

**Final Report on the RTI Assessment of Ministries
Departments and Agencies (MDAs) with respect to
Compliance**

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Abbreviations and acronyms:

- i. **CLD: Centre for Law and Democracy**
- ii. **RTIIACM: Right to Information Implementation Assessment Comprehensive Methodology**
- iii. **RTI: Right to Information**
- iv. **SDG: Sustainable Development Goal**
- v. **RAIC: Right to Access Information Commission**
- vi. **MDAs: Ministries, Departments and Agencies**
- vii. **SOEs: State-Owned Enterprises**
- viii. **IO: Information Officer**
- ix. **IRs: Information Requestors**
- x. **TRs: Test Requests**
- xi. **PR: Public Requestor**
- xii. **ATI: Access to Information**
- xiii. **RAI: Right to Information**
- xiv. **RTK: Right to Know**
- xv. **ACHPR: African Charter on Human and Peoples Rights**
- xvi. **ICIC: International Conference of Information Commissioners**
- xvii. **ANIC: African Network of Information Commissioners**
- xviii. **UNESCO: United Nations Educational Scientific and Cultural Organisation**
- xix. **TRC: Truth and Reconciliation Commission**
- xx. **RAIR: Right to Access Information Regulation**
- xxi. **AR: Annual Report**
- xxii. **PIO: Public Information Officer**
- xxiii. **PA: Public Authority**
- xxiv. **OB: Oversight Body**
- xxv. **TI: Transparency International**
- xxvi. **NMYCW: Network Movement for Youth and Children's Welfare**
- xxvii. **BAN: Budget Advocacy Network**
- xxviii. **MoF: Ministry of Finance**
- xxix. **BSL: Bank of Sierra Leone**
- xxx. **EDSA: Electricity Distribution and Supply Authority**
- xxxi. **SLLB: Sierra Leone Library Board**
- xxxi. **ACC: Anti-Corruption Commission**
- xxxiii. **PPRC: Political Party Regulation Commission**
- xxxiv. **MCC: Makeni City Council**
- xxxv. **BDC: Bo District Council**
- xxxvi. **KDC: Kenema District Council**
- xxxvii. **SLP: Sierra Leone Police**
- xxxviii. **CHRDI: Campaign for Human Rights and Development Interna**

FOREWORD

It is with great pride and a deep sense of responsibility that I introduce this inaugural assessment of the Right to Information (RTI) implementation in Sierra Leone. Enacted in October 2013, our Right to Access Information law represented a landmark commitment to transparency and citizen empowerment. Over the past twelve years, we have witnessed significant strides: the establishment of the Right to Access Information Commission (RAIC), the development of implementing regulations in 2022, and the creation of regional offices that extend our reach beyond the capital, Freetown. Yet, enduring gaps in capacity, consistency, and proactive/reactive disclosure underscore the need for a rigorous, data-driven examination of how our foundational legal guarantees translate into everyday practice.

This report responds to that need. This assessment was funded in part by the Government of Canada through the project Improving the Implementation of Access to Information Laws. We wish to thank the Government of Canada for their financial support. We also wish to thank the Centre for Law and Democracy for working in partnership with us to provide support and assistance with implementing this assessment. Applied in collaboration with some selected Civil Society Organizations, especially FORWARD—Sierra Leone, this report details the application of CLD’s comprehensive RTI Implementation Assessment Methodology to eleven pilot Ministries, Departments, and Agencies (MDAs) over the period of March to May 2025. Our three-month project encompasses four interrelated dimensions:

1. **Central Measures** assess the RAIC’s own performance as the statutory oversight body: how we process appeals and complaints, undertake outreach, and strengthen our internal structures to guide MDAs in fulfilling their RTI obligations.
2. **Institutional Measures** evaluate whether each pilot MDA has appointed and adequately trained Public Information Officers, established records-management and ICT units, and allocated the resources necessary for timely, accessible information handling.
3. **Proactive Disclosure Measures** examine the extent to which MDAs make essential information available to the public on their own initiative—through websites, notice boards, and other platforms—thereby reducing the need for formal requests and fostering a culture of openness.

4. **Reactive Disclosure Measures** gauge the responsiveness of MDAs to information requests, including the processing of test information requests by eight Civil Society Organizations, which serve as practical litmus tests for compliance with statutory timeframes and procedures without necessarily letting them know these are test information requests

The CLD methodology aligns closely with Sustainable Development Goal 16.10.2, reinforcing Sierra Leone's commitment to global norms on access to public information and the protection of fundamental freedoms. By combining structured self-assessments with independent verification through expert interviews, desk and on sight reviews, and test requests, this exercise not only measures compliance but also identifies systemic strengths and weaknesses that will guide targeted reforms.

Among our key findings, we note that the vast majority of MDAs have embraced the role of public information officers (PIOs) in the right to access information ecosystem, yet regional disparities persist—particularly outside Freetown—where resource constraints and technical challenges hinder both proactive and reactive information disclosures. Similarly, while record-management and ICT capacities have improved in many agencies, a minority still lack the foundational infrastructure to process requests efficiently. On the positive side, our oversight functions have matured over the past six years: appeals are handled more consistently, and our outreach efforts—including workshops, media engagements, and community dialogues—have raised awareness of citizens' rights, not least their right to information.

This report is more than a diagnosis of ATI in Sierra Leone; it is a call to collective action. I urge public authorities to use these findings and recommendations as a roadmap for strengthening institutional frameworks, investing in digital and human resources, and prioritizing proactive publication of information. To my colleagues at the RAIC, let us redouble our efforts to support MDAs through targeted capacity-building, streamlined guidance materials, and improved monitoring systems. And to our civil society partners, development agencies, and media practitioners, your continued advocacy and collaboration will be indispensable in sustaining this momentum and ensuring that access to information becomes deeply embedded in Sierra Leone's democratic culture.

As we reflect on twelve years of legal progress and eleven years of institutional experience, this comprehensive assessment offers us both affirmation of our achievements and clarity on the path ahead. I extend my heartfelt gratitude to the Centre for Law and Democracy for their methodological expertise, to FORWARD–Sierra Leone for their unwavering support, and whose Executive Director served as the project coordinator, to the Government of Canada for their financial support and to the dedicated project team whose meticulous work made this report possible.

May these insights inspire strategic reforms, invigorate public discourse, and ultimately, guarantee that every Sierra Leonean can exercise their fundamental right to know.

*Dr. Ibrahim Seaga Shaw
Chairman & Information Commissioner
Right to Access Information Commission
24th May, 2025*

Executive Summary

Twelve years since the enactment of the Right to Access Information Act 2013 and eleven years after the Right to Access Information Commission (RAIC) was constituted, there has never been a comprehensive assessment of the performance of the Right to Information (RTI) law implementation in Sierra Leone. So, to this end, the Right to Access Information Commission (RAIC) partnered with the Centre for Law and Democracy (CLD) in Canada, and selected leading Civil Society Organisations (CSOs) on Access to Information, to implement a three-month project using the RTI Methodology Assessment developed by CLD, to assess the performance of eleven Pilot Ministries, Departments and Agencies (MDAs) on their compliance with the ATI law in Sierra Leone.

The RTI Assessment Comprehensive Methodology is an in-depth tool that assesses how well right to information laws are being implemented. The need for such tools has long been apparent and the inclusion of the implementation of RTI in the Sustainable Development Goals (SDGs) Indicator 16.10.2 further highlights this need. This Assessment therefore sought to assess the RTI law compliance of: the Ministry of Finance (MoF), Political Parties Regulatory Commission (PPRC), Bank of Sierra Leone (BSL), Sierra Leone Library Board (SLLB), Electricity Distribution Supply Authority (EDSA), Parliament, Sierra Leone Police (SLP), Anti-Corruption Commission (ACC), Makeni City Council (MCC), Bo District Council (BoDC) and the Kenema District Council (KenDC), including also the RTI Oversight Body the Right to Access Information Commission (RAIC). The Comprehensive Methodology assessment covered four key assessment areas: Central Measures: which focused on the RAIC as Oversight Body and consisted mainly of assessing the processing of appeals/complaints and the undertaking of promotional measures. The other three assessment areas are applicable to each of the eleven Pilot MDAs covered by the project. They consist of Institutional Measures, which looked at issues like whether an information officer had been appointed and if the officer had been provided with training, and then a direct assessment of Proactive Disclosure and Reactive Disclosure.

