



CENTRE FOR LAW
AND DEMOCRACY

Comprehensive Right to
Information Assessment
Methodology

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Handbook on Assessment Tools and Issues

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Introduction

This Comprehensive Right to Information Assessment Methodology: Handbook on Assessment Tools and Issues is a guide to how to apply the Methodology, focusing on the assessment tools and key issues the Methodology employs. The Methodology revolves around four main assessment areas, namely Central Measures and then three areas under Public Authorities, specifically Institutional Measures, Proactive Disclosure and Reactive Disclosure. For each assessment area, the Methodology identifies both the issues and sub-issues which are to be assessed, the assessment tools to be used to assess those issues and finally how grades are to be generated.

This Handbook focuses on the assessment tools and the issues to be addressed under each assessment area. It begins with a review of all of the seven assessment tools used in the Methodology and then turns to each assessment area. For each assessment area, the Handbook lists the relevant issues to be assessed, followed by the assessment tools to be used to assess them.

1. Assessment Tools Used in the Methodology

Seven different assessment tools are used in this Methodology. These are described briefly below, while more detailed information is provided in Annexe I to the Methodology, titled Planning the Rollout of the Assessment Tools, and Annex II, titled The Protocol for RTI Request Testing.

i) Desk-based literature review

These should include a review of all material relevant to the implementation of RTI obligations. Some of the key categories of information to be considered for review include:

- The annual reports of the oversight body and the public authorities which are being reviewed
- Any other relevant reports issued by the oversight body and the public authorities which are being reviewed
- Reports by civil society organisations, whether local or international, about implementation, including any testing they may have done (for example by making RTI requests)

- Any relevant reports by inter-governmental organisations
- Any relevant official reports which may have been issued (i.e. by the government)
- Relevant media reports, including blogs
- Relevant records of parliamentary discussions

ii) Desk-based review of appeals

This involves a desk-based review of the decisions of the oversight body on appeals or complaints, under the Central Measures assessment area. These will hopefully be available on the oversight body's website but otherwise may be available directly from that body.

iii) Desk-based review of proactive disclosure

For the Proactive Publication assessment area, a review of what has been published by public authorities on their websites and in other ways is key. Ultimately, proactive publications means that information has been made accessible, so testing whether assessors can actually access that information is a key litmus test of success in this area.

iv) Key informant interviews

These are provided for in relation to every single assessment area in this Methodology, i.e. Central Measures and for public authorities in the three areas of Institutional Measures and Proactive and Reactive Disclosure. Who, exactly, needs to be interviewed will depend on the assessment area, but some of the key types of experts include:

- members of the oversight body
- public information officers (IOs)
- senior and other officials
- key civil society groups
- journalists who make frequent RTI requests (key media users)
- potentially other requesters and/or complainants (although it might be difficult to identify them).

v) Self-assessments

These are also provided for in relation to every single assessment area in this Methodology, reflecting their importance as a source of information. For the first (i.e. Central Measures), the oversight body will conduct the self-assessment, while for the others (i.e. Institutional Measures and Proactive and Reactive Disclosure) the self-assessment will be completed by the individual public authorities being assessed. The idea behind having self-assessments in



addition to key informant interviews is that it is helpful to have varying perspectives and officials may be able to provide the back story on certain issues.

vi) Office visits

This assessment tool is primarily designed to assess whether information is being published proactively in physical forms at the office (such as on a notice board). But it might make sense to schedule the self-assessment and any key informant interviews with staff there at the same time.

vii) RTI request testing

This is a complex and sophisticated assessment tool for which an entire protocol, set out in Annex II, and reporting format has been developed. It involves launching test RTI requests and assessing the responses to them.

1. Central Measures

1.1. Assessment Tools

The following assessment tools should be used here:

- A desk-based literature review
- Key informant interviews, such as with members of the oversight body, key civil society groups, key media users, and potentially complainants (although it might be difficult to identify them)
- Desk-based review of actual decisions on complaints/appeals. It will normally be necessary to select a random sample of the appeal decisions from among all of them because it would not be practical to review them all. For example, every 10th or 20th decision could be selected. Decisions should also be reviewed over a period of years.

The review of the decisions should look at the following issues:

- How long it took to resolve the appeals
- The percentage of appeals that were decided in favour of the complainant
- Whether decisions appear to be appropriate (i.e. correct) (although this is somewhat subjective, general comment on it is legitimate where decisions seem to diverge from legal requirements)
- Whether remedial measures were imposed and, if so, whether they were effective and followed by the public authorities



- Whether the oversight body conducted follow-up to ensure that its decisions were followed
- A self-assessment completed by the oversight body.

