



CENTRE FOR LAW  
AND DEMOCRACY

# Second Global Comparative Testing of Responses to Requests for Information

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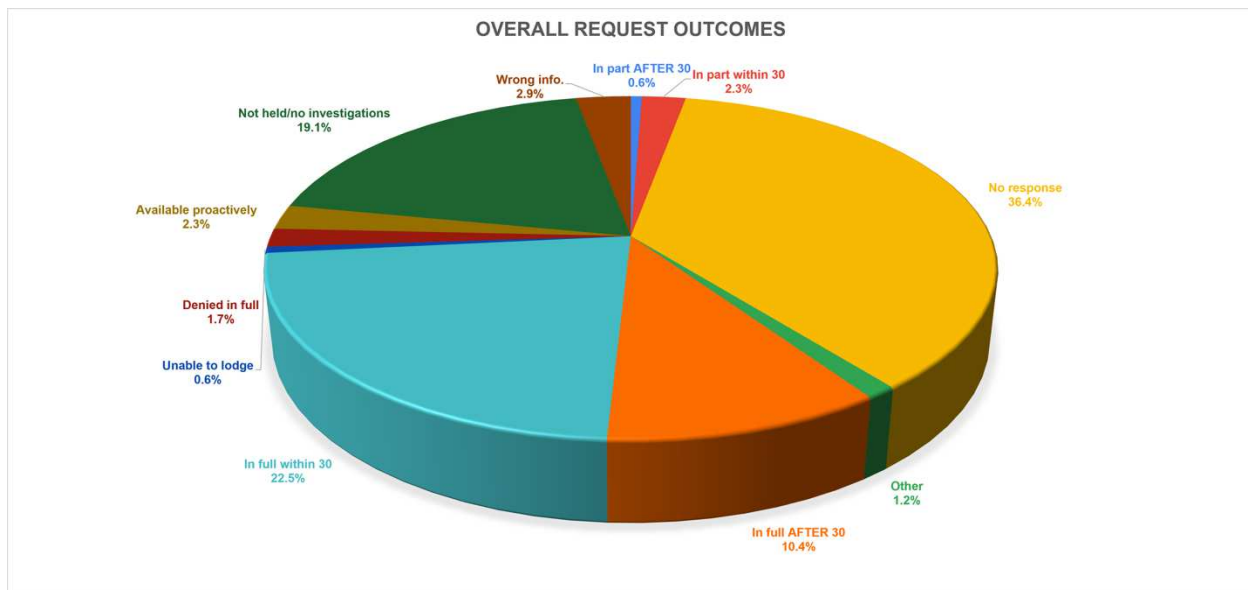
## Executive Summary

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 countries and territories around the world with RTI laws as possible. This was the second time we conducted this exercise, following the pilot in 2025. In the end, volunteers covering 126 countries signed up to participate in the exercise and results were obtained from 173 requests which were lodged in 90 countries. As such, this is the most comprehensive RTI “stress test” ever carried out on a global scale, significantly expanding on the 2025 exercise. The results provide invaluable insight into where RTI implementation is working and where it stalls.

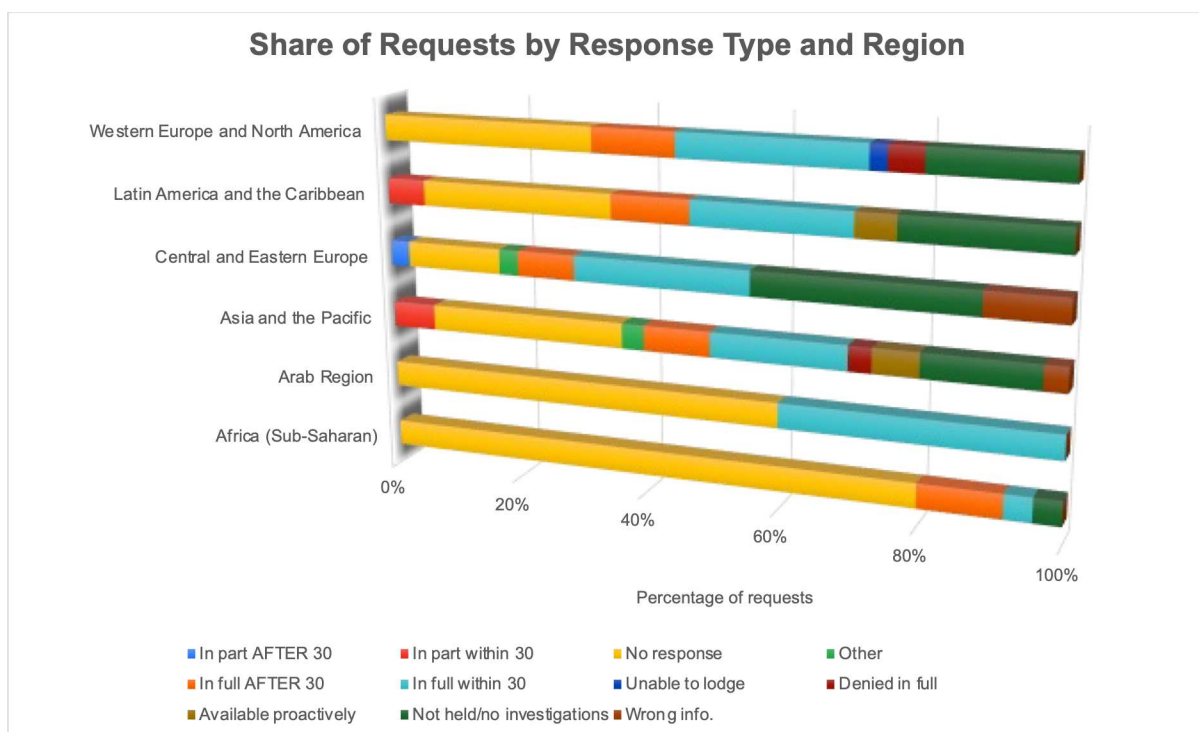
### The results at a glance (see chart below)

- 36% mute refusals, or no substantive reply at all, the worst possible outcome, with at least one such result in nearly one-half (47%) of all countries, but down from a total of 38% in 2025
- Some information was provided in 38% of all cases, of which 33% were full disclosures, albeit 10% were late
- In 19% of the cases, the information was either not held or, as regards investigations of social media platforms, none had been conducted
- Explicit denials represented only 2% of all cases, showing that exceptions are not the problem, it is that public authorities simply do not answer
- Receipts were issued in just 55% of all cases – highlighting a basic administrative failure, given how easy it is to do this – but, positively, 80% of receipts were issued in 5 days or less
- The average response time was 21 days and 79% were responded to within 30 days, both of which are positive
- Fees were rarely an issue, with only five countries charging to lodge requests and only one charging to provide information





When these results are broken down by region, within the sample covered by this exercise (and noting that different numbers of countries from each region were covered), Africa had the highest rate of no substantive responses and the lowest rate of information being provided. For its part, Eastern and Central Europe had by far the lowest number of mute refusals and was tied with Latin America and the Caribbean for top position in terms of responses which were positive. The results by region are shown in the chart below.



## Why we should care

- Mute responses are the most basic denial of the right to information. In such cases, the law only establishes a paper right, not a real one. In the end, “no response” results erode trust in government, stymie public participation and erode accountability.
- At the same time, information was provided, at least in part, in a larger number of cases than the mute refusals, and mostly on time. Right to information laws do enable people to get information from the government.
- The high rates of not providing receipts illustrate an area of significant room for improvement, as a failure to provide one creates challenges for applicants who wish to lodge appeals.
- The low number of explicit denials show that public authorities are not trying to take advantage of exceptions to deny requests.

Overall, the results in 2026 tracked those from 2025 quite closely, with mute refusals and the provision of at least some information dominating the results. The exercise generated a large volume of relevant data about funding for children’s programmes and investigations into social media platforms, which is available publicly for those who may be interested in using it for research purposes. But the exercise also illustrates clearly that many States have to do much better in terms of implementing their RTI laws. Only then can these laws deliver their real benefits in terms of fostering participation and holding governments to account.



## Introduction<sup>1</sup>

The right to access information held by public bodies or the right to information (RTI),<sup>2</sup> has long been recognised as a fundamental human right, one which is instrumental in ensuring a variety of benefits, including government accountability, increased participation and economic efficiency. As of today, most States in the world have adopted laws giving effect to this right, with the Centre for Law and Democracy (CLD) counting 142 countries as having adopted such laws at the national level.<sup>3</sup> However, there is a significant difference between adopting a law and implementing it properly, and the right to information is an area where implementation gaps are all too prevalent.

A key challenge to addressing these gaps is a lack of data on how well public authorities are doing in terms of providing information in accordance with the rules in their RTI laws. As a contribution to addressing the lack of data, leading up to the 2026 International Day for Universal Access to Information (IDUAI), 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 in all of the States and territories which have RTI laws. The main purpose of this initiative was to provide a broad comparative assessment of how well public authorities are doing in terms of responding to requests for information. This is just one element of a strong RTI system, for example with proactive disclosure being another element, but it nevertheless lies at the heart of RTI systems. This was the second year CLD has undertaken such a global study, following its initial pilot in 2025.<sup>4</sup>

While two requests are not enough to assess how well each country is doing, when this is scaled up to multiple countries it does provide a useful snapshot of global progress on the right to information. As such, this year the exercise has again provided valuable insights into how well public authorities are responding to requests globally and in each different region

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<sup>2</sup> Also referred to in some countries as access to information or freedom of information.

<sup>3</sup> See our RTI Rating, <https://www.rti-rating.org/country-data/>.

<sup>4</sup> Centre for Law and Democracy, *Global Comparative Testing of Responses to Requests for Information*, 2025, <https://www.law-democracy.org/resources/launch-of-report-on-global-right-to-information-stress-test>.

of the world. As an ancillary benefit, the information which was received in response to the requests is again being released as a resource for researchers.<sup>5</sup>

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), which assesses the number of States which have both adopted *and implemented* such laws.

Logistical support for this initiative was provided by three international partners, namely the Freedom of Information Advocates Network (FOIANet),<sup>6</sup> the Global Forum for Media Development (GFMD)<sup>7</sup> and the Global Investigative Journalism Network (GIJN).<sup>8</sup> In particular, these partners helped CLD identify local volunteers to file the requests in each country.

