appropriate items for their own country.

factors such as whether the country had a central online requesting platform, the capabilities of the public authorities concerned and so on). Volunteers could also decide how they wished to receive the information although, due to time constraints, electronic provision was obviously preferable. It was also left up to volunteers as to how they should identify themselves, including whether they mentioned their profession or the organisation they worked for. Volunteers were, however, instructed not to indicate that the request was part of a testing exercise (for example, in countries where reasons for requests are required to be provided).

Volunteers were asked to select two different, appropriate national-level public authorities within their country or territory with which to file requests. For federal States, we asked volunteers to file requests with a relevant national authority. It was up to volunteers to identify the appropriate authorities to which these requests would be directed. Note that, as phrased, the questions were explicitly designed to be limited in scope to the selected public authority (via the use of the phrase “your department”).

As such, if a volunteer (by mistake) filed a request with a public authority which did not hold any responsive information, it was sufficient for that authority to respond to the request by indicating that it did not hold the information (as opposed to by transferring the request to another public authority). Where this happened, we recorded the outcome as being that the information was provided in full (which was no information, since that was what the public authority held).

Despite that, in a number of cases authorities did transfer requests, while in a number of other cases, authorities referred applicants (volunteers) to other public authorities. In the latter case, volunteers were not required to file secondary requests, since we had not asked them to do so. Thus, in one country, the emergency service responded with a recommendation on where to send the environmental request, and the same was true of the health department in another country with respect to the vaccine information request.

Where requests were transferred, we continued to monitor them for the period of the exercise, and the final assessment depended on the response of the second public authority to the transferred request.

For purposes of simplicity and standardisation, a uniform deadline of 30 calendar days was given to public authorities to respond the requests. This deadline was chosen on the basis that the initial deadline for responding to requests for information is 30 days or fewer in most countries. Although many countries provide for extensions to the initial deadline, we took



the position that these requests were simple enough that this should not be necessary (i.e. that it was not legitimate to claim such an extension, even where it was allowed by law). This was because the requests were designed not to engage internationally recognised exceptions (which can take additional time), to generate voluminous records to be searched or to require the collection of information from a number of discrete records. At the same time, we also recorded as separate outcomes cases where responses were provided late, whether that involved provision of the information in full or in part, or a denial of the information.

Volunteers were not required to do more than simply lodge requests (and respond to queries about clarifying the requests). However, some volunteers elected to follow up with unresponsive public authorities. As the report aimed to track responsiveness at the public authority level, volunteers were also not asked to lodge any appeals, although some elected to do so. While this initiative did not formally track the results of any such appeals, should any information be released through such appeals, it will be added to the publicly accessible database of responses.

Volunteers were asked to report their findings via an online form once 30 days had elapsed from the date they had lodged their requests or, if they received responses within the 30 days deadline, once they had received the responses. CLD has been updating the data in cases where volunteers have contacted us to indicate that information was received subsequently (i.e. late). Results in this report are current as of 2 September 2025, our final deadline for processing them.

Both the FOIANet and CLD methodologies for assessing RTI implementation also involve test requests. In both cases, these methodologies call for one or more requests to be lodged with at least ten different public authorities. The results of many national applications of those methodologies found significant variations between different public authorities in terms of responding to requests.¹¹ The relative complexity of these laws and variations among authorities in terms of resources, commitment to openness and staff performance means that it is natural to see such variations. A limitation of the methodology used in this report is that only two requests were filed per country, which is a small sample size. As a result, the results for any given country should be treated with caution and do not necessarily reflect the average performance of public authorities in that country. However, a strength of this

¹¹ See, for example, the results on reactive disclosure from CLD's Right to Information Implementation Assessment: Comprehensive Methodology available here: <https://www.rti-evaluation.org/evaluations> (you have to click to expand on the data under each country to see this, in the column on Reactive Disclosure).

methodology is the number of countries covered, and here the strong sample size means that the results do provide a good picture of global trends for RTI implementation.

2. Findings

2.1. Outcomes

The following is summary of the results of the test requests, based on results reported as of 2 September 2025. Out of the 146 requests for which responses were recorded,¹² the most common substantive response, unfortunately, was a mute refusal (i.e. cases where no substantive response to a request was provided before the 2 September 2025 cut off).¹³ This occurred in 55 cases, representing 38% of all requests. Mute refusals were recorded in 40 different countries from all regions of the world, with 15 countries having mute refusals for both requests. A mute refusal is generally considered to be the worst possible outcome in terms of how well an RTI system is working. In most cases, it represents no substantive engagement at all with an applicant although, in some cases, receipts were provided against requests or demands to clarify the request were made. Despite the disappointingly high of mute refusals, this is consistent with some other testing exercises.¹⁴

On a more positive note, the second most common response was provision of the information in full, on time, with 45 such responses, representing 31% of all requests. This was supplemented by 5 responses indicating the information was available proactively, and another 11 responses providing the information in full but late. Thus, overall, full information was provided in 61 cases (42%), exceeding the number of mute refusals. In another 17 cases, part of the information was provided within the 30-day period and, in 1 case, information was received in part after the 30-day period. Thus, 79 requests, or just over one-half (54%), did manage to elicit some or all of the information sought.

¹² We note that in a couple of countries, only one request was lodged for various reasons, while in one country requests were not lodged under the RTI law but informally (so we have excluded the results from that country).

