Assessing the Implementation of the Right to Information Act, 2019 (Act 989): An Evaluation Report for Ghana.

Acknowledgements

TABLE OF CONTENTS

List of Tables

Lists of Figures

Executive Summary

This report presents the results of a comprehensive evaluation of the implementation of Ghana's Right to Information Act, 2019 (Act 989), conducted using the internationally recognised RTI Evaluation Methodology developed by the Centre for Law and Democracy. The assessment focused on four key areas: Central Measures, Institutional Measures, Proactive Disclosure, and Reactive Disclosure. It covered 20 public institutions across four regions which are Greater Accra, Ashanti, Upper East, and Bono, where the Right to Information Commission (RTIC) maintains regional offices. The evaluation was spearheaded by the RTIC with the exception of the parts of the assessment which assessed the Commission's performance for which a civil society group, the RTI Coalition, was responsible.

The evaluation found that while Ghana has made meaningful progress since the passage of the RTI Act, implementation remains uneven across institutions. Ghana achieved an overall average score of 0.63, placing it within the yellow grade category, which signifies mediocre performance and the need for improvements to strengthen RTI implementation.

The strongest results were observed in Central Measures, with an average score of 0.73 (Green grade), reflecting the RTIC's active role in enforcement, public awareness, and appeals handling. Institutional Measures also performed relatively well, scoring an average of 0.70, indicating that many public authorities have taken important steps such as appointing Information Officers and adopting standard operating procedures.

However, Proactive Disclosure and Reactive Disclosure scored 0.53 and 0.55 respectively, both falling within the yellow grade range, though with clear signs of underperformance in several institutions. In the case of proactive disclosure, many institutions lack up-to-date websites or fail to publish essential documents such as budgets, contracts, and directories. For

reactive disclosure, delayed or no responses to RTI requests were common, with several institutions offering mute refusals or inconsistent acknowledgement of applications.

Out of the 20 public authorities assessed:

- 10 received green grades (good performance),

- 7 received yellow grades (mediocre performance),

- 3 received red grades (poor performance).

The RTIC has demonstrated strong oversight through enforcement decisions, fines, and public outreach. Nevertheless, persistent challenges such as funding constraints, staffing gaps, and low levels of compliance in certain sectors hinder full implementation of the law.

The report concludes with specific recommendations aimed at improving compliance, strengthening institutional capacity, enhancing proactive and reactive disclosures, and increasing public awareness. More importantly, it calls on the Government of Ghana to prioritise investment in RTI systems and provide the RTIC with the resources necessary to fully carry out its mandate.

1.0 Introduction

Access to information is a fundamental human right and a cornerstone of transparent and accountable governance. The Right to Information (RTI) laws empower citizens to access government-held information, thereby enhancing public participation, reducing corruption, and promoting good governance (Singh et. al., 2025).

Sweden was the first country to enact freedom of information legislation in 1766, setting a precedent for other nations to follow (Blanton, 2010). Globally, the recognition of the right to information has evolved over the years. Today, 140 countries have adopted RTI laws, reinforcing the principle that government transparency is essential for democracy and development (https://www.rti-rating.org/country-data).

In Ghana, the journey toward the enactment of an RTI law spanned nearly two decades of advocacy and legislative processes (Gyekye, 2023). The Right to Information Act, 2019 (Act 989) was passed by Parliament on March 26, 2019, and assented to by the President on May 21, 2019. The law officially came into force in January 2020, marking a significant milestone in the country's democratic governance (Adjei, 2023). The Act provides a legal framework to operationalize Article 21 (1) (f) of Ghana's 1992 Constitution which states, "All persons shall have the right to information subject to such qualifications and laws as are necessary in a democratic society".

The implementation of the RTI Act is overseen by the Right to Information Commission, which plays a crucial role in monitoring compliance, addressing appeals, and promoting awareness about the law. As mandated by the RTI Act, 2019 (Act 989), the Commission's primary objective is to ensure that public institutions adhere to the principles of open governance by granting citizens unfettered access to public information, except in cases where disclosure is

exempt under the law. Since its inception, the Commission has undertaken various interventions to ensure effective implementation, including capacity-building for public institutions, public education campaigns, and the establishment of reporting mechanisms.

This evaluation report seeks to provide a data-driven analysis of the progress made in implementing the RTI Act in Ghana.

2.0 Methodology

This section outlines the methodology applied in evaluating the implementation of the Right to Information (RTI) Act in Ghana. The assessment follows the standard RTI Evaluation methodology, which employs seven key assessment tools to measure transparency, accountability, and compliance with RTI obligations. These tools provide a comprehensive analysis of RTI implementation across four key assessment areas.

2.1 Assessment Tools

To evaluate the implementation of the Right to Information (RTI) Act in Ghana, seven primary assessment tools were employed. These tools were selected based on their ability to capture a comprehensive understanding of both the structural and practical aspects of RTI compliance across public institutions. The aim was to gather a mix of quantitative data (e.g., compliance scores, response times) and qualitative insights (e.g., experiences of officials and requesters), ensuring a well-rounded analysis of institutional performance.

2.1.1 Desk-based Literature Review

A comprehensive desk-based literature review was undertaken to provide context and support for the assessment of RTI implementation in Ghana. This review involved the analysis of

relevant laws, policies, institutional reports, and academic literature relating to the right to information both within Ghana and globally. Key documents reviewed included the Right to Information Act, 2019 (Act 989), annual reports from the Right to Information Commission (RTIC), records of parliamentary debates on information access, and research studies on transparency and open governance in Ghana.

The literature review aimed to identify prevailing trends, challenges, and best practices in RTI implementation. It also provided critical background for understanding the broader legal and institutional environment in which public authorities operate regarding information disclosure.

2.1.2 Desk Review of Proactive Disclosure

As part of the evaluation of Right to Information (RTI) implementation in Ghana, a comprehensive desk review was undertaken to assess the proactive disclosure practices of the 20 selected public authorities. This exercise aimed to determine the extent to which institutions were complying with the RTI Act, 2019 (Act 989), particularly the requirements under Section 3(1) and other relevant provisions mandating proactive publication of information.

The assessment focused on reviewing the official websites and publicly accessible platforms of these institutions to check for the availability, accessibility, and regular updating of key categories of information. These included:

- Organisational structure and leadership profiles

- Functions, mandates, and services provided

- Subordinate departments and regional offices

- Budget statements, financial and audit reports

- Public procurement information (tenders, awarded contracts, etc.)

- Internal policies, strategies, and operational plans

- Domestic and international agreements

- Guidelines and procedures for requesting information under the RTI Act

- Categories of information held by the institution

- Names and contact details of designated RTI officers

- Annual RTI reports and performance reviews

- Public consultation processes and related reports

This component of the assessment was guided by the standards set in Section 3(2) of Act 989, which require that public institutions publish this information at least once a year, and in formats that are accessible and machine-readable.

2.1.3 Desk Review of Appeal Decisions

A desk review of appeal decisions was carried out to assess how disputes over access to information have been managed by the Right to Information Commission (RTIC) and, where applicable, by the courts. This review involved a detailed analysis of case rulings, focusing on the application of the RTI Act, 2019 (Act 989), and the interpretation of key provisions such as exemptions, timelines for responses, and the obligations of public authorities.

The assessment specifically examined trends in the types of appeals submitted, the nature of decisions made by the Commission under Section 65 of the Act, and how these decisions have contributed to the development of RTI jurisprudence in Ghana. It also considered the responsiveness of public institutions to appeal outcomes, including whether institutions complied with orders to release information or take corrective action.

2.1.4 Key Informant Interviews

Key informant interviews were conducted with carefully selected individuals who possess extensive knowledge and practical experience in the implementation of the Right to Information (RTI) Act in Ghana. These interviews were aimed at gaining qualitative insights

into the progress, challenges, and institutional dynamics affecting RTI compliance and performance.

Unlike a full institutional survey, these interviews were not carried out systematically across all 20 selected public authorities. Instead, the approach was targeted and strategic, focusing on individuals and organisations that could offer expert perspectives on RTI implementation at both national and institutional levels.

The interviews included:

- A General Manager from the Legal Department of the Right to Information Commission (RTIC), who provided Meaningful observations on the legal frameworks guiding RTI enforcement and the challenges faced in ensuring compliance across public institutions.

- Senior officials from select public institutions, whose contributions highlighted institutional practices, bottlenecks, and areas where improvements in proactive and reactive disclosure are most needed.

- A representative from the Center for Democratic Development (CDD-Ghana), a well-established civil society organisation involved in promoting good governance and transparency. This perspective was critical in understanding the role of civil society in advocating for access to information and monitoring compliance.

- A journalist from The Fourth Estate, an investigative journalism project of the Media Foundation for West Africa in Ghana known for leveraging RTI in uncovering public interest stories. This provided contributions to the experience of requesters and the practical use of the RTI law in holding public institutions accountable.

These key informant interviews complemented other assessment tools by providing rich, contextual information that cannot be captured solely through document reviews or scoring

5

matrices. The qualitative data gathered helped deepen understanding of the systemic and operational issues influencing RTI performance in Ghana.

Table 1: A summary of the groups represented in the key informant interviews is provided below

Stakeholder Group	Number of Respondents	Description/Role
Oversight Body (RTIC)	1	General Manager at the Legal Department
Public Officials	3	Senior staff from selected public institutions
Civil Society	1	CDD-Ghana representative involved in transparency advocacy
Media	1	Journalist from The Fourth Estate with RTI request experience

2.1.5 Self-Assessments

As part of the evaluation process, public authorities were required to complete self-assessment questionnaires to gauge their own level of compliance with the obligations under the Right to Information (RTI) Act. These self-assessments focused on critical areas such as institutional capacity for handling information requests, proactive disclosure practices, and responsiveness to RTI requests from the public.

The self-assessment exercise was designed to encourage institutions to critically reflect on their internal processes, identify strengths, and acknowledge areas needing improvement. Institutions were asked to provide information on the existence and functioning of RTI units, the appointment and training of Information Officers, procedures for record management, and efforts to proactively publish key categories of information as mandated by law.

In the case of the oversight body, the Right to Information Commission (RTIC), the self-assessment was independently conducted by the Commonwealth Human Rights Initiative (CHRI) - Secretariat of the RTI Coalition. This approach was adopted to ensure objectivity and credibility in assessing the Commission's own compliance with its obligations under the RTI framework.

2.1.6 Office Visits

As part of the assessment exercise, staff of the Right to Information Commission conducted monitoring visits to the 19 selected public institutions across the four regions where the Commission has a regional presence (Greater Accra, Ashanti, Bono, and Upper East). These visits were aimed at directly observing the extent to which the Right to Information (RTI) Act, 2019 (Act 989) was being implemented in practice within these institutions.

During the office visits, Commission staff primarily focused on monitoring and assessing how public institutions were fulfilling their obligations under the RTI Act. The visits involved observing the availability of information officers, checking whether official RTI structures and systems were in place, and reviewing how public records were organised and managed.

Another important aspect of the office visits was the verification of proactive disclosure practices. Commission staff checked for the availability of key public information, such as budget documents, procurement records, organisational structures, and annual reports, both on the institutions' official websites and within their physical offices. This exercise helped to determine the extent to which public authorities were complying with their obligations under the RTI Act regarding proactive disclosure.

2.1.7 RTI Requests

To assess the responsiveness of public authorities and their compliance with the Right to Information (RTI) Act, test information requests were submitted to the selected sample of the

19 institutions across different sectors and regions. The requests focused on key governance areas such as public finance, procurement, service delivery, and institutional operations where all of which are critical to promoting transparency and accountability.

The process of submitting these requests was designed as a form of mystery shopping. National Service Persons attached to the Commission were deployed to act as ordinary citizens seeking information. They submitted requests without disclosing their affiliation to the Commission. This approach allowed for an unbiased assessment of how institutions handled requests from the general public and whether they adhered to the timelines, procedures, and standards outlined in the RTI Act.