1.2. Key assessment issues

Two main areas are relevant here:

1. Have the necessary institutional steps been taken to ensure that the oversight body is established and functional (effective). In most cases, the responsibility for this lies with the government and/or parliament.
2. Is the oversight body is operating in an effective way (i.e. is it is discharging its responsibilities properly)?

The key issues to be assessed are the following:

Structural issues	Performance
<ul style="list-style-type: none"> • Have independent, effective governing members of the oversight body (commissioners) been appointed? • Has the body been provided with reasonably sufficient funding to enable it to carry out its tasks? • Does the body recruit its own expert staff (as opposed to staff being allocated from the civil service whose primary loyalties tend to lie with the civil service)? • Does it have a full complement of staff (i.e. compared to its organigram or official documents)? Are they on long-term employment contracts? Do they reflect the diversity of society, including in terms of gender? 	<ul style="list-style-type: none"> • Does the oversight body process appeals appropriately and in accordance with the law? • Does the oversight body take (meaning on their own initiative and not in response to complaints, i.e. <i>suo moto</i>) steps to ensure that public authorities are implementing the law properly? • Does the oversight body discharge its regulatory functions properly? This will depend on what the law requires/authorises it to do in terms of regulation. • Does the oversight body take steps to raise public awareness about the RTI Law? • Has the oversight body supported the provision of training to IOs?



<ul style="list-style-type: none"> • Does the oversight body make an effort to be geographically accessible to complainants (for example by having branches or focal people in different locations, by conducting hearings in different locations, by allowing complainants to participate via video and/or by dispensing with hearings in cases where they are not necessary)? 	<ul style="list-style-type: none"> • Does the oversight body publish an annual report on overall implementation? • Does the oversight body actively use whatever powers it has under the law to impose appropriate sanctions on individuals/entities who obstruct access? • Has the oversight body commented on draft laws that affect RTI? • Does the oversight body provide advice to public authorities which ask for it? What about members of the public? • Has the oversight body taken any other steps to improve implementation?
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For several of these issues (specifically all those highlighted in green), the Methodology identifies sub-issues to be assessed and factors to be considered. In particular:

- When assessing **whether independent, effective governing members of the oversight body (commissioners) been appointed**, the following are relevant:
 - Are these positions filled and were appointments made in accordance with the law?
 - Are members independent in practice (this is ultimately subjective but can be assessed by their backgrounds, views of third parties, comment in the literature, a review of appeal decisions and even the views of members)?
 - Have any been removed? Was this justified (i.e. was it in line with the conditions for this in the law)?
 - Do they have appropriate expertise/qualifications (as provided for in the law)?
 - How effective are the members (again this is quite subjective but can be gleaned from the views of third parties and comments in the literature)?
 - Have they been provided with training/onboarding programmes?
 - Are they diverse, including in terms of gender?



- When assessing **whether reasonably sufficient funding has been provided to the oversight body**, the following should be considered:
 - Views of members and civil society
 - Changes in funding over time (i.e. does it go up or down or remain stagnant)
 - Comparison with the level of funding for other independent bodies
 - Range of activities the body is able to undertake as compared to its mission (i.e. is its funding enough to enable it to deliver its mission)
 - How the budget is allocated and whether it is a separate line item in the overall budget (or just included as part of a broader budget for a ministry)

- When assessing **whether the oversight body processes appeals appropriately and in accordance with the law**, the following should be considered:
 - Have clear and fair procedures for processing appeals been adopted?
 - How long does it take to process appeals (on average, longest 10%)?
 - Are basic due process rights (including the right of the complainant to be heard) respected?
 - Are appropriate decisions being made (this is subjective but at least it would be appropriate to comment on decisions that seem to the reviewer to be incorrect or possibly even biased)?
 - Are appropriate remedies being awarded (again, this is subjective but it can be assessed by looking at the remedies that are allowed under the law and whether these seem to be applied in relevant cases)?
 - Does the body conduct follow-up to ensure that the remedies (its orders or recommendations) are respected (i.e. implemented)?
 - Does the oversight body have an appeals management system or some way of managing appeals and ensuring that they are processed quickly (within the time limits set out in the law) and appropriately?
 - Are the decisions on appeals posted online?
 - Is gender disaggregated data on appeals collected? If so, does it suggest any measures that the oversight body might or should be taking to address gender disparities?