In the end, we were successful in having volunteers sign up to file requests for this project in 126 countries and territories. 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 some countries with a very small population or a less developed civil society or independent journalism community, it was just not possible to locate volunteers. But it was also clear to us that, in some States with reduced civic space, fear of reprisals for participating in this project also contributed to our failure to identify volunteers.

Ultimately, from among those who signed up to make requests, not everyone actually did lodge the requests or lodge them in time, some volunteers appear not to have reported their results, and a few volunteers did not follow the protocol properly and so their results had to be excluded. As a result, the sample size for this report comprises 173 requests from 90 countries from all regions of the world, representing a clear majority of all countries where RTI laws are in force and a significant sample size for assessing general trends in responding to requests.

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<sup>5</sup> This information is available online at [https://drive.google.com/drive/folders/1RF1CdVddFzq-dgc3UYt6jCGUMY6m2TAb?usp=drive\\_link](https://drive.google.com/drive/folders/1RF1CdVddFzq-dgc3UYt6jCGUMY6m2TAb?usp=drive_link).

<sup>6</sup> See <https://www.foiadvocates.net>.

<sup>7</sup> See <https://gfmd.info>.

<sup>8</sup> See <https://gijn.org>.



Several initiatives have emerged in recent years to monitor the implementation of RTI laws. FOIANet, the leading global network of civil society activists focusing on RTI,<sup>9</sup> has developed a civil society assessment tool designed to be able to be applied reasonably easily and repeatedly over time by civil society organisations with relatively limited resources.<sup>10</sup> 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.<sup>11</sup> While both the FOIANet Methodology and CLD's Comprehensive Methodology have been applied in a number of countries, allowing for some comparative assessment, 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 progress on that Indicator),<sup>12</sup> has also developed a self-reporting, survey-based methodology to assess progress on Indicator 16.10.2.<sup>13</sup> 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).<sup>14</sup> 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.<sup>15</sup> The UNESCO survey, unlike the two other methodologies, has been applied widely, with 123 countries completing it in 2025 and 125 in 2024. 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.

<sup>9</sup> See note 6.

<sup>10</sup> The FOIANet tool is available at: [http://foiadvocates.net/?page\\_id=11036](http://foiadvocates.net/?page_id=11036).

<sup>11</sup> See <https://www.rti-evaluation.org/methodology>.

<sup>12</sup> UNESCO's general page for its RTI work is <https://www.unesco.org/en/right-access-information?hub>.

<sup>13</sup> Note that this refers to “Number of countries that adopt and implement constitutional, statutory and/or policy guarantees for public access to information.” So it is broader than just countries which have adopted RTI laws and it covers both the adoption and implementation of these laws.

<sup>14</sup> 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](https://uis.unesco.org/sites/default/files/documents/sdg_16.10.2_survey_instructions-manual-full-en_web.pdf).

<sup>15</sup> UNESCO's 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>.

This initiative thus helps to fill a gap by providing an independent, request-based assessment of how well RTI laws are being implemented, 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 information without having received a specific request for it), 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. Annex 1 contains two lists of countries, the first of which covers the 90 countries for which responses were reported and included in this report and the second of which covers the 126 countries where a volunteer signed up to participate in this initiative. Volunteers were provided with a simple Protocol for the IDUAI Testing Exercise, which sets out in some detail the procedures for making and tracking requests. The Protocol also contains a Request Tracking Sheet to help volunteers keep track of relevant information so as to be able subsequently to fill in a standardised online form to report on their results. The Protocol and Tracking Sheet are provided in Annex 2 of this report.

The two requests which volunteers were asked to file are as follows:

- 1) Please provide the amount of money which your department (ministry – select appropriate name) allocated for programmes to support children in each of the three fiscal years 2022-2024, broken down by type of programme, if relevant and available, or any record which includes this information. [NOTE: adapt to the relevant fiscal year in your country.] NOTE 2: we have left this open but please choose one specific programme for children which you know was undertaken in your country and for which information is not available proactively. Examples might be an immunization programme or spending on early childhood education.]
- 2) Please provide information on the three most recently completed formal investigations, reviews, audits, supervisory actions, enforcement actions or compliance proceedings involving the social media platforms Facebook, Instagram, WhatsApp, YouTube TikTok, WeChat, and/or Telegram which your department

(ministry – select appropriate name) undertook and for which records are available. We are looking for final reports, enforcement notices, decisions or recommendations on these matters, if available, or other significant documents relating to the investigations, excluding routine administrative communications such as internal emails or scheduling correspondence.<sup>16</sup>

The questions were carefully chosen, following consultation with experts on making requests for information, with the aim of targeting information which was believed to be universally relevant, likely to be held by national-level authorities and straightforward to provide (so that delays or the application of exceptions should not have occurred).

As relevant, volunteers were asked to translate the two requests from English into their local languages and then to file them in the most efficient manner possible (which would depend on factors such as whether the country had a central online requesting platform). Volunteers could also decide how they wished to receive the information, for example in printed (photocopied) form or electronically. 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, including in the relatively few 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 (under the national law, so as to ensure consistency within the exercise). It was up to volunteers to identify the appropriate authorities with which to lodge their requests.

If a volunteer filed a request with a public authority which did not hold any responsive information, whether due to their having chosen the wrong public authority by mistake or because there simply was no responsive information (for example in the case of the second request relating to investigations of social media platforms, where no investigations had taken place or where a national authority claimed it had no jurisdiction to conduct these investigations), the response was categorised as information not held/no investigations.

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<sup>16</sup> The highlighting appeared in the text as provided to volunteers to signal parts which needed to be adapted to their individual circumstances.

Note that, as phrased, the questions were explicitly designed to be limited in scope to information held by the selected public authority (via the use of the phrase “your department”). Despite this, in a number of cases authorities transferred requests or referred applicants (volunteers) to other public authorities. In the latter case, volunteers were asked to relodge the request with the other authority, although in a couple of cases this did not happen and the response was then recorded as an instance of information not being held. Where requests were transferred or relodged, we continued to monitor them for the period of the exercise, and the assessment was based on how the second public authority responded to the transferred request, including as to timeliness, measured from the date the second authority received the request.

For purposes of simplicity and standardisation, a uniform deadline of 30 calendar days was given to public authorities to respond the requests. This was calculated from the date of the original request (or from the date of the transfer or relodging of the request in cases where that happened). This deadline was chosen on the basis that the initial legal deadline for responding to requests for information is 30 days or fewer in a large majority of all countries. Many countries do provide legally for extensions to the initial deadline, but we took the position that these requests were simple enough that this should not have been necessary (i.e. that, for purposes of this comparative exercise, such extensions would not normally be necessary, even where they were otherwise provided for by law). This was because the requests were designed not to engage internationally recognised exceptions (which can take additional time), to require voluminous records to be searched or to require the collection of information from a number of discrete records or sources. We recorded as separate from on time outcomes, cases where responses were provided late, whatever that response was. At the same time, extensions were official claimed in a number of cases.<sup>17</sup>

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 appeals, although some elected to do so. Appeal results have not been incorporated into this report.

Volunteers were asked to report their findings via an online form once 30 days had elapsed from the date their requests were lodged or once they received a response where this happened before the 30-day deadline. The online form was editable and volunteers were asked to update their responses where late responses were received after initial results had

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<sup>17</sup> Note that, in these case, we still recorded any responses which were provided after 30 days as being late.

been filed. Results in this report are current as of 16 September 2026, our final deadline for processing them.

A limitation of the methodology 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, as they do not necessarily reflect the average performance of all of the public authorities in that country, given that performance typically varies considerably across different public authorities due to various factors, such as experience with processing requests and degree of commitment to transparency.<sup>18</sup> In this sense, this Methodology differs from the FOIANet Methodology<sup>19</sup> and CLD's Comprehensive Methodology for assessing RTI implementation,<sup>20</sup> which are designed to provide a more in-depth assessment of implementation within specific jurisdictions, including through assessing a number of different public authorities. However, a strength of the methodology used in this report is the number of countries covered during the same time period, which gives a broader view of global trends for RTI implementation.

## 2. Findings

### 2.1. Outcomes

The following is summary of the results of the responses to the test requests, based on results reported as of 16 September 2026. Out of the 173 requests for which responses were recorded,<sup>21</sup> the most common substantive response by quite a large margin, unfortunately, was no response (i.e. cases where no substantive response to a request was provided or what is often called a “mute refusal”).<sup>22</sup> This occurred in 63 cases, representing 36% of all requests. It is also possible that this represents something of an undercount, as it is possible that some

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<sup>18</sup> 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 click to expand the data under each country to see the results for each individual public authority covered, in the column on Reactive Disclosure).

<sup>19</sup> See FOIANet, “Measuring SDG 16.10.2”, <https://www.foiadvocates.net/measuring-sdg-16-10-2>.

<sup>20</sup> See [RTI-Evaluation.org](https://www.rti-evaluation.org).

<sup>21</sup> We note that, in a couple of countries, only one request was lodged for various reasons or one or more responses were excluded for not asking the correct questions.

<sup>22</sup> 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).

volunteers failed to file the results when they simply did not get any response, despite CLD reminding them to do so (and stressing that we had a specific response category for this).<sup>23</sup>

Despite the extremely high rate of mute refusals, this is a very similar rate to the results from the 2025 application of this Methodology, which resulted in a mute refusal rate of 38%, and, as noted in the 2025 report, this is broadly consistent with some other testing exercises.<sup>24</sup>

At least one no response was recorded in 42 different countries from all regions of the world, or very nearly one-half of the total of 90 countries. And all of the requests from fully 24 countries (27%) were met with mute refusals, potentially suggesting wider structural problems with responding to 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 17 of these cases an acknowledgment of receiving the request was provided, albeit a number of these appeared to have been provided automatically (i.e. immediately following the request being lodged, electronically).