The test requests also served to monitor key aspects such as acknowledgment of receipt, clarity of communication, decision-making on granting or refusing information, fees charged (if any), and adherence to appeal procedures. Observations from this exercise provided evidence of institutional behavior towards information seekers and offered insights into the practical effectiveness of RTI systems at the ground level.

2.2 Scoring and Grading

The evaluation employed a structured grading system to assess the performance of public authorities across the four key assessment areas: Central Measures, Institutional Measures, Proactive Disclosure, and Reactive Disclosure. Each area was evaluated using a scoring system based on predefined criteria, which considered:

- Compliance with provisions of the Right to Information (RTI) Act
- Institutional capacity to manage information access systems
- Responsiveness to information requests from the public
- Effectiveness and consistency in proactive disclosure of information

Scores were assigned to each institution on a scale from 0 to 1, reflecting their performance across the respective indicators. These raw scores were then converted into a color-coded grading system as follows:

Figure 1: Scoring Systems

Red	Yellow	Green
0-0.33	0.34-0.66	0.67-1.0

The colour scores denote the following:

Colour Score	Description
Red Score	Performance in the relevant area is significantly below what the law requires or better practice as manifested in other countries, suggesting a need for major improvements to be introduced in terms of practice – *considered as weak.*
Yellow Score	Performance in the relevant area is adequate in terms of what the law requires or better practice in other countries, but there remain important areas for improvement to be introduced to meet fully what is required – *considered as average.*
Green Score	Performance in the relevant area is strong, and the requirements of the law and better practice standards are largely being met. At the same time, depending on where exactly on the green spectrum performance lies, there is still room for further improvement to reach truly best practice in the area – *considered as effective.*

2.3 Selection of Public Authorities

A nationwide strike called by the leadership of the Civil and Local Government Staff Association of Ghana (CLOGSAG) (https://citinewsroom.com/2025/03/stay-home-do-not-work-clogsag-renews-strike-over-registrar-appointment/) affected the timelines and participation of institutions in the assessment exercise. The Commission therefore revised the concept to focus on public authorities within the regions where the Commission had regional offices and ensured that the proposed number of public authorities in the earlier concept was maintained.

The selection of public authorities for this assessment was guided by a combination of practical and strategic considerations. Drawing on the 2023 Annual Report of the Right to Information Commission, institutions were selected based on their reporting status, the nature of their RTI activity, and their responsiveness to information requests. Specifically, the selection included:

- Institutions that submitted their 2023 annual RTI reports

- Institutions that did not submit their RTI reports

- Institutions that reported receiving no applications for information

- Institutions that did receive and processed applications for information

This approach allowed for a balanced and representative sample, encompassing both high- and low-performing institutions in terms of RTI implementation.

In addition to these performance indicators, further selection criteria included the mandates of institutions, their roles in public service delivery, and their levels of interaction with citizens. The goal was to ensure diversity across institutional types and geographical locations.

The final sample comprised 20 public authorities from four regions of Ghana, which are Greater Accra, Upper East, Ashanti, and Bono. The regional focus was influenced by the operational presence of the RTIC, making it feasible to conduct assessments and engage stakeholders locally. These institutions represented a mix of ministries, metropolitan assemblies, regulatory agencies, educational institutions, and specialised public bodies.

Table 2: The final list of 20 public authorities assessed, is provided in the table below

Region	Institution
Greater Accra	1. Ministry of Youth and Sports
	2. Accra Metropolitan Assembly
	3. Office of the President
	4. National Health Insurance Authority
	5. Ghana Education Service
	6. Right to Information Commission (RTIC)
Upper East	7. Social Security and National Insurance Trust (SSNIT)
	8. Ghana National Fire Service
	9. Bolgatanga Nursing Training College
	10. Bolgatanga East District Assembly
	11. Upper East Regional Coordinating Council
Ashanti	12. Kumasi Metropolitan Assembly
	13. Ghana Free Zones Authority
	14. Ghana Shippers Authority
	15. Middle Belt Development Authority
	16. Tree Crops Development Authority
Bono	17. Births and Deaths Registry

	18. National Service Secretariat
	19. Technical and Vocational Education and Training (TVET)
	20. Land Use and Spatial Planning Authority

2.4 Assessment Areas

In line with the RTI Evaluation methodology, four distinct areas were assessed to measure the level of implementation of the RTI Act in Ghana.

The first area, Central Measures, focuses on the performance of the oversight body—the Right to Information Commission (RTIC). To maintain the integrity and impartiality of the assessment process, a safeguard was introduced to address a potential conflict of interest, since the RTIC could not objectively assess its own performance.

To avoid this, and in line with best practices in transparency evaluations, the responsibility for preparing and scoring the Central Measures was delegated to the RTI Coalition, an independent civil society platform with expertise in access to information. This ensured an objective and credible review of the RTIC's mandate in areas such as enforcement, appeals, public awareness, and capacity building.

This division of roles demonstrates the commitment of all stakeholders to accountability, independence, and transparency throughout the assessment process.

The assessment tools used for Central Measures included office visits, a desk review of appeal decisions, and a self-assessment questionnaire specifically completed for the Commission by the Commonwealth Human Rights Initiative (CHRI) – Secretariat of the RTI Coalition. Also a

structured key informant interview was conducted for Central Measures by Commonwealth Human Rights Initiative.

The remaining three assessment areas (Institutional Measures, Proactive Disclosure and Reactive Disclosure) assessed the performance of selected public authorities, and the assessment of these areas was undertaken by staff of RTIC with the exception of the assessment of RTIC itself. However, the assessment of the RTIC itself under these areas was conducted by the RTI Coalition to ensure an independent perspective. Institutional Measures focused on the internal systems and mechanisms established by public authorities to promote the proper implementation of the RTI Act. The key assessment tools used for Institutional Measures were office visits by Commission staff and the self-assessment questionnaires completed by the institutions themselves. These tools helped to gauge institutional capacity, record-keeping systems, and readiness to respond to information requests.

Proactive Disclosure, assessed how well public authorities are fulfilling their obligation to voluntarily publish key categories of information without waiting for specific requests. The main assessment tool for this area was a desk review of the public authorities' websites to check for the publication of information as required under Section 18 of the RTI Act, 2019 (Act 989). This was supplemented by the findings from office visits and insights from the self-assessment responses.

Finally, Reactive Disclosure measured the performance of public authorities in responding to actual information requests. To assess this area, mystery shopping (test RTI requests) was conducted by National Service personnel across the selected institutions. This allowed the evaluation team to measure responsiveness, procedural compliance, and the quality of engagement with requesters. The reactive disclosure assessment was further supported by self-assessments and office monitoring activities.

Whereas Institutional Measures and Proactive Disclosure assessed the performance of 20 selected public authorities in these assessment areas, for Reactive Disclosure, 19 of these public authorities' performance were assessed with the RTIC being omitted from assessment here. The reason for this omission is that the Reactive Disclosure Assessment area depends in large measure on the test request assessment tool, and the awareness by the RTIC of the assessment complicated the ability to engage in a blind test request exercise for this public authority.

3.0 Literature review

This section provides an overview of the findings of the literature review and describes the legal framework for RTI in Ghana, as well as previous studies of the state of RTI implementation.

3.1 Legal and Policy Framework

The Right to Information Act, 2019 (Act 989) serves as the primary legal instrument governing access to public information in Ghana. The Act was enacted to operationalise Article 21(1) (f) of the 1992 Constitution, which guarantees every citizen the right to access official information, subject to necessary restrictions. Act 989 aims to enhance transparency, accountability, and citizen participation in governance by compelling public institutions to disclose information and respond to requests in a timely manner.

Prior to the passage of the RTI Act, 2019 (Act 989), access to government-held information was largely discretionary, with no legal obligation on public institutions to disclose information. The enactment of the RTI law operationalised the constitutional provision by establishing a clear legal framework for requesting and obtaining information from public institutions.

14

Ghana's right to information legal framework is reinforced by international legal obligations and regional commitments. Ghana is a signatory to several international conventions and treaties that emphasise the right to information as a key pillar of good governance, including:

- The African Charter on Human and Peoples' Rights (ACHPR): Article 9 of the ACHPR recognises the right to receive and disseminate information, reinforcing the importance of freedom of information as a human right.

- The Universal Declaration of Human Rights (UDHR): Article 19 of the UDHR affirms the right to freedom of expression, which includes the right to seek, receive, and impart information.

- The United Nations Convention Against Corruption (UNCAC): This convention promotes transparency in governance by obligating state parties to adopt measures that enhance public access to information.

- The African Union Convention on Preventing and Combating Corruption: This treaty emphasises the role of access to information in curbing corruption and promoting integrity in governance.

Furthermore, Ghana has participated in regional and international initiatives that promote open governance and information accessibility. For example, the country is a member of the Open Government Partnership (OGP), a global initiative that encourages participatory governance and proactive disclosure of public information (Nuhu, 2022).

3.1.1 Proactive Disclosure

The Right to Information Act, 2019 (Act 989) mandates public institutions to proactively disclose essential governance documents, ensuring transparency and reducing bureaucratic barriers to accessing information. This requirement is outlined in Section 2, which states:

"The Government shall make available to the public, general information on governance without an application from a specific person."

In addition, Section 3(1) expands this obligation by requiring each public institution to compile and publish an up-to-date manual of information annually:

A public institution shall, within twelve months from the date of the coming into force of this Act, and every twelve months after that date, compile and publish an up-to-date information in the form of a manual.

This provision ensures that critical information is readily accessible without the need for formal requests, thereby enhancing citizen engagement and accountability.

To standardise proactive disclosure, Section 3(2) specifies the minimum requirements for the manual that public institutions must publish. These include:

- Organisational Structure and Responsibilities: Institutions must provide a description of their departments, divisions, or agencies, outlining their roles and responsibilities (Section 3(2) (a)).

- Classification of Information Held: A comprehensive list of documents prepared or controlled by the institution must be made available (Section 3(2) (b)). This ensures transparency regarding the types of records accessible to the public.

- Access to Information Categories: The manual should specify the types of information that can be accessed freely and those that require a fee, as regulated by Section 75 of the Act (Section 3(2) (c)).

- Contact Details of Information Officers: Each institution must provide the name, address, and contact information of its designated Information Officer, who is responsible for handling RTI requests (Section 3(2) (d)).

- Public Contact Channels: Institutions must list their official telephone numbers, fax, email, and postal addresses, ensuring multiple avenues for requesting information (Section 3(2) (e)).

- Amendments to Personal Records: Citizens should be informed about the procedures for requesting corrections or amendments to their personal records held by public institutions (Section 3(2) (f)).

3.1.2 Reactive Disclosure under Ghana's RTI Act, 2019 (Act 989)

The Act grants citizens the right to formally request information from public institutions, ensuring transparency and accountability in governance.

Section 18(1) explicitly guarantees the right to access information, stating:

"A person has the right to information, subject to the provisions of this Act."

Furthermore, Section 23(1) mandates public institutions to respond within 14 days, with a possible 14-day extension under exceptional circumstances. This provision is designed to facilitate timely access to public information while allowing institutions flexibility in cases of logistical constraints.

Despite these legal safeguards, implementation challenges persist. A review of RTI Commission reports (2021, 2022) indicates that many public institutions fail to comply with the response deadlines, often exceeding the 14-day timeframe. Also, some institutions provide vague, incomplete, or overly redacted information, making it difficult for requesters to obtain meaningful data (Agyemang-Badu, 2023). Adu-Gyamfi et al. (2025) also notes that delays and limited disclosure discourage public engagement with the RTI system.

Institutional capacity gaps further hinder effective reactive disclosure. Many public bodies lack trained RTI officers and efficient record management systems, leading to difficulties in

retrieving and disseminating requested information. Also, the broad interpretation of exemptions related to national security, public interest, and personal privacy has been identified as a major barrier to access (RTIC Annual Report, 2022).