¹³ We included here cases where receipts were provided but not followed up with substantive responses and also the very small number of cases where the country formally extended the time limit for responding with the result that no response was provided on time (based on our assessment that such extensions were not legitimate).

¹⁴ See, for example, The Ask Your Government! 6 Question Campaign, undertaken in 2011, https://www.law-democracy.org/wp-content/uploads/2025/09/6QC-Report.final_.pdf.

In terms of other outcomes, in five cases the applicant was unable to lodge their request at all. Clearly this is highly problematical but at least the number of these cases was small. For example, in one case, the request could not be lodged due to an explicit refusal to accept the request based on alleged national security concerns, while in others there were insurmountable technical barriers to lodging a request, such as the lack of availability of a publicly-facing email address in the case of one public authority.

In only three cases were requests actually denied, two on time and one late. This is a positive outcome and to some extent reflects the careful choice of requests (which, as noted above, were designed so as not to engage exceptions). Finally, in four cases, we classified the outcome as “other”, meaning that it did not fit cleanly into any of the former outcomes.

Some cases were classified as information provided in part because responses appeared to be incomplete, while in other cases this was due to part of the information being explicitly withheld based on claims of exceptions. For instance, for the vaccine request, the department of health in one country invoked two exceptions, one for commercially sensitive information and another for functions and negotiations of public authorities, but released the names of the different COVID vaccines purchased and the total number of doses purchased, albeit not disaggregated by vaccine manufacturer.

For the three cases where requests were explicitly denied in full, the reasons given varied. For example, a ministry of health in one country rejected the vaccine request on the bases that the information was covered by non-disclosure agreements, and that disclosure would jeopardise future negotiations and agreements and impact the operations of a public authority, while in another the relevant public authority relied more generally on the confidentiality of the information.

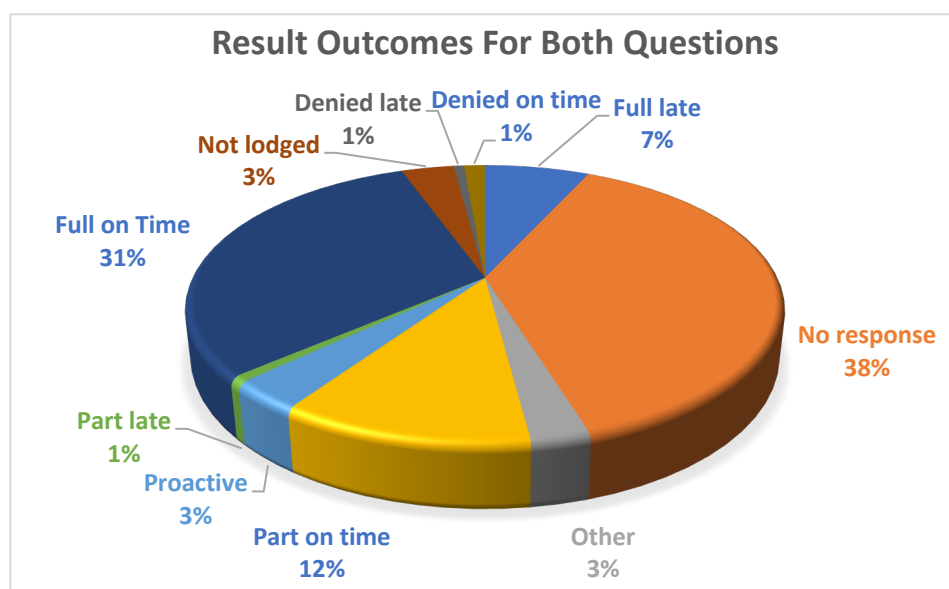
Where a public authority simply indicated that they did not hold any information which was responsive to a request, the response was classified as having provided the information in full, on the basis that they had provided the information they held (i.e. no information). This was because, as noted above, requests were explicitly designed to elicit only information held by the particular public authority approached and, as such, the public authorities originally approached were not expected to transfer requests to other public authorities. As an example of this, in one country the ministry of the environment indicated that it did not allocate funding for remediation for environmental incidents. Similarly, in another country, the ministry of the environment indicated that remediation was not under its purview and that it was the responsibility of private parties to bear remediation costs.



Notwithstanding the above, in some cases requests were transferred by public authorities and, in such cases, we assessed the results based on how the second public authority dealt with the request. Our findings reveal some concerns as to how public authorities handle these situations. For example, in one country, the request for vaccine information was originally addressed to the ministry of health, which then transferred it to a body which was responsible for epidemiological welfare and public health. However, the applicant was only informed of this verbally when she followed up with the first authority by telephone. In other cases, applicants received official notification of the transfer, but how requests were handled post-transfer varied, with some receiving the information promptly and others not receiving any information or update following the transfer. Where no substantive response was received following the transfer, in most cases this was likely because the authority to which the information was transferred failed to process the request promptly. But it is also possible that some organisational problems with proper tracking and processing of transferred requests might have affected this as well.

Chart 1, below, shows the combined results by result outcome in a pie chart format.

Chart 1



In terms of the breakdown of responses as between the two requests, the total number of responses to the first question, on vaccines, was 75 and to the second question, on environmental incidents, 71 (for a total of 146 responses).