On a more positive note, the second most common response was provision of the information in full, on time, with 39 such responses, representing 23% of all requests.<sup>25</sup> In another 18 cases (10%), information was provided in full but late. Thus, in 33% of cases, the information requested was eventually provided in full. In another 4 cases, information was provided in part within 30 days and in one case in part after 30 days (in both cases without explicitly denying the other information based on the application of one or more exceptions) and in one other case information was provided in part after 30 days with an explicit denial of the rest of the information. In yet another 4 cases, the response indicated that the information was available proactively. Thus, in total, some information was provided in 38% of all cases, higher than the rate of mute refusals, but a much lower percentage than in the 2025 exercise, where at least some information was provided in 54% of all cases.<sup>26</sup>

The third most common kind of response, at 33 responses (19%), was one indicating that the information was not held or that no investigations had been conducted, with the latter result

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<sup>23</sup> This conclusion is also supported by the fact that the results which were filed following final promptings from CLD to volunteers had a significantly higher rate of mute refusals than results which had been filed earlier.

<sup>24</sup> *Global Comparative Testing of Responses to Requests for Information*, note 4, p. 7.

<sup>25</sup> For the purposes of this exercise, where information was provided with only the redaction of some personal information, this was classified as provided in full.

<sup>26</sup> But note that the high rate of information not held, detailed just below, is an important contributor to this lower result.



only being relevant to the request about regulation of platforms. It should be emphasised that most of these were valid responses rather than representing poor performance by the public authority in responding to requests. Only two of these responses related to the request about children, with the rest relating to the request about regulation of platforms. In the case of the former, in one case, the response was that the information was not held in a central database and, in the other, the public authority referred the volunteer to another public authority, but in this case the request was not re-lodged.

There are a few reasons for the high number of platform regulation requests being categorised as this type of response. First, in some cases the public authority explicitly stated that they did not have jurisdiction over platforms or did not conduct investigations of this type. For example, in the case of many European Union Member States, which operate collectively under the framework of the Digital Services Act in terms of regulation of platforms, the response often specified that no national authority had jurisdiction over the platforms due to the fact that they were legally established in another European Union country. In other States, a less developed legal framework for the regulation of digital platforms may have been responsible for this kind of response (i.e. because no authority had been allocated this responsibility). Second, in other cases, the response indicated simply that there were no responsive records or that no investigations or enforcement actions had been taken. In some such cases, this was likely the result of investigations simply not having been conducted, despite the authority having the power to do so. But in other such cases, the lack of action may have been due to a lack of jurisdiction. It is also possible that some of these responses represented improper processing of the requests. Supporting this, in one case the volunteer was initially met with a claim that the public authority did not hold any responsive records, but the information was ultimately provided late following a successful appeal.

In terms of the other responses, in 5 cases (3%) wrong information was provided. In most cases, this was due to applicants being forwarded to websites (i.e. proactively disclosed information) which either did not hold the information requested or held only part of it. It seems somewhat likely that, in at least some of these cases, this was essentially an obstructive measure to try to get rid of the request without actually providing the information. In another case, specific information was provided to the applicant, but it failed to segregate out information relating to children from among the country-wide statistics (i.e. including adults).

Positively, in only 3 cases (2%) was the information actually denied in full, all for regulation of platform requests. In one case, a provision in the local privacy act was cited whereby the



privacy commissioner and his or her staff were required to keep secret all information to which they had gained access by virtue their functions under that act, while in another the office of the information commissioner was entirely excluded from the scope of the RTI law. Such provisions clearly fail to strike an appropriate balance with the right to information. In another case, several secrecy rules were cited including the risk of prejudicing an investigation, information provided in confidence and trade secrets, with the public authority deciding that it was not in the public interest to disclose the information. It is hard to assess this claim without knowing more about the information involved.

Also positively, in only one case could the request not be lodged, down from five cases in 2025. It should be noted that this type of response was limited to cases where the applicant was unable to lodge a request despite attempting to do so and having complied with domestic legal requirements. In this case, the public authority refused to process the request on the basis that the applicant had provided a business address instead of a personal one, an issue which did not present a barrier for the other request from that country and which would appear to have no basis under the relevant RTI law. However, we excluded from this response category another case where an applicant was unwilling to provide information which was required by the local RTI law, albeit contrary to international best practices.<sup>27</sup>

We also did not include here cases where volunteers were unwilling to make an appropriate effort to file the request. For example, in one case, CLD communicated with a volunteer from a country who had been unable to lodge the requests for information due to the fact that the central requesting portal's website was inaccessible, apparently due to website maintenance. We were later informed that the volunteer had not tried other means to lodge the requests, so we excluded this country from the study, rather than categorising it as impossible to lodge.

Like other response categories, we were only able to assess cases here where volunteers reported their findings to us via the online form, so it is possible that the number of impossible to lodge responses represents an undercount. Nevertheless, the low incidence of impossible to lodge cases is an encouraging result. However, another way of looking at this is that in many systems it may be easier simply to ignore requests rather than to take active steps to present barriers to their being lodged in the first place. The high rate of mute refusals lends support to this theory.

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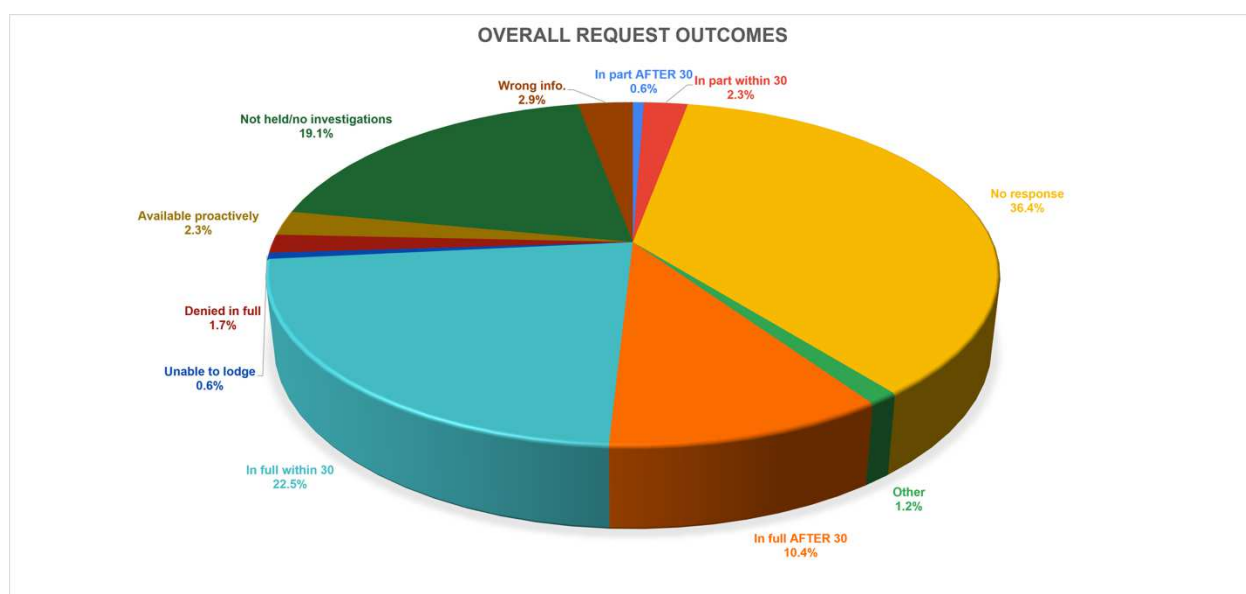
<sup>27</sup> In that case, the volunteer did then follow up by making a request which conformed to the requirements of the local law.



There were also two responses which were categorised as “other”. In one case, the public authority claimed that to provide the information required further processing, which the RTI law did not require them to do. In the other case, after the 30-day deadline, some information on regulatory actions against platforms was provided while the names of some platforms were withheld on the basis of supposed harms to their competitive positions.

Chart 1, below, is a pie chart showing the overall results for this exercise.

Chart 1: The overall combined results by response category



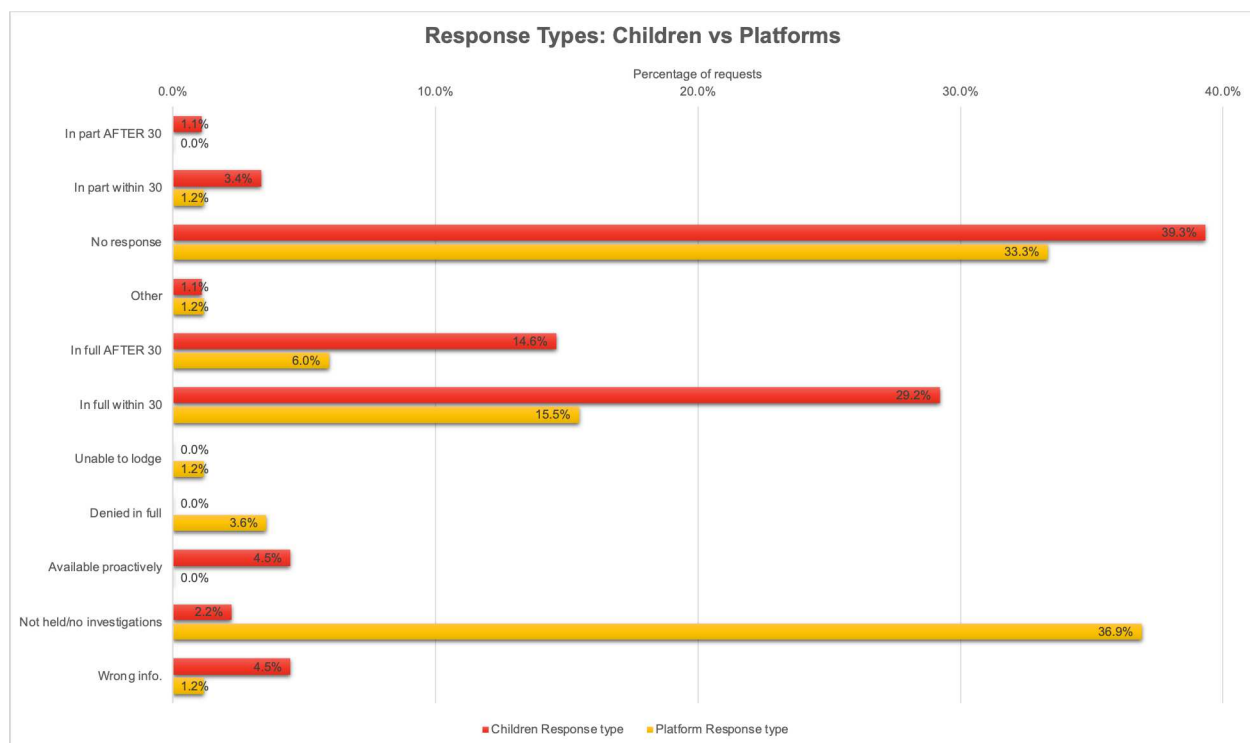
In terms of different responses by type of request, the most dramatic difference, as noted above, was in terms of information not held/no investigations, with the “no investigations” part of this response category only applying to the request relating to regulation of platforms. Nearly 37% of the regulation of platforms requests fell into this response category, compared to just 2% for the request about children. This dramatic difference clearly skewed the comparative percentages for the other response categories.