To address these challenges, the RTI Commission has issued compliance directives, organised capacity-building workshops, and adjudicated appeals against wrongful denials. However, enforcement remains weak due to limited resources and institutional resistance (RTIC Annual Report, 2023).

In conclusion, while the RTI Act provides a solid legal foundation for reactive disclosure, its effectiveness is undermined by delays, capacity constraints, and misuse of exemptions. Strengthening enforcement mechanisms, digitalising record management, and increasing public awareness are essential to improving access to information in Ghana.

3.1.3 Appeal Decisions

The 2023 Annual Report of the Right to Information Commission provides a helpful picture of how the appeals system is working and how citizens are making use of their right to challenge decisions when they are denied access to public information. Over the three-year period from 2021 to 2023, there has been a steady increase in the number of Applications for Review submitted to the Commission. In 2021, the Commission received twenty-four applications. This jumped to eighty-five in 2022, and then slightly decreased to sixty-five in 2023. Although there was a decline in 2023, the figures suggest a general rise in public awareness and growing confidence in the Commission's ability to address such matters.

In terms of resolution, there has also been progress. In 2023, thirty-eight cases were settled, compared to thirty-one in 2022 and just eight in 2021. This improvement shows that the Commission is making more effort to address complaints and resolve them in a timely manner.

The number of formal determinations, where the Commission made official rulings after reviewing the facts, was twenty-four in 2023. While this is slightly lower than the twenty-seven decisions made in 2022, it remains a significant increase from the six recorded in 2021.

Another observation is that there were no discontinued cases in 2023. This is a positive sign and may reflect better support for complainants during the review process, ensuring they follow through with their cases. Only two matters were referred to other relevant institutions, suggesting that most cases are now being handled directly by the Commission.

However, one area that needs attention is the number of unresolved or pending applications. By the end of 2023, twenty-eight applications were still awaiting action. This shows a slight increase from the twenty-seven pending cases in 2022. While the numbers are not overwhelming, it points to a growing workload and the need for stronger systems to manage the volume of appeals efficiently.

Figure 2: Summary of Application for Review
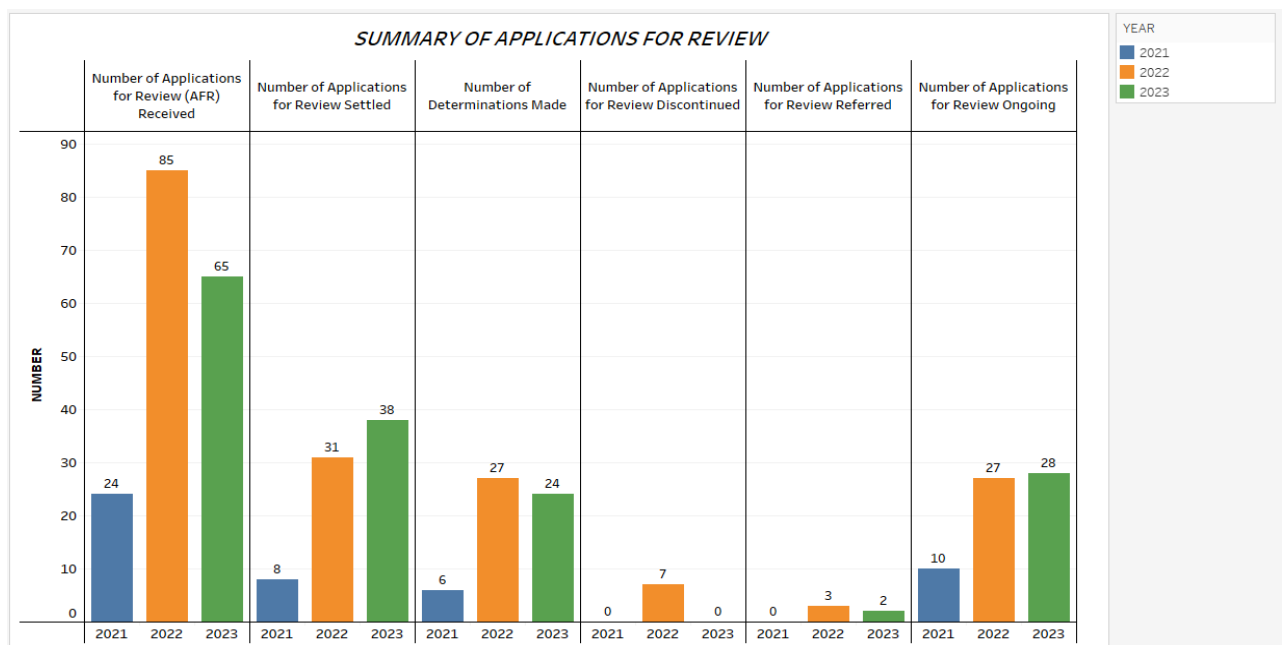
Source: RTIC Annual Report 2023

Throughout the year, the RTIC received numerous applications for review from individuals and organisations seeking access to information, with the Commission reporting various

enforcement actions, including imposing significant fines on public institutions that failed to comply with the Act:

- Lands Commission: Fined GH¢100,000 for refusing to release information on state lands returned to private individuals, following a request by the pressure group OccupyGhana.

- Keta Municipal Assembly: Fined GH¢60,000 for denying an assembly member access to information regarding contracts and committee decisions.

- Ghana Police Service: Fined GH¢50,000 for failing to provide a journalist with budgetary allocation information spanning 2013 to 2020.

In total, the RTIC reported fining 23 public institutions a cumulative amount of GH¢1 million for various violations of the RTI law.

4.0 Findings of the Implementation Assessment

This section details the key findings of each of the four assessment areas: Central Measures, Institutional Measures, Proactive Disclosure and Reactive Disclosure.

4.1 Central Measures

The key oversight body for the right to information under Ghana's RTI Act, 2019 (Act 989) is the Right to Information Commission (RTIC). Members of the Commission were appointed in 2020, and so had been in place for about four years at the time this assessment was conducted. The main results from the central assessment here, conducted using key informant interviews, self-assessments, desk reviews, and RTI request monitoring, are provided in Table 3 below.

Table 3: Results from Central Measures

		Oversight Body(Right to Information Commission)
Objective Evaluation (Yes = 1; No = 0)		
1	Has funding been allocated?	1
2	Does the body recruit its own staff?	1
3	Are the body's appeals decisions available online?	1
4	Has the body produced and published an annual report for the last two years?	1
5	Has the body published a guide for requesters?	1
	Average (Objective Evaluation)	1.00
Qualitative Evaluation (Strongly = 1; Partially = .5; Weakly = 0)		
6	Have the members been appointed?	1
7	Are the members of the body independent and effective?	1
8	Is the funding provided to the body reasonably sufficient for it to discharge its functions?	0
9	Does the body decide appeals in a timely fashion?	0.5
10	Are the due process rights of parties respected during appeals?	1
11	Has the body made reasonable efforts to raise public awareness?	1
12	Have effective measures been taken to provide training to officials?	0.5
13	Has the body made a reasonable effort to comment on draft laws which affect the right to information?	0.5
	Average Qualitative Evaluation)	0.69
	Average	0.73
	Overall Grade	

The final grade for Central Measures was tabulated by averaging the results for the 13 questions and converting this score to a colour grade. As Table 3 shows, the overall grade of the RTIC is Green, indicating good performance (green is allocated for scores ranging from 0.67 to 1.00).

Table 3 indicates that members have been appointed and are generally considered independent and effective (questions 6 and 7). This largely aligns with the responses from the key informant interviews. However, several informants, particularly from civil society and media, raised concerns about the perception of limited independence because members are appointed by the President. Although the Commission operates with professionalism, the appointment

21

mechanism was seen as a potential source of political influence, particularly when politically sensitive requests are involved.

According to Table 3, funding has been allocated to the RTIC, but this is not sufficient for it to fully discharge its functions (questions 1 and 8). This again aligns with responses from all key informants, who indicated that although a budget is provided, it is inadequate for expanding operations, especially for regional outreach and sustained awareness-raising activities. Some respondents suggested that the Commission would need a funding increase of around 10–20% to meet its growing obligations.

Table 3 also shows that the RTIC recruits its own staff (question 2), which was confirmed during interviews. However, several respondents highlighted that the staffing levels are still not fully adequate to cover the entire country's RTI needs.

In terms of appeals management, Table 3 indicates that appeal decisions are available online (question 3), enhancing transparency. Nonetheless, key informants reported that appeals are not always decided in a timely manner, with some decisions taking between three and eight months. Although the RTIC generally respects due process during appeals (question 10), enforcement challenges were noted, and some institutions ignore fines and still refuse to release information.

On annual reporting (question 4), the RTIC has consistently published annual reports for the years 2020, 2021, 2022, and 2023, which were accessible online at the time of this review. Also, a Guide for Requesters has been published (question 5), although some respondents recommended the development of simplified versions in multiple local languages.

Regarding public awareness efforts (question 11), informants positively noted the Commission's efforts through activities such as RTI Month celebrations, media engagements,

and public sensitisation tours. However, resource limitations were seen as constraining the overall scale of these initiatives.

In terms of training, Table 3 indicates that training provided to officials is only partially effective (question 12). While training programs for Public Information Officers (PIOs) have been organised, there has been limited training for other categories of officials, affecting the broader implementation environment.

Finally, regarding commenting on draft laws (question 13), the Commission has made some efforts to comment on legislation affecting the right to information, but this engagement has been sporadic and not yet institutionalised.

Recommendations

The following recommendations are based on the results and key findings from the assessment exercise. Implementing these measures will help strengthen the Right to Information Commission's (RTIC) effectiveness, credibility, and overall capacity to uphold the right to information in Ghana.

- Strengthen the Independence and Sufficiency of RTIC Funding

Additional steps should be taken to ensure that the RTIC's funding process is more independent, reliable, and adequate to meet its operational needs. The Commission's budget should be protected from political interference and be determined based on a realistic assessment of its growing mandate. Securing sustainable funding would allow the Commission to expand its regional presence, enhance public outreach, and maintain consistent operational activities without overreliance on donor support.

- Accelerate Appeals Processing and Strengthen Enforcement Mechanisms

The Commission should prioritise reducing delays in handling appeals by streamlining internal processes, setting specific timeframes, and adopting digital tracking systems. In addition, enforcement mechanisms should be strengthened beyond the mere imposition of fines. For example, follow-up monitoring should ensure that information is actually released after a decision, and public naming-and-shaming strategies could be used against persistently non-compliant institutions.

- Expand Public Awareness and Accessibility Initiatives

The RTIC should continue its public awareness efforts but with greater emphasis on reaching rural, marginalised, and linguistically diverse communities. This could involve developing and distributing more accessible information materials, such as pamphlets, radio jingles, and infographics, in local languages and formats that are easily understood. Strengthening community-level engagement will foster greater demand for information rights across the country.

- Broaden Training Programs for All Public Officials

Training activities should not be limited to designated public information officers but expanded to include senior management, record-keeping officers, and other frontline public officials. A broader and more consistent training approach will promote a culture of openness within public institutions and ensure that RTI responsibilities are integrated into the everyday operations of government bodies.

- Establish a Regular System for Commenting on Draft Laws

The Commission should institutionalise a structured process for reviewing and commenting on all draft laws, regulations, and policies that may affect access to information. This could involve setting up an internal legal and policy analysis unit tasked with monitoring legislative

developments and providing timely submissions to Parliament and other bodies. Proactive engagement in the legislative process will help safeguard and advance the right to information.

- Promote Innovation and Strategic Partnerships

The RTIC should continue to explore innovative strategies for promoting the right to information. This could include launching digital platforms for easy request submissions, collaborating with civil society organisations for joint advocacy campaigns, partnering with media houses for investigative reporting, and engaging with international organisations for capacity-building support. Leveraging strategic partnerships will help amplify the Commission's impact and broaden the constituency for transparency and accountability in Ghana.