Seven different assessment tools in the Comprehensive Methodology were deployed for the assessment: a desk-based literature review, a desk-based review of appeal decisions, a desk-based review of proactive disclosure (focusing on online publication), key informant interviews,

office visits (to check physical proactive disclosure) and RTI test requests. Assessment tools were used to gather information in relation to four assessment areas:

- i. Central Measures
- ii. Institutional Measures
- iii. Proactive Disclosure
- iv. Reactive Disclosure

The role of the selected six partner Civil Society Organisations (CSOs) i.e. Transparency International -SL, FORWARD-SL, Network Movement for Youth and Children's Welfare (NMYCW), People's Rights Integrity and Dignity Empowerment (PRIDE), Centre for Security, Peace and Development (CESOPAD) and Mobilisation for the Reign of Democracy (MRD) in putting through nineteen (19) Test Requests to all eleven Pilot MDAs without them knowing they were being tested, aimed at gauging their compliance in line with the Reactive Disclosure Measure assessment, was one of the key highlights of this RTI Comprehensive Methodology Assessment. Out of the eleven MDAs, six responded within the prescribed 15 working days (section 4) of the RAI Act 2013, whilst the others defaulted. However, it has been a learning curve for all of the pilot MDAs as was evidently shown during the validation exercise of the report findings.

1. Introduction:

The Right to Information Implementation Assessment Comprehensive Methodology (RTIIACM) was developed by the Centre of Law and Democracy (CLD) as an in-depth tool to assess how well the Right to Information (RTI) laws are being implemented. The need for such tool has long been apparent and the inclusion of implementation of RTI in the Sustainable Development Goal (SDG) Indicator 16.10.2 (from project document) has further highlighted this need. The Comprehensive Methodology therefore provides a deep assessment of the state of implementation, including both strengths and areas for improvement.

Against this backdrop therefore, the Right to Access Information Commission (RAIC) in Sierra Leone, with support from the Centre of Law and Democracy (CLD) Canada, implemented a three-month Project on RTI implementation assessment of Ministries, Departments and Agencies (MDAs) from March to May, 2025. This project aimed at assessing the compliance rate of MDAs in relation to RTI implementation as provided for in the Right to Access Information (RAI) Act 2013.

In order for the assessment to be more focused and apt, the RAIC selected eleven (11) MDAs as a pilot with the understanding that a broader selection of authorities may be selected in a future assessment. These 11 institutions cut across a broad spectrum of MDAs ranging from: ministries, local councils, state-owned enterprises (SOEs) and quasi-government bodies. The Comprehensive Methodology deployed for this assessment covered four key assessment areas: Central Measures, Institutional Measures, Proactive Disclosure and Reactive Disclosure.

The Central Measures assessment focused mainly on the Oversight Institution, in this case, the Right to Access Information Commission (RAIC), and consisted mainly of assessing the processing of appeals/complaints and the undertaking of promotional measures, whilst the other three assessment areas were applicable to each of the Pilot MDAs that were selected for the assessment. The Institutional Measures assessment looked at issues such as whether an Information Officer (IO) had been appointed and whether or not the IO has been provided with training. The Proactive Disclosure assessment looked at an online publication/disclosure of information by the Pilot MDA as well as a physical visit observation; whilst the Reactive

Disclosure assessment looked at the MDAs' ability to respond to Information Requests (IRs) from Public Requesters (PR) within the ambit of the law.

The assessment also took cognisance of the role of civil society in pushing MDAs to their limits in enhancing their compliance level with the RTI law. In bringing this to the fore of the just concluded RTI Assessment in Sierra Leone, eight Civil Society Organisations that work around Access to Information (ATI) and that were part of the key front-liners in the decade-long campaign that led to the enactment of the RAI Act 2013, were brought onboard the assessment exercise to lodge Test Requests (TRs) to the eleven Pilot MDAs in a bid to gauge their compliance level with Reactive Disclosure obligations under the RTI law.

After a two-day workshop jointly conducted by the Right to Access Information Commission (RAIC) and the Centre for Law and Democracy (CLD) based in Canada, on the Right To Information (RTI) Methodology and how to carry out its assessment of the Ministries, /Departments and Agencies (MDAs) with respect to compliance with the provisions of the Right to Access Information (RAI) Act 2013, the RAIC through its Chairman and Information Commissioner then swiftly put a Project Team together to undertake a three-month project implementation of the RTI Methodology.

The three months project aimed to carry out a 'Compliance Assessment' of eleven (11) Pilot MDAs and a separate assessment of the 'Oversight Body', the Right to Access Information (RAIC) Commission.

2. Literature Review:

Right to information (RTI) also called access to information (ATI) or right to know (RTK) is a fundamental human right recognized and protected in international law and the 1991 Constitution of Sierra Leone. Right to information has been a central discourse in several regional and global conferences or meetings, especially in the last decade. Such a right is considered as the enabler of all development enablers as it promotes transparency, accountability, good governance and empowers citizens with information and understanding to take part in decision-making and hold their leaders to account. It is obvious that no sector can thrive without adherence to the tenets of **Right to Information**. It is vivid that the lack of access to timely and credible information is a recipe for misinformation, fake news and instability.

At the international front, among other legal instruments, article 19 of the International Covenant on Civil and Political Rights (ICCPR); article 19 of the Universal Declaration of Human Rights (UDHR) and article 9 of the African Charter on Human and Peoples Rights (ACHPR) recognize the **Right to Information** as central and pivotal. The International Conference of Information Commissioners (ICIC) and the African Network of Information Commissioners (ANIC) are **Inter-State Bodies** established to promote the right to information both at International and Regional levels respectively. The United Nations Educational Scientific and Cultural Organisation (UNESCO) is the specialised United Nations Agency that provides global oversight for Sustainable Development Goal 16.10 (SDG 16.10) – the SDG target on **Access to Public Information (API)**. It is obvious that the **Right to Information** is the heartbeat of democracy and development as everything revolves around it.

In Sierra Leone, the legislation of Access to Information began with consistent advocacy by influential Civil Society and Media voices as it is also a key recommendation of the country's Truth and Reconciliation Commission (TRC), a restorative justice body set up to investigate the cause of Sierra Leone's eleven-year civil war [1991-2002]. Following a decade-long strong consistent advocacy, the Government of Sierra Leone in October, 2013 passed into law the **Right to Access Information Act**, and in 2022, the **Right to Access Information Regulations**. The 2013 Right to Access Information Law of Sierra Leone was the world's third strongest RTI law at the time of its passage according to the respected Right to Information (RTI) Rating which

measures the strength of legal guarantees for the right to information globally. The RTI Law of Sierra Leone gives and guarantees everyone the **Right** to access information held by Public Authorities or by institutions providing service for public authorities.

However, despite the passage of the Right to Access Information Act in 2013, which provided for the establishment of the Right to Access Information Commission (RAIC) as the country's access to information oversight body, the Commission was only established a year later in 2014. Thus, as of 2025, Sierra Leone's RTI law is twelve years old while the oversight body is eleven years old.

Since the passage of the RAI Law and establishment of the Commission, however, there has been tremendous progress in transitioning Sierra Leone from a culture of secrecy to one of openness. It is important to emphasize that the country now has an **RTI Law and Oversight Body**. The Commission now has a structured Secretariat in the capital, Freetown, and in four of the now five regions of the country with staff charged with the mandate of implementing the RAI Act of 2013 of the country. The enactment of the **Right to Access Information Regulations (RAIR) in 2022** is an additional legal strength to the Commission and Public Requesters. The Commission has been consistently publishing **Annual Reports (AR)** capturing the status of access to information yearly since 2019. Though fraught with institutional and logistical challenges, there has been a consistent increase in **Information Requests (IR)** nationwide. The Commission is fully constituted at both Secretariat and Regional levels with an up-to-date website and several social media handles to publish stories, articles and other contents bordering on the work of the Commission and other access to information related concepts and materials. These media also serve as channels for interfacing with the public and receiving feedback. Additionally, there have been several needs-based trainings for the Public Authorities, Media, Civil Society and other entities on **Access to Information (ATI)** as part of RAIC's awareness-raising strategy of RTI law, processes and procedures in addition to consistent media, school and community appearances or engagements in local dialects. Moreover, there have been landmark cases where the RAIC has fined Public Authorities for not providing information according to the RAI Law of 2013. Moreover, the Commission for the first time launched a digital access to information platform in March 2024, providing an online alternative for filing information requests from public authorities. Also, Sierra Leone is now a member of both the International

Conference of Information Commissioners and the African Network of Information Commissioners with the head of the Right to Access Information Commission currently serving as a member of the Executive Committees of both organisations.