The rate of no responses was pretty comparable between the two requests, especially taking into account the point above, with 39% for children and 33% for platforms. More information was provided in relation to the children’s request across all response areas here (i.e. provided in full within or after 30 days, provided in part within or after 30 days or available proactively). Indeed, in each of those five response types, the rate for children’s requests was more than twice as high as for platforms or nearly so.

As noted above, all three full denials were in response to the regulation of platforms request. This is to some extent understandable, even though, as the analysis above makes clear, at least two of the three denials did not comply with international standards in this area. This is because the children's request was about the allocation of funds (so harder to refuse to disclose) and also designed to be rather generic in nature, asking about funds for whole programmes. In contrast, investigations necessarily involve one or more specific private businesses. On the other hand, the provision of wrong information was more than three times as common for children's requests, perhaps in part reflecting the large amount of information about children's programmes which is made available proactively in most countries, to which volunteers were sometimes referred even where this did not include the information which had actually been requested.

Chart 2 shows the results by outcome for each of the two requests, presented as a percentage.

Chart 2: Outcomes by request



## 2.2. Receipts

Volunteers were asked to provide the date a receipt acknowledging the request was provided, if that happened. Receipts were provided for 95 or 55% of all requests, similar to the 57% recorded in the 2025 exercise. In 54 of these cases, or over one-half, the date of the receipt was the same as the date the request was lodged, which presumably in most cases is due to the receipt being issued automatically, whether through an online portal or via an automated email response.

The overall average time taken to issue a receipt was 3.8 days across both requests, and a bit longer – 4.4 days – for the children question than for the platforms question – 3.1 days. Once the immediate receipts are excluded,<sup>28</sup> the average time for issuing receipts was 6.9 days and the gap between the children question and the platforms question increased to 8.2 days compared to 4.5 days.

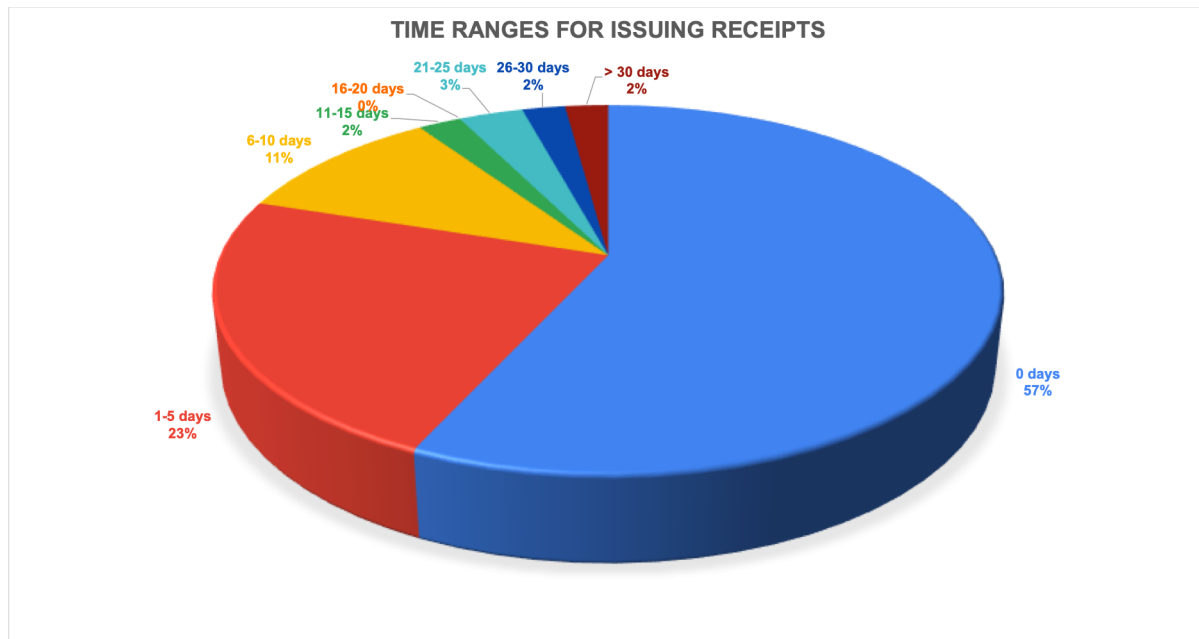
Chart 3 sets out the time it took to provide receipts, broken down into 5-day intervals. As noted, in over one half of all cases, receipts were issued the same day as the request was lodged, listed here as being zero days. The next most common interval, by far, was 1-5 days, representing 23% of cases, followed by 6-10 days, at 11%, such that, overall, receipts were provided in 5 days or fewer 80% of the time and in 10 days or fewer 91% of the time. Far fewer receipts fell into the other intervals, although in a couple of cases receipts were only provided after 30 days, which was our deadline for a substantive response to be provided.

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<sup>28</sup> Along with eight somewhat anomalous cases where receipts were reported by volunteers to have been issued on the same day as the substantive response to the request.



Chart 3: Times for Issuing Receipts by 5-day Intervals



### 2.3. Fees

Across both requests, the vast majority of volunteers reported that no fees were charged, including in those cases where information was actually provided. This year, we disaggregated results for fees for lodging requests and fees for providing information. Only five countries (3%) required volunteers to provide application fees (i.e. simply for filing the requests)<sup>29</sup> and, interestingly, in one of these countries such a fee was only charged for one of the two requests. These fees ranged from quite modest amounts to about USD 6. In only one country did a volunteer report that fees needed to be paid for providing information, in this case of approximately USD 73 for printed copies for the children request.<sup>30</sup> These findings are consistent with those of the 2025 exercise, which similarly resulted in a very low incidence of fees of any type being charged.

<sup>29</sup> Note the one case of unable to lodge was excluded here.

<sup>30</sup> Unusually, the amount charged for printed copies was significantly less than would have been levied had the requester chosen electronic copies on a CD. The fee this volunteer was charged for the platforms request was much lower and, since the application fee, which exceeded that amount, was deducted from this, no additional amount was actually due.

The low incidence of fees in this exercise is clearly a positive finding, as fees for filing or receiving information can pose significant impediments for many people to exercise the right to information. At the same time, no fee for provision of information could be charged for the relatively high percentage of mute refusals, and the same is true of for the large number of requests on platform regulation for which no information was provided.

## 2.4. Timeliness

The average response time from lodging the initial request (measured from the second authority in cases involving transfers or relodging) for all requests for which any formal response was provided (including to deny the request in whole or part or to indicate that no information was held) was 21.1 days. This is a bit lower than in the 2025 assessment, which yielded an average response rate of 22.06 days.<sup>31</sup> However, one difference in this year's assessment was that we tracked the new lodging dates where requests were transferred or re-lodged, resulting in a "resetting of the clock" in such cases, which reduced the response time slightly.

Chart 4 sets out the distribution of times for responding to requests by 10-day intervals. From among the 109 requests which fell into this category (i.e. excluding the 63 mute refusals and one unable to lodge), 86 or 79% were responded to within 30 days and only 23 or 21% were late. And the distribution among the subcategories for timely responses (i.e. 1-10 days, 11-20 days and 21-30 days) was roughly similar (ranging from 24 to 33 requests). As we had to cut off the exercise at a certain point in time, we cannot tell whether additional responses might come in even later than these periods. It is, however, of interest to note that none of the six responses which came in after 50 days were from countries ranked either as least developed countries (LDCs) or medium human development by the UN and only one of the ten responses which took 41-50 days fell into these categories, suggesting that poverty is not correlated with at least very late responses to requests for information. In most cases, late responses represented a breach of the relevant legal requirements although, in a number of cases, public authorities did formally extend the time limit for responding to requests.

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<sup>31</sup> Note 4, p. 12.