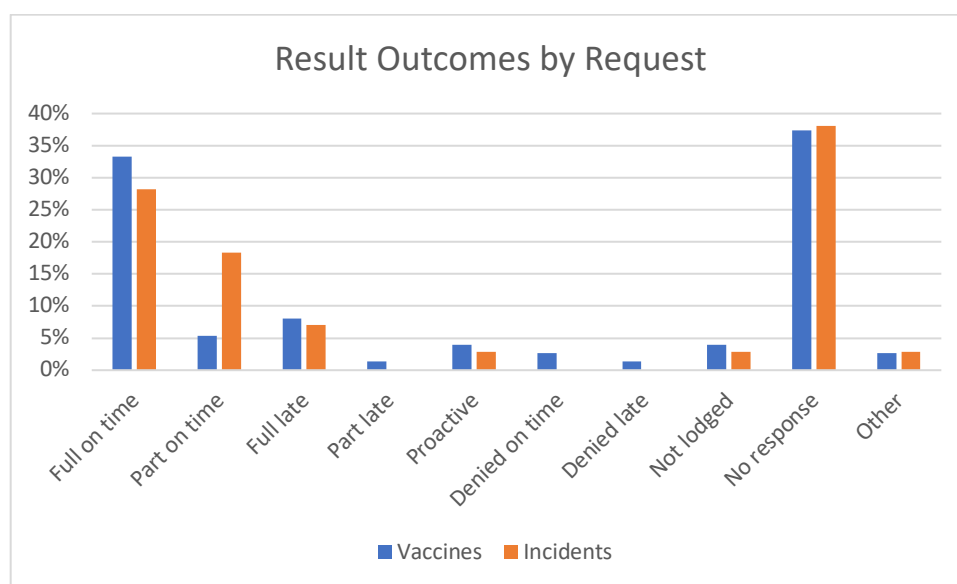
Chart 2 shows the results by outcome for each of the two requests, presented as a percentage. A few observations are immediately clear from the Chart. First, there were more full

responses, both on time and late, to the vaccine than the environmental incidents question, but more part responses, especially on time, to the latter. Combining these results shows that at least some information, whether on time or late, was provided in response to 52% of the vaccine questions whereas the same was true of 56% of the environmental incidents question. The latter was a more complex question, perhaps explaining why the rate of timely partial responses to it was much greater (18% versus 5%).

Second, all of the (very small number of) denials were in relation to the vaccine question. This is not surprising. First, it would be hard to deny a request asking for information about the level of expenditure of public funds (the environmental incidents question). Second, although we designed the question carefully so as not to screen in exempt information, for example by not asking for amounts paid for vaccines, there was some sensitivity around the fact that private commercial actors had supplied the vaccines.

Third, the rate of mute refusals (no response) was very similar for both questions (37% for vaccines and 38% for environmental incidents). It is hard to draw any firm conclusions from this. As noted above, 15 countries refused both requests. Otherwise, mute refusals were distributed evenly between the two questions from among the other 25 countries involved. This is likely a somewhat random result based on the selection of public authorities with which these requests were lodged.

Chart 2



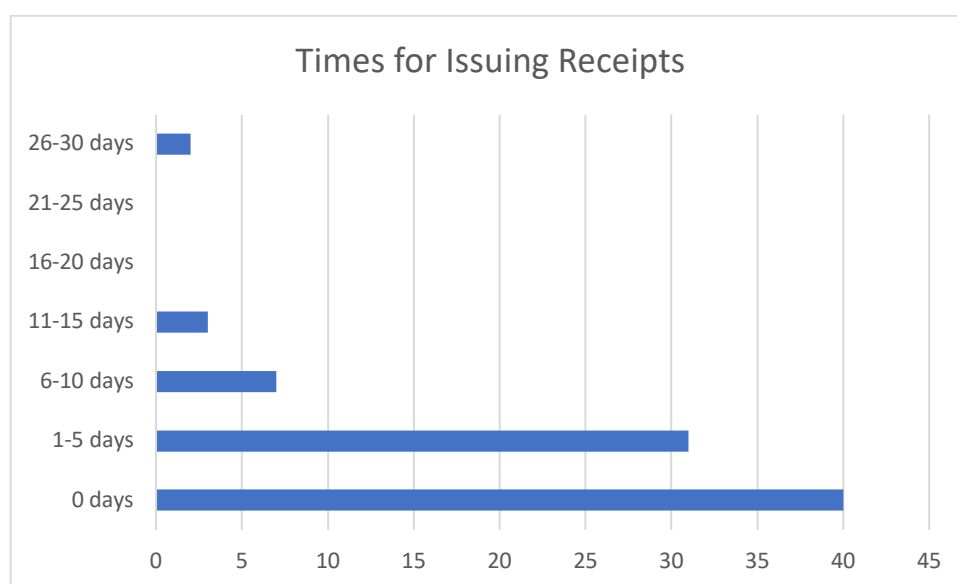
2.2. Fees

Across both questions, the vast majority of volunteers who received information reported that no fees were charged. Indeed, fees were charged in only three countries, in one country of approximately USD 5.66 for both requests, in another of approximately USD 2.03 (with additional fees to be determined subsequently) for the environmental question and approximately USD 6.06 for the vaccine question, and in another where an approximately USD 3.62 application fee was charged for both requests. The virtual absence of fees being charged is one of the positive outcomes of this testing exercise.