Notwithstanding the gains over the years, there remain to be funding, technical capacity and compliance challenges, and the Commission continues to engage government, development partners and other stakeholders in the **Access to Information** sphere to enhance the full implementation and enforcement of Sierra Leone's RTI Law.

It is against this backdrop that the Right to Access Information Commission (RAIC) in Sierra Leone hired Mr. Charles Keif-Kobai, Executive Director of FORWARD- Sierra Leone, a vibrant civil society organisation and one of the non-state actors which has been championing the Right to Information in Sierra Leone, as a consultant project coordinator with the support of the RAIC Compliance staff to conduct a comprehensive review to bring out sound data on the implementation realities of the country's RTI Law as it clocks twelve years. The Project team utilised and relied on the RTI Evaluation Methodology, a comprehensive right to information implementation evaluation methodology developed by the Centre for Law and Democracy (CLD) Canada. The methodology tests and assesses the implementation of RTI laws, whereas the same Centre for Law and Democracy's RTI Rating (rti-rating.org), only focuses on rating the strength of the legal framework for RTI laws.

The assessment was conducted between March and May in 2025 and this report contains the outcome of the evaluation exercise.

The report begins with highlighting and explaining the methodology adopted in addition to specific sections which delve deep into the outcome of the four assessment areas: Central Measures, Institutional Measures, Proactive Disclosure and Reactive Disclosure. Central Measures assesses the performance of Sierra Leone's RTI oversight body – the Right to Access Information Commission. The other three assessment areas – Institutional Measures, Proactive Disclosure and Reactive Disclosure – evaluate the performance of the selected Public Authorities.

Each of the Public Authorities was assessed on how well it is doing in terms of structural or institutional measures – such as appointing and training a **Public Information Officer (PIO)**

and preparing annual reports on the right to information – in terms of the proactive disclosure of information – i.e. whether it is disseminating important information to citizens even where they do not ask for it – and, finally, in terms of reactive disclosure – or how well it is responding to requests for information. A final section looks at the final grades both for Sierra Leone as a jurisdiction and for the eleven **Public Authorities** (PA) which were assessed.

References

- Right to Access Information Act of Sierra Leone of 2013
- RTI Evaluation Methodology adopted by Centre for Law and Democracy
- Sustainable Development Goals

3. Brief Organisational Background of RAIC:

The Right to Access Information Commission (RAIC) was established by an Act of Parliament under section 30 (1) of the RAI Act 2013, as an **Oversight Body (OB)** to guide and lead on the implementation of provisions of the RAI Act 2013. Constituted in 2014, a year after the enactment of the Act, the RAIC comprises a Chairman/ Information Commissioner and four Regional Commissioners (section 31)— i.e. for Western Area, Northern Region, Southern Region and Eastern Region—an Executive Secretary, Core Staff and support Staff, that are charged with the day-to-day responsibilities and activities of the Commission across the country. The RAIC has its Headquarters housed in the capital Freetown, on 58 Krootown, with its Regional offices in the Regional Headquarter towns of Freetown, Makeni, Bo and Kenema respectively.

Over the last ten to eleven years, the RAIC has preoccupied itself in enrooting the culture and values of access to information amongst MDAs by providing requisite capacity building trainings, and infrastructure for Public Authorities aimed at promoting public accountability, good governance and citizens' access to public held information. The Commission has also on a number of times acted on matters/complaints and/or appeals brought before it by public requesters against public authorities alleged to have violated the RTI law since it has a High Court status as provided for in section 32 (3).

4. The Project Team:

A Project Coordinator was first contracted that led the project implementation efforts. A Project Team of six personnel was thereafter constituted by the Chairman and Information Commissioner, Dr Ibrahim Seaga Shaw and charged with the responsibility of undertaking the project implementation led by the Project Coordinator. The Team consisted of Charles Keif-Kobai – Project Coordinator, from FORWARD-SL. David Patrick Kamara, RAIC, Fanta Morgan (Mrs.) RAIC, Miss. Davida Campbell, RAIC, Amara Thoronka, RAIC, and Mattu Bendu (Mrs.) RAIC, being secretary to the team.

The Project Team, in a bid to properly set in motion the project workplan, met on two separate days initially, acquainted themselves with the task at hand, understood the project document proper, and shared responsibilities amongst the team members. These meetings were held on March 13th and 17th, 2025. It was in these meetings that the list of Pilot MDAs was discussed, agreed upon and developed by the Team, and later on presented to the Chairman and Information Commissioner, RAIC, for approval before meeting with the selected MDAs themselves. Fifteen MDAs, 12 of which from Freetown and 3 from the provinces, were initially listed for the pilot assessment and officially written to and invited to a Maiden Meeting on 25th March, 2025.

The Project Team held meetings over the course of implementation at least once a week to share updates with team members and to evaluate progress made so as to keep on track with deadlines. They worked as a team every step of the way. This was evident in the manner in which team members were peered up on responsibilities throughout the implementation.

5. RTI Methodology:

The RTI Methodology covered four Assessment Areas:

- i. Central Measures
- ii. Institutional Measures
- iii. Proactive Disclosure and
- iv. Reactive Disclosure

Central Measures assessed the Oversight Body in this case, the RAIC, on how appeals/complaints from citizen/public requesters had been handled/processed during the year under review 2024, whilst the three (3) other assessment areas directly assessed the MDAs.

- i. **Central Measures:** One of the CSOs that was brought onboard the process, Campaign for Human Rights and Development International (CHRDI), was charged with the responsibility for assessing the RAIC as the Oversight Body. Two staff members of CHRDI were trained by a project team member on how to conduct the assessment on the Oversight Body. CHRDI then conducted both a physical and online

assessment of the RAIC both in terms of complaints/appeals, and the infrastructure to manage as well as effectively provide oversight for Public Authorities with respect to the RTI Law implementation.

- ii. **Institutional Measures:** A team of two project team members charged with the responsibility for assessing the **Institutional Measures** of the MDAs, over a two-week period conducted Key Informant Interviews with designated staff/personnel of the said pilot MDAs.
- iii. **Proactive Disclosure:** A desk review was undertaken by two designated team members who carried out an online assessment on all eleven MDAs and ascertained their Proactive Disclosure status. Visitation to the premises of the MDAs was also carried out, and the team assessed the physical proactive disclosure of information within the MDAs' facilities intended for public consumption.
- iv. **Reactive Disclosure:** In a bid to effectively carry out this reactive disclosure assessment, seven CSOs brought onboard the project were engaged on the project document and assessment guidelines; and each assigned MDAs that they formulated and sent test requests to determine the MDAs' response rate in terms of reactive disclosure. Of the seven CSOs recruited for this exercise, four were from Freetown i.e. FORWARD-SL, Transparency International (TI), Network Movement for Youth and Children's Welfare (NMYCW), and Budget Advocacy Network (BAN); and three were drawn from the provinces i.e. People's Rights Integrity and Dignity Empowerment (PRIDE), Bo, Southern Province, Centre for Security, Peace and Development (CESOPAD), Makeni, Northern Province, and Mobilisation for the Reign of Democracy (MRD), Kenema, Eastern Province.

The eight MDAs in Freetown were then distributed among the aforementioned CSOs selected from Freetown, two MDAs per each CSO, although one of the CSOs ended up not continuing with the exercise so FORWARD-SL doubled in for that CSO i.e. BAN, whilst the provincial CSOs each covered one City/District Council in each of the three provinces.

Overall scores between 0 and 1 were assigned to RAIC, in relation to the Central Measures Assessment Area, and to each selected public authority in relation to each other assessment area, as well as Sierra Leone as a whole. These scores were then converted into colour grades representing an overall score of poor, mediocre or good in each area, according to the below chart:

Colour Grade	Red	Yellow	Green
Score	0.00 - 0.33	0.34 - 0.66	0.67 - 1.00

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*.

6. MDAs Engagement:

The project kick-started with a training of the RAIC project staff and MDAs/CSOs staff to take part in the implementation. The training took place on the 20th and 21st February, 2025 at the Family Kingdom resort and was facilitated by Raphael Vagliano of the Centre for Law and Democracy in Canada. At the end of the two-day training on how to use the RTI methodology developed by CLD, certificates of participation were presented to all the participants.