Chart 4: Response Time by 10-Day Periods

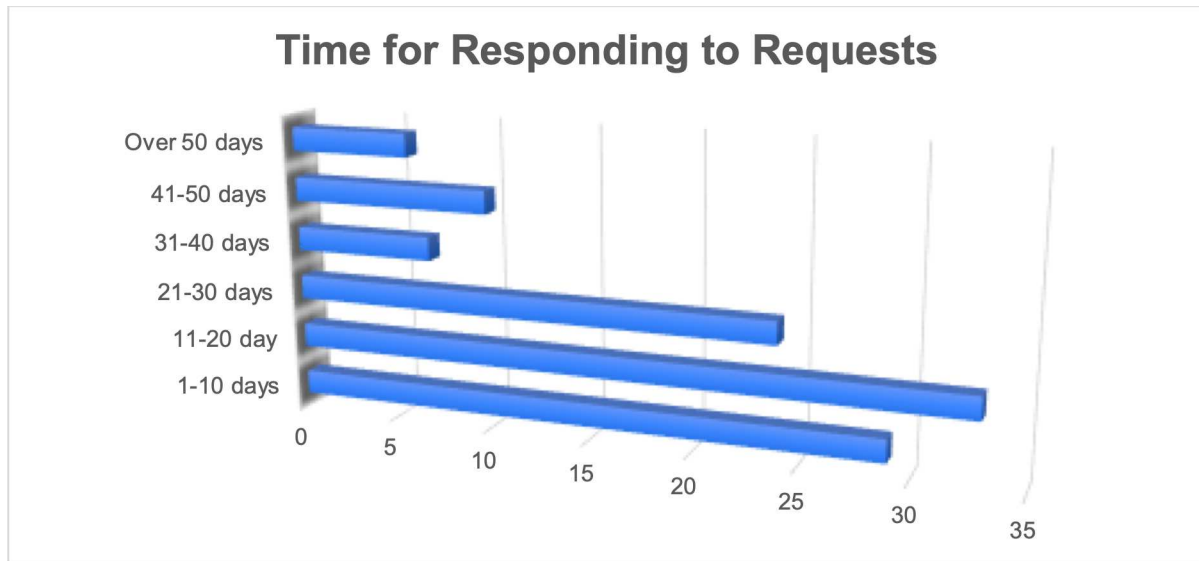
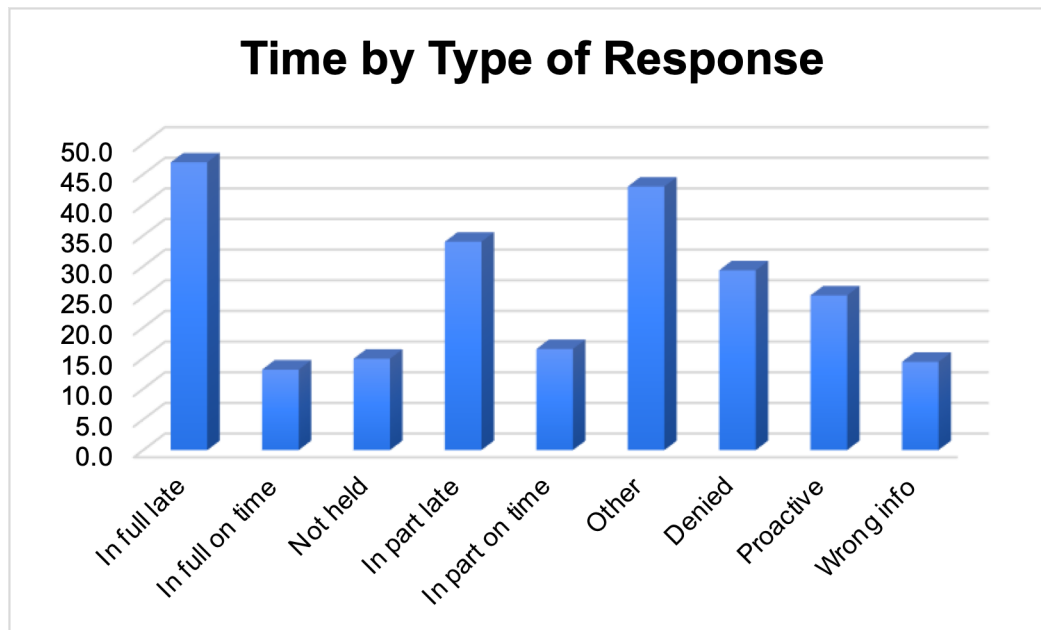


Chart 5 shows the time taken to respond by type of response. Perhaps surprisingly, the most rapid average response time was for information which was provided in full and on time, at just over 13 days. This was followed by wrong information at 14.4 days although, since this mostly involved directing applicants to websites which did not actually hold the information they were looking for, more rapid responses could be expected. This was then followed by information not held/no investigation conducted (14.9 days) and then providing part of the information on time (16.5 days). While it is of course natural that the responses of providing information late, whether in full or in part, would take more time (since by definition these come in after 30 days), the long time taken to deny information and to provide it proactively, each of around 30 days, could be considered surprising. Where information is already available proactively, simply directing an applicant to the relevant material should generally not require much time.

Chart 5: Average Time by Type of Response



Breaking timeliness down by request, the average response time for the children request was 22.8 days while, for the request on platform regulation, the average response time was 19.4 days. The shorter time for the latter is likely in part a reflection of the relatively high number of responses there where the public authority had no responsive records or had no jurisdiction over the matter, in which case indicating this would normally have been relatively straightforward.

## 2.5. Data by Region

We also analysed the results by region, using the 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 smallest region in our exercise, by far, was the Arab region, with 10 responses from 5 countries. Africa was next, at 24 responses from 13 countries, and every other region had 30 or more responses. Given these varying sample sizes, the results should not be treated as a regional ranking.

The overall outcomes by region are set out in Chart 6. When it comes to no responses, Africa had by far the highest rate, as was also the case in the 2025 assessment. Although the 2026 rate of 80% was at least a bit lower than the 84% rate observed in 2025, it is still an extremely high rate. The second highest rate here was from the Arab region, at 60%, also a very high

rate and higher than the 2025 figure (although, in that exercise, it was not even possible to lodge the other requests in that region). Asia and the Pacific, Latin America and the Caribbean, and Western Europe and North America all ranged between 30 and 33% here, still indicating substantial scope for improvement, while Central and Eastern Europe did by far the best, at just 15%.

When it came to rates of providing information, and looking at all five responses which involved some provision of information – namely in full or in part, either within or after 30 days, or proactively – all five regions, excluding Africa, performed somewhat similarly, ranging from 38% to 47%, albeit with Latin America and the Caribbean coming in top place. An encouraging change here from 2025 was that the Arab region earned a very respectable 40%, the more so since this was comprised entirely of information being provided in full, on time, meaning that it recorded the highest rate on this measure by quite a healthy margin (with Western Europe and North America coming in second at 28%). Africa again came at the bottom, with information being provided in just 16% of cases.

However, here, as we noted previously, any assessment of the results needs to take into account the rates of information not held/no investigations which, given their relatively large presence in the overall sample, do skew the results. Here, Central and Eastern Europe had the highest rate, at 32%, followed by Latin America and the Caribbean at 24%. Pooling cases of some information being provided with information not held/no investigations, on the theory that most of the latter are legitimate responses, Latin America and the Caribbean and Central and Eastern Europe came out on top, both at 71%, followed by Asia and the Pacific at 63 %, Western Europe and North America at 60%, the Arab region at 40% and Africa at 20%.

Perhaps surprisingly, the one case of unable to lodge was in Europe, which also hosted two of the three cases of full denials (the other one being in Asia and the Pacific). In terms of wrong information being provided, Central and Eastern Europe had the highest rate, at 12%, followed by Asia and the Pacific at 3% and no cases in any other region.



Chart 6: Outcomes by Region

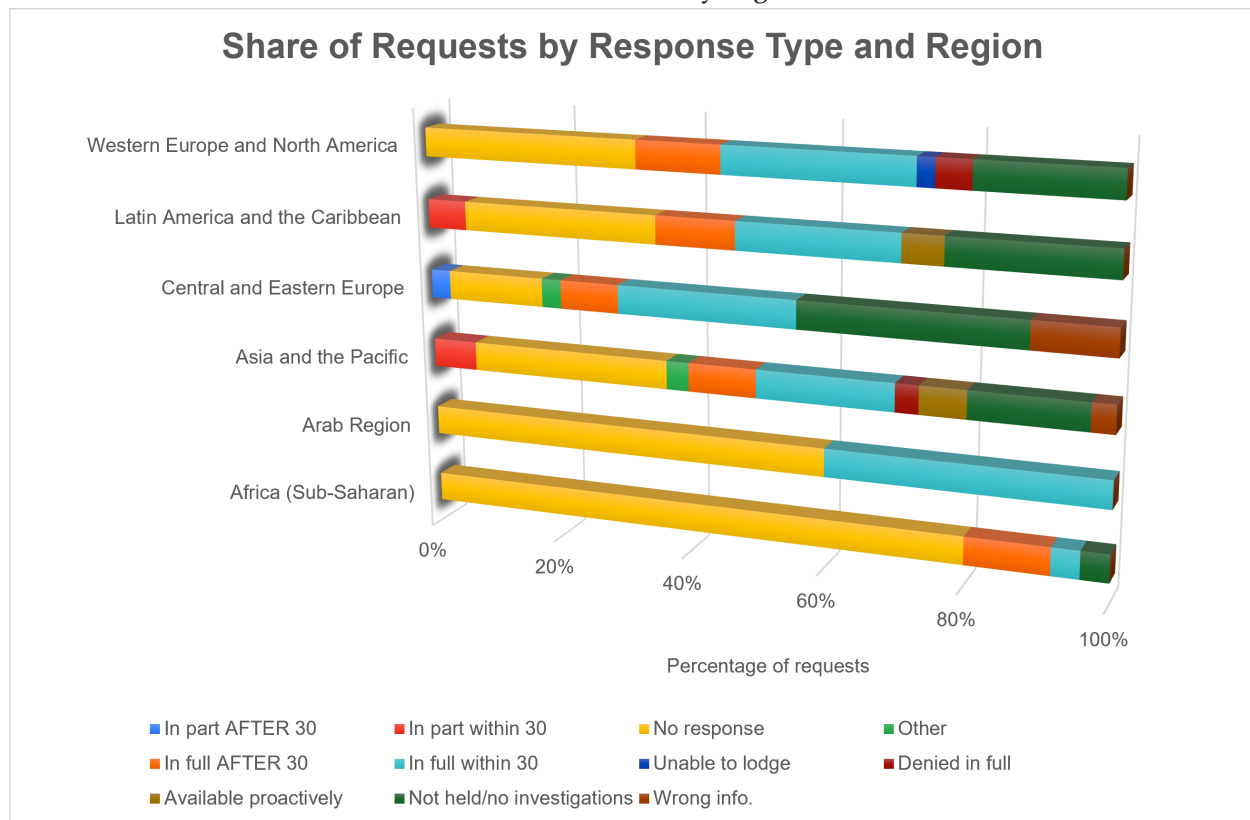
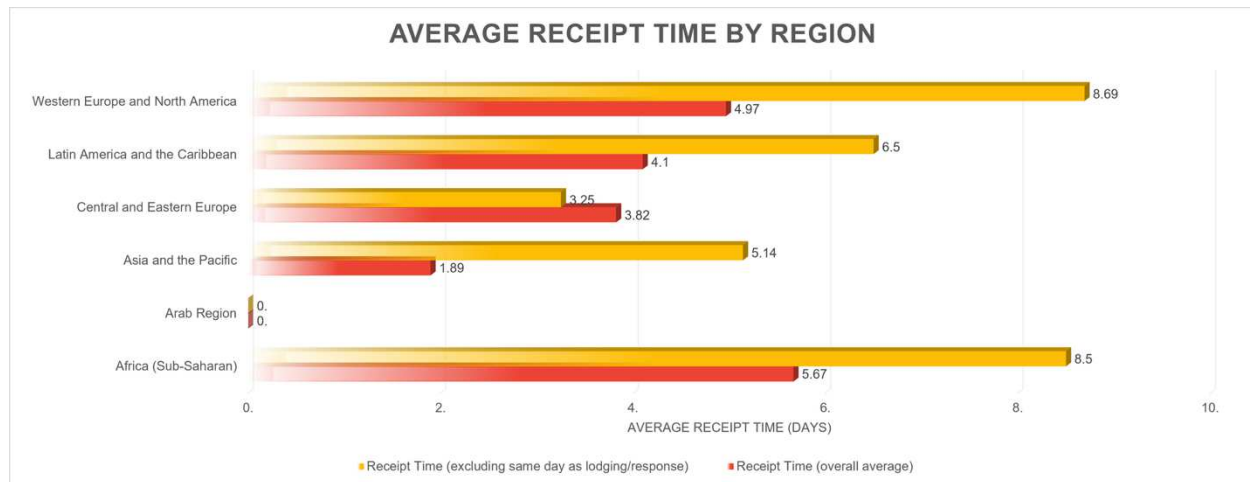


