Kurdistan Region of Iraq

Note on the Right to Access Information Law

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ku
Centre for Law and Democracy
info@law-democracy.org
+1 902 431-3688
www.law-democracy.org

Introduction

The Government of the Kurdistan Region of Iraq has recently adopted a Right to Access Information Law, 2013 (RTI Law). This Note provides an assessment of the Law, taking into account international standards and better comparative practice.

The RTI Law is a relatively progressive piece of legislation, but it could be significantly improved. Weak areas include the procedures for processing requests for information, which are too brief and overview in nature, and the regime of sanctions and protections. The Law also fails to create a dedicated oversight body for information appeals (such as an information commission), instead allocating this task to the existing Human Rights Commission in Kurdistan Region. The Law is, on the other hand, quite strong in terms of scope and in terms of promotional measures.

This Note is based on international standards regarding the right to information, as reflected in the *RTI Legislation Rating Methodology*, prepared by the Centre for Law and Democracy (CLD) and Access Info Europe (RTI Rating).[1] They also take into account better legislative practice from other democracies around the world.[2] A quick assessment of the RTI Law based on the RTI Rating has been prepared and should be read in conjunction with this Note (the relevant sections of this assessment are pasted into the text of this Note at the appropriate places). The overall score of the Law, based on the RTI Rating, is as follows:

Section	Max Points	Score
1. Right of Access	6	5
2. Scope	30	26
3. Requesting Procedures	30	12
4. Exceptions and Refusals	30	23
5. Appeals	30	18
6. Sanctions and Protections	8	2
7. Promotional Measures	16	12

[1] This document, first published in September 2010, reflects a comprehensive analysis of international standards adopted both by global human rights mechanisms, such as the UN Human Rights Committee and Special Rapporteur on Freedom of Opinion and Expression, and by regional courts and other regional mechanisms. A full rating of all national access to information laws was published in September 2013. Information about the RTI Rating is available at: http://www.law-democracy.org/live/global-rti-rating/.

[2] See, for example, Toby Mendel, *Freedom of Information: A Comparative Legal Survey, 2nd Edition* (2008, Paris, UNESCO), available in English, Arabic and several other languages at: http://portal.unesco.org/ci/en/ev.php-URL_ID=26159&URL_DO=DO_TOPIC&URL_SECTION=201.html.

Total score	**150**	**98**

This score places the RTI Law in a tie position for 28th place out of 95 countries globally, tied with Uganda.

1. Right of Access and Scope

The Iraqi Constitution does not include an explicit guarantee for the right to information, but a guarantee of the right to information is found at Article 19(11) of the 2009 Constitution of the Kurdistan Region-Iraq. Such guarantees are essential elements of a robust right to information system, especially inasmuch as they provide important support for strong, human rights based interpretation of the legislation.

Otherwise, the RTI Law does include a brief statement of its purposes or aims, in Article 2, but these mainly just reaffirm the existence of a right to access information held by public authorities or institutions. Article 2 refers to only one wider benefit of the right to information, namely that of fostering active participation in the democratic process. While this is useful, it would be preferable to refer to a wider set of benefits, including accountable government, stronger development processes and combating corruption. Importantly, the RTI Law fails to include a provision calling for its rules to be interpreted in the manner that best gives effect to both the right to information and the wider benefits this brings.

It is not clear from the RTI Law whether the right to make requests for information is limited to citizens or applies to everyone. Article 2 refers to the right in terms only of citizens, while Article 4 refers to "every natural or legal person" and Article 5 refers to "every person". Better practice is to allow anyone to make a request for information.

Articles 1(8) and (9) define information and documents, respectively, in a broad manner. Articles 4 and 5, which establish the underlying right to access information, refer to a right to access both information and documents. It is important that in practice requesters be allowed to lodge both requests for specific documents and for types of information, which can then be compiled from documents.

Articles 1(4) and (5) define, respectively, public and private institutions. These are broad definitions, but it is not clear from them that the head of the Kurdistan region and other senior officials fall within the scope of the Law. It is also not entirely clear that all statutory bodies and all bodies created by public or private institutions are also covered. Finally, while NGOs are included within the scope of the Law, it is not clear that all private bodies which undertake public functions are covered.