4.2 Institutional Measures

The Institutional Measures assessment focused on evaluating the internal structures, systems, and actions taken by public authorities to facilitate the proper implementation of the Right to Information (RTI) Act, 2019 (Act 989). The assessment looked at 20 public authorities selected from four regions of Ghana, where the RTI Commission has established a regional presence. Both objective and qualitative evaluations were conducted to measure how institutions are operationalising their RTI obligations in practice. The Institutional Measures score for each public authority was tabulated by averaging that authority's results across all of the 16 objective and qualitative criteria.

The main results from the institutional measures assessment are presented in Table 4 below:

Table 4: Results from Institutional Measures

		Accra Metropolitan Assembly	National Health Insurance Authority	Ministry of Sports & Hygiene	Office of The President	Ghana Education Service	Ghana Fire Service (Upper East)	SSNIT	Bolgatanga Nursing Training College	Kumasi Metropolitan Assembly	Middle Belt Development Authority	Ghana Shippers Authority	Ghana Freezones Authority	Tree Crop Development Authority	TVET	Birth and Death Registry	Land Use & Spatial Planning	National Service Secretariat	Upper East Regional Cordinating Council	Right to Information Commission	Bolgatanga East District Assembly	Criteria Average	Overall Average
Objective Evaluation (Yes = 1; No = 0)																							
1	Has an IO been appointed?	1	1	1	1	1	1	1	0	1	1	1	1	0	1	0	0	1	1	1	1	0.8	
2	Has the IO formally been given terms of reference or a job description?	1	1	1	1	1	1	1	0	1	1	1	1	0	1	0	0	1	1	1	1	0.8	
3	Has the IO been provided with training?	1	1	1	1	1	1	1	0	1	1	1	1	0	1	0	0	1	1	1	0	0.75	
4	Has an overall implementation plan or set of standard operating procedures (SOPs) been adopted?	1	1	1	1	1	1	1	1	1	1	1	1	0	0	0	0	0	1	1	1	0.75	
5	Has a set of guidelines for how to process RTI requests been adopted?	1	1	1	1	1	1	1	1	1	1	1	1	0	1	0	0	1	1	1	0	0.8	

#	Question																						Avg
6	Is it possible to lodge requests electronically? Is it easy to obtain an RTI request form? Is it easy to find the contact details of the IO? (YES is given for two or more positive answers, NO for one or less)	1	1	1	1	1	1	1	1	0	0	1	1	0	0	0	0	1	0	1	0	0.6
7	Has a person who is different from the IO been appointed to deal with internal complaints?	1	1	0	1	1	1	0	0	0	0	0	0	0	1	1	1	1	1	1	1	0.6
8	Did the public authority publish an annual report for the last two years?	1	1	1	1	1	0	1	0	1	0	1	1	0	1	0	0	1	1	1	1	0.7
9	Has the public authority conducted any public awareness-raising activities over the last year?	1	0	0	1	1	1	0	1	0	0	0	0	0	1	1	1	0	1	1	0	0.5
10	Has the public authority put in place any system or taken any action to improve its record management?	1	1	1	1	1	1	1	1	0	0	1	1	0	1	1	1	1	1	1	1	0.85
	Average (Objective Evaluation)	1	0.9	0.8	1	1	0.9	0.8	0.5	0.6	0.5	0.8	0.8	0	0.8	0.3	0.3	0.8	0.9	1	0.6	

Qualitative Evaluation (Strongly = 1; Partially = .5; Weakly = 0)

#	Question																					Average
11	Does the IO have appropriate qualifications for the job and has he or she been allocated time to do the job?	1	1	1	1	1	1	1	1	1	1	1	1	0	0.5	0.5	0	0.5	1	1	1	0.83
12	Has the IO come under political pressures that make it difficult for him or her to do the job properly?	0.5	0.5	1	0.5	0.5	0.5	1	1	1	1	1	1	1	1	1	1	1	1	1	1	0.88
13	How strong is the overall implementation plan or SOP?	0.5	0.5	0.5	0.5	0.5	1	1	1	0.5	0.5	0	1	0	0	0	0	0	0.5	1	0.5	0.48
14	How strong is the annual report?	1	1	1	1	1	1	1	0	1	1	1	1	0	1	0	0	1	0.5	1	1	0.78
15	How extensive are the awareness-raising activities?	1	0.5	0.5	0.5	0.5	1	1	0.5	0	0	0	0	0	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.45
16	How effective are the measures taken to improve records management?	0.5	1	0.5	1	0.5	1	1	1	0	0	1	1	0	0.5	0.5	0.5	0.5	1	0	1	0.63
	Average (Qualitative Evaluation)	0.75	0.75	0.75	0.75	0.67	0.92	1.00	0.75	0.58	0.58	0.67	0.83	0.17	0.58	0.42	0.33	0.58	0.75	0.75	0.83	
	Average by Authority	0.91	0.84	0.78	0.91	0.88	0.91	0.88	0.59	0.59	0.53	0.75	0.81	0.06	0.72	0.34	0.31	0.72	0.84	0.91	0.69	
	Colour Grade by Authority																					
	Overall Average																					0.70
	Overall Grade																					

As Table 4 shows, the overall average score across all 20 public authorities was 0.70, which corresponds to a Yellow grade (Mediocre Performance). However, a closer look at the results reveals significant variation among institutions, with some achieving strong compliance and others scoring very low, highlighting uneven implementation across the public sector.

Table 4 indicates that a majority of institutions have appointed Information Officers (IOs), and in many cases, these IOs have been provided with job descriptions and some form of training (questions 1 to 3). For example, institutions like the Accra Metropolitan Assembly, Office of the President, Ghana Education Service, and the National Health Insurance Authority scored highly across these indicators. However, others, such as the Bolgatanga Nursing Training College and Birth and Death Registry, showed weaker performance, with missing or informal IO appointments and limited training structures.

The adoption of implementation plans or Standard Operating Procedures (SOPs) was moderate across institutions (question 4). While most top-performing agencies had clear SOPs in place, a number of institutions including the TVET, Land Use & Spatial Planning, Birth and Death Registry and Tree Crop Development Authority etc. had not adopted any such plans, limiting their operational readiness to handle RTI requests effectively.

Positive results were observed regarding the adoption of guidelines for processing requests (question 5), with an average score of 0.80, suggesting that most institutions had some internal procedures in place. However, the provision of electronic access and ease of locating RTI contact points remained a challenge. Question 6 scored an average of 0.60, showing that digital access to RTI services remains weak in several institutions, particularly in smaller and regional offices.

Complaint-handling mechanisms (question 7) also revealed gaps: just about half of the public authorities had appointed a separate person to handle internal RTI complaints, resulting in an

average of 0.60. This shows a need for better institutional separation and due process for appeals and internal redress.

On proactive transparency, approximately 70% of institutions had published annual RTI reports over the last two years (question 8), but less than half had conducted awareness-raising activities in the past year (question 9). This reflects a serious gap in public engagement and awareness, especially among regional and sector-specific authorities. In contrast, record management systems (question 10) were relatively well-established, with a high average score of 0.85, indicating that public authorities are prioritising data organisation and retrieval mechanisms.

The qualitative evaluation provides a more nuanced view. Most IOs were considered to be adequately qualified and given sufficient time to perform their roles (question 11), with a strong average score of 0.83. However, many IOs reported facing political or institutional pressure (question 12), scoring an average of 0.88 — though this score implies limited pressure, it must be interpreted carefully since the 0.5 value assigned to several institutions suggests moderate concerns around IO independence.

The strength of implementation plans (question 13) was mixed, averaging only 0.48, which implies that many of the SOPs that exist are either underdeveloped or ineffective in practice. Similarly, awareness-raising activities (question 15) received a low average score of 0.45, showing that outreach to the public remains a weak spot in RTI implementation. Annual reports (question 14) fared better with an average of 0.78, indicating decent reporting quality among institutions. Record management improvement efforts (question 16) were moderately strong, averaging 0.63, but still showing gaps in consistency and depth across institutions.

Some institutions such as Accra Metropolitan Assembly (0.91), Office of the President (0.91), Right to Information Commission (0.91), and the National Health Insurance Authority (0.84)

achieved relatively high average scores (above 0.80), reflecting robust systems and stronger commitment to RTI implementation. On the other hand, institutions such as the Tree Crop Development Authority (0.06), Birth and Death Registry (0.34), and Land Use & Spatial Planning (0.31) had significantly lower scores, indicating weak institutional structures, low awareness, and limited engagement with RTI responsibilities.

Recommendations

Based on the findings from the institutional assessment of public authorities, the following recommendations are proposed to strengthen the implementation of the Right to Information (RTI) Act, 2019:

- Ensure Appointment of Dedicated and Well-Trained Information Officers Across All Institutions

Public authorities that have not yet appointed designated Information Officers (IOs) must urgently do so, ensuring that appointees are properly trained and resourced. All IOs should be given formal terms of reference or job descriptions clearly outlining their RTI responsibilities.

- Strengthen Training Programs for Information Officers and Other Staff

Regular and comprehensive training programs should be instituted not only for IOs but also for senior management and frontline staff across public institutions. Training should include practical sessions on processing RTI requests, proactive disclosure obligations, record management, and citizen engagement.

- Develop and Institutionalise Standard Operating Procedures (SOPs)

All public authorities should be required to adopt clear Standard Operating Procedures (SOPs) or RTI implementation plans. These SOPs should detail how to receive, process, and respond

31

to RTI requests, including internal timelines, escalation procedures, and quality assurance checks.

- Expand Digital Access and Improve Electronic Request Systems

Institutions should prioritise developing user-friendly systems for lodging RTI requests electronically. Websites should clearly display request forms, the contact details of Information Officers, and guidelines for submitting requests. This will ensure easier access for the public, especially for remote and marginalised communities.

- Establish Independent Complaints Handling Mechanisms

Institutions should designate officials separate from the IOs to handle internal complaints relating to denied or mishandled RTI requests. Clear complaints procedures will help enhance internal accountability and protect requesters' rights.

- Improve Publication of Annual Reports

Public authorities must consistently publish comprehensive annual reports that include RTI-related information, such as the number of requests received, granted, denied, and pending. Institutions with gaps in publishing reports should receive targeted support and follow-up monitoring from the RTI Commission.

- Enhance Public Awareness Initiatives

Institutions must take deliberate steps to raise public awareness about the right to information and the procedures for accessing it. This could include community outreach programs, media campaigns, workshops, and producing RTI materials in multiple local languages.

- Strengthen Records Management Systems

Efforts to improve records management should be deepened to ensure that public authorities can easily retrieve and disclose requested information. Investment in digital archiving and staff training in modern records management practices will be crucial.

- Monitor and Support Low-Performing Institutions

Special attention should be given to institutions that recorded low scores in the assessment, such as the Birth and Death Registry, Land Use and Spatial Planning Authority, and Tree Crop Development Authority. Tailored capacity-building programs, technical assistance, and closer monitoring are recommended to help these bodies improve.

4.3 Proactive Disclosure

Proactive disclosure refers to the obligation of public institutions to make key information available to the public without requiring a formal request. The assessment of proactive disclosure focused on evaluating the extent to which public authorities in Ghana are publishing key categories of information without waiting for specific requests, as required under Section 18 of the Right to Information Act, 2019 (Act 989). In particular, public authorities were assigned Substantive Issues scores, which were based on an assessment of their disclosure of 10 categories of information with scores ranging from Full (1), Full to Partial (.75), Partial (.5), Partial to None (.25) or None (0). In assigning these scores, consideration given to:

- Whether the available information was complete in the sense of including everything in the relevant category
- How easy the information was to find
- How up to date the information was, taking into account how frequently that type of information changes

A second part of the grading process assigned scores to each public authority of strong (1), partial (.5) or weak (0) compliance for five other issues relevant to proactive disclosure:

1. The extent to which the website is WCAG 2.1 compliant.

2. The extent of the efforts the public authority takes to disseminate information other than simply via its website.

3. The extent to which the public authority makes use of social media and other means to draw the attention of the public to its proactive publications and to disseminate information proactively.