In assessing **whether the oversight body has taken active (meaning on their own initiative and not in response to complaints, i.e. *suo moto*) steps to ensure that public authorities are implementing the law properly**, the following should be considered:



- Does the oversight body monitor proactive disclosure and take steps where public authorities are failing in this area?
- Does it monitor public authorities which are seriously failing to undertake the main institutional measures to implement the law (such as appointing IOs or managing their records properly) and take steps to address this?

In assessing **whether the oversight body discharges its regulatory functions properly**, the exact sub-issues will depend on the requirements/authorisations under the law. Possible sub-issues to be considered are:

- Is it setting (appropriate) records management standards (whether they are appropriate is subjective but at least some comment on this can be made based on the content of any actual standards it has adopted)?
- Has it adopted a schedule of fees that may be charged for responding to requests, and are these fees reasonable?
- Has it adopted additional proactive publication obligations for public authorities?
- Has it responded (quickly) to requests to extend the period of secrecy (i.e. beyond 20 or 30 years)?

In assessing **whether the oversight body takes steps to raise public awareness about the RTI Law**, the following should be considered:

- Has it published a guide for requesters?
- Has it sponsored public events?
- Has it publicised the right, for example through media advertisements?
- Has it undertaken other activities?

In assessing **whether the oversight body has supported the provision of training to IOs**, the following should be considered:

- Has it prepared a training manual and/or handbook for IOs?
- Has it delivered or participated in delivering training programmes?
- Has it trained trainers?
- Has it provided training on records management?



In assessing **whether the oversight body publishes an annual report on overall implementation**, the following sub-issues should be considered:

- Is the report comprehensive (including by providing overall statistics about RTI requests), accessible (for example online and at the offices of the body) and easy to understand?
- Does it include recommendations for improving the system (or just observations about how it is working)?
- Has it been formally submitted to whomever is tasked with reviewing it (i.e. normally a minister and/or parliament)?

2. Public Authorities

The assessment of RTI implementation by public authorities is divided into three assessment areas: Institutional Measures, Proactive Disclosure and Reactive Disclosure.

2.1. Institutional Measures

2.1.1. Assessment Tools

The following assessment tools should be used in this assessment area:

- Key informant interviews (for example with IOs, requesters, if they can be identified, senior officials at the authority, civil society groups)
- A self-assessment by the public authority
- A desk-based literature review

2.1.2. Key Assessment Issues

This assessment area looks at the institutional measures that have been taken by individual public authorities as part of their implementation of the RTI Law. The key issues to be assessed here are:

Structural issues	Performance
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<ul style="list-style-type: none"> • Has the authority appointed an IO? • Has the IO been provided with training? If so, how long was the training and who provided it? Was it just a one-off or has upgrade training been provided? • Have other staff been formally instructed to cooperate with the IO in discharging his or her functions, in particular in relation to the processing of RTI requests? • Does the authority have an overall implementation plan or standard operating procedure (SOP) for RTI? If so, is the plan or SOP reasonably detailed and does it seem realistic? • Has the authority developed/issued internal guidelines for receiving and responding to RTI requests? • Has the authority appointed someone to receive and process internal complaints? 	<ul style="list-style-type: none"> • Are there political pressures that make it difficult for the IO to do his or her job? Is he or she treated as a sort of “spy in the office”. Are there institutional incentives or just disincentives (most of this is quite subjective but it can be assessed in various ways, such as by asking the IO and civil society representatives)? • Is it easy to lodge RTI requests with the authority? • Does the authority prepare and publish annual reports, including statistics on RTI requests? If so, when was the last report published? How detailed is it (for example, how many types of information does it provide about RTI requests)? • Has the authority undertaken any public awareness-raising efforts? If so, what? • Has the authority put in place any systems or standards to improve its records management? Are these monitored, applied or enforced in any way?
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For several of these issues, specifically those highlighted in green, the Methodology identifies sub-issues to be assessed:

- When assessing **whether an IO has been appointed**, the sub-issues to be examined are:
 - Was the appointment done in a formal way (i.e. through a written notice)?
 - Were terms of reference or a job description provided to the person? Were these formally approved?