Recommendations:

- The law should refer to more of the wider benefits the right to information brings, and should require its provisions to be interpreted so as best to give effect to these benefits.
- It should be very clear from the text of the law that everyone, not just citizens, has the right to make requests for information.
- It should also be clear that this right applies to both documents and information.
- The law should apply to the head of the Kurdistan region and other senior officials, as well as all bodies that are created by statute or by other public or private bodies, or that undertake public functions.

Right of Access

Indicator		Max	Points	Article
1	The legal framework (including jurisprudence) recognises a fundamental right of access to information.	2	2	19(11) of Kurdistan Constitution
2	The legal framework creates a specific presumption in favour of access to all information held by public authorities, subject only to limited exceptions.	2	2	4, 5
3	The legal framework contains a specific statement of principles calling for a broad interpretation of the RTI law. The legal framework emphasises the benefits of the right to information.	2	1	2
	TOTAL	**6**	**5**	

Scope

Indicator		Max	Points	Article
4	Everyone (including non-citizens and legal entities) has the right to file requests for information.	2	1	2, 4, 5
5	The right of access applies to all material held by or on behalf of public authorities which is recorded in any format, regardless of who produced it.	4	4	1(8), (9)
6	Requesters have a right to access both information and records/documents (i.e. a right both to ask for information and to apply for specific documents).	2	2	1(9), 5
7	The right of access applies to the executive branch with no bodies or classes of information excluded. This includes executive (cabinet) and administration including all ministries, departments, local government, public schools, public health care bodies, the police, the armed forces, security services, and	8	7	1(4), (5)

	bodies owned or controlled by the above.			
8	The right of access applies to the legislature, including both administrative and other information, with no bodies excluded.	4	4	1(4)
9	The right of access applies to the judicial branch, including both administrative and other information, with no bodies excluded.	4	4	1(4)
10	The right of access applies to State-owned enterprises (commercial entities that are owned or controlled by the State).	2	2	1(5)
11	The right of access applies to other public authorities, including constitutional, statutory and oversight bodies (such as an election commission or information commission/er).	2	1	1(4), (5)
12	The right of access applies to a) private bodies that perform a public function and b) private bodies that receive significant public funding.	2	1	1(4), (5)
	TOTAL	**30**	**26**	

2. Duty to Publish

Article 6 of the RTI Law provides a brief list of categories of information that all institutions must publish, via a "yearly book". While the items included on the list are important, overall the list lacks the sort of detail that one finds in better practice RTI laws. It is, for example, limited in terms of requirements to publish information about beneficiaries of public contracts and services, and it also fails to require institutions to make available the name and contact details of the information officer ("specialised employee").

Another problem with the approach taken in the RTI Law is that it is not practical to rely on a yearbook or other physical publication to comply with proactive publication obligations. Instead, for the most part, such information should be published electronically, via websites, while certain types of information should also be published in other forms, in particular to ensure that those affected by it can access it.

Recommendations:

- **The list of the types of information subject to proactive publication should be substantially expanded, in line with better practice in other laws.**
- **Consideration should be given to providing for proactive publication to take place mainly via websites, as supplemented by more targeted dissemination of certain types of information.**

Note: The RTI Rating did not assess the duty to publish and so no excerpt from it is provided here.

3. Requesting Procedures

This is a category where the RTI Law does particularly poorly, mostly because several of the key procedural rules that are found in better practice RTI laws are missing. These include the following:

- A prohibition on requiring requesters to provide reasons for their requests (institutions should not be allowed to take reasons into account when processing requests).
- Requirements to provide assistance to requesters either where they are disabled or illiterate, or where they need help in formulating their requests.
- A clear set of rules regarding fees for the provision of information (beyond the Article 15 rule that requesters must pay for their requests), which should make it clear that it is free to lodge requests, that only the costs of reproducing and sending information may be charged, and that fee waivers will be extended to impecunious requesters.
- A provision making it clear that requesters are free to reuse information obtained via a request as they may wish.

In addition to these omissions, there are a few areas where the procedures in the RTI Law could be improved. Article 7(2) suggests that only the name and contact details of the requester and a description of the information sought may be required to be provided, but this is not as clear as it could be. It is also unfortunate that the RTI Law allows institutions to require requests to be submitted on their own templates (Article 7(2)), as it would be preferable to accept any request which included the required information (as set out in the law). It should also be clear that requests may be submitted via any reasonable communication system, including electronically (at least where the institution has the capacity to receive such requests). Requests must be registered (Article 7(4)), but it is not clear that requesters must be given receipts acknowledging this registration; such receipts can be very important if requesters want to lodge appeals, especially in the face of administrative silence (i.e. where they do not receive any response to their request).