2.3. Receipts

Volunteers were also asked to record whether and, if so, on what date a receipt was issued to them. Receipts were issued in 83 of the 146 requests, or 57%. This is a somewhat lacklustre result but perhaps not that surprising when compared to the rate of mute refusals on the main requests. Of those, nearly one-half (40) were issued on the same day the request was lodged. We presume this was largely due to requests being lodged electronically, with receipts being provided automatically (and immediately). From among the 43 other receipts, the average time to provide them was 5.3 days (with the overall average time for all receipts being just 2.7 days). However, these results were skewed upwards based on the five requests where receipts were provided only after 10 days (two being provided only after 28 days). Chart 3 shows the distribution of receipts issued by five-day time period.

Chart 3

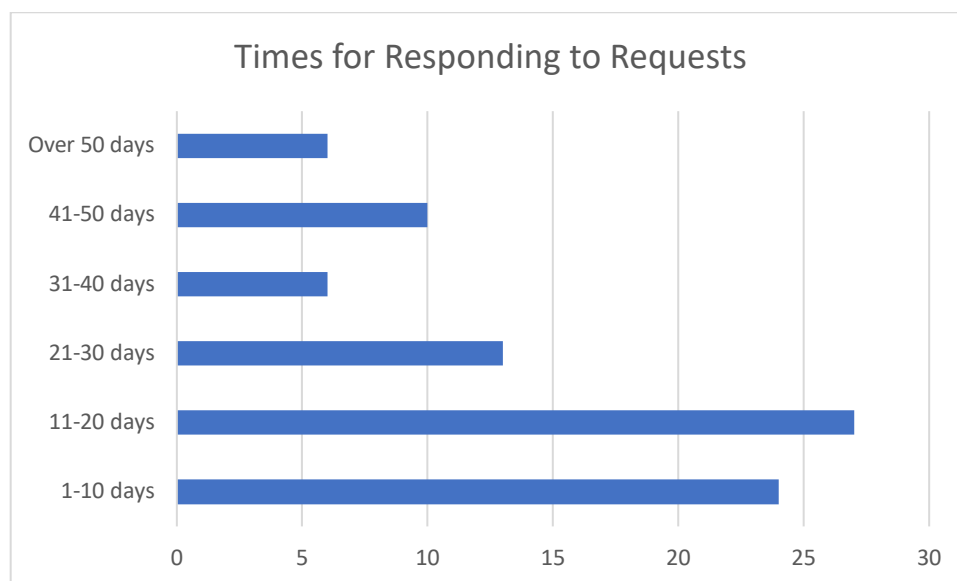


Receipts were issued for a slightly higher percentage (60%) of the environmental incidents requests than for the vaccine requests (53%). And the average time to issue receipts was also lower for the environmental incidents requests (2.0 days, overall, versus 3.5 days, and 4.8 days for the non-electronic requests, versus 5.6 days). These differences are relatively small and the fact that both of the very delayed receipts (of 28 days) were for vaccine requests may have influenced the results.

2.4. Timeliness

Overall, responses were deemed to have been provided in response to a total of 86 requests. The overall average time taken to respond to requests was 22.06 calendar days, which is a decent result. About a quarter of these (22) came in after the 30 days allocated, so were formally classified as late, but only 6 responses came in after 50 days.¹⁵ Chart 4 shows the breakdown of responses by 10-day time range.

Chart 4



In most cases, late responses represented a breach of the relevant legal requirements but, in a few cases, public authorities formally extended the time limit for responding to requests.

¹⁵ Although these numbers would likely increase if we had kept the window for responding open longer, albeit in that case so would the number of cases where responses were provided. Also, some requests were lodged earlier, leaving more time within the project timeframe for late responses.

For example, a body responsible for the environment in one country extended the period for responding to the request about environmental incidents by a somewhat incredible 150 days.

Breaking timeliness down by question, the average response time was a bit shorter (21.34 days) for the environmental incidents requests than for the vaccine requests (23.34 days). And only one of the six over 50-day responses was for an environmental incidents request, versus five for vaccine requests. Thus, it is fair to say that procedural compliance (both on receipts and timeliness) was a bit stronger for the environmental incidents requests, while substantive compliance (i.e. provision of information) was weaker.

2.5. Results by Region

We also analysed the results by region, using six standard UNESCO regions, namely Africa (i.e. Sub-Saharan Africa), Arab Region, Asia and the Pacific, Central and Eastern Europe, Latin America and the Caribbean, and Western Europe and North America. The outcomes – partially grouped into full information provided (whether on time or late, or via proactive disclosure), part information provided (whether on time or late), denied (whether on time or late), no response and not lodged/other – are set out in Chart 5. In terms of providing information, Central and Eastern Europe does well and away the best, both in full and in part, with a combined total of 77% of requests eliciting at least some information. Western Europe and North America, Asia and the Pacific, and Latin America and the Caribbean are all roughly on par for providing full information (ranging from 47% to 44%), but Asia and the Pacific leads this group in providing some information (64%), followed by Western Europe and North America (58%) and then Latin America and the Caribbean (54%). Africa is far behind, at only 16% full and no partial responses. But not one of the five responses recorded from the Arab Region provided any information at all.

In terms of no response rates, Africa has by far the largest rate, at fully 84%, followed by the Arab Region, and Latin America and the Caribbean (each 40%), Western Europe and North America, and Asia and the Pacific (each 32%). Central and Eastern Europe again does the best here, with only a 15% rate of no responses.