4. The extent to which the public authority makes an effort to create understandable versions of at least the most important documents (such as its budget).

5. The extent to which it is reasonably easy to find specific information from among all of the information that is being published online.

The proactive disclosure score for each public authority was tabulated by taking 75 percent of the average score for the public authority across the Substantive Issues and 25 percent of their average score on the Other Issues. The main results from the proactive disclosure assessment are presented in Table 5 below:

34

Table 5: Results from Proactive Measures

	What We are Looking For	Accra Metropolitan Assembly	National Health Insurance Authority	Ministry of Sports & Hygiene	Office of The President	Ghana Education Service	Ghana Fire Service (Upper East)	SSNIT	Bolgatanga Nursing Training College	Kumasi Metropolitan Assembly	Middle Belt Development Authority	Ghana Shippers Authority	Ghana Freezones Authority	Tree Crop Development Authority	TVET	Birth and Death Registry	Land Use & Spatial Planning	National Service Secretariat	Upper East Regional Cordinating Council	Right to Information Commission	Bolgatanga East District Assembly	Category Average
		Points	Points	Points	Points	Points	Points	Points	Points	Points	Points	Points	Points	Points	Points	Points	Points	Points	Points	Points	Points	
SUBSTANTIVE ISSUES																						
Institutional mandate and core functions	Does the institution publish its mandate, mission, and core responsibilities?	1	1	0.75	1	1	0.75	1	0.5	1	0.75	1	0.75	0.5	0.75	0.75	0.5	0.5	1	1	1	0.83
Operational budget and financial statements	Is the current or previous year's budget and expenditure publicly available?	0.5	0.75	0.5	0.75	0.5	0.5	0.75	0.25	0.5	0.5	0.5	0.5	0.25	0.5	0.25	0.25	0.25	0.5	0.75	0.5	0.49
Procurement procedures and contract awards	Are procurement plans, awarded contracts, and tender details accessible online?	0.5	0.5	0.25	0.75	0.5	0.25	0.5	0.25	0.5	0.25	0.5	0.25	0.25	0.25	0.25	0.25	0.25	0.5	0.5	0.5	0.39
Internal rules, procedures, and manuals	Are administrative procedures, manuals, or policy guidelines published on their website?	0.75	0.5	0.5	0.75	0.75	0.5	0.75	0.25	0.5	0.5	0.5	0.5	0.25	0.25	0.25	0.25	0.25	0.5	0.75	0.5	0.49
Names and designations of key officers	Is there a directory of officers with names, titles, and contact details?	0.75	0.5	0.5	0.75	0.75	0.5	0.75	0.25	0.5	0.5	0.5	0.5	0.25	0.25	0.25	0.25	0.25	0.5	1	0.5	0.50

		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	Avg
Information request procedures	Is there a guide on how to submit an information request under the RTI Act?	0.75	0.75	0.5	0.75	0.75	0.5	0.75	0.25	0.5	0.5	0.5	0.5	0.25	0.25	0.25	0.25	0.25	0.5	1	0.5	0.51
Organisational structure or organogram	Is there an organisational chart showing departments and leadership hierarchy?	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.25	0.5	0.5	0.5	0.5	0.25	0.25	0.25	0.25	0.25	0.5	0.5	0.5	0.43
Publications and press releases	Are press statements, newsletters, or publications uploaded on a regular basis?	1	1	0.75	1	1	0.75	1	0.5	1	0.75	1	0.75	0.5	0.5	0.5	0.5	0.5	1	1	0.75	0.79
Reports on activities and operations	Are annual reports, performance reports, or evaluations published and accessible	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.25	0.5	0.5	0.5	0.5	0.25	0.25	0.25	0.25	0.25	0.5	0.5	0.5	0.43
Categories of information held	Is there a list or description of the types of documents or records the institution holds?	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.25	0.5	0.5	0.5	0.5	0.25	0.25	0.25	0.25	0.25	0.5	0.5	0.5	0.43
Average Substantive Issues		**0.68**	**0.65**	**0.53**	**0.73**	**0.68**	**0.53**	**0.70**	**0.30**	**0.60**	**0.53**	**0.60**	**0.53**	**0.30**	**0.35**	**0.33**	**0.30**	**0.30**	**0.60**	**0.75**	**0.58**	**0.53**
OTHER ISSUES																						
Is the public authority's website WCAG 2.1 compliant?		0	0	0	0	0	0	0.5	0	0	0	0.5	0	0	0	0	0	0	0.5	0	0	0.08
What efforts does the public authority make to disseminate information other than simply via its website?		1	1	1	1	1	1	1	0.5	1	0.5	0.5	0.5	0.5	1	1	0.5	1	1	1	1	0.85

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)?		1	1	1	1	1	1	1	0.5	1	0.5	0.5	0.5	0.5	1	1	0.5	1	1	1	1	0.85
Does the public authority make an effort to create understandable versions of at least the most important documents (such as its budget)?		1	0.5	0.5	0	1	1	0.5	1	1	0	0.5	0	0	0	0	0	0	1	1	0	0.45
Is it reasonably easy to find specific information from among all of the information that is being published online?		1	0.5	0.5	0	1	1	1	1	1	0	0.5	0	0	0	0	0	0	1	1	0	0.48
Average Other Issues		**0.8**	**0.6**	**0.6**	**0.4**	**0.8**	**0.8**	**0.8**	**0.6**	**0.8**	**0.2**	**0.5**	**0.2**	**0.2**	**0.4**	**0.4**	**0.2**	**0.4**	**0.9**	**0.8**	**0.4**	**0.54**
Total Score by Authority		**0.71**	**0.64**	**0.54**	**0.64**	**0.71**	**0.59**	**0.73**	**0.38**	**0.65**	**0.44**	**0.58**	**0.44**	**0.28**	**0.36**	**0.34**	**0.28**	**0.33**	**0.68**	**0.76**	**0.53**	
Grade by Authority																						
Overall Average																						0.53
Overall Grade																						

37

The results show that the overall average score across the 20 public authorities assessed was 0.46, corresponding to a Yellow grade, which indicates mediocre performance. This suggests that while some institutions have made efforts toward proactive disclosure, the overall level of compliance remains limited, with substantial room for improvement across many areas.

In assessing substantive issues, the evaluation revealed mixed results. Institutional mandates and core functions were the most consistently published information, achieving an average score of 0.83. Major public bodies such as the Accra Metropolitan Assembly, the Office of the President, and the Ghana Education Service performed strongly in this regard. However, the publication of operational budgets and financial statements was far less consistent, with an average score of 0.49, pointing to significant weaknesses in financial transparency. Procurement procedures and contract awards were even less disclosed, averaging just 0.39, indicating that procurement transparency is a major area of concern.

Also, internal rules, procedures, and manuals were only moderately published, with an average score of 0.49, and many institutions had not adequately provided administrative guidelines online. Information on the names and designations of key officers achieved a mediocre average of 0.50, while the provision of guides on how to submit RTI requests averaged 0.51. Organisational structures, activity reports, and lists of information categories held all recorded low average scores of around 0.43, suggesting that institutions are only partially fulfilling their obligation to inform the public about their operations. On a slightly more positive note, publications and press releases were more frequently updated, achieving a higher average of 0.79. Overall, the average for substantive issues stood at 0.44, reflecting a general weakness in the systematic disclosure of important governance information.

When assessing other aspects of dissemination, results varied. Website accessibility, particularly compliance with WCAG 2.1 standards, was extremely poor, with a very low

average score of 0.08. This highlights the major challenges that persons with disabilities face in accessing public information online. Nevertheless, efforts to disseminate information through other means, such as public forums, traditional noticeboards, and social media, were more encouraging, with an average score of 0.85. Also, the use of social media platforms to publicise key information and proactive publications also recorded an average of 0.85, suggesting that many institutions are leveraging newer communication tools to reach broader audiences.

In contrast, efforts to create simplified, understandable versions of critical documents, such as budgets, were limited, achieving an average score of only 0.45. Also, even when information was published, the ease of locating specific pieces of information on public websites was rated low, with an average of 0.48. The overall average for other issues stood at 0.54, slightly better than the performance on substantive issues, suggesting that while outreach methods are being used, the substance and quality of disclosed information remain weak.

Performance varied significantly between institutions. The Right to Information Commission (RTIC), Accra Metropolitan Assembly, SSNIT and Ghana Education Service were among the better performers, with total scores above 0.70. However, many institutions, particularly those in the regions, such as the Land Use and Spatial Planning Authority and Tree Crop Development Authority, recorded poor scores, highlighting a need for focused interventions to build their capacity in proactive disclosure practices.

Overall, the proactive disclosure assessment reveals that while some steps have been taken to improve transparency and public access to information, major gaps remain. Public authorities need to intensify efforts to publish essential governance documents, make their websites accessible and user-friendly, and ensure that disclosed information is easy to find and understand by all citizens.

Recommendations

Based on the findings from the proactive disclosure assessment, several recommendations are proposed to strengthen transparency and improve public access to information across public authorities in Ghana.

One, public authorities should prioritise the publication of core governance documents, including operational budgets, financial statements, procurement procedures, and internal administrative rules. Efforts should be made to update institutional websites regularly with this information, ensuring that it is accurate, comprehensive, and current. Special attention should be given to procurement transparency, which remains one of the weakest areas according to the assessment results.

Two, there is an urgent need to enhance the accessibility and usability of public authority websites. Institutions should work towards making their websites compliant with WCAG 2.1 accessibility standards to accommodate persons with disabilities. Websites should be user-friendly, with clear navigation, search functions, and direct links to key documents such as annual reports, procurement contracts, and budgets.

Also, public authorities should also develop and disseminate simplified and understandable versions of critical documents, especially financial information such as budgets and expenditure reports. Using infographics, summaries, and translations into local languages would make these materials more accessible to the general public and contribute to greater citizen engagement.

In addition to website publications, institutions should intensify the use of alternative communication channels such as social media platforms, community radio, printed notices, and public fora. Such strategies are particularly important for reaching rural and marginalised communities who may have limited internet access.

Moreover, authorities should establish internal systems to regularly monitor and update published information. Proactive disclosure should not be treated as a one-off exercise but as a continuous obligation. Internal checklists, periodic audits, and regular updates can ensure that disclosed information remains relevant and reliable.

Finally, the RTI Commission should consider issuing detailed guidelines and minimum standards for proactive disclosure to assist public authorities in meeting their obligations. Targeted capacity-building support should also be offered to low-performing institutions, such as the Birth and Death Registry and the Land Use and Spatial Planning Authority, to address the gaps identified in the assessment.

4.4 Reactive Disclosure

The reactive disclosure assessment focused on evaluating how public authorities responded to actual information requests submitted during the exercise. The goal was to assess responsiveness, timeliness, fee practices, and the overall quality of engagement with requesters in accordance with the Right to Information Act, 2019 (Act 989).

Each public authority was assigned a processing score, which was composed of three sub-scores, each evaluated on a binary Yes (1 point) or No (0 points) basis:

- o Receipt score: Whether a receipt was provided to the requester.
- o Timeliness score: Whether the request was responded to within the 21-day deadline limit, including any extensions that complied with legal rules and were reasonable.
- o Fee score: Whether any charged fee adhered to the legal requirements.

The average of these three sub-scores provided the processing score for each request.

- This score evaluated the outcome of the request based on the quality and completeness of the response:

  o Full disclosure: Awarded 1 point for valid and complete information disclosure.

  o Oral refusals or mute refusals (failure to respond within the deadline) and cases where it was not possible to lodge the RTI request: 0 points (considered never valid).

  o Other responses (e.g., written refusal, partial disclosure, referral to another authority, or incomplete answers) were assessed based on their validity:

    ▪ LIKELY valid: 1 point.

    ▪ MAYBE valid: 0.5 points.

    ▪ UNLIKELY valid: 0 points.

The overall score for each request was calculated by adding one-third of the processing score and two-thirds of the result score. The final score for each public authority was determined by averaging the scores across both RTI requests submitted to that authority.