The rules on time limits could be strengthened. It is not clear that, as a general rule, institutions are required to provide information as soon as possible. Article 8(2) provides for information to be provided directly, where it is already "ready", but this is not the same as a general requirement to provide information as soon as possible.

There is also no requirement for institutions to inform requesters when they extend the original time limit for responding to requests pursuant to Article 7(5).

Recommendations:

- Provisions addressing the gaps noted above – regarding the non-provision of reasons for requests, assistance, fees and reuse of information – should be added to the law.
- The rules on lodging requests should be improved by making it clear that any request which includes a clear description of the information sought and an address for delivery of that information should be accepted, that requests may be submitted via any form of communication, and that requesters must be given a receipt when they lodge their requests.
- The rules on time limits should be strengthened by requiring institutions to provide information as soon as possible and to inform requesters when they extend the original ten-day time limit for responding to requests.

Indicator		Max	Points	Article
13	Requesters are not required to provide reasons for their requests.	2	0	
14	Requesters are only required to provide the details necessary for identifying and delivering the information (i.e. some form of address for delivery).	2	2	7(2)
15	There are clear and relatively simple procedures for making requests. Requests may be submitted by any means of communication, with no requirement to use official forms or to state that the information is being requested under the access to information law.	2	1	7(2), (3)
16	Public officials are required provide assistance to help requesters formulate their requests, or to contact and assist requesters where requests that have been made are vague, unduly broad or otherwise need clarification.	2	0	
17	Public officials are required to provide assistance to requesters who require it because of special needs, for example because they are illiterate or disabled.	2	0	
18	Requesters are provided with a receipt or acknowledgement upon lodging a request within a reasonable timeframe, which should not exceed 5 working days	2	1	7(4)
19	Clear and appropriate procedures are in place for situations where the authority to which a request is directed does not have the requested information. This includes an obligation to inform the requester that the information is not held and to refer the requester to another institution or to transfer the request where the public authority knows where the information is held.	2	2	10

20	Public authorities are required to comply with requesters' preferences regarding how they access information, subject only to clear and limited overrides (e.g. to protect a record).	2	2	9
21	Public authorities are required to respond to requests as soon as possible.	2	1	8(2)
22	There are clear and reasonable maximum timelines (20 working days or less) for responding to requests, regardless of the manner of satisfying the request (including through publication).	2	2	7(5)
23	There are clear limits on timeline extensions (20 working days or less), including a requirement that requesters be notified and provided with the reasons for the extension.	2	1	7(5)
24	It is free to file requests.	2	0	
25	There are clear rules relating to access fees, which are set centrally, rather than being determined by individual public authorities. These include a requirement that fees be limited to the cost of reproducing and sending the information (so that inspection of documents and electronic copies are free) and a certain initial number of pages (at least 20) are provided for free.	2	0	15
26	There are fee waivers for impecunious requesters	2	0	
27	There are no limitations on or charges for reuse of information received from public bodies, except where a third party (which is not a public authority) holds a legally protected copyright over the information.	2	0	
	TOTAL	**30**	**12**	

4. Exceptions and Refusals

Article 14 is the key provision dealing with exceptions. A progressive feature of the RTI Law is that it allows for exceptions in other laws only to the extent that they do not contradict its provisions (Article 14(3)). It also provides for a general public interest override, so that information must be released even if an exception applies, where this is in the overall public interest (Article 14(1)).

However, one exception is too broad and two lack harm tests, as follows:

- Article 14(2)(2), which excludes information where both parties have agreed to secrecy, instead of conditioning secrecy on the protection of a specific interest (such as harm to relations with other States).
- Article 14(2)(1), which covers all secrets relating to defence, rather than just information the disclosure of which would harm defence.
- Article 14(2)(5), which lists categories of information generally deemed to be private – education, employment and professional secrets – rather than applying only to breaches of legitimate privacy interests.

The RTI Act lacks any requirement to consult with third parties when information provided by them is requested. Such consultations can be useful either to obtain third parties' consent if they do not object to the release of the information or to obtain their reasons for wishing to keep the information secret. In the latter case, these reasons should be taken into account by the institution, but the final test should be the list of exceptions set out in the Law.