The other outcome areas all polled very low overall and again largely by region, with the exception of a 60% rate of not being able to lodge a request at all in the Arab Region. In contrast, there were no cases of not being able to lodge requests in Africa, Asia and the Pacific, and Central and Eastern Europe (but a few “other” outcomes in Asia and the Pacific). Perhaps also of interest was the fact that all three denials (two on time and one late) came from Europe (two on time from Central and Eastern Europe and one late from Western Europe).

Chart 5

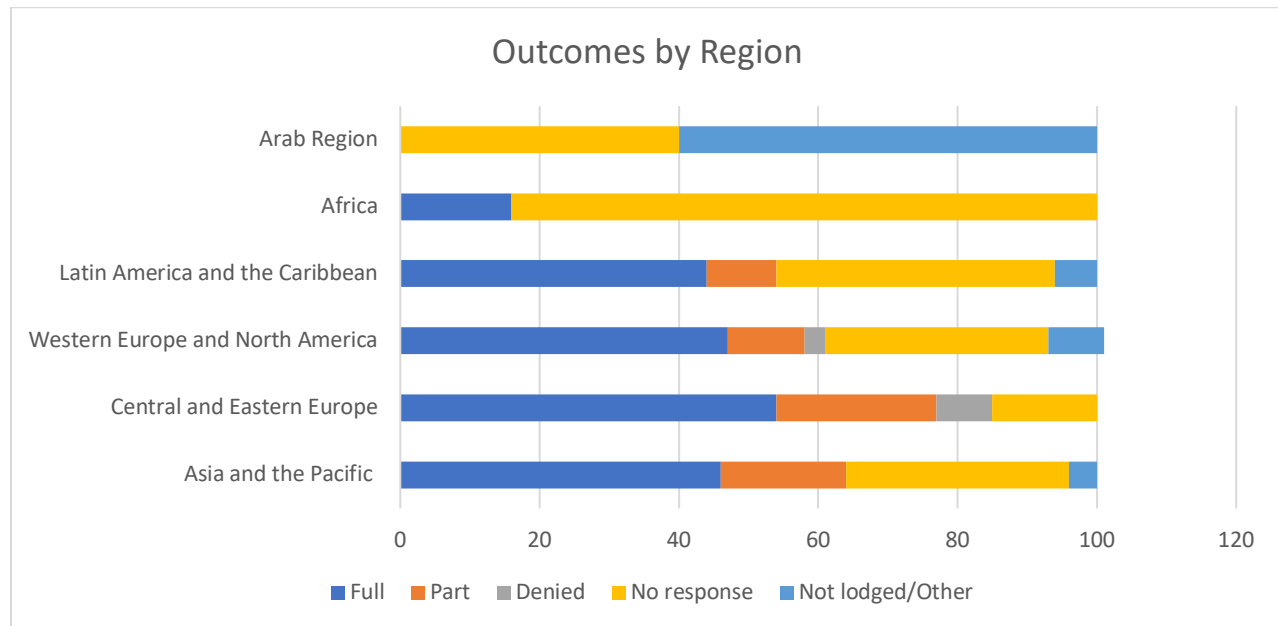
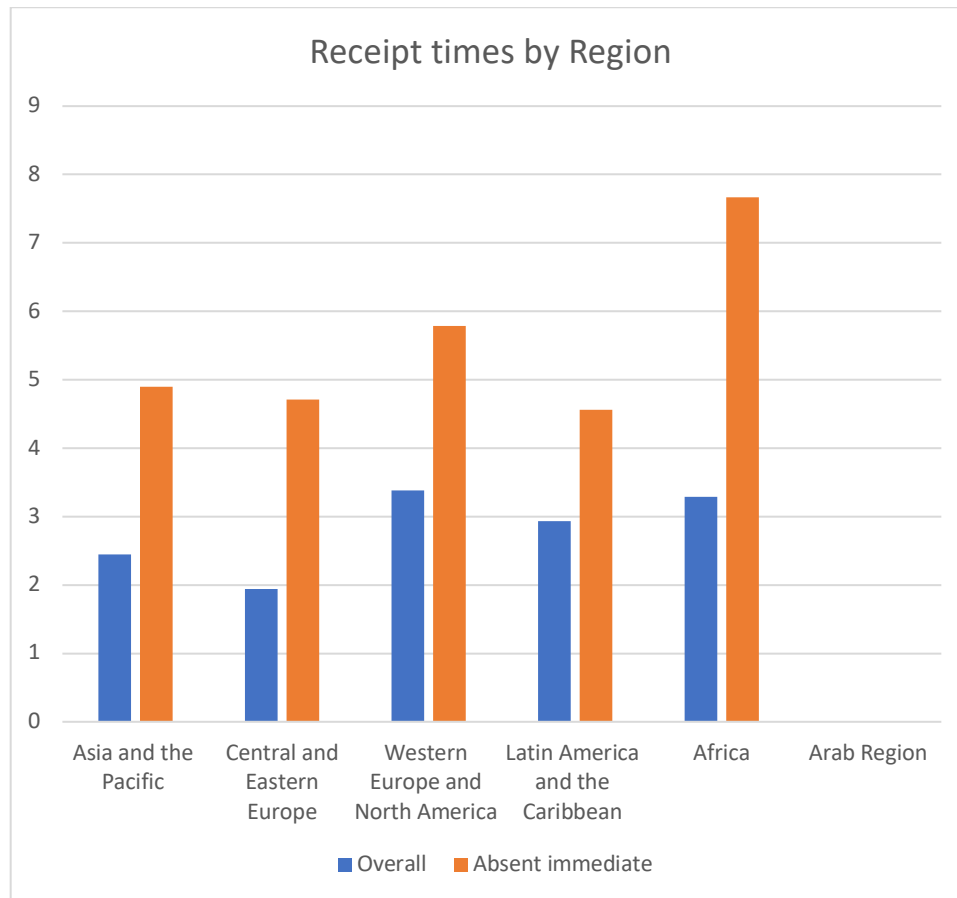