- Was the person allocated time to do this job (i.e. were his or her other duties reduced to make way for this function)?
 - Has appropriate equipment (such as a photocopier) been made available to the IO?
 - Does the person meet any legal conditions for being appointed to this position (for example as to the minimum civil service rank required)?
 - The report should also look at whether, across all public authorities assessed, there is diversity among IOs, including in terms of gender.
- When assessing **whether the authority has an overall implementation plan or standard operating procedure (SOP) for RTI** and the adequacy/realism of this plan, the following sub-issues are relevant:
 - Does the plan cover the main issues that need to be addressed, namely proactive and reactive disclosure, internal complaints, records management, annual reports, training and public outreach?
 - Does it set clear targets and time limits for what will be done?
 - Does it indicate clearly who is responsible for delivering the targets?
 - When assessing **whether it is easy to lodge RTI requests with the authority**, the following sub-issues are relevant:
 - Is it possible to lodge RTI requests electronically?
 - Is it easy to obtain an RTI request form from the authority (electronically and in paper form)?
 - Is it easy to find the contact details of the IO (online and at the public offices of the authority)?
 - When assessing **whether the authority has appointed someone to receive and process internal complaints**, the following sub-issues are relevant:
 - Is the process independent from the initial processing of an RTI request (i.e. are different people involved, is the substance of the complaint decision at least sometimes different from the original decision)?
 - Has the authority adopted any procedures for internal complaints?
 - As a matter of practice, are complaints dealt with in a timely fashion?
 - When assessing **whether the authority publishes annual reports** and their adequacy, the following sub-issues should be covered those reports:



- Information about RTI requests (number received; number of times assistance was provided; number which were granted, in full or in part, and refused; the average time taken and the number of times the initial time limit was extended; data on the format in which access was provided (i.e. electronically, paper copy, inspection); data about fees charged; data about exceptions relied on to refuse access; the number of RTI requests transferred to other authorities; the number of internal complaints and their outcome; the number of appeals to the oversight body)
- Better practice is not to require requesters to provide identifying information, including as to their gender; however, where such information is collected, the annual report should provide gender-disaggregated information on the issues listed above
- Overview of proactive publication efforts including website development work
- A description of any training provided to staff on RTI
- A description of the challenges faced in implementing the law and any recommendations for reform

2.2. Proactive Disclosure

2.2.1. Assessment Tools

The main assessment tool to be used here is:

- Desk-based review of what is available proactively, mainly via websites but also via other means. This should also assess: whether the website is functional and WCAG 2.1 compliant; whether it is reasonably easy to find information; whether information is available in the main local languages.

The following cannot be observed just through desk-based observation: local dissemination via other means (such as publication on local bulletin boards); efforts to create accessible versions of documents; use of social media and/or other means to publicise proactive disclosure; and/or efforts to render information more accessible online. For these issues, the following assessment tools should be used:

- A self-assessment by the public authority
- Key informant interviews, for example with IOs, IT staff, senior staff, civil society representatives



- Visits to some of the public offices of the authority to see what information, if any, is displayed or otherwise made available there

2.2.2. Special Considerations for Proactive Disclosure

Formally, the proactive publication obligations of public authorities are limited to what the RTI law requires them to do. So performance should be assessed against the list of proactive publication obligations set out in the law. The types of documents that are required to be disclosed under the law should be listed and the assessment conducted against that list.

At the same time, a few key considerations are important to keep in mind:

- Laws often have vague or general requirements for proactive disclosure, which means that it may be necessary to ‘interpret’ what the law says. In doing this, assessors should clarify exactly what information they are looking for. For example, section 4(b) of the Punjab Transparency and Right to Information Act 2013 calls on public authorities to disclose information about the “powers and functions of its officers and employees”. Assessors should clarify whether they are expecting only general descriptions of powers or more precise descriptions for each rank and type of employee.
- Although this technically goes beyond assessing implementation of the RTI law, it is recommended that in this assessment area public authorities should also be assessed against a set of better practice standards. This is because proactive disclosure is an area of rapid change and in many cases RTI laws are already behind better practice. The report should clearly differentiate between legal requirements and better practices that go beyond any legal requirements and make it clear that, in the case of the latter, the public authority is not required to meet them but that it is better practice for them to aim to publish this information. In terms of better practice, the types of information that should be covered are as follows:
 - Information about the functions of the authority and its powers
 - Information on names, positions and contact details of public officials
 - Detailed information about the strategies, plans and activities of the authority
 - The laws, regulations, policies and other rules governing the authority’s operations
 - Descriptions of services offered directly to the public, including forms required to be filled out and deadlines for receiving these services
 - Detailed financial information, such as its proposed and adopted budget, actual income and expenditure (i.e. at year-end), and audit reports