Chart 7 shows the average time to provide receipts by region, broken down into the overall average time and then the average time excluding cases where receipts were provided the same day (presumably in almost all cases immediately, via an automated system).<sup>32</sup> While of course it is positive to provide immediate receipts automatically, what is perhaps more significant is the time taken when receipts are provided manually. Here, we must exclude the Arab region because, although the chart suggests the average time was zero, in fact no receipts were provided manually in that region (compared to four receipts, from two countries, being provided automatically). Otherwise, here Central and Eastern Europe did the best, at 3.3 days, followed by Asia and the Pacific at 5.1 days, Latin America and the Caribbean at 6.5 days, Africa at 8.5 days and Western Europe and North America at 8.7 days.

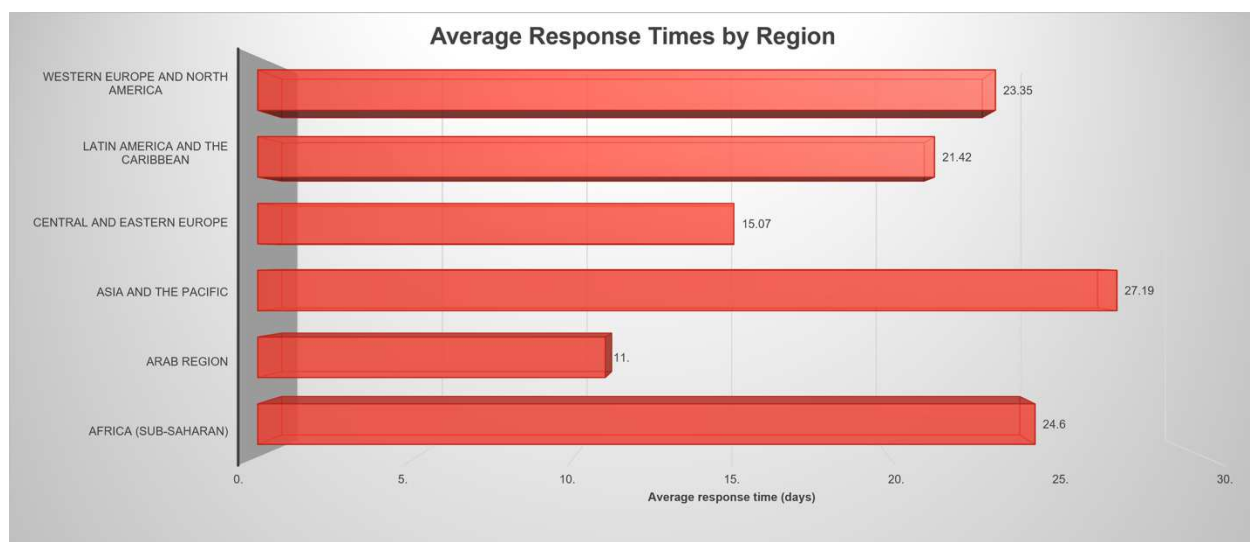
<sup>32</sup> And, again, excluding the anomalous cases where receipts were reported to have been issued the same day as the response.

Chart 7: Time Taken to Provide Receipts



Finally in terms of regions, Chart 8 shows the results in terms of timeliness of providing substantive responses to requests. Asia and the Pacific had the longest response rate, of 27.2 days, followed by Africa at 24.6 days, Western Europe and North America at 23.4 days, Latin America and the Caribbean at 21.4 days and Central and Eastern Europe at 15.1 days. The fastest average response rate was for the Arab Region, at 11.0 days, although this is based on a small sample size of just four substantive responses. In addition, the lengthy response rate for Western Europe and North America was heavily impacted by the fact that three of the six outliers sitting at over 50 days came from that region, including one at 84 days.

Chart 8: Response Times by Region



Overall, within the sample covered by this exercise, Africa recorded the highest rate of no substantive responses, the lowest rate of information being provided and one of the longest average response times, while its average time for providing receipts was the second longest. Unlike last year, when Eastern and Central Europe recorded the strongest results across several indicators, the matter is not as clear-cut this year. However, that region again recorded comparatively strong results, with by far the lowest number of mute refusals, tied for top position in terms positive responses, and coming in first or second place on the timeliness measures.

## 2.6. Results for Small Island Developing States

For the first time, this year we also evaluated separately responses for States and UNESCO Associate Members which UNESCO recognises as being small island developing States (SIDS). The adoption and implementation of RTI laws pose particular challenges for these States due to their small populations and the often limited resources which are available to their bureaucracies. Despite that, these States did rather well compared to the geographical regions. This exercise encompassed 16 responses from 8 different SIDS spread across Africa, Asia and the Pacific, Latin America and the Caribbean, and Western Europe and North America.

Chart 9 shows the types of responses provided by SIDS. The rate of no responses (31.3%) is significantly below the global average of 36%, and compares favourably to every geographic region apart from Central and Eastern Europe, although this rate is still significantly higher than it should be.

In terms of some information being provided, the SIDS came in second place after Latin America and the Caribbean, at 44% vs. 47%. However, the entirety of this figure for the SIDS is comprised of information being provided in full, albeit quite a high proportion of that (43%) was provided after 30 days (see the paragraph on response times below). When that figure is combined with the rates of information not held/no investigation, the SIDS tied for third place, at 63%, after Central and Eastern Europe and Latin America and the Caribbean, each at 71, and alongside Asia and the Pacific, also at 63%.

One of the three denials comes from a SIDS, but no case of wrong information being provided was logged in any of these countries. Overall, these are very positive results given the special challenges SIDS face in implementing RTI laws.



Chart 9: Outcomes for SIDS

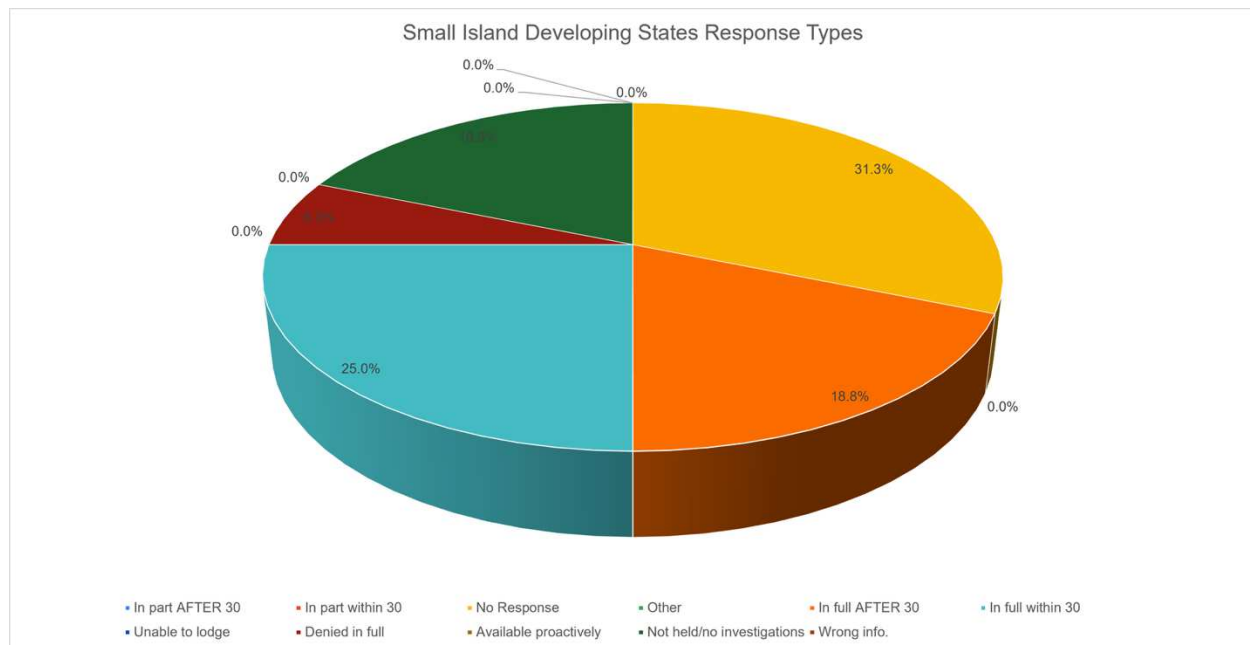
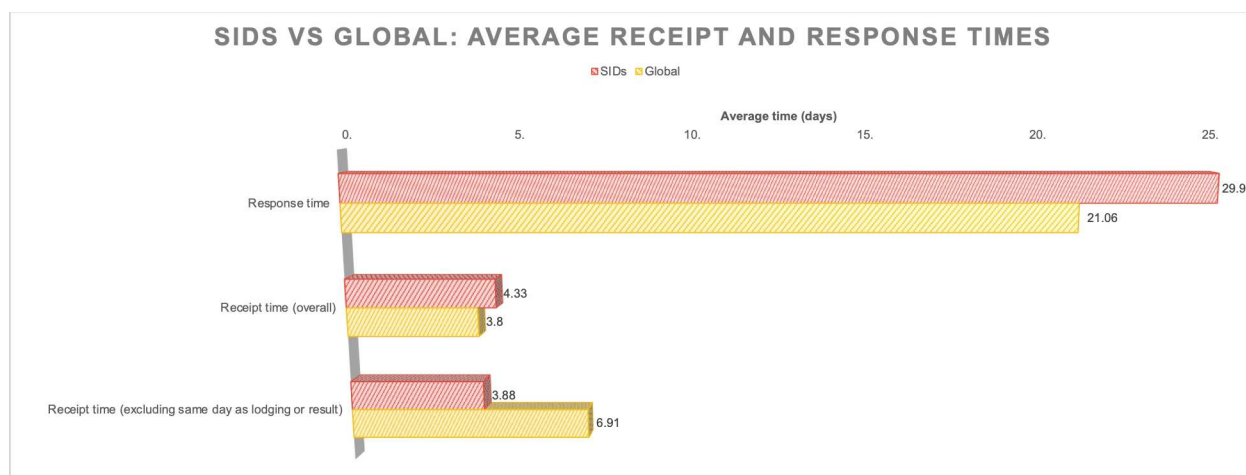