The RTI Law does provide for an overall time limit of 20 years for exceptions protecting public interests (Article 14(4)), but it does not provide that information should be released as soon as an exception ceases to apply. An explicit rule along these lines can help make it clear that the risk of harm should be assessed at the time of a request, and that a refusal to provide information should not be based on a preset period that may have been put on the document when it was created, as part of a system of classification.

It is also not clear from the RTI Law that where only part of a document is covered by the exceptions, the rest of the document should still be disclosed. This is implied in Article 8(3), which refers to the partial or full rejection of a request, but it is not set out clearly as a positive rule in the Law.

Recommendations:

- The exception in Article 14(2)(2), which allows parties to agree on secrecy, should be replaced by an exception which protects institutions against harm to their relations with other States or inter-governmental organisations.
- A harm test should be added to the exceptions in Articles 14(2)(1) and (5), which cover, respectively, defence and personal records.
- Institutions should be required to consult with third parties whenever a request is made for information provided to them by those third parties.
- Information should be required to be released as soon as an exception ceases to apply (as opposed, for example, to when a preset period of classification expires).
- A clear rule on severability (i.e. the partial release of documents) should be added to the Law.

Indicator		Max	Points	Article
28	The standards in the RTI Law trump restrictions on information disclosure (secrecy provisions) in other legislation to the extent of any conflict.	4	4	14(3)
29	The exceptions to the right of access are consistent with international standards. Permissible exceptions are: national security; international relations; public health and safety; the prevention, investigation and prosecution of legal wrongs; privacy; legitimate commercial and other economic interests;	10	9	14(2)

	management of the economy; fair administration of justice and legal advice privilege; conservation of the environment; and legitimate policy making and other operations of public authorities. It is also permissible to refer requesters to information which is already publicly available, for example online or in published form.			
30	A harm test applies to all exceptions, so that it is only where disclosure poses a risk of actual harm to a protected interest that it may be refused.	4	2	14(2)
31	There is a mandatory public interest override so that information must be disclosed where this is in the overall public interest, even if this may harm a protected interest. There are 'hard' overrides (which apply absolutely), for example for information about human rights, corruption or crimes against humanity.	4	4	14(1)
32	Information must be released as soon as an exception ceases to apply (for example, for after a contract tender process decision has been taken). The law contains a clause stating that exceptions to protect public interests do not apply to information which is over 20 years old.	2	1	14(4)
33	Clear and appropriate procedures are in place for consulting with third parties who provided information which is the subject of a request on a confidential basis. Public authorities shall take into account any objections by third parties when considering requests for information, but third parties do not have veto power over the release of information.	2	0	
34	There is a severability clause so that where only part of a record is covered by an exception the remainder must be disclosed.	2	1	8
35	When refusing to provide access to information, public authorities must a) state the exact legal grounds and reason(s) for the refusal and b) inform the applicant of the relevant appeals procedures.	2	2	8
	TOTAL	**30**	**23**	

5. Appeals

The RTI Law contains only very brief provisions relating to appeals, which are essentially set out as part of the mandate of the Human Rights Commission in Kurdistan Region rather than as a specific regime providing for a right to make requests. For the most part, the scores given for this category in the Rating are based on assumptions about Law No. 4 of 2010, which establishes the Commission (and which we were not able to review independently).

There are two key problems with the approach taken in the RTI Law. First, experience in countries around the world demonstrates that the success of an RTI law depends in important ways on having a dedicated administrative oversight body – such as an information commission – to deal with complaints/appeals and to undertake promotional measures. Otherwise, RTI risks getting lost among the other

issues that the body has to deal with, and it is also unlikely that the body will develop the specialised expertise required to deal with information requests.

Second, the RTI Law refers to the mandate of the Commission to process complaints, but it does not actually give requesters a right to lodge complaints. While this may seem somewhat of a detail, it is actually quite important, in particular to make it clear that there is a specific right to lodge a complaint.

For purposes of this analysis, we have made a number of assumptions regarding the independence and powers of the Commission, as follows:

- That members are appointed in a manner that protects their independence.
- That the Commission reports to and has its budget approved by parliament (or in ways that protect its independence).
- That there are prohibitions on individuals with strong political connections from being appointed as commissioners.
- That the Commission has the necessary mandate and power to investigate complaints, including by reviewing classified documents and inspecting the premises of institutions.
- That appeals before the Commission are free and do not require a lawyer.

To the extent that any of these assumptions are not correct, they should be addressed.