- Detailed information on public procurement processes and criteria, outcomes of tenders, copies of contracts and reports on completion of contracts
- Information about the grant of licences, permits and other formal authorisations which have been issued
- Any registers which the authority is required by law to create and/or maintain, unless these are legitimately required to be kept secret
- Information about the mechanisms and procedures for public consultation and participation
- Whether information is disclosed proactively following it being provided in response to an RTI request, where it seems likely that other people might make an RTI request for that same information
- Information about how to make an RTI request, including the contact details of the IO
- Information about the costs/fees for RTI requests, such as the cost of photocopies
- The assessment should also review whether information is kept up-to-date.
- It is not enough for public authorities just to upload information to their websites. Where information is of particular relevance to a community – such as information about a development project taking place in or affecting that community – efforts should be made to ensure that the information is made available in an accessible manner to the members of that community (such as by posting key information on local bulletin boards, disseminating it via the media, and announcing both on bulletin boards and through the media where more information may be found online). For those who are illiterate, disseminating information via radio and/or television is very important.
- Information should be made available via websites in ways that are accessible for persons with disabilities, sometimes known as WCAG 2.1 (Web Content Accessibility Guidelines) compliance. There are a number of ways that this can be done, such as by providing text alternatives for non-text content (for example where the search feature is represented by a symbol), providing captions and other alternatives for multimedia content, and presenting content in ways that either are or can be rendered easier to see or hear (for example by being magnified).
- Some information is so important that it should be ‘translated’ into simple language, so that it is understandable to someone who is not an expert in the particular area, for example in the case of budgets, which often use complicated language.



- Even where information is published online, it may not be easy to access. This may be because there are multiple websites with different parts of the information (for example, different hospitals providing information about their own services but no central point with a compilation of this information). Or it may be because it is hard to find the information from among the vast amount of information being published (needle in a haystack). The assessment should therefore include information on how easy it is to access information published online.

2.2.3. Key Assessment Issues

The key issues to be assessed in evaluating proactive disclosure are:

- Is the public authority's website WCAG 2.1 compliant?
- What efforts does the public authority make to disseminate information other than simply via its website?
- Does the public authority use social media or other means to draw the attention of the public to its proactive publications (and to provide key information directly to the public)?
- Does the public authority take advantage of its public service points (i.e. offices to which the public has direct access) both to engage directly in proactive publication and to highlight its online proactive publication efforts?
- Does the public authority make an effort to create understandable versions of at least the most important documents (such as its budget)?
- Is it reasonably easy to find specific information from among all of the information that is being published online?
- Has the public authority taken steps to reach women, rural communities, persons with disabilities or other groups which may face barriers to accessing information, such as by making information available in different languages and in ways that are accessible in practice to women and rural residents?
- Is information, where relevant, both collected and then disseminated in a gender-disaggregated format?

Note that the assessment should also review whether the information is kept up-to-date.

Best practice is to disseminate the following information proactively, even if this is not formally required by law:

- Information about the functions of the authority and its powers



- Information on names, positions and contact details of public officials
- Detailed information about the strategies, plans and activities of the authority
- The laws, regulations, policies and other rules governing the authority's operations
- Descriptions of services offered directly to the public, including forms required to be filled out and deadlines for receiving these services
- Detailed financial information, such as its proposed and adopted budget, actual income and expenditure (i.e. at year-end), and audit reports
- Detailed information on public procurement processes and criteria, outcomes of tenders, copies of contracts and reports on completion of contracts, and information about the grant of licences, permits and other formal authorisations which have been issued
- Any registers which the authority is required by law to create and/or maintain unless these are legitimately required to be kept secret
- Information about the mechanisms and procedures for public consultation and participation
- Whether information is disclosed proactively following it being provided in response to an RTI request, where it seems likely that other people might make an RTI request for that same information
- Information about how to make an RTI request, including the contact details of the IO
- Information about the costs/fees for RTI requests, such as the cost of photocopies

Where these are not legal requirements but only best practices, this should be clearly identified in the final report.

2.3. Reactive Disclosure

2.3.1. Assessment Tools

The primary assessment tool here is to test responses to RTI requests by making a number of actual RTI requests.