The results show a mixed level of performance across the institutions. The overall average score recorded for reactive disclosure was 0.55, corresponding to a Yellow grade (Mediocre Performance). This indicates that while some institutions responded positively to requests for information, a significant number either failed to respond altogether or delayed unduly in processing requests.

Institutions such as the Accra Metropolitan Assembly, National Health Insurance Authority, Ministry of Sports and Hygiene, and the Office of the President performed relatively well, granting the information requested without charging fees and processing the requests within reasonable, though not excellent, timeframes. For these institutions, the processing time ranged between 19 and 35 days. Although this exceeded the 14-day timeframe prescribed by the RTI

Act, the authorities still ultimately provided full responses, contributing to their relatively high scores. These authorities achieved final scores averaging approximately 0.59, which, although mediocre, reflected a willingness to engage with requesters.

By contrast, several institutions performed poorly. Bodies such as the Ghana Education Service, Bolgatanga Nursing Training College, Middle Belt Development Authority, Tree Crop Development Authority, TVET, Birth and Death Registry, Land Use and Spatial Planning Authority, National Service Secretariat, Upper East Regional Coordinating Council, and Bolgatanga East District Assembly largely failed to respond to the information requests. Most of these institutions were classified under "mute refusals," where no response was provided within the stipulated timeframe or at all. These mute refusals resulted in very low final scores, with many institutions recording averages around 0.11 to 0.22, indicating poor compliance with the reactive disclosure obligations.

It was also noted that no institution charged a fee for processing the requests, which is a positive sign in terms of compliance with the affordability principle embedded in the RTI framework. However, the timeliness of responses was a serious concern across the board. Even where responses were eventually given, most institutions failed to meet the strict legal timeframes, highlighting systemic delays in processing information requests.

Performance varied significantly among institutions. The Ghana Fire Service (Upper East), SSNIT, and the Kumasi Metropolitan Assembly recorded the highest performance levels, achieving full compliance with RTI requirements, including prompt acknowledgments, timely responses, and the granting of the requested information.

Overall, the reactive disclosure assessment revealed that although a handful of public authorities demonstrated good practices in responding to information requests, a large number continue to struggle with basic compliance. Lack of responses, significant delays, and failure

to even acknowledge receipt of requests were common challenges. This underlines the urgent need for further institutional strengthening, capacity building, and stricter oversight to ensure that citizens' right to information is fully respected and operationalised.

Table 6: Results from Reactive Measures

Public Authority	Questions	Date Request Submitted (DD-MM-YYYY)	How Request was filed	Application acknowledged	Acknowledgement score	Date, if any, of response (DD-MM-YYYY)	Days	Timeliness score	Fee Charged, if any	Fee score	Processing score	Result	Comment	Result score	Final score	Average score by authority	Colour grade by authority
Accra Metropolitan Assembly	1. How is the AMA working to improve sanitation in the mark areas?	27-Feb-25	In person	YES	1	18-Mar-25	19	0	No	1	0.67	Granted		1	0.89	0.89	
	2.What are the 'AMA's efforts to engage with local communities and involve them in decision making processes.	27-Feb-25	In person	YES	1	18-Mar-25	19	0	No	1	0.67	Granted		1	0.89		
National Health Insurance Authority	1.Are there financial assistance or subsidy programs available?	27-Feb-25	In person	YES	1	3-Apr-25	35	0	No	1	0.67	Granted		1	0.89	0.89	
	2. Does the plan include dental and visions care ? If so, what are the specifics of the at coverage.	27-Feb-25	In person	YES	1	3-Apr-25	35	0	No	1	0.67	Granted		1	0.89		
Ministry of Sports & Hygiene	1. What percentage of the ministry's budget is allocated to programs to support youth participant in non-traditional sports?	26-Feb-25	Email	YES	1	25-Mar-25	27	0	No	1	0.67	Granted		1	0.89	0.89	
	2. What is the annual budget allocated to youth sports development programs, and how has it changed over the past 3 years?	26-Feb-25	Email	YES	1	25-Mar-25	27	0	No	1	0.67	Granted		1	0.89		
Office of The President	1. Could you provide a detailed breakdown of the roles and responsibilities of key presidential staff members?	27-Feb-25	In person	YES	1	3-Apr-25	35	0	No	1	0.67	Granted		1	0.89	0.89	
	2. How are the lines of authority and communication defined within the presidential staff?	27-Feb-25	In person	YES	1	3-Apr-25	35	0	No	1	0.67	Granted		1	0.89		

Institution	Question	Date	Method															
Ghana Education Service	1.How do you incorporate new technologies into teaching and learning at the SHS level since the use of mobile phones is prohibited?	12-Mar-25	Email	NO	0	No Response	Null	0	No	1	0.33	Mute		0	0.11	0.11	
	2. What professional development and career guidance opportunities do you offer to third year students both JHS and SHS and teachers in the school?	12-Mar-25	Email	NO	0	No Response	Null	0	No	1	0.33	Mute		0	0.11		
Ghana Fire Service (Upper East)	Data on fire incidents recorded in the Upper East Region from January 2022 to December 2024.	27-Feb-25	In-person	YES	1	12-Mar-25	13	1	No	1	1.00	Granted		1	1.00	1.00	
	2. Staffing numbers and firefighting equipment availability across fire stations in the Upper East Region.	27-Feb-25	In-person	YES	1	12-Mar-25	13	1	No	1	1.00	Granted		1	1.00		
SSNIT	1. How many new pension applications have been processed and approved by the SSNIT Bolgatanga office in the last two years?	27-Feb-25	In person	YES	1	11-Mar-25	12	1	No	1	1.00	Granted		1	1.00	1.00	
	1. What is the average processing time for pension benefits, and what measures are in place to improve efficiency?	27-Feb-25	In person	YES	1	11-Mar-25	12	1	No	1	1.00	Granted		1	1.00		
Bolgatanga Nursing Training College	1. How many students were admitted into the Nursing Training School in the past three years, and what were the cut-off points for admission?	27-Feb-25	In-person	YES	1	No Response	Null	0	No	1	0.67	Mute		0	0.22	0.22	
	Can you provide a breakdown of government and internally generated funds received by the institution for academic and infrastructure development?	27-Feb-25	In-person	YES	1	No Response	Null	0	No	1	0.67	Mute		0	0.22		
Kumasi Metropolitan Assembly	1. How much did the Assembly spend on sanitation campaigns in Kumasi between 2021 and 2023?	25-Feb-25	In person	YES	1	4-Mar-25	7	1	No	1	1.00	Granted		1	1.00	1.00	

Institution	Question	Date	Method										Status				Score	
	2. How much did the Assembly generate from property taxes in 2021?	25-Feb-25	In person	YES	1	4-Mar-25	7	1	No	1	1.00	Granted		1	1.00		
Middle Belt Development Authority	1. When was the Ejisu water supply expansion project completed?	25-Feb-25	In person	YES	1	No Response	Null	0	No	1	0.67	Mute		0	0.22	0.22	
	2. What was the cost of the Ejisu water expansion project?	25-Feb-25	In person	YES	1	No Response	Null	0	No	1	0.67	Mute			0.22		
Ghana Shippers Authority	1. How much unpaid services and charges has the Ghana Shippers Authority recovered from shipping service providers for 2024?	25-Feb-25	In person	YES	1	13-Mar-25	16	0	No	1	0.67	Granted		1	0.89	0.89	
	2. How many enterprises became a part of the Ghana Shippers Authority in 2024?	25-Feb-25	In person	YES	1	13-Mar-25	16	0	No	1	0.67	Granted		1	0.89		
Ghana Freezones Authority	1. The total number of compliant and non-compliant free zone enterprises for 2023	25-Feb-25	In person	YES	1	25-Mar-25	28	0	No	1	0.67	Granted		1	0.89	0.89	
	2. How many licenses did Ghana Freezones authority grant to its applicants in 2024?	25-Feb-25	In person	YES	1	25-Mar-25	28	0	No	1	0.67	Granted		1	0.89		
Tree Crop Development Authority	1. How much did Tree Crops Development Authority spend on tree crops seedlings distribution in 2023?	25-Feb-25	In person	YES	1	No Response	Null	0	No	1	0.67	Mute		0	0.22	022	
	2. What was the total amount spent on farmer training in 2023?	25-Feb-25	In person	YES	1	No Response	Null	0	No	1	0.67	Mute		0	0.22		
TVET	1. TVET schools in bono region	25-Feb-25	In person	YES	1	No Response	Null	0	No	1	0.67	Mute		0	0.22	0.22	
	2. Is TVET education free in bono region?	25-Feb-25	In person	YES	1	No Response	Null	0	No	1	0.67	Mute		0	0.22		
Birth and Death Registry	1. How many certificates have been issued from January-December 2024?	25-Feb-25	In person	YES	1	No Response	Null	0	No	1	0.67	Mute		0	0.22	0.22	

	2.How long after death do you register a person after birth?	25-Feb-25	In person	YES	1	No Response	Null	0	No	1	0.67	Mute		0	0.22		
Land Use & Spatial Planning	1. How many staff do you have in Sunyani office?	25-Feb-25	In person	YES	1	No Response	Null	0	No	1	0.67	Mute		0	0.22	0.22	
	Which year was land and spatial planning established and what are your mandates?	25-Feb-25	In person	YES	1	No Response	Null	0	No	1	0.67	Mute		0	0.22		
National Service Secretariat	1. How many NSS personnel were registered in the year 2024 (January –December).	25-Feb-25	In person	YES	1	No Response	Null	0	No	1	0.67	Mute		0	0.22	0.22	
	2.How many permanent staff operates in the Sunyani Regional Office?	25-Feb-25	In person	YES	1	No Response	Null	0	No	1	0.67	Mute		0	0.22		
Upper East Regional Cordinating Council	1. Furnish me with copies of the development plans and budgets approved for the Upper East Region in 2024?	27-Feb-25	In person	YES	1	No Response	Null	0	No	1	0.67	Mute		0	0.22	0.22	
	2. How much funding has been allocated and disbursed to the various Municipal and District Assemblies under the Regional Coordinating Council in the past two years?	27-Feb-25	In person	YES	1	No Response	Null	0	No	1	0.67	Mute		0	0.22		
Bolgatanga East District Assembly	1. What have been the major development projects undertaken by the District Assembly in the past three years, and what are their status	27-Feb-25	In-person	YES	1	No Response	Null	0	No	1	0.67	Mute		0	0.22	0.22	
	2.How much funding has the District Assembly received from the central government and donor partners over the past two years and how has it been utilised?	27-Feb-25	In-person	YES	1	No Response	Null	0	No	1	0.67	Mute		0	0.22		
Average Score					0.95			0.16		1	0.70			0.49	0.55		
Grade by Area																	
Overall Grade																	

Recommendations

Based on the findings from the reactive disclosure assessment, several recommendations are proposed to strengthen public authorities' ability to respond to information requests in a timely, effective, and lawful manner.

First, public authorities must prioritise the establishment of internal systems to promptly acknowledge and process information requests. A significant number of institutions failed to respond altogether or delayed unduly, demonstrating the need for better internal request-tracking systems. Authorities should designate dedicated officers or teams responsible for monitoring, processing, and following up on all RTI requests within the statutory timeframes established under Act 989.

Second, training for Information Officers and relevant institutional staff should be intensified, with specific focus on the legal obligations under the RTI Act regarding request handling. Training should cover response deadlines, requirements for providing written explanations for denials, and the importance of upholding requesters' rights to timely and affordable access to information. Refresher training should be mandatory, especially for institutions that recorded mute refusals.

Third, institutions should invest in simple and user-friendly request management systems, including both manual registers and digital tracking tools where possible. Having an efficient tracking system will enable authorities to monitor the status of pending requests, flag delays, and ensure that each request is addressed appropriately within the stipulated period.