Chart 10 shows figures for the average receipt and response times of SIDS compared to the average for all countries which were surveyed in this assessment. When it comes to global average response times, SIDS do measurably worse than the global average at 29.9 days versus 21.1 days. This is also longer than any other geographic region. The point made above, about how a significant proportion of the information provided in full by SIDS, namely 43%, was provided after 30 days, is part of the reason for this longer global average response time.

While SIDS had a similar overall average receipt time (4.3 days for SIDS versus 3.8 globally), when receipts issued the same day (i.e. presumptively automatically) are excluded,<sup>33</sup> SIDS actually move ahead, showing an average response rate of 3.9 versus 6.9 days globally, which would also put them in second place compared to geographic regions.

<sup>33</sup> And, once again, excluding the anomalous cases where receipts were reported to have been issued the same day as the response.

Chart 10: Timeliness: SIDS vs. Global



## Conclusion

The second iteration of CLD's project on Comparative Testing of Responses to Requests for Information, whereby we lodged the same two requests for information in as many as possible of the countries and territories around the world which have RTI laws, has generated a number of very important insights into how well jurisdictions globally and regionally are doing in terms of responding to requests for information. While this is only part of what is delivered by an RTI law, it lies at the very centre of the role these laws play in facilitating the flow of government information to the public.

In this iteration, we were able to secure 173 responses from 90 countries, up from 146 responses from 76 countries in 2025. In key respects, this exercise generated similar broad results to the 2025 pilot exercise. The rate of mute refusals, or a complete failure to respond to requests for information, was very similar, at 36% versus 38%. The rate of provision of the information in full, whether on time or late and whether directly or via the proactive publication of information, was also similar, albeit a bit lower, at 33% as compared to 42% in 2025. This drops somewhat for provision of at least some information (i.e. after adding in partial disclosures), to 39% versus 54% in 2025. But one reason for the lower rates of provision of information in 2026 was the much higher rate of information not held/no investigations in 2026, at 19% of all responses, based on the different types of questions posed this year.

Looking at these three most common responses, the continued high rate of cases with no substantive response remains a serious implementation concern, as does the fact that such a large number of countries had at least one such response (42 or nearly one-half) and that so

many countries had only such responses (24 or 27%). This response was entered if a public authority refused to respond to a request within the initial 30 days, but it was changed if a response came in even after that period (i.e. we were flexible with timelines in this regard). In practice, many public authorities had still not provided a substantive response well after requests were initially filed. This sort of response likely points in most cases to failures in terms of putting in place the basic machinery to receive and respond to requests for information, which is a minimum condition for the successful implementation of RTI laws.

On the other hand, it is positive that information was provided, whether in part or in full, in a larger percentage of cases than mute refusals for in 2026, namely 38% and also that provision of information on time (i.e. within the 30 calendar days allocated by the project) occurred at about twice the rate of late provision of information. Furthermore, we assume that most of the information not held/no investigations responses represented proper processing of the requests, whether because the public authority in question did not have a mandate to conduct such investigations or because it had just not conducted any as a matter of fact, although it is possible that some of these responses did not reflect the actual situation (i.e. because the public authority did in fact hold some responsive information). Taking that into account, up to 58% (38% + 19%) of requests received a response which was substantively compliant for purposes of this exercise, if sometimes late.

Taken together, mute refusals, the provision of at least some information and information not held/no investigations responses accounted for the vast majority – 95% – of all responses. In five cases, wrong information was provided, while requests were denied in full in just three cases. Providing information which does not respond to the request does not fulfil the request and our analysis shows that at least two and quite possibly all three of the denials were not in line with international standards for this. But the very low incidence of these types of responses was a very positive outcome of the exercise. And, this year, there was only one case where a volunteer was unable to lodge their request. While this sort of response raises very serious concerns, the fact that it only occurred once was positive.

Comparing the two requests, the results were roughly similar with the important difference that the large majority of the information not held/no investigations responses were in relation to the request about regulation of platforms. This then had a knock-on (negative) effect on the rate of information being provided for this question. In addition, all three denials were for that request, which may be understood as a reflection of the regulatory nature of that request as compared to the service provision nature of the children request. On the other hand, most of the wrong information responses were in relation to the children request,



largely because public authorities directed applicants to websites which did not actually contain the information sought. It is not clear from the evidence whether these were simple mistakes or were intentional efforts to direct applicants to non-responsive websites.

Receipts were provided for 95 requests, or 55% of all requests, almost exactly the same rate as in 2025 (57%), meaning that the rate of no receipts being provided was high. On the other hand, over one-half of these receipts were provided on the same day (presumably via an automated system), and fully 81% were provided within 5 days, which is good practice (as compared to 86% in 2025). On the other hand, two receipts were only issued 26-30 days after the requests were lodged and another two after 30 days, which is so late as to be minimally useful for applicants.

Fees to make a request were only charged in five countries, mostly fairly modest sums, and only in one country was a fee charged for provision of the information. This is a relatively positive outcome although better practice is not to charge for either lodging a request or provision of information.

The overall average time to respond to requests was 21.1 days, and 79% of all requests were responded to within 30 calendar days, which is a fairly positive outcome, although this of course excludes the mute refusal and unable to lodge cases. And, at the same time, there were some very delayed responses, including six over 50 days. Comparing the two requests, responses were quicker for the regulation of platforms request (19.4 days) than for the children request (22.8 days), perhaps in part due to the high number of information not held/no investigation responses for the former, which would have been an easier and quicker response to provide.

When analysing the data according to the 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 – in this exercise the results for Africa demonstrated the greatest implementation challenges and room for improvement among the regions covered. The top performer was not as clear as last year, but that position does go to East and Central Europe, which had a much lower rate of mute refusals than any other region, was tied for top position on positive responses and did well across all of the timeliness metrics. The Arab Region recorded a significant improvement on several measures compared with the 2025 exercise, with 40% cases of information being provided in full, on time, albeit also with 60% mute refusals.<sup>34</sup> Perhaps surprisingly, Western

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<sup>34</sup> We also had a larger sample size from that region this year.



Europe and North America recorded mixed results across the indicators used in this exercise, coming in third place among the six regions for at least some information being provided, hosting the only unable to lodge response and two of the three denials, and having the second longest average response time (and the longest time to provide receipts, if automatic receipts are excluded).

This year, for the first time, we assessed the performance of Small Island Developing States (SIDS) separately. Despite the fact that these States, by definition, have very small bureaucracies, which are often seriously overburdened, this group of eight States did comparatively well in this exercise. At 31%, their rate of mute refusals was well below the global average (36%), while still indicating substantial scope for improvement. They were second only to Latin America and the Caribbean in terms of provision of at least some information, at 44% vs. 47%, but, positively, in all cases for SIDS the information was provided in full. They were, unfortunately, responsible for one of the denials which did not comply with international standards. And, although they did comparatively well in terms of timely provision of receipts, their overall average response time was significantly longer than the global average, at 29.9 days versus 21.1 days. Overall, this was a very strong performance by SIDS.

This year, like last year, responses to the test requests overwhelmingly fell into two main areas, mute refusals and the provision of at least some information, whether in full or in part, or on time or late. Indeed, this year, performance in each of those areas was essentially on par, at 36-38% of the total number of responses. Taken together, these results present a mixed picture. On the one hand, the very high rate of mute refusals represents a failure of RTI systems, likely mostly at the basic request processing machinery level (i.e. due to an absence of basic systems for this). On the other hand, the fact that information was provided in an equally large number of cases, with other likely mostly proper responses accounting for another 19% of all responses, shows that RTI systems continue to deliver real benefits in terms of flowing information to applicants. And this conclusion is supported by the broadly good practice achieved in terms of timely provision of receipts and timely responses. As such, the overall message of this exercise is that RTI remains a valuable source of information for those who seek it from government. And it is likely that the more people who do that, the better these systems will work.

While further research would be needed to pinpoint the exact reasons for the results obtained in this exercise, they do point to a number of possible policy and practice solutions. In many cases, basic request processing systems, including intake of requests and responding to them



in accordance with the legal requirements, including as to time limits, could be improved. In some cases, information officers may not have been designated or, if they were, they might benefit from additional training. Many public authorities would no doubt be well served by improved records management practices, to the benefit of both supply- and demand-side actors. On the other hand, the low rate of explicit denials suggests that, at least within the context of this exercise, exceptions are not being relied on unduly, which is very positive.