The following additional assessment tools should be used here:

- A desk-based literature review, including of any annual reports prepared by the public authority and of any requesting exercises which have been done by others.
- Key informant interviews, including with the IO and individuals who have made repeated RTI requests
- A self-assessment by the public authority



2.3.2. Special Considerations for the RTI Request Testing Assessment Tool

The RTI request testing assessment tool represents a more complicated methodology than the other assessment tools. As such, it is important to keep in mind the following considerations:

- Avoid lodging too many RTI requests with the same authority as this may make them suspicious that a test of some sort is going on. Where more than one RTI request is made, it might be a good idea to have different people submit them.
- Where allowed under the law, try to submit at least some RTI requests without using the form for this to see how the public authority reacts.
- The RTI requests should range in terms of how ‘challenging’ they are, with at least some being very simple and easy. Most of the RTI requests (at least 75%) should be for information which is clearly not exempt. These requests demonstrate most obviously whether or not the system is basically functional. At the same time, some RTI requests should engage the exceptions (i.e. represent borderline cases). This will give some indication of how authorities go about interpreting exceptions. At least some RTI requests should also engage public interest issues, to see if the public interest override is applied.
- Some RTI requests should relate to a larger volume of information, again to see how public authorities deal with this.
- Some RTI requests should also relate to information which requires consultation with third parties (either other public authorities or private third parties).
- Some RTI requests should be made in a way that demands that assistance be provided, for example because the information sought is not described clearly or because the requester either is or pretends to be illiterate.
- Ideally half the RTI requests should be made by individuals with names traditionally identifiable as ‘male’ and half by individuals with names traditionally identifiable as ‘female’ to assess potential gender biases.
- For at least some of the RTI requests, a specific format for provision of the information should be indicated, to assess whether public authorities respect the rules on this.
- Depending on the time available, three approaches may be employed:
 - Just lodge the RTI requests and do not do anything else
 - Lodge the RTI requests and then follow-up with the IO and/or lodge an internal complaint (as needed)
 - Lodge the RTI requests and then lodge an external appeal with the oversight body (as needed)



- To the extent possible, the assessment should evaluate whether responses to RTI requests vary depending on the gender of the requester. Best practice is for RTI systems not to require requesters to identify their gender or even their name, many systems do require names and, in these systems, this can be used as a rough means to assess whether male and female requesters are treated differently. There may also be other sources, such as where gender disaggregated data is available in annual reports.
- This is the most time consuming of all of the assessment tools. Try to reduce this burden, for example by getting interns or students to make the requests.
- The requesting exercise also takes the longest time, so it should be started first.

2.3.3. Key Assessment Issues

The key issues to be assessed for reactive disclosure are the following:

- Is it easy to submit RTI requests (electronically, in other ways)? Do you need to use the form? Is the form easily available? Do you need to prove citizenship? If so, is this easy to do?
- Is only the minimum information required by the law demanded when making an RTI request or is other (additional) information demanded?
- Can RTI requests be made in commonly used local languages or only official languages?
- Is assistance provided when needed?
- Is a receipt provided when an RTI request is lodged?
- If the public authority does not hold the information, do they transfer the RTI request to the public authority which does hold it (or at least refer the requester to that authority)? In a timely manner? Are transfers made which the law does not authorise (i.e. where the request should not be transferred because the original public authority holds the information)?
- How long does it take to process RTI requests? Are responses provided as soon as possible? Within the maximum time limits? Are any extensions legitimate in terms of the rules in the law for this? Where extensions are claimed, are responses provided within the extended period?
- Is information provided in the format stipulated by the requester? If not, are reasons for this given? Are these reasons in line with the law (i.e. in line with the conditions regarding not respecting the requester's preferred format set out in the law)?
- Are only reasonable fees charged for RTI requests (i.e. in line with what the law and any rules on this allow, including no fee for lodging the request)?



- If an RTI request is refused, is appropriate notice in line with the legal requirements provided?
- Are claims for exceptions reasonable or overbroad (this is a subjective issue but can be assessed both directly by reviewing these claims and also by looking at the percentage of the appeals which are based on refusals that the authority loses, if that information is available)?
- Are any internal guidelines adopted by the public authority followed when RTI requests are processed?
- To the extent that this can be determined, do responses to RTI requests appear to vary as a function of the gender of the requestor? Where this is the case, this should be reflected and analysed in the final report, including any statistically relevant information on this.