RAIC CIC Dr Shaw and CLD Training Facilitator Raphael Vagliano presenting the certificate of participation to participant Charles Keif Kobai



Presenting the certificate of participation to participant Davida Campbell

In a bid to kickstart the project implementation proper, and to effectively have the buy-in as well as collaboration of the MDAs, the Project Team through the RAIC Executive Secretary Hon Mustapha Braima officially wrote and invited 15 Pilot MDAs one week prior to the scheduled March 25th Maiden Meeting but only six (6) attended from Freetown out of the 12, plus the 3 in the provinces who attended the Meeting virtually via WhatsApp Call. Due to the low turnout of the Freetown MDAs, a second meeting was slated for Thursday 27th March, 2025, where the Team met with the remaining MDAs that did not attend the March 25th meeting.

The second meeting with MDAs was held on Thursday 27th March, 2025, between 10:00 am and 12:00 pm at the RAIC's Headquarters, at 58 Krootown Road. Unfortunately, only two of the remaining six (6) MDAs attended the second meeting. As a result of which, the Team therefore took a decision to work with the eight MDAs that attended the two MDA meetings of 25th and

27th March, 2025, from Freetown jurisdiction, plus three from the provinces, making a total of eleven MDAs that were assessed on the RTI Methodology. The objective of these two separate meetings with the MDAs was aimed at briefing them on the project details where the Project Team highlighted the key Assessment Areas of the Methodology that deepened their understanding of the RTI Methodology project.

Questions/concerns were hitherto raised by the MDAs and addressed jointly by the project team. In attendance of the two separate MDA Meetings were:

1. Ministry of Finance (MoF)
2. Bank of Sierra Leone (BSL)
3. Electricity Distribution and Supply Authority (EDSA)
4. Sierra Leone Library Board (SLLB)
5. Anti-Corruption Commission (ACC)
6. Political Parties Regulation Commission (PPRC)
7. Bo District Council (BoDC)
8. Makeni City Council (MCC)
9. Kenema District Council (KenDC), on the first day and:
10. Sierra Leone Police (SLP)
11. Parliament of Sierra Leone, on the second day.

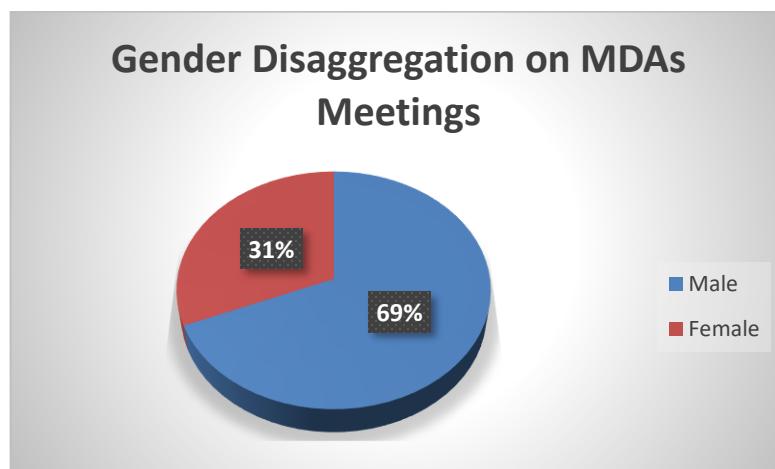
Gender Disaggregation of Attendees for the 2 separate MDAs Engagements

No.	Name	Designation	Institution	Gender
1.	Ahmed Sesay	Media & Public Relations	MoF	M
2.	Soko B. Kamara	Senior Manager	BSL	M
3.	Amadu Bah	Project Engineer	EDSA	M
4.	Abu Bakarr Kargbo	Communication Officer	SLLB	M
5.	Martina George	Communication Officer	ACC	F
6.	Eugene Momoh	Outreach Officer	PPRC	M
7.	John Kalokoh	Public Information and Communication Officer (via online)	RAIC	M

8.	Millicent Braima	Public Information and Communication Officer (via online)	RAIC	F
9.	Abdul Rahman Tejan	Information Officer (via online)	KDC	M
10.	Joseph Bangura	Admin Officer	SLP	M
11.	Mohamed A. Sesay	Public Information Officer	Parliament	M
12.	Charles Keif-Kobai	Project Coordinator	RAIC	M
13.	Mattu Bendu	Open Data Officer	RAIC	F
14.	Fanta Morgan	Manager, Records & Open Data	RAIC	F
15.	James Fortune	Public Information Officer (via online)	RAIC	M
16.	Davida Campbell	Senior Compliance Officer	RAIC	F

Aside from these meetings whereby the project team engaged with the MDAs, the team, over the course of the project implementation, engaged and interacted with the 11 pilot MDAs around the Key Informant Interviews and for the physical visit assessment.

Interpretation of gender analysis of attendees of the MDA Meetings: 68.75% male attendees, as against 31.25% female attendees.



7. CSO Engagements:

The Project Team held two sets of meetings with selected CSOs; the first one of which was held on Thursday 27th March, 2025, between 12:30 pm and 1:30 pm, where they were orientated on the key highlights of the RTI Methodology Assessment and took them through all the four assessment areas. However, out of the five CSOs that were initially selected by the team, only 3 showed up for the meeting that day i.e. FORWARD-SL, Transparency International and Network Movement for Youth and Children's Welfare (NMYCW). The second of which was also held on Tuesday 1st April, 2025, and in attendance were:

- i. Transparency International (TI)
- ii. Network Movement for Youth and Children's Welfare (NMYCW)
- iii. Budget Advocacy Network (BAN)
- iv. FORWARD-SL

It was at this second meeting that the eight selected Pilot MDAs in Freetown were distributed amongst the four selected CSOs; 2 MDAs per CSO for the Test Requests that were conducted in Freetown during the course of the project implementation, whilst 3 CSOs were recruited in the provinces that conducted the Test Requests for the Three (3) provincial councils i.e. Bo District Council, Makeni City Council and Kenema District Council respectively. These selected CSOs were also worked through sample requests and were then asked by the Team to send their draft requests through a WhatsApp forum that was established for ease of communication among them, which they did. In total, sixteen (16) information requests were made to the eight (8) MDAs in Freetown, and three (3) requests the provinces.

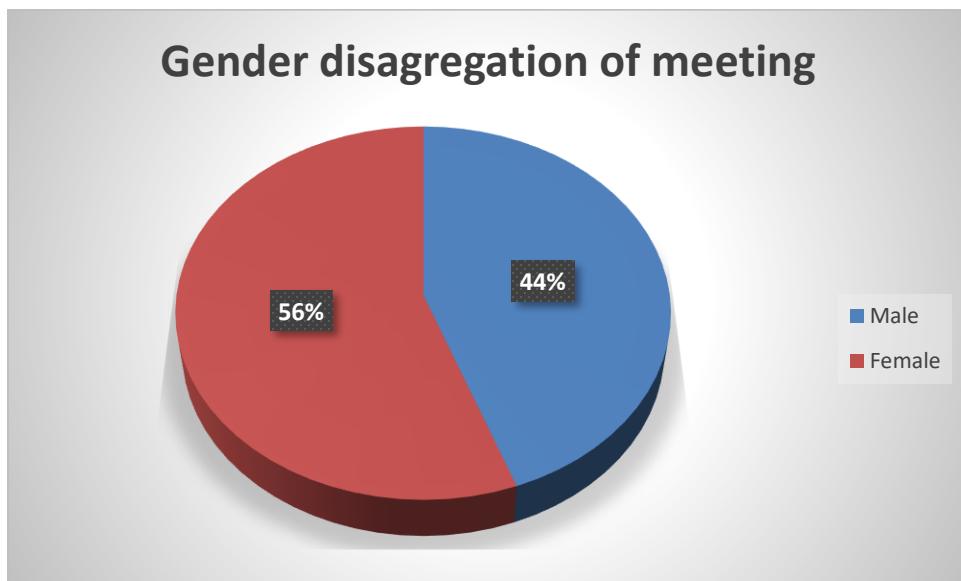
Gender Disaggregation of Attendees for the CSOs Meetings:

No.	Name	Designation	Institution	Gender
1.	Hajie Bah	Coordinator	NMYCW	M
2.	Memunatu Monye	Programme/Admin	TI	F
3.	Salamatu Mansaray	Gender Officer	FORWARD-SL	F

4.	Charles Keif-Kobai	Project Coordinator	RTI Project	M
5.	Mattu Bendu	Open Data Officer	RAIC	F
6.	David P. Kamara	Manager PIC	RAIC	M
7.	Davida Campbell	Senior Compliance Officer	RAIC	F
8.	Fanta Morgan	Manager, Open Data and Records	RAIC	F
9.	Abu Bakarr Tarawally	Coordinator	BAN	M

The project team through its designated officers, David Patrick Kamara and Charles Keif-Kobai, coordinated the CSOs and made constant follow ups with them since they placed in their information requests to the pilot MDAs.