Chart 6 shows the average time to provide receipts by region, broken down into the overall average time and then the average time excluding cases where receipts were provided the same day (presumably in almost all cases immediately, via an automated system). Central and Eastern Europe again does the best here overall, but falls slightly behind Latin America and the Caribbean once automated responses are excluded, with Asia and the Pacific coming in a close third on that metric. Western Europe and North America, and Africa were behind the three regions noted above on both metrics here. While these two regions were very close in terms of overall average time to provide receipts, Africa was considerably slower in providing non-automated receipts. Note that the absence of any bars for the Arab Region is because no receipts were provided in that region, and not because all receipts were provided immediately.



Chart 6

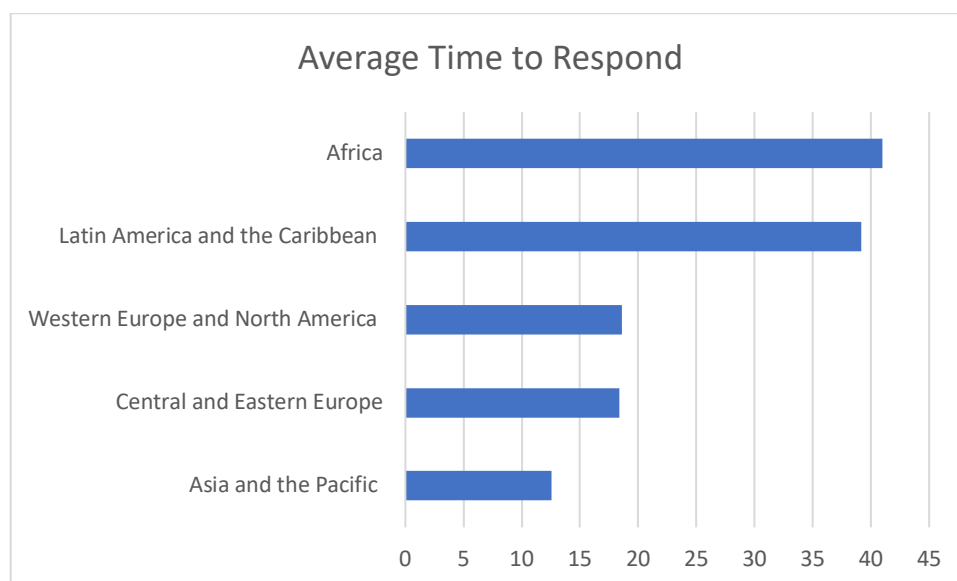


Finally, Chart 7 shows the results in terms of timeliness of providing substantive responses to requests (note the Arab Region is absent from this chart because no responses were provided in that region). Here, Asia and the Pacific achieved the best result, with an average response time of just 12½ days, followed by Central and Eastern Europe, and Western Europe and North America, both at around 18 days. Latin America and the Caribbean, and Africa were the weak performers here, at 39 and 41 days respectively.

Asia and the Pacific also did best in the sense of not having any countries take longer than 30 days to respond, with Western Europe and North America coming in next, at 16% of requests beyond 30 days, Central and Eastern Europe at 18%, Latin America and the Caribbean a rather poor 65%, including the longest single response time, of 87 days, and Africa with fully 100% of responses provided beyond 30 days.



Chart 7



Overall, Central and Eastern Europe emerges as the strongest region, well outperforming other regions in terms of outcomes (i.e. providing both full and partial information and not failing to respond to requests), and performing strongly across timeliness metrics regarding both receipts and substantive responses. The Arab Region, in contrast, is clearly the weakest performer, with that assessment holding across all of the metrics discussed above. At the same time, the small number of responses recorded from that region – just five – is a statistically limited sample. Africa is the second weakest performer, again maintaining this position across all metrics, while the other three regions – Latin America and the Caribbean, Asia and the Pacific, and Western Europe and North America – are broadly similar in the middle of the pack, albeit with Latin America and the Caribbean recording a substantially weaker timeliness performance.

Conclusion

The relatively large sample size of this study, involving 146 requests in 76 countries, provides a solid basis for drawing some broad conclusions about the status of RTI implementation globally. The findings point to both challenges and some positive areas for implementation of RTI laws globally. The unacceptably high number of 38% of all requests to which no response was provided within the time frames available for this initiative, or mute refusals, suggests that much more work has to be done to ensure that RTI systems are functioning at a basic level. And this number would have been much higher if we had not accepted late responses (i.e. beyond the 30-day time limit we had established for requests). While a small

number of public authorities formally extended the time limit for responding, often presumably in line with local legislation, we did not deem this to be necessary and most did not (and hence represent classic mute refusals).

On the other hand, outside of these cases, most other requests did receive at least some of the requested information. For 42% of the requests, full information was provided, either on time, via proactive disclosure or late. And part information was provided in another 12% of cases.