We have also made a number of assumptions about powers and procedures that we assume do not apply in the context of the Commission, based on the sorts of rules that normally apply to these bodies. These include the following:

- That decisions of the Commission are not binding. Experience in countries around the world demonstrates very clearly that, to be effective, at least in the context of information appeals, decisions of the oversight body need to be binding since otherwise institutions will simply tend to ignore them.
- That the procedures for processing appeals before the Commission are not well developed, including as to set timelines for completing the processing of appeals.
- That the rules fail to place the burden of proof on institutions to prove that they have operated in compliance with the Law.

To the extent that any of these assumptions are not correct, then it follows that the related recommendations are also not correct.

The RTI Law fails to require institutions to put in place an internal system for processing complaints. Such systems can provide a very useful means for sorting out problems internally, before they go to an external decision maker (i.e. the Commission).

Article 3(3) refers to the power of the Commission to "take the appropriate measures" when deciding on complaints. This would presumably include the power to recommend release of the information, but it would be useful to make this explicit.

Article 3(6) refers to the power of the Commission to file a legal complaint for violations of the RTI Law. Better practice is to allow individuals to file legal complaints, in many cases against decisions of the oversight body, where they are not satisfied with them. This allows difficult issues to be considered by the courts, which is appropriate given the complexity of RTI issues, and especially applying the regime of exceptions.

The RTI Law fails to set out the grounds upon which a complaint may be lodged, such as failing to provide information, providing incomplete or wrong information, failing to process requests within the set time limits and so on. Absent a clear statement on this, it is not clear which types of complaints fall within the jurisdiction of the Commission and which do not.

Pursuant to Article 3(4), the Commission may "inform the institutions to correct the cases" which disclose violations of the Law. The precise implications of this are not clear. Ideally, oversight bodies should have the power both to make orders regarding specific cases (i.e. to provide redress to individuals) and, in appropriate cases, to order institutions to put in place structural reforms to ensure that they meet their obligations under the Law (for example, by providing appropriate training to their employees or by managing their records better).

Recommendations:

- Consideration should be given to establishing a dedicated body – for example an information commission – to process appeals regarding requests for information and to undertake promotional measures.
- The Law should make it clear that requesters have a specific right to appeal to the oversight body against failures to process requests for information in accordance with the rules set out in the Law.
- To the extent that any of the positive assumptions about the independence and powers of the Commission are not correct, they should be addressed.
- Decisions of the Commission should be binding.
- A set of clear rules should be put in place regarding the manner in which information appeals are to be processed, whether this is done by a dedicated body or by the Commission.
- In appeals, the burden should lie on institutions to show that they have acted in accordance with the law.
- Consideration should be given to requiring institutions to establish internal

appeals systems.

- The law should make it quite clear that the Commission has the power to order institutions to provide information to requesters.
- It should be clear that individuals have a right to appeal against decisions of the Commission (or directly against decisions by institutions) to the courts.
- The Law should set out clearly the grounds for lodging appeals, which should be broad and cover all failures by institutions to process requests in accordance with the Law.
- The Commission should have the power to impose structural remedies on institutions, where this is justified by persistent or structural failures to respect the provisions of the Law.

Indicator		Max	Points	Article
36	The law offers an internal appeal which is simple, free of charge and completed within clear timelines (20 working days or less).	2	0	
37	Requesters have the right to lodge an (external) appeal with an independent administrative oversight body (e.g. an information commission or ombudsman).	2	2	3(3)
38	The member(s) of the oversight body are appointed in a manner that is protected against political interference and have security of tenure so they are protected against arbitrary dismissal (procedurally/substantively) once appointed.	2	2	
39	The oversight body reports to and has its budget approved by the parliament, or other effective mechanisms are in place to protect its financial independence.	2	2	
40	There are prohibitions on individuals with strong political connections from being appointed to this body and requirements of professional expertise.	2	2	
41	The independent oversight body has the necessary mandate and power to perform its functions, including to review classified documents and inspect the premises of public bodies.	2	2	
42	The decisions of the independent oversight body are binding.	2	0	
43	In deciding an appeal, the independent oversight body has the power to order appropriate remedies for the requester, including the declassification of information.	2	2	3(3)
44	Requesters have a right to lodge a judicial appeal in addition to an appeal to an (independent) oversight body.	2	1	3(6)
45	Appeals (both internal and external) are free of charge and do not require legal assistance.	2	2	
46	The grounds for the external appeal are broad (including not only refusals to provide information but also refusals to provide information in the form requested, administrative silence and other breach of timelines, charging excessive fees, etc.).	4	2	
47	Clear procedures, including timelines, are in place for dealing with external appeals.	2	0	