Interpretation of gender analysis of attendees of the CSOs Meetings: 44.4% male attendees, as against 55.6% female attendees.



9. Analysis of Assessment measures:

The analysis here covers all four key measures in the RTI tool namely:

- i. Central Measures
- ii. Institutional Measures
- iii. Proactive Disclosure
- iv. Reactive Disclosure

Central Measures:

This analysis highlights the findings of CHRI's assessment of the **Oversight Body (RAIC)**. The scoring for Central Measures was based on five objective criteria, which were assessed in a binary manner (1-full compliance, 0-no compliance) and 10 more qualitative criteria evaluating strong compliance (1); partial compliance (0.5) and weak compliance (0.0) to be assigned. The final score consisted of an average of all of the 13 criteria, which was converted into a colour grade as described in the above RTI Methodology section. The results of this assessment are found in the below table:

		Score	Numerical Score
Objective Evaluation (Yes = 1; No = 0)			
1	Has funding been allocated to RAIC?	Y	1
2	Does RAIC recruit its own staff?	Y	1
3	Are RAIC appeals decisions available online?	Y	1
4	Has RAIC produced and published an annual report for both of the last two years?	Y	1
5	Has RAIC published a guide for requesters?	Y	1
	Average (Objective Evaluation)	GREEN	1.00
Qualitative Evaluation (Strongly = 1; Partially = 0.5; Weakly = 0)			
6	Have the members been appointed?	S	1

7	Are the members of RAIC independent and effective?	S	1
8	Is the funding provided to RAIC reasonably sufficient for it to discharge its functions?	P	0.5
9	Does RAIC decide appeals in a timely fashion?	S	1
10	Are the due process rights of parties respected during appeals?	S	1
11	Has RAIC made reasonable efforts to raise public awareness?	S	1
12	Have effective measures been taken to provide training to officials?	P	0.5
13	Has RAIC made a reasonable effort to comment on draft laws which affect the right to information?	S	1
Average Qualitative Evaluation)		GREEN	0.88
Overall Average			0.85
Overall Colour Grade		GREEN	G

Analysis:

The Right to Access Information Commission (RAIC), as the information oversight body of Sierra Leone, scored an overall average of **0.85**, showing a very strong commitment to the compliance of the RTI law. Below is an analysis of factors considered and reviewed, in line with the stipulated evaluation indicators, leading to the said impressive performance.

The Central Measures assessment was done by a leading good governance civil society organization in Sierra Leone – Centre for Human Rights and Development International (CHRDI). Each assessment indicator was evaluated and scored after thorough engagement with key officials of the oversight body in addition to careful perusal of documents, programs and available data on the work of the RAIC.

Financial documents clearly indicate that funding is being allocated by the central government to the national information oversight body.

On recruitment of staff, the Right to Access Information law of Sierra Leone empowers the Commission to recruit its own staff and such recruitment is evident, taking into account the recruitment records of the Commission.

Appeal decisions of the Commission are available on its website in the form of reports, media releases and other formats.

Records also show that the oversight body has been publishing annual reports consistently in the last four years. All the annual reports are also on the website of the Commission.

The RAIC has a guide for requesters, available both in hard and soft copies – with a digital copy available online.

Members of the Commission have been appointed, including the Chairman and Information Commissioner, the regional information commissioners, managers and officers to execute the mandate of the Commission.

The country's right to information law grants members of the commission the independence to execute their mandate. This is evident in decisions of the commission which can only be challenged at the high court, and the records available do not indicate any other person or authority influencing its decisions. The Commission has ordered top public institutions like the Bank of Sierra Leone, Corporate Affairs Commission, Sierra Leone Police and more to release information, and in some instances, imposed fines – decisions that do not suggest influence by any authority.

On the sufficiency of funding, with the aid of financial papers reviewed, it shows that the Commission is financially constrained as its yearly allocation disbursed by the central government cannot properly fund its access to information driven programs and activities. The most challenging part is there have always been delays in accessing the insufficient state funds.

On appeals, all the appeals decisions of the Commission analysed, for the purpose of this assessment, indicate clearly that the Commission decides appeals in a timely fashion. The Right to Access Information law of Sierra Leone gives the Commission fifteen working days to decide on appeals and all the decisions of the Commission fall within the said timeframe.

The said law also states that parties in an appeal case need to be given the opportunity to respond before a decision is reached. That right is being respected as arguments of parties in each appeal case are attached to each case decided on by the Commission.

In raising public awareness, we saw evidence of all the Commission's effort in raising awareness, online and offline. There are several examples of nationwide awareness raising programs on the Commission's website and social media handles. There is also a whole one-hour weekly program (RAIC Hour) on the national broadcaster radio and TV dedicated to raising awareness on access to information.

There is also evidence of trainings provided to both RAIC and other officials in public and private institutions on access to information laws, processes and procedures. Special trainings on ICT and records management have been done. However, such trainings have not been done frequently due to funding challenges.

It is also evident that the Commission has made a reasonable effort to comment on draft laws which affect the right to information. We saw and reviewed evidence which shows that the Commission has always been reacting, in writing or bilateral engagements with relevant institutions on laws that can either support and/or challenge the implementation of the right to information, including the recently drafted data protection law which is now in parliament. The Commission made a persuasive comment to be the oversight body of the said law and it has been supported widely.

While not part of the grading criteria, records on the Commission's relationship with all public authorities show that the Commission has always been providing advice to public authorities like how to facilitate access to information within public authorities and how to properly complete annual access to information evaluation templates designed by the Commission for all public authorities.

Records also show that RAIC has taken significant steps to improve implementation of right to information, including training public information officers and records or data officers in almost all public authorities, digitalizing and automating freedom of information (FOI) forms, training non-state actors on the right to information, and designing unique templates to access

information. The Commission also punishes defaulters in accordance with the RAI law and gives annual awards to consistently compliant institutions.

Institutional Measures:

During the course of the project implementation, the team through its designated officers, Fanta Morgan, Davida Campbell and Amara Thoronka, conducted Key Informant Interviews with four selected CSOs i.e. NMYCW, Transparency International-SL, FORWARD-SL and CHARDI on the one hand, two selected Media Practitioners on the other hand, and conducted an institutional assessment of pilot MDAs in terms of whether Information Officers have been recruited, trained and equipped to carry out their work, using the Key Informant model/tool.

Analysis of CSOs Key Informant Interviews:

RTI ASSESSMENT METHODOLOGY

INSTITUTIONAL MEASURES – KEY INFORMANT INTERVIEWS FOR CSOs

NO.	QUESTIONS	NMYCW – SL	TRANSPARENCY INTERNATIONAL	FORWARD-SL	CHARDI
1a	Has the organisation used the RAI Law of 2013? If yes.	Yes	Yes	Yes	Yes
1b	When?	3 to 4 years ago and recently (2025)	2 nd April, 2025	Multiple times in 2014, 2015, 2017, 2018, 2022, 2023; April and May, 2025	2020, 2021, 2023 & 2024
1c	How many times?	More than 10 times	Two (2) times	Multiple times	Severally

1d	What was the organisation's experience?	Very Poor	Bittersweet	A mixed bag of experience	Fairly
2a	Was there any challenge faced in using the RAI Law 2013?	Yes Not meeting the time limits for compliance which is 15 working days. Partial Information was provided.	Yes Two (2) Information requests were sent to two public authorities but only one responded and provided the information requested. The other did not, despite a series of follow-up calls.	Yes - A good number in the recent past hardly responded and those who ever did, did so way outside of the 15 working days, with no valid explanation. - Out of the 4 public authorities that I requested information from between April and May, 2025, only 2 responded. And of the	Yes Of the many requests done so far, less than 50% responded favourably and within the 15 working days.