Another positive outcome was the tiny percentage of requests which elicited actual denials of access, only three or some 2%. All of these fell within the scope of the question on vaccines. This question was carefully designed not to engage exceptions, in particular through specifically excluding the issue of costs, so as to avoid raising potentially legitimate commercial issues. As such, the cases where exceptions were claimed here point to challenges relating to overbroad interpretation of exceptions relating to commercial secrets and the tension between confidentiality agreements and RTI. Furthermore, it is vitally important that States have adequate checks in place regarding these exceptions, in particular by ensuring that they are subject to a harm test, whereby information may be withheld only when its disclosure would be likely to harm the protected interest, and a public interest override, whereby information is still released if the public interest in disclosing the information outweighs the likely harm to the protected interest. Given the subject matter of this question – COVID 19 vaccines – the public interest in knowing about them is clearly very high.

The four countries where it was not possible even to lodge at least one request (and in one case either request) clearly need to engage in a significant overhaul of their RTI systems. This is simply not an acceptable result.

There were some important outcome differences between the two questions, with the vaccine question obtaining a higher rate of information provided in full responses, albeit fewer cases where any information was provided than the environmental incidents question, due to significantly lower partial information responses. The relative complexity of the latter question might help explain this.

A positive finding of this exercise was the low incidence of fees being charged, with this occurring in only three countries, in some cases as part of an application fee for making a request. Moreover, the fees which were charged were relatively small. These are positive findings and likely reflect the digital nature of many of the requests which were lodged as part of this exercise. It is also possible that some public authorities would treat more complex



requests differently, taking into account the fact that the requests in this case were relatively straightforward.

When it comes to receipts, the large percentage of requests – 43% – for which no receipt was issued can only be described as disappointing. Issuing receipts is an important administrative practice which informs applicants that their request has been properly received and facilitates applicants' ability to follow up on requests and seek redress in cases where requests are not processed properly. Where RTI laws do not require receipts to be issued in a timely manner, consideration should be given to introducing such a requirement, and where this is required, States should ensure that all public authorities respect this requirement. Most receipts – 86% – were issued within five days of the request being lodged, but a couple took as long as 28 days to be issued, which is clearly not acceptable.

The overall average time taken to respond to requests of 22.06 days is somehow positive, as is the fact that 61% of requests which were responded to received those responses in 20 days or less. Still, the 24% of requests which were answered late, as well as whatever proportion of the requests tagged as “no response” in this exercise which may eventually receive substantive responses (also late, mostly very late), is a matter of concern. Here, as with exceptions, the questions were specifically designed so as not to be overly complex, such that there was no need for these delays. The delays which were experienced may suggest challenges in proper records management practices in some of the public authorities concerned. Good records management is clearly needed to support the proper functioning of RTI laws.

There was quite a lot of variation in the results when disaggregated by region, with Central and Eastern Europe performing most strongly in terms of information actually disclosed (the key aim of the right to information), and among the strongest in terms of other metrics. The Arab Region was the weakest performer, with no information released at all, albeit based on a relatively small sample size of five requests. Africa was the second weakest performing region, with Asia and the Pacific, Latin America and the Caribbean, and Western Europe and North America falling into the middle.

In conclusion, this study suggests that there is wide variance in the quality of implementation of RTI laws among different countries, among different regions and, within countries, among different public authorities. While an important volume of relevant data was obtained through this study, the results also demonstrate that many countries need to redouble their efforts to improve the implementation of these laws, so as to ensure timely and responsive provision of information to applicants. In order to do so, countries should consider



improving efforts to monitor and assess implementation carefully, with a view to identifying points of weakness, including failures to respond in a timely manner to requests and, of course, failures to respond at all to requests.



Annex 1: Countries with Volunteers and with Responses

The 76 Countries/Territories with Data Used in the Report:

Albania, Antigua and Barbuda, Armenia, Australia, Austria, Bangladesh, Belarus, Belgium, Belize, Bermuda, Bosnia and Herzegovina, Canada, Cayman Islands, Chile, China, Colombia, Costa Rica, Czechia, Denmark, Dominican Republic, El Salvador, Finland, France, Gambia, Ghana, Guyana, Honduras, Iceland, India, Indonesia, Ireland, Israel, Italy, Japan, Kuwait, Kyrgyzstan, Latvia, Lebanon, Luxembourg, Maldives, Malta, Mexico, Monaco, Montenegro, Mozambique, Nepal, Netherlands, New Zealand, Nicaragua, Niger, Nigeria, North Macedonia, Pakistan, Poland, Portugal, Qatar, Republic of Korea, Romania, Rwanda, Saint Kitts and Nevis, Serbia, Sierra Leone, Slovakia, South Africa, Spain, Sweden, Switzerland, Thailand, Togo, Trinidad and Tobago, Türkiye, Uganda, Ukraine, United Kingdom of Great Britain and Northern Ireland, United States of America, Uruguay, Uzbekistan