48	In the appeal process, the government bears the burden of demonstrating that it did not operate in breach of the rules.	2	0	
49	The external appellate body has the power to impose appropriate structural measures on the public authority (e.g. to conduct more training or to engage in better record management)	2	1	3(4)
	TOTAL	**30**	**18**	

6. Sanctions and Protections

This is the category where the RTI Law performs weakest, scoring just two out of a possible eight points, or 25 percent. The Law does not provide for sanctions for wilful obstruction of the right to information or for addressing cases where institutions are systematically failing to disclose information. This is important to ensure that neither individuals nor institutions as a whole can get away with this sort of behaviour. The Law also fails to provide protection for individuals who release information in good faith pursuant to the Law. This is important to give officials, who are historically used to a system whereby nearly all information has been kept secret, the confidence to release information pursuant to the Law. It does, however, provide for protection for individuals who release information on wrongdoing (Article 16).

Recommendations:

- The Law should provide for sanctions in cases where officials wilfully obstruct access to information.
- Consideration should be given to allocating the Commission or another body (e.g. the courts) the power to impose sanctions on institutions which systematically fail to respect the right to information.
- Protection should be provided to those who release information in good faith pursuant to the Law.

Indicator		Max	Points	Article
50	Sanctions may be imposed on those who wilfully act to undermine the right to information, including through the unauthorised destruction of information.	2	0	
51	There is a system for redressing the problem of public authorities which systematically fail to disclose information or underperform (either through imposing sanctions on them or requiring remedial actions of them).	2	0	
52	The independent oversight body and its staff are granted legal immunity for acts undertaken in good faith in the exercise or performance of any power, duty or function under the RTI Law.	2	0	

	Others are granted similar immunity for the good faith release of information pursuant to the RTI Law.			
53	There are legal protections against imposing sanctions on those who, in good faith, release information which discloses wrongdoing (i.e. whistleblowers).	2	2	16
	TOTAL	**8**	**2**	

7. Promotional Measures

The RTI Law does relatively well in this category, scoring 12 out of a possible 16 points. Two promotional measures are, however, ignored in the Law. The first is the failure of the Law to put in place any system for improving record management. Good management of records is essential to the success of an RTI law, because if institutions cannot find information, they cannot provide it to requesters. Better practice in this area is to allocate the power and responsibility to a central body to set binding standards regarding record management. After setting standards, the body should give all institutions a certain period of time to bring themselves into conformity with those standards. Once that time has passed, the central body might then establish new (higher) standards, thereby forcing standards upwards over time. This is a realistic approach to improving record management standards in practice. Normally, it would be an internal government body that would do this, based on: a) its familiarity with record management practices inside government; and b) its ability to enforce the rules in practice.

The RTI Law also fails to place an obligation on institutions to publish lists of the documents that they hold. This is important to provide requesters with a sort of information mapping, which makes lodging requests for information much easier.

Recommendations:

- The Law should establish a system for record management along the lines noted above, with a view to levering up the quality of record management practices over time.
- The law should require public authorities to publish lists of the records they hold or, at a minimum, a list of the categories or types of records they hold.

Indicator		Max	Points	Article
54	Public authorities are required to appoint dedicated officials (information officers) or units with a responsibility for ensuring that they comply with their information disclosure obligations.	2	2	1(6), 7(1)

55	A central body, such as an information commission(er) or government department, is given overall responsibility for promoting the right to information.	2	2	3(1)
56	Public awareness-raising efforts (e.g. producing a guide for the public or introducing RTI awareness into schools) are required to be undertaken by law.	2	2	3(5)
57	A system is in place whereby minimum standards regarding the management of records are set and applied.	2	0	
58	Public authorities are required to create and update lists or registers of the documents in their possession, and to make these public.	2	0	
59	Training programmes for officials are required to be put in place.	2	2	3(2), 12
60	Public authorities are required to report annually on the actions they have taken to implement their disclosure obligations. This includes statistics on requests received and how they were dealt with.	2	2	13
61	A central body, such as an information commission(er) or government department, has an obligation to present a consolidated report to the legislature on implementation of the law.	2	2	3(7)
	TOTAL	**16**	**12**	