The RTI Commission should intensify its oversight role by instituting regular audits or spot checks on public authorities' handling of information requests. Public institutions that habitually fail to respond to requests should be named in annual reports, and where necessary, administrative sanctions should be pursued in accordance with the enforcement provisions of the RTI Act.

Public authorities should also adopt a proactive communication strategy to update requesters about the status of their applications. Even when information cannot be immediately provided, interim updates acknowledging receipt and explaining expected timelines are crucial in maintaining public trust and minimising disputes.

Finally, where resource constraints exist, public authorities should collaborate with the RTI Commission and other stakeholders to seek technical or logistical support to improve their responsiveness. Special attention should be given to regional and smaller public bodies, many of which recorded lower scores in this assessment, to ensure that citizens across all parts of Ghana enjoy the same right to timely information.

5.0 Final Grades

The sections above have presented the results from the perspective of the four assessment areas covered by the RTI Evaluation methodology, namely Central Measures, Institutional Measures, Proactive Disclosure, and Reactive Disclosure. This final section looks at the overall results or grades, both for Ghana as a whole based on all four assessment areas and for each discrete public authority. The main results are shown in Table 7 below.

Table 7: Final Grades

Area	Central Measures	Institutional Measures	Proactive Measures	Reactive Measures	Average
Result	0.73	0.7	0.53	0.55	0.63
Grade					

The results show that Ghana falls within the Yellow grade area, with an overall average score of 0.63. This positioning reflects a relatively strong performance in Central Measures and Institutional Measures,

50

which both achieved Green grades, but a weaker performance in Proactive and Reactive Disclosure, where scores fell within the Yellow range. Ghana's comparatively lower score in Proactive and Reactive Disclosure pulled down the overall average, despite the strength observed in the systems and institutional frameworks supporting the right to information.

The assessment of public authorities across three key dimensions which are Institutional Measures, Proactive Measures, and Reactive Measures, reveals a mixed pattern of performance in implementing the Right to Information (RTI) Act, 2019. While some institutions have built relatively strong internal systems, others exhibit significant weaknesses, especially in responding to RTI requests and proactively disclosing information.

Performance on Institutional Measures was generally encouraging, with a number of public authorities demonstrating high compliance. Institutions such as the Accra Metropolitan Assembly, Office of the President, RTI Commission, SSNIT, and Ghana Education Service all scored between 0.84 and 0.91. These scores suggest that many institutions have taken foundational steps such as appointing Information Officers (IOs), issuing formal terms of reference, adopting implementation procedures, and building basic RTI infrastructure. However, some institutions, particularly at the local and regional level, were far weaker in this area. For example, the Tree Crop Development Authority, Birth and Death Registry, and Land Use & Spatial Planning recorded institutional scores below 0.35, indicating that critical structural elements remain undeveloped or non-existent.

By contrast, Proactive Measures which include actions like publishing information and raising public awareness, showed weaker performance across the board. Some institutions, such as the RTI Commission (0.76), SSNIT (0.73), Accra Metropolitan Assembly (.71), Ghana Education Service (.71) and Upper East Regional Cordinating Council (.68) demonstrated strong efforts in this area, while the others scored below

0.66. This suggests that many public authorities are not yet fulfilling their legal obligation to proactively disclose information or adequately educate the public on the RTI process.

The weakest area across the assessment was Reactive Measures, which evaluates how institutions respond to RTI requests. A significant number of authorities scored just 0.22 in this category, indicating minimal responsiveness. Institutions such as the Ghana Education Service (0.11), Tree Crop Development Authority (0.22), TVET (0.22), National Service Secretariat (0.22), and others showed limited evidence of effectively handling information requests. This is a serious concern, as the ability to receive, process, and respond to requests lies at the heart of the RTI system. Only three institutions namely SSNIT, Ghana Fire Service, and Kumasi Metropolitan Assembly, received full (1) scores, with an additional six public authorities also receiving strong (Green) scores.

Overall, the top-performing institutions were the RTI Commission (0.86), SSNIT (0.87), Accra Metropolitan Assembly (0.84), and Ghana Fire Service (0.83), each showing a relatively balanced and committed approach to RTI implementation, although it should be noted that the RTI Commission's final grade did not factor in performance in Reactive Disclosure, which tended to be a weaker area for many public authorities. In contrast, the Tree Crop Development Authority (0.16), Land Use & Spatial Planning (0.24), Birth and Death Registry (0.32) were the lowest-scoring institutions, with consistently poor outcomes across all dimensions.

Table 8: Overall Grading for Each Institution.

Public Authority	Institutional Measures	Proactive Measures	Reactive Measures	Average	Grade
Accra Metropolitan Assembly	0.91	0.71	0.89	0.84	
National Health Insurance Authority	0.84	0.64	0.89	0.79	

Ministry of Sports & Hygiene	0.78	0.54	0.89	0.74	
Office of The President	0.91	0.64	0.89	0.81	
Ghana Education Service	0.88	0.71	0.11	0.57	
Ghana Fire Service (Upper East)	0.91	0.59	1.00	0.83	
SSNIT	0.88	0.73	1.00	0.87	
Bolgatanga Nursing Training College	0.59	0.38	0.22	0.40	
Kumasi Metropolitan Assembly	0.59	0.65	1.00	0.75	
Middle Belt Development Authority	0.53	0.44	0.22	0.40	
Ghana Shippers Authority	0.75	0.5	0.89	0.71	
Ghana Freezones Authority	0.81	0.58	0.89	0.76	
Tree Crop Development Authority	0.06	0.2	0.22	0.16	
TVET	0.72	0.32	0.22	0.42	
Birth and Death Registry	0.34	0.4	0.22	0.32	
Land Use & Spatial Planning	0.31	0.2	0.22	0.24	
National Service Secretariat	0.72	0.4	0.22	0.45	
Upper East Regional Coordinating Council	0.84	0.9	0.22	0.65	
Right to Information Commission	0.91	0.8	--	0.86	

53

Bolgatanga East District Assembly	0.69	0.4	0.22	0.44

6.0 Conclusion

Ghana is among the 140 countries worldwide that have adopted legislation recognising the right of individuals to access information held by public authorities. The passage of the Right to Information Act, 2019 (Act 989) marked a significant step forward in the country's commitment to transparency, accountability, and democratic governance. However, as is the case with many countries, passing the law is only the first step but the real challenge lies in its effective implementation. This RTI Evaluation represents the most comprehensive assessment to date of how well Ghana is putting its access to information law into practice, and it reveals a mixed picture.

Ghana earns an overall yellow grade, reflecting mediocre performance across the four core assessment areas. The strongest result comes from Central Measures, where the Right to Information Commission demonstrated commendable institutional capacity and commitment, earning a green grade. Ghana's performance in Institutional Measures was similarly strong, with many public authorities having appointed Information Officers and put basic systems in place. However, performance dropped in the areas of Proactive Disclosure and Reactive Disclosure, both of which received yellow grades, indicating that significant gaps remain in how public information is published and how requests are handled in practice.

Looking more closely at the public authorities assessed, performance varied widely. While some institutions such as the RTI Commission itself, Accra Metropolitan Assembly, and SSNIT showed strong or improving compliance, many others lagged behind. A number of institutions, particularly in the education, local government, and regulatory sectors, received red grades, with minimal efforts observed

in key areas like proactive disclosure and responsiveness to requests. Several public authorities failed to respond to any RTI requests submitted as part of this assessment, undermining the core purpose of the law, which is to give citizens meaningful access to information held by their government.

This report includes targeted recommendations for a range of actors including the RTI Commission, individual public institutions, and the government as a whole, etc., to address these implementation gaps. These include improving awareness and training, strengthening enforcement, increasing resources for the Commission, and institutionalising best practices across all public authorities.

Ghana has taken an important and admirable step by enacting Act 989. The legal framework is in place, and public expectations are rising. What is now required is sustained political commitment, administrative leadership, and practical reforms to ensure that the law is not only respected in principle but fulfilled in practice. Ghana has the opportunity to emerge as a leader in access to information on the African continent. To do so, it must now match the strength of its law with equally strong implementation.

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ANNEX 1: Self-Assessment 1: Oversight Body Questionnaire

Please fill in this survey according to your best ability, providing as much detail as possible. If you need more space at any point, please feel free to continue on another page.

Independence

(a) Do you feel that overall, the oversight body is independent?

☐ Yes ☐ No   ☐ Partially

(b) If NO or PARTIALLY, why not?

_____

_____

_____

(c) Could its independence be improved? ☐ Yes ☐ No

(d) If YES, how?

_____

_____

_____

1. (a) Were appointments made in accordance with the law?
☐ Yes ☐ No   ☐ Partially

(b) If NO or PARTIALLY, what were the differences?

_____

_____

_____

1. (a) Have any members been removed? ☐ Yes   ☐ No

(b) If YES, was this in accordance with the law? ☐ Yes ☐ No
2. (a) Have members been provided with appropriate training or onboarding programmes?

☐ Yes ☐ No   ☐ Partially

(b) If YES or PARTIALLY, please describe the programme briefly:

_____

2. (a) Is the membership as a whole diverse and representative, including in terms of gender?
☐ Yes ☐ No ☐ Partially

(b) If NO or PARTIALLY, please explain:

_____

_____

3. (a) Does the oversight body receive a sufficient allocation of funding (is it able to undertake all of the activities assigned to it)?
☐ Yes ☐ No

(b) If NO, by what amount (e.g. percentage) do you feel it needs to increase? _____

(c) Please explain your answer:

_____

_____

_____

(d) Has funding ever been decreased year over year? ☐ Yes ☐ No
4. (a) Does the oversight body (i) recruit its own staff or (ii) are these allocated to it by government?
☐ (i) ☐ (ii)

(b) Are they on (i) long-term or (ii) short-term contracts? ☐ (i) ☐ (ii)
5. (a) Does the oversight body have a full or nearly full complement of staff?
☐ Yes ☐ No

(b) Do they have appropriate qualifications and training?

☐ Yes ☐ No ☐ Partially

(b) If NO or PARTIALLY, please explain:

_____

_____

ANNEX 2: Self-Assessment 2: Public Authorities Questionnaires 1

INSTITUTIONAL MEASURES

1. Name of Institution

    _____

2. Has an IO been appointed?

    ☐ Yes
    ☐ No

3. Has the IO formally been given terms of reference or a job description?.

    ☐ Yes
    ☐ No

4. Has the IO been provided with training?

    ☐ Yes
    ☐ No

5. Has an overall implementation plan or set of standard operating procedures (SOPs) been adopted?

    ☐ Yes
    ☐ No

6. Has a set of guidelines for how to process RTI requests been adopted?

☐ Yes
☐ No

7. Is it possible to lodge requests electronically? Is it easy to obtain an RTI request form? Is it easy to find the contact details of the IO? (YES is given for two or more positive answers, NO for one or less)

☐ Yes
☐ No

8. Has a person who is different from the IO been appointed to deal with internal complaints?

☐ Yes
☐ No

9. Did the public authority publish an annual report for the last two years?

☐ Yes
☐ No

10. Has the public authority conducted any public awareness-raising activities over the last year?

☐ Yes
☐ No

11. Has the public authority put in place any system or taken any action to improve its record management?

☐ Yes
☐ No

12. Does the IO have appropriate qualifications for the job and has he or she been   allocated time to do the job?

☐ Strongly
☐ Partially
☐ Weakly

13. Has the IO come under political pressures that make it difficult for him or her to do the job

properly?

☐ Strongly
☐ Partially
☐ Weakly

14. How strong is the overall implementation plan or SOP?

☐ Strongly
☐ Partially
☐ Weakly

15. How strong is the annual report?

◯ Strongly
◯ Partially
◯ Weak

ANNEX 3: Self-Assessment 2: Public Authorities Questionnaire 2

Please fill in this survey according to your best ability, providing as much detail as possible. If you need more space at any point, please feel free to continue on another page.

Name of Public Institution

1. Was the appointment of the IO done in a formal way (i.e. in writing and with a written terms of reference (ToRs) setting out the responsibilities and powers of the post)?