Countries/Territories for which Individuals Volunteered to Make Requests

Afghanistan, Albania, Antigua and Barbuda, Argentina, Armenia, Australia, Austria, Azerbaijan, Bangladesh, Belarus, Belgium, Belize, Bermuda, Bolivia (Plurinational State of), Bosnia and Herzegovina, Brazil, Bulgaria, Burkina Faso, Canada, Cayman Islands, Chile, China, Colombia, Cook Islands, Costa Rica, Croatia, Czechia, Denmark, Dominican Republic, Ecuador, El Salvador, Estonia, Ethiopia, Fiji, Finland, France, Gambia, Germany, Ghana, Gibraltar, Greece, Guatemala, Guyana, Honduras, Hungary, Iceland, India, Indonesia, Ireland, Isle of Man, Israel, Italy, Ivory Coast, Jamaica, Japan, Jersey, Jordan, Kenya, Kuwait, Kyrgyzstan, Latvia, Lebanon, Liberia, Lithuania, Luxembourg, Malawi, Maldives, Malta, Mexico, Mongolia, Montenegro, Morocco, Mozambique, Namibia, Nepal, Netherlands, New Zealand, Nicaragua, Niger, Nigeria, North Macedonia, Pakistan, Panama, Paraguay, Peru, Philippines, Poland, Portugal, Qatar, Republic of Korea, Republic of Moldova, Romania, Rwanda, Saint Kitts and Nevis, Serbia, Seychelles, Sierra Leone, Slovakia, South Africa, South Sudan, Spain, Sri Lanka, Sudan, Sweden, Switzerland, Thailand, Togo, Trinidad and Tobago, Tunisia, Türkiye, Uganda, Ukraine, United Kingdom of Great Britain and Northern Ireland, United Republic of Tanzania, United States of America, Uruguay, Uzbekistan, Vanuatu, Venezuela (Bolivarian Republic of), Yemen, Zambia, Zimbabwe



Annex 2: Protocol for Filing Requests and Tracking Sheet



Protocol for IDUAI Testing Exercise

May 2025

This is the simple protocol to be followed by everyone who is placing two test requests as part of the Centre for Law and Democracy (CLD), Global Investigative Journalism Network (GIJN), Global Forum for Media Development (GFMD) and Freedom of Information Advocates Network (FOIANet) joint project, which is sponsored by UNESCO.

You need to start by identifying the relevant body within your jurisdiction which is likely to hold the information we are looking for. Note that for federal or non-unitary jurisdictions, we only want requests to be placed with the federal or national government. We have designed the questions so that at least some responsive information should be held by a federal body, regardless of how powers are allocated in your country.

The specific public authorities which will hold this information will vary from country to country. However, the first question, about COVID-19 vaccinations, is likely to be held by the ministry which is responsible for health, the ministry which is responsible for finance or perhaps a central non-ministerial body which deals with health issues. For the second question, the information is likely to be held by the ministry which is responsible for the environment or again perhaps a central non-ministerial body which deals with environmental matters.

Please lodge separate requests for the two types of information. Requests should be lodged in the most efficient way for doing this which is available in your country, such as via an online portal or email, if possible. It is up to you whether or how you identify yourself or the organisation you work for when making these requests. However, this should be done in a way which does not indicate that these are test requests as we DO NOT want to attract special attention to or priority processing for these requests.

We are asking all requesters in this exercise to allocate a maximum of 30 calendar days for responding to these test requests. For the vast majority of countries, this is as long or longer than the ordinary statutory deadline for responding to requests. We do not believe there is any justification for public authorities to claim extended deadlines for responding to these requests.

At the same time, if the public authorities do provide you with relevant information after the deadline, please do record this on the tracking sheet (see below) and send us the information.

It is up to you to decide whether you wish to follow up on your requests if answers are not provided within the statutory deadlines. If you do follow up, please indicate that on the tracking sheet.

It is up to you to decide how you would like to receive the information, where you have a choice about that in your jurisdiction, but for communication purposes with us electronic records will ultimately be needed.

We are asking requesters to record the following information relating to each request, on the tracking sheet which is appended to this Protocol (see below and please use a separate sheet for each request):

- 1) The date each request was lodged and how (e.g. by email, on a requesting portal, in person).
- 2) The public authority with which each request was lodged.
- 3) The date and other relevant details about any transfers of your requests to other public authorities (or referrals to other public authorities).
- 4) The date, if any, when a receipt acknowledging each request was provided.
- 5) A brief record of any communications with the public authority (do not include purely technical details – for example as to how you would like to receive the information and so on – here). Any follow-up you conduct with the public authorities should be listed here.
- 6) The date, if any, on which a formal response to each request was provided, including the main details of that response. Where the response is to refuse to provide the information on the basis that it is exempt, please list the exception being relied upon. Where information is provided, please indicate whether you believe it is complete, incomplete or simply not relevant.
- 7) Any fee which you are charged for providing the information.

Please also send us the substance of any responses you receive to your requests (i.e. the actual information/records provided to you).

If you have any questions about this Protocol or about any issue which arises during the test requesting exercise, please do not hesitate to contact us at raphael@law-democracy.org.

Good luck!!



Request Tracking Sheet

1. Request 1 (vaccines) ☐
Or request 2 (environmental plans/policies) ☐
2. Date request was lodged: _____
3. Name of public authority where request lodged: _____
4. Relevant details, where your request was transferred to another public authority or you were referred to another public authority, including the date of the transfer, the authority to which the request was sent and any justification provided for this:

5. The date of any receipt acknowledging the request: _____
6. A brief record of substantive communications with the public authority concerning the request:

7. The date on which a formal response to the request was provided: _____
8. A description of the main details of the response:

9. Any fee you were charged and the amount: _____