## Annex 1: Countries with Volunteers and with Responses

### The 90 Countries/Territories with Responses Which Were Included in this Report

|    |                        |    |             |    |                     |
|----|------------------------|----|-------------|----|---------------------|
| 1  | Albania                | 31 | Greece      | 61 | Panama              |
| 2  | Argentina              | 32 | Guatemala   | 62 | Paraguay            |
| 3  | Armenia                | 33 | Hungary     | 63 | Philippines         |
| 4  | Australia              | 34 | India       | 64 | Poland              |
| 5  | Austria                | 35 | Ireland     | 65 | Portugal            |
| 6  | Bangladesh             | 36 | Israel      | 66 | Republic of Belarus |
| 7  | Belgium                | 37 | Ivory Coast | 67 | Romania             |
| 8  | Belize                 | 38 | Jamaica     | 68 | Russia              |
| 9  | Benin                  | 39 | Japan       | 69 | Rwanda              |
| 10 | Bermuda                | 40 | Jersey      | 70 | Senegal             |
| 11 | Bolivia                | 41 | Jordan      | 71 | Seychelles          |
| 12 | Bosnia and Herzegovina | 42 | Kazakhstan  | 72 | Slovakia            |
| 13 | Brazil                 | 43 | Kenya       | 73 | Slovenia            |
| 14 | Bulgaria               | 44 | Lebanon     | 74 | South Africa        |
| 15 | Canada                 | 45 | Lithuania   | 75 | South Korea         |
| 16 | Cape Verde             | 46 | Maldives    | 76 | Spain               |
| 17 | Cayman Islands         | 47 | Malta       | 77 | Sri Lanka           |
| 18 | Chile                  | 48 | Mexico      | 78 | Sudan               |
| 19 | Colombia               | 49 | Monaco      | 79 | Switzerland         |
| 20 | Costa Rica             | 50 | Mongolia    | 80 | Thailand            |
| 21 | Czechia                | 51 | Montenegro  | 81 | Togo                |
| 22 | Denmark                | 52 | Mozambique  | 82 | Tunisia             |
| 23 | Dominican Republic     | 53 | Namibia     | 83 | Türkiye             |



|    |             |    |                 |    |                |
|----|-------------|----|-----------------|----|----------------|
| 24 | Ecuador     | 54 | Nepal           | 84 | Ukraine        |
| 25 | El Salvador | 55 | Netherlands     | 85 | United Kingdom |
| 26 | Finland     | 56 | New Zealand     | 86 | United States  |
| 27 | France      | 57 | Nicaragua       | 87 | Uruguay        |
| 28 | Gambia      | 58 | North Macedonia | 88 | Uzbekistan     |
| 29 | Germany     | 59 | Norway          | 89 | Yemen          |
| 30 | Ghana       | 60 | Pakistan        | 90 | Zimbabwe       |

### The 126 Countries/Territories Where Volunteers Signed up to Participate in this Initiative

|    |                        |    |             |     |                       |
|----|------------------------|----|-------------|-----|-----------------------|
| 1  | Albania                | 43 | Hungary     | 85  | Panama                |
| 2  | Angola                 | 44 | India       | 86  | Paraguay              |
| 3  | Antigua and Barbuda    | 45 | Indonesia   | 87  | Peru                  |
| 4  | Argentina              | 46 | Ireland     | 88  | Philippines           |
| 5  | Armenia                | 47 | Israel      | 89  | Poland                |
| 6  | Australia              | 48 | Italy       | 90  | Portugal              |
| 7  | Austria                | 49 | Ivory Coast | 91  | Qatar                 |
| 8  | Bangladesh             | 50 | Jamaica     | 92  | Republic of Belarus   |
| 9  | Belgium                | 51 | Japan       | 93  | Romania               |
| 10 | Belize                 | 52 | Jersey      | 94  | Russia                |
| 11 | Benin                  | 53 | Jordan      | 95  | Rwanda                |
| 12 | Bermuda                | 54 | Kazakhstan  | 96  | Saint Kitts and Nevis |
| 13 | Bolivia                | 55 | Kenya       | 97  | Senegal               |
| 14 | Bosnia and Herzegovina | 56 | Kuwait      | 98  | Serbia                |
| 15 | Brazil                 | 57 | Kyrgyzstan  | 99  | Seychelles            |
| 16 | Bulgaria               | 58 | Latvia      | 100 | Sierra Leone          |
| 17 | Burkina Faso           | 59 | Lebanon     | 101 | Slovakia              |



|    |                    |    |                 |     |                     |
|----|--------------------|----|-----------------|-----|---------------------|
| 18 | Canada             | 60 | Liberia         | 102 | Slovenia            |
| 19 | Cape Verde         | 61 | Liechtenstein   | 103 | South Africa        |
| 20 | Cayman Islands     | 62 | Lithuania       | 104 | South Korea         |
| 21 | Chile              | 63 | Luxembourg      | 105 | Spain               |
| 22 | Colombia           | 64 | Malawi          | 106 | Sri Lanka           |
| 23 | Cook Islands       | 65 | Maldives        | 107 | Sudan               |
| 24 | Costa Rica         | 66 | Malta           | 108 | Sweden              |
| 25 | Czech Republic     | 67 | Mexico          | 109 | Switzerland         |
| 26 | Denmark            | 68 | Moldova         | 110 | Tajikistan          |
| 27 | Dominican Republic | 69 | Monaco          | 111 | Tanzania            |
| 28 | East Timor         | 70 | Mongolia        | 112 | Thailand            |
| 29 | Ecuador            | 71 | Montenegro      | 113 | Togo                |
| 30 | El Salvador        | 72 | Morocco         | 114 | Trinidad and Tobago |
| 31 | Estonia            | 73 | Mozambique      | 115 | Tunisia             |
| 32 | Ethiopia           | 74 | Namibia         | 116 | Turkey              |
| 33 | Finland            | 75 | Nepal           | 117 | Uganda              |
| 34 | France             | 76 | Netherlands     | 118 | Ukraine             |
| 35 | Gambia             | 77 | New Zealand     | 119 | United Kingdom      |
| 36 | Georgia            | 78 | Nicaragua       | 120 | United States       |
| 37 | Germany            | 79 | Niger           | 121 | Uruguay             |
| 38 | Ghana              | 80 | Nigeria         | 122 | Uzbekistan          |
| 39 | Greece             | 81 | North Macedonia | 123 | Vanuatu             |
| 40 | Guatemala          | 82 | Norway          | 124 | Yemen               |
| 41 | Guyana             | 83 | Pakistan        | 125 | Zambia              |
| 42 | Honduras           | 84 | Palau           | 126 | Zimbabwe            |

## Annex 2: Protocol for Filing Requests and Tracking Sheet



## Protocol for the IDUAI Testing Exercise

May 2026

This is the protocol to follow for 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.

We have tried to explain everything as clearly as possible here but of course just reach out to us in case you are not sure about anything (contact information below). Better to ask than to take a wrong turn!

- **Choose the Authority**

Start by identifying one relevant body within your jurisdiction for each request which is likely to hold the information we are looking for. As this is a test, it is important that you only file each request with one public authority. It is important that you think carefully about this since choosing the wrong authority will delay the response. Note that we only want requests to be placed with the national government, even for federal jurisdictions. We have designed the questions so that at least some responsive information should be held by a national body.

The specific public authorities which will hold this information will vary from country to country. However, the first question, about support programmes for children, is likely to be held by a ministry which is responsible for health or education or social services. For the second question, the information may be held by the telecommunications regulator or the ministry which is responsible for the information.

- **Lodging Requests**

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

- **Timelines**

We are allocating 30 calendar days for responding to these test requests. For most countries, this is as long or longer than the ordinary deadline for responding. We do believe there is limited justification for claiming extended deadlines for these requests. If the authority asks for a clarification of the request, please do so quickly and keep the clock ticking. However, if the

authority does provide a response after the deadline, please do record this on the tracking sheet (see below). It is up to you to decide whether 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. If the response changes after you follow up, please file the final response as the result, including as to timelines (so this will be later than the original response).

- **Transfers/Referrals**

If you choose the public authority carefully, there should be no need for a transfer or referral of the request. However, if the request is transferred to another public authority, restart the process, including time limit, once the second authority receives the request. If you are referred to another authority, please relodge the request and restart the process and time when you do that.

- **Receiving Information**

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

- **Recording Processing Data**

We have set up a Google Form for you to transfer the request processing data, as well as any substantive information you received in response to your request, to us **at the end of the process** (note the Form can be modified if changes occur after you have filled it in). To ensure you are able to fill out the Form properly, we are asking volunteers to record the following information for each request. In case it helps, we have provided a tracking sheet to this Protocol (see below; please use a separate sheet for each request):

- 1) The requests (support for children or regulatory actions)
- 2) The date each request was lodged and how (e.g. by email, on a requesting portal, in person).
- 3) The public authority with which each request was lodged.
- 4) The date and other relevant details about any transfers of your requests to other public authorities (or referrals to other public authorities).
- 5) The date, if any, when a receipt acknowledging each request was provided.
- 6) 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.
- 7) The date, if any, on which a formal response to each request was provided.
- 8) A description of 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 (partial) or not the correct information. The following are the responses we are recording:
  - a. The request could not be lodged
  - b. Information provided in full within 30 days
  - c. Information provided in full AFTER 30 days

- d. Information provided in part within 30 days but there was no explicit denial of the rest
  - e. Information provided in part AFTER 30 days but there was no explicit denial of the rest
  - f. Information formally (explicitly) denied in full
  - g. Information formally (explicitly) denied in part (use this if the part which is not denied is provided)
  - h. No substantive response
  - i. Information available proactively
  - j. Information not held
  - k. Wrong information was provided
  - l. Other
- 9) Any fee, broken down into any fee for lodging the request and any fee for providing the information.

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 [toby@law-democracy.org](mailto:toby@law-democracy.org).

Good luck!!



### Request Tracking Sheet

1. Request 1 (support for children) ☐  
Or request 2 (regulatory actions) ☐
2. Date request was lodged: \_\_\_\_\_
3. Name of public authority where request lodged: \_\_\_\_\_
4. If the request was transferred to another public authority or you were referred to another public authority, please provide relevant details, including the date of the transfer/referral, the authority to which the request was sent (or on which you lodged the request with the new authority) 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 was provided (if any): \_\_\_\_\_
8. A description of the main details of the response (classified according to (6) above:



9. Any fee you were charged and the amount:

a. For lodging the request: \_\_\_\_\_

For receiving the information: \_\_\_\_\_