				2, only 1 responded with all the requested information.	
2b	Has the authority ever complained to RIAC?	NO	NO	NO	YES
2c	How did RAIC intervene?				RAIC ordered the authority to provide the info
2d	What was the outcome?				The info was provided

Further analyses of the CSOs Key Informant Interviews:

- All four CSOs interviewed have used the RTI Law before
- All CSOs but one (TI) have used the RTI law in recent years and current year 2025
- All four (4) CSOs have used the RTI law at least two times
- All Key Informants had mixed experiences with the RTI law
- All CSOs faced multiple challenges while testing the RTI law with MDAs in relation to compliance
- Only one (1) CSO, CHRDI, out of the four has ever lodged a complaint with the RAIC. CHRDI complained and sought for a review from the RAIC.

Analysis of Public Authorities' Key Information Interview

Key Informant Interviews were also utilized in assessing public authorities. Public authorities were officially approached and appointments fixed for the interviews without letting them know the actual purpose of the interviews, so they took it like any other official engagement.

The chart below represents the scores assigned based on critical data derived from the key informant interviews with public authorities. Scoring was based on averaging 10 objective criteria (scored on binary basis of 1 or 0) and six more qualitative criteria for which scores of partial compliance (.5) were also possible.

												Criteria Average
												Library Board
												Kenema District Council
												Makeni City Council
												Bo District Council
												Sierra Leone Police
												Parties Regulations
												Anti-Corruption
												Bank of Sierra Leone
												Ministry of Finance
												Electricity Authority
												Parliament
												Objective Evaluation (Yes = 1; No = 0)
1	Has an IO been appointed?	1	1	1	1	1	1	1	1	1	1	1
2	Has the IO formally been given terms of reference or a job description?	1	1	1	1	1	1	1	1	1	1	1
3	Has the IO been provided with training?	1	1	1	1	1	1	1	1	1	1	1
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
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
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	1	1	1
7	Has a person who is different from the IO been appointed to deal with internal complaints?	0	0	1	0	1	0	1	0	0	0	0.27
8	Did the public authority publish an annual report for the last two years?	0	0	0	0	1	1	1	0	0	0	0.27
9	Has the public authority conducted any public awareness-raising activities over the last year?	1	1	1	1	1	1	1	1	1	1	1
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	1	1	1
	Average (Objective Evaluation)	0.8	0.8	0.9	0.8	1	0.9	1	0.8	0.8	0.8	0.86
	Qualitative Evaluation (Strongly = 1; Partially = .5; Weakly = 0)											
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
12	Has the IO come under political pressures that make it difficult for him or her to do the job properly?	0	0	0	0	0	0	0	0	0	0	0
13	How strong is the overall implementation plan or SOP?	0.5	0.5	0.5	0.5	1	0.5	0.5	0.5	0.5	0.5	0.55
14	How strong is the annual report?	0	0	0	0	0.5	0.5	0.5	0	0	0	0.14
15	How extensive are the awareness-raising activities?	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5
16	How effective are the measures taken to improve records management?	0.5	0.5	0.5	0.5	1	0.5	0.5	0.5	0.5	0.5	0.55
	Average (Qualitative Evaluation)	0.42	0.42	0.42	0.42	0.67	0.5	0.5	0.42	0.42	0.42	0.46
	Average by Authority	0.66	0.66	0.72	0.66	0.88	0.75	0.81	0.66	0.66	0.66	0.71
	Colour Grade by Authority											
	Overall Average											0.77
	Overall Grade											

The chart above indicates that all public authorities assessed have appointed information officers with terms of reference or clear job descriptions. All public authorities confirmed that their information officers have been provided with essential trainings to enable them to facilitate access to information at an institutional level. They cited that their information officers have appropriate qualifications, adding that their IOs are being given tasks with allocated time in doing their job. Also, all the IOs interviewed confirmed that they have not come under political pressures that make it difficult for them to do their job properly.

All mentioned they have developed and adopted an overall implementation plan or set of standard operating procedures (SOPs) and also a set of guidelines on how to process RTI requests. However, only the Anti-Corruption Commission has a strong implementation plan with several staff to timely and accordingly process information. In fact, the Anti-Corruption Commission has a dedicated desk on access to information within its public affairs department. The implementation plans of other public authorities are available but demonstrate only partial strength on actual implementation.

Information requesters can lodge requests electronically to the public authorities. This is made more possible by a system developed by the Right to Access Information Commission through which information can be requested from public authorities electronically as it has electronic RTI request forms either for making a request, acknowledging a request, providing information or lodging a complaint. The public authorities also confirmed that it is also easy to contact their information officers, saying their contact details are on all their correspondences to the public like press release and sensitization messages.

With the exception of the Ministry of Finance, Anti-Corruption Commission and Sierra Leone Police, none of the other public authorities have another designated person who is different from the information officer for dealing with internal complaints. This is why complaints are mostly lodged to the country's information oversight body.

The Anti-Corruption Commission, Political Parties' Regulation Commission and Sierra Leone Police are the only public authorities which have published annual reports capturing some important data on right to information compliance in the last two years. The other public authorities have not published such annual reports. However, even public authorities that have

published such annual reports have a partial strength score on the strength of their annual reports as they do not contain data on requests and how they were processed and supplied.

All the public authorities highlighted and showed some public awareness-raising activities they have conducted over the last year, including letting people and institutions know where and how to contact them on anything within their mandates as public institutions. However, they all attracted a partial score on this factor, as the said awareness-raising initiatives are generic in their mandates, programs and activities and not necessarily a good means for carefully guiding people to access information from them and explaining the processes involved.

All the public authorities showed that they are taking conscious actions to improve their record management, especially to go fully digital. However, the Anti-Corruption Commission has the highest score on this front as it has gone completely digital in enhancing asset declaration by public officials and all other programs. It has a digitalized records unit with a user-friendly electronic data processing and accessing mechanism.

Proactive Disclosure:

For the proactive disclosure assessment, the team's designated officer, Amara Thoronka, Public Information and Communication Officer (PICO) at RAIC charged with the responsibility of assessing the pilot MDAs conducted a desk review of all the selected MDAs and assessed their online publication proactiveness in terms of information sharing with the public. He and Mattu Bendu, Open Data Officer, also jointly conducted physical visits to the premises of the MDAs and assessed their level of physical display of information sharing on noticeboards/walls within their confines for public consumption.

Public authorities were assigned Substantive Issues scores, which were based on an assessment of their disclosure of 13 categories of information which public authorities are required by law to disclose with scores ranging from Full (1), Full to Partial (.75), Partial (.5), Partial to None (.25) or None (0).

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 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 the below table.

Analysis of MDAs' Proactive Disclosure:

	Category Average											
PROACTIVE DISCLOSURE	Kenema District Council	Makeni City Council	Bo District Council	Library Board	Sierra Leone Police	Parties	Regulations	Anti-Corruption	Bank of Sierra Leone	Ministry of Finance	Parliament	Electricity Authority
SUBSTATIVE ISSUES - Key: full-1; full-partial-0.75; partial-0.50; partial-none-0.25; none-0												
Organisation and structure	0.5	1	1	1	1	1	1	1	1	1	1	1
Information on provincial offices	0.75	n/a	n/a	n/a	1	0.75	1	0.75	0.75	0.75	0.75	0.81
Procedures and mechanisms related to public participation	0.5	1	0.75	0	0	0	0.75	0	0	0	0	0.27
Information on bidders, and related documents and procurement contracts	0.25	0.25	0.5	0	1	0	0	0	0	0	0	0.18
Details of the budget	0.25	0.25	1	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.32
Services provided to the public	1	1	1	1	1	1	1	1	1	1	1	1
Guidelines for requesters and complainants	0	0	0	0	0	0	0.5	0	0	0	0	0.04
Relevant domestic and international agreements and protocols	0	1	0.75	0	0	0	0	0	0	0	0	0.15
Policies, strategies and related work plan	0.75	0.75	0.75	0.75	0.75	0.25	0.25	0.25	0.25	0.25	0.25	0.47
Categorization of information held	0.75	0.75	0.75	0.75	0.75	0.75	0.75	0.75	0.75	0.75	0.75	0.75
Information on salary	0	0	0	0	0	0	0	0	0	0	0	0.00
Information on public information officers	0	0	0	0	0	0	0	0	0	0	0	0.00
Annual report related to ATI law	0	0	0	0	0	0	0	0	0	0	0	0.00
Average Substantive Issues	0.37	0.50	0.54	0.34	0.44	0.33	0.42	0.33	0.31	0.33	0.33	0.38
OTHER ISSUES - Key: strongly-1; partially-0.5; weakly-0												
Is the website WCAG 2.0 compliant?	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.50
Efforts to disseminate information other than simply via its website	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.50
Use of social media/smartphone apps to highlight proactive publication	1	0.5	0.5	0.5	1	0.5	0.5	0.5	0.5	0.5	0.5	0.59
Understandable versions of the most important documents (e.g. budget)	1	0.5	0.5	0.5	1	0.5	1	0.5	0.5	0.5	0.5	0.53
Ease of finding information	1	1	1	0.5	1	0.5	1	0.5	0.5	0.5	0.5	0.62
Average Other Issues	0.80	0.60	0.60	0.50	0.80	0.50	0.70	0.50	0.50	0.50	0.50	0.59
Total Score by Authority	0.47	0.53	0.56	0.38	0.53	0.38	0.49	0.38	0.36	0.38	0.38	0.43
Grade by Authority												
Overall Average : .43												
Overall Grade: Yellow												

ANALYSIS

The above data shows that all the eleven public authorities proactively disclosed information on the organization and structure of their institutions with some MDAs providing more leadership or organogram details than others.