☐ Yes ☐ No

(b) Was time for this task allocated to the IO (i.e. were his or her other duties reduced)?

☐ Yes ☐ No

(c) Does the IO have access to the equipment needed for this job (such as a photocopier/scanner)?

☐ Yes ☐ No

 (d) What is the rank of the IO?

(e) Have other staff been asked to cooperate with the IO?

☐ Yes ☐ No

(f) Do they, in practice?

☐ Yes ☐ No

2. Has the IO been provided with any training?

☐ Yes ☐ No

(b) If YES, describe it briefly:

---

3. Does the IO face any institutional resistance relating to the job (whether formal or informal)?

☐ Yes ☐ No

(b) If YES, describe it briefly.

---

4. Does the public authority have a formal plan of action, standard operating procedures or similar document for RTI?

☐ Yes ☐ No

(b) If YES, is it effective?

☐ Yes ☐ No

(c) Please describe briefly what it contains:

---

5. Has the public authority adopted formal internal procedures for receiving and responding to RTI requests?

☐ Yes ☐ No

(b) Is it easy to lodge a request with the public authority?

☐ Yes ☐ No

(c) Can this be done electronically?

☐ Yes ☐ No

(d) In person?

☐ Yes ☐ No

(e) By post?

☐ Yes ☐ No

(f) Are the contact details of the IO posted online?

☐ Yes ☐ No

(g) At the public offices of the authority?

☐ Yes ☐ No

6. Has the public authority appointed someone to receive and process internal complaints (who is different from the IO)?

☐ Yes ☐ No

(b) Has the public authority adopted procedures for these complaints?

☐ Yes ☐ No

(c) In practice, are they dealt with in a timely manner?

☐ Yes ☐ No

7. Does the public authority publish annual reports on RTI which include statistics on requests?

☐ Yes ☐ No

(b) If YES, indicate when last report was published and describe briefly the information in that report:

8. Has the public authority done anything to raise public awareness about the RTI law?

☐ Yes ☐ No

(b) If YES, please describe briefly what it has done:

9. Has the public authority done anything to improve its records management standards?

☐ Yes ☐ No

(b) If YES, please describe briefly what it has done:

PROACTIVE DISCLOSURE

10. Taking into account the list of types of information subject to proactive publication in the RTI law, does the public authority disclose all or most of the types of information on the list?

☐ Yes ☐ No

☐ PARTIAL

(b) If NO or PARTIALLY, how could it do better?

(c) Does it go beyond the minimum requirements in any respect?

☐ Yes ☐ No

(d) If YES, please describe briefly:

---

11. (a) Is your website WCAG 2.0 compliant (i.e. disabled accessible)? *(Web Content Accessibility Guidelines 2.0 - recommendations for building websites to make it accessible to persons with disabilities or illiterates)*

☐ Yes ☐ No

☐ Partially

(b) If YES or PARTIALLY, what features does it have in this respect?

---

12. Do you disseminate information other than over the website?

☐ Yes ☐ No

(b) If YES, please describe briefly how:

---

13. Are there documents for which you create simple versions that people can understand (i.e. in addition to the main, formal document)?

☐ Yes ☐ No

(b) If YES, please describe which ones?

REACTIVE DISCLOSURE

14. Can citizens submit requests electronically?

☐ Yes ☐ No

(b) In person?

☐ Yes ☐ No

(c) By mail?

☐ Yes ☐ No

(d) Do they have to use a form?

☐ Yes ☐ No

(e) Is the form easily accessible?

☐ Yes ☐ No

(f) Do they need to prove citizenship?

☐ Yes ☐ No

(g) If so, how is this done in practice?

_____

15. When making a request, what information does a requester need to provide?

_____

16. What languages may requests be made in?

_____

17. Where the requester appears to need assistance, is this provided?

☐ Yes ☐ No

☐ Sometimes

(b) If YES or SOMETIMES, how often is such assistance provided (e.g. as a percentage of all requests)?

_____

(c) What sorts of assistance are provided?

_____

18. When an application is lodged, does the IO acknowledged receipt?

☐ Yes ☐ No

☐ Sometimes

(b) If YES or SOMETIMES, how is it provided?

_____

19. When the public authority does not hold the information, what does it do?

_____

(b) If, in this situation, requests are transferred or the requester is informed that the authority does not hold the information, how long on average does this take?

_____

20. How long (days) on average does it take the public authority to respond to requests?

_____

(b) What standards are applied in terms of timeliness?

_____

(c) Are extensions to the time limit sometimes imposed?

☐ Yes ☐ No

(d) If YES, how and when is that done?

_____

(e) Are there cases where it takes longer than the time limit or any formal extension to respond to a request?

☐ Yes ☐ No

(f) If YES, how often does this happen as a percentage of all requests?

_____

21. Do requesters sometimes ask for information in a particular format?

☐ Yes ☐ No

(b) If YES, is it normally provided in this format?

☐ Yes ☐ No

22. If NO, what conditions are used to justify providing it in a different format?

_____

23. What fees does the public authority charge when providing information?

_____

(b) Does the public authority charge a fee when a requester first lodges a request?

☐ Yes ☐ No

8. Has the public authority done anything to raise public awareness about the RTI law?

☐ Yes ☐ No

24. How often does the public authority refuse requests (e.g. as a percentage of all requests)? percentage

_____

(b) When this happens, is the requester informed about it?

☐ Yes ☐ No

(c) If YES, how and what is included in the notice?

_____

25. What is the most common exception used when refusing requests?

_____

(b) What other exceptions are common?

_____

26. If the answer to the first part of Question 5 about having adopted formal internal rules on processing requests was YES, does the authority comply with the formal internal rules on processing requests?

(b) If NO or SOMETIMES, what are the most common ways the rules are not followed?

ANNEX 4: KEY INFORMANTS INTERVIEWS

CLD COMPREHENSIVE METHODOLOGY FOR ASSESSING RTI

IMPLEMENTAITON

KEY INFORMANTS INTERVIEWS

1. Do you feel overall that the oversight body is independent?
   - ➢ Why or why not?
   - ➢ Could its independence be improved?
   - ➢ If so, how?
   - ➢ What about the members as individuals?
   - ➢ What reasons justify your answer?
   - ➢ Do they have appropriate expertise for this position?
   - ➢ Are they effective in their work?
   - ➢ How were they appointed?
   - ➢ Have any members been removed?
   - ➢ If so, how was this done?
   - ➢ Have members been provided with appropriate training or onboarding programmes?
   - ➢ Is the membership as a whole diverse and representative, including in terms of gender?
2. Does the oversight body receive a sufficient allocation of funding (is it able to undertake all of the activities assigned to it)?
   - ➢ If not, by what amount (e.g. percentage) do you feel it needs to increase?
   - ➢ Has funding ever been decreased year over year?
3. Does the oversight body recruit its own staff or are these allocated to it by government?
   - ➢ Are they on long-term or short-term contracts?
   - ➢ Does it have a full or nearly full complement of staff?
   - ➢ Do they have appropriate qualifications and training?
4. Does the oversight body make an effort to be geographically accessible (e.g. by holding hearings outside of the capital or by making videoconference facilities available)?
   - ➢ If so, how?
5. Have clear procedures for processing appeals been adopted?
   - ➢ If so, what procedures do they provide for?
   - ➢ How long, on average, does it take to process appeals?
   - ➢ What about longer appeals?
6. Are appropriate decisions being made on appeal?
   - ➢ Are appropriate remedies being awarded?

> ➤ If your answer to either question is no, in what way are the decisions or remedies inappropriate?

7. Does the oversight body conduct follow up to assess whether its decisions have been implemented?
   > ➤ If so, what sort of follow up?
8. Are appeal decisions posted online?
9. Beyond formal appeals, does the oversight body take steps of its own (suo moto steps) to ensure that public authorities are respecting the law?
   > ➤ What sorts of steps?
10. Has the oversight body undertaken any regulatory steps to implement the law (e.g. to set fees or records management standards, to discipline officials, and so on)?
    > ➤ If it has powers to discipline officials, has it used these?
    > ➤ If so, how many times and imposing what sorts of sanctions?
11. Has the oversight body taken steps to raise public awareness about RTI?
    > ➤ If so, what sorts of steps?
12. Has the oversight body participated in providing training for PIOs?
    > ➤ For other officials?
    > ➤ If so, what sorts of activities has it undertaken in this regard?
13. Does the oversight body produce an annual report each year?
    > ➤ If so, where is this available?
    > ➤ What is included in the annual report?
14. Has the oversight body provided comments on draft laws?
    > ➤ If so, which laws?
15. Has the oversight body taken any other steps to improve implementation?

ANNEX 5: LIST OF REQUESTS MADE TO THE 19 DIFFERENT PUBLIC INSTITUTIONS

Accra Metropolitan Assembly	How is the AMA working to improve sanitation in the mark areas?
	What are the 'AMA's efforts to engage with local communities and involve them in decision making processes.
National Health Insurance Authority	Are there financial assistance or subsidy programs available?
	Does the plan include dental and visions care? If so, what are the specifics at coverage?
Ministry of Sports & Hygiene	What percentage of the ministry's budget is allocated to programs to support youth participant in non-traditional sports?
	What is the annual budget allocated to youth sports development programs, and how has it changed over the past 3 years?
Office of The President	Could you provide a detailed breakdown of the roles and responsibilities of key presidential staff members?
	How are the lines of authority and communication defined within the presidential staff?
Ghana Education Service	How do you incorporate new technologies into teaching and learning at the SHS level since the use of mobile phones is prohibited?
	What professional development and career guidance opportunities do you offer to third year students both JHS and SHS and teachers in the school?
Ghana Fire Service (Upper East)	Data on fire incidents recorded in the Upper East Region from January 2022 to December 2024.
	Staffing numbers and firefighting equipment availability across fire stations in the Upper East Region.
SSNIT	How many new pension applications have been processed and approved by the SSNIT Bolgatanga office in the last two years?
	What is the average processing time for pension benefits, and what measures are in place to improve efficiency?
Bolgatanga Nursing Training College	How many students were admitted into the Nursing Training School in the past three years, and what were the cut-off points for admission?
	Can you provide a breakdown of government and internally generated funds received by the institution for academic and infrastructure development?
Kumasi Metropolitan Assembly	How much did the Assembly spend on sanitation campaigns in Kumasi between 2021 and 2023?
	How much did the Assembly generate from property taxes in 2021?
Middle Belt Development Authority	When was the Ejisu water supply expansion project completed?
	What was the cost of the Ejisu water expansion project?
Ghana Shippers Authority	How much unpaid services and charges has the Ghana Shippers Authority recovered from shipping service providers for 2024?
	How many enterprises became a part of the Ghana Shippers Authority in 2024?
Ghana Freezones Authority	The total number of compliant and non-compliant free zone enterprises for 2023
	How many licenses did Ghana Freezones authority grant to its applicants in 2024?
Tree Crop Development Authority	How much did Tree Crops Development Authority spend on tree crops seedlings distribution in 2023?
	What was the total amount spent on farmer training in 2023?
TVET	TVET schools in bono region
	Is TVET education free in bono region?

Birth and Death Registry	How many certificates have been issued from January- December 2024?
	How long after death do you register a person after birth?
Land Use & Spatial Planning	How many staff do you have in Sunyani office?
	Which year was land and spatial planning established and what are your mandates?
National Service Secretariat	How many NSS personnel were registered in the year 2024 (January –December).
	How many permanent staff operates in the Sunyani Regional Office?
Upper East Regional Cordinating Council	Furnish me with copies of the development plans and budgets approved for the Upper East Region in 2024?
	How much funding has been allocated and disbursed to the various Municipal and District Assemblies under the Regional Coordinating Council in the past two years?
Bolgatanga East District Assembly	What have been the major development projects undertaken by the District Assembly in the past three years, and what are their status
	How much funding has the District Assembly received from the central government and donor partners over the past two years and how has it been utilised?