With regard to information on decentralized offices in the provinces, the data indicates that certain public authorities by nature of their legal structure (Parliament of Sierra Leone, Ministry of Finance and Bank of Sierra Leone) only have offices in the capital Freetown; thus, they were not graded on that proactive disclosure criterion.

Only four of the eleven public authorities have some guided procedures and mechanisms, relating to public participation can be found, either on their websites, social media handles or notice boards.

The data shows that only four public authorities have proactively disclosed information on bidders, procurement contracts and related documents.

All public authorities have some information on their budgetary allocations and expenditures.

All the selected public authorities have information on their websites or social media pages explaining their mandates and services they render to the public.

With the exception of one public authority (Sierra Leone Police), no other public authority has proactively published guidelines for information requesters and complainants.

Additionally, only two public authorities (Parliament and Ministry of Finance) have clearly published information on relevant domestic and international agreements and protocols; while all the public authorities have some policies, strategies and work plans published on their websites.

On categorization of information held, all the public authorities have taken some efforts to proactively disclose, via their websites, the main categories of information that they hold.

All the public authorities do not have any proactive information disclosures on the salaries and allowances of their staff - a key proactive disclosure requirement in the Right to Access Information Act of Sierra Leone.

None of the public authorities have proactively disclosed details of their public information officers who are mandated by the RTI Law of Sierra Leone to facilitate access to information within their institutions.

Also, the data shows that none of the public authorities evaluated have proactively published annual reports related to Access to Information Law. However, three institutions (Anti Corruption Commission, Sierra Leone Library Board, and the Political Parties Regulations Commission) said in expert interviews and at the validation that they have such reports but could not be found on their websites.

It is important to note that the proactive disclosure data indicate that none of the public authorities' websites fully comply with the benchmarks contained in the Web Content Accessibility Guidelines (WCAG 2.0) - the leading global guidelines to make a website more interactive and easy to navigate by all, including persons with disabilities. However, it is evident that the selected public authorities have functional websites with much useful information freely accessible on their mandates, services and operations.

It is also evident that the said public authorities have social media pages other than just websites to publish what they do and related materials. All the selected public authorities either have social media pages on Facebook, Twitter (now X) or Instagram. Some are on all the aforementioned social media platforms and use them frequently and effectively to proactively disclose information.

All the selected public authorities have simplified versions of some complex technical documents published on their websites.

From close observation, it is easy to obtain information on the websites and social media handles of public authorities as they are not restricted and all the menus can be accessed and navigated.

Overall, each of the selected public authorities received a yellow (mediocre) grade for their overall proactive disclosure grade, indicating that this assessment area is one where public authorities broadly should improve their performance.

Reactive Disclosure:

Reactive disclosure concentrates on testing and evaluating the manner in which public authorities respond to the information requests put to them by individuals and entities. In doing so, the project team, in collaboration with the selected CSOs for this project, put out one information request per public authority. Thus, each of the eleven selected public authorities received one request. The requests specifically targeted obtaining information generally considered to be within the purview of the selected public authorities. Throughout the exercise, none of public authorities was informed about the intent of the request, so as to get their actual reactions to realistic requests for information. The information requested from each public authority is detailed in the below table:

Public Authority	Information Requested
Electricity Authority	Data on the Benguma Substation project: cost, contractor, timelines, and repair costs and repairs of the Blackhall Road and Kingtom: cost, contractor, timelines, and repair costs
Parliament	Details of all mining agreements reviewed over the past five years, including company names and review dates and sought audit recommendations made during hearings and their implementation status.
Ministry of Finance	Comprehensive breakdown of total budgetary allocation support to each individual council for 2023, 2024 and 2025
Bank of Sierra Leone	Total amount of Old Leones withdrawn from the market to enhance the smooth rollout of the New Leones
Anti-Corruption	Gender-disaggregated list of public officials who declared their assets in 2024 by public authorities
Parties Regulations	Data on political parties that failed to submit annual reports, actions taken against defaulters, and declarations of income, assets, and liabilities.

Sierra Leone Police	Requested disaggregated data on police recruits prior to the 2023 elections, including gender, district, age, promotions, and dismissals from 2022–2025
Bo District Council	Comprehensive list of locations of all poles operated by Mobile Network Operators within the District.
Makeni City Council	Information on waste management budgets and revenue sources from 2022 to 2025.
Kenema District Council	List of all devolved sectors currently receiving government funding, details of their staffing under the government payroll, and oversight bodies responsible for each sector.
Library Board	Number and source of books received, procurement costs, and book categories related to tertiary education and total staff numbers, regional distribution, and locations of libraries

The evaluation, under reactive disclosure, focuses on two scoring criteria. The first is the processing score which has three sub-scores: receipt score (whether receipt was provided), timeliness score (whether there was compliance within statutory time limits) and fee score (whether fee was charged in line with legal requirements), each evaluated on a binary Yes (1 point) or No (0 points) basis. The second scoring criteria is the result score that assesses how requests were responded to in substance. The possible subscore here ranges from Full Compliance (1), Partial Compliance (0.5), and Non-Compliance (0). The overall score for each request was calculated by adding one-third of the processing score and two-thirds of the result score.

Analysis

The table below represents the outcome of the reactive disclosure measure. One information request each was put out to all the eleven public authorities. No public authority charged a fee for processing and delivering requested information.

Six of the eleven selected public authorities acknowledged receipts of the six information requests put out to them within the three working days given under the Right to Access Information Regulations to acknowledge receipt of requests, and the same public authorities provided the requested information within the fifteen working days provided by the RTI law of Sierra Leone. The Sierra Leone Library Board was the swiftest to respond to the information request. It provided a receipt and the information within two days after the request.

However, one public authority (Kenema District Council) provided a receipt and the information request but went beyond the given legal timeframes for both of these and therefore received a 0 for its receipt and timeliness sub-scores. Its delivery of the requested information and the fact that it did not charge a fee nonetheless resulted in a green grade for reactive disclosure as a whole.

The worst performers on the reactive disclosure, which all received red grades, are the Electricity Authority, Political Parties Regulation Commission, and the Sierra Leone Police as they neither acknowledged receipts nor did they provide the information requested. The Bank of Sierra Leone also received a red score due to its failure to provide the information requested, although it was a slightly higher red score due to its having provided a receipt.

The final overall score for reactive disclosure (taken by averaging all of the eleven public authorities' scores) was .67. This amounts to a green grade but barely (and only due to rounding up from 2/3).

Public Authority	Date Request Submitted (DD-MM-YYYY)	How Request was filed	Receipt provided	Receipt score	Date, if any, of response (DD-MM-YYYY)	Timeliness score	Fee Charged, if any	Processing score	Fee score	Result	Comment	Final score
												Final score
Electricity Authority	04/04/2025	Hand	No	0		0	No	1	0.33333333	Mute	No receipt or information was provided	0.11111111
Parliament	07/04/2025	Hand	Yes	1	11/04/2025	1	No	1		Full disclosure	Receipt and information were provided	11
Ministry of Finance	07/04/2025	Hand	Yes	1	10/04/2025	1	No	1		Full disclosure	Receipt and information were provided	11
Bank of Sierra Leone	04/04/2025	Hand	Yes	1		0	No	1	0.66666666	Mute	The request was acknowledged but information was not provided	0.22222222
Anti-Corruption	04/04/2025	Hand	Yes	1	11/04/2025	1	No	1		Full disclosure	Receipt and information were provided	11
Parties Regulations	03/04/2025	Hand	No	0		0	No	1	0.33333333	Mute	No receipt or information was provided	0.11111111
Sierra Leone Police	08/04/2025	hand	No	0		0	No	1	0.33333333	Mute	No receipt or information was provided	0.11111111
Bo District Council	07/04/2025	hand	Yes	1	14/04/2025	1	No	1		Full disclosure	Receipt and information were provided	11
Makeni City Council	07/04/2025	Hand	Yes	1	15/04/2025	1	No	1		Full disclosure	Receipt and information were provided	11
Kenema District Council	04/04/2025	hand	Yes (but late)	0	24/04/2025	0	No	1	0.33333333	Late disclosure	Receipt and information were provided	0.77777777
Library Board	07/04/2025	Hand	Yes	1	09/04/2025	1	No	1		Full disclosure	Receipt and information were provided	11
Average Score				Average of above scores		Average of above scores		Average of above scores	Average of above scores		Average of above scores	Average of above scores
Grade by Area				0.636363636		0.545454545		0.727272727			0.636363636	0.666666666
Overall Grade	Green											

Challenges /Findings:

The following is a summary of Sierra Leone' grades per assessment area.

Central Measures	Institutional Measures	Proactive Disclosure	Reactive Disclosure
.85 (Green)	.77 (Green)	.43 (Yellow)	.67 (Green)

Averaging these four assessment areas yields an overall score for Sierra Leone of .68, which amounts to a green grade. However, the findings from this exercise highlight mixed levels of compliance with the RAI Act 2013 among specific public institutions:

- While Agencies like the ACC, Sierra Leone Library Board, the Makeni City Council and the two District Councils in Kenema and Bo demonstrated openness and cooperation, others, such as Sierra Leone Police and EDSA showed a worrying lack of responsiveness.
- There was also observed to be a palpable lack of effective communication as well as a lack of coordination between the heads of MDAs whom information requests are directed to and the designated IOs who process these information requests, and as well interface with the public on information sharing on their specific MDAs.
- These outcomes reaffirm the need for sustained advocacy, capacity-building, and enforcement to ensure full institutional adherence to access to information obligations. CSO partners should continue to monitor and report on the performance of public bodies in promoting transparency and accountability across Sierra Leone.
- Pilot MDAs were seen to have infinitesimal female representation of IOs i.e. 1 out of the 11 pilot IOs engaged, which undermines our country's move towards 30% female representation.
- Some MDAs lack websites, while those that have hardly update their sites or effectively utilise it to ensure proactive disclosure.
- Only less than 50% of pilot MDAs have prepared an annual report and published it

- All the selected public authorities submitted they have an implementation plan or standard procedure (SOP) and have developed internal guidelines for receiving and responding to RTI requests, but that did not reflective in how some of the perform in the various measures assessed.

10. Recommendations

After careful considerations of the findings drawn from the various research tools, the following are recommended for the full implementation and enforcement of RTI law in Sierra Leone:

1. RAIC should have the powers to enforce its orders issued for non-compliance and step up its oversight of public authorities or ministries, departments and agencies (MDAs), especially the defaulting ones to ensure compliance.
2. RAIC should conduct special session (s) with Heads of MDAs and their IOs on their roles and responsibilities with respect to effective coordination and communication between them.
3. RAIC should continue and intensify efforts to ensure sustained advocacy, capacity building training programmes for MDAs, and enforcement.
4. MDAs should ensure increase in the intake/recruitment of female IOs in line with the Gender and Women's Empowerment (GEWE) Act 2022 which promotes 30% female representation in all spheres of employment in the Public Sector.
5. MDAs should step up their level of commitment to addressing key RTI provisions.
6. RAIC should work with MDAs that do not yet have websites to set up one to aid online Proactive Disclosure and ensure that those that already have websites regularly update them.
7. RAIC should encourage peer review between and amongst MDAs especially for those MDAs that are lagging behind the RTI implementation in a bid to strengthen them and bring them up to speed.

8. RAIC should enforce annual report publication compliance by MDAs on their web sites and social media handles and ensure that MDAs publish data on RTI in a separate section in their annual reports.
9. RAIC should work to build MDAs' capacity to develop implementation plans or standard operating procedures on RTI.
10. MDAs should establish an RTI desk to expedite access to information.
11. MDAs should be clear, online and offline, in communicating their services and mandates to the public and should ensure that they regularly publish at a minimum the categories of proactive disclosure which they are required to by law.
12. RAIC should provide continuous trainings for public authorities on proactive and reactive information disclosures, targeting heads and information officers of public authorities.
13. Public authorities should publish data on both proactive and reactive information disclosures on their websites.
14. The Government of Sierra Leone and its development partners should prioritize access to information and provide the needed funding to fully facilitate and enforce access to information in Sierra Leone.

11. Validation:

A validation exercise of Pilot MDAs was conducted on Thursday 22nd May, 2025 at the Family Kingdom Resort. All pilot MDAs that took part in the RTI Methodology Assessment were in attendance and fully participated as well as meaningfully contributed to finalizing the Report. The opening ceremony of the Validation Exercise was graced by personalities from the office of the Bank Governor, Bank of Sierra Leone in the person of Dr. Bandura, Senior Staff Member of the Media Reform Coordinating Group and the Director General, Sierra Leone Broadcasting Corporation (SLBC), who gave the Keynote Address. The Validation was well attended, with participants drawn from the 11 pilot MDAs, including the three selected Local Councils from the North, South and Eastern provinces, CSOs, Journalists, and RAIC Staff from both Freetown and the provinces directly involved in the project.



Participants at the Validation

List of participants at the Validation Exercise:

No.	Name	Institution	Gender
1.	Ahmed G. Kallon	RAIC East	M
2.	Millicent Brima	RAIC South	F
3.	John Kalokoh	RAIC North	M
4.	Daniel Kpukumu	Makeni City Council	M
5.	Ernestine Bangura	Bo District Council	F
6.	Abdul Rahman Tejan	Kenema District Council	M
7.	Memuna Monye	TISL	F
8.	Augusta James	MRCG	F
9.	Eugene Momoh	PPRC	M
10.	Pst. M. Sesay	RAIC	M
11.	Hon. Mustapha M. Brima	RAIC	M
12.	Allan Bangura	RAIC	M
13.	Hajie Bah	NMYCW	M
14.	Amadu Bah	EDSA	M

15.	Mohamed Bangura	RAIC	M
16.	Mohamed D.M. Conteh	AYVTV	M
17.	Steven Dammole	SLBCTV	M
18.	Saphie Kamara	AYV	F
19.	Cynthia Kamara	SLBC	F
20.	Karifatu Conteh	Radio Democracy	F
21.	Amie Massaquoi	ACC	F
22.	Yankuba Bangura	SLLB	M
23.	Ahmed Sesay	MoF	M
24.	David Patrick Kamara	RAIC	M
25.	Amara Thoronka	RAIC	M
26.	Mary N.K. Massally	EDSA	F
27.	Charles Keif-Kobai	FORWARD-SL	M
28.	Dr. Ibrahim S. Shaw	RAIC	M
29.	Davida Campbell	RAIC	F
30.	Mattu Bendu	RAIC	F



Speakers at the opening ceremony of the validation

12. Media Engagement

Media engagements started soon after the ceremonial segment of the Validation was ended, with the Chairman/Information Commissioner granting a series of radio and tv interviews aimed at raising public awareness around the outcome of the RTI Methodology Assessment of Pilot MDAs.

The various Radio and TV outlets i.e. AYVTV, SLBCTV, and Radio Democracy that graced the Validation, all granted interviews with the Chairman/ Information Commissioner and the Manager Public Information and Communications, RAIC. A couple more live TV and Radio discussions, including a one-hour roundtable TV programme will ensue by early this week.

Conclusion

It is evident from the report that despite the fact that the RAIC scored great success in their implementation of the ATI law in Sierra Leone as evident in the Central Measures evaluation,

the challenges evident in the evaluation of the other assessment areas, i.e. Institutional Measures, Proactive Disclosure and Reactive Disclosure, show that there is still more room for improvement in the implementation of the RAI law in Sierra Leone. It is however hoped that the recommendations offered at the end of the report would stimulate future projects to be undertaken by the RAIC and their partners to address the challenges identified in the implementation of the CLD RTI methodology in Sierra Leone.