

ANTI-CORRUPTION HELPDESK

PROVIDING ON-DEMAND RESEARCH TO HELP FIGHT CORRUPTION

GOOD PRACTICE IN ACCESS TO INFORMATION LAW

QUERY

Could you provide us with examples of good practice in access to information laws? What is the status of such legislations in the Arab region?

CONTENT

1. Key features of ATI laws
2. Country examples of ATI laws
3. References and resources

REMARK

An answer has also been produced on Information Commissions and independent oversight bodies for access to information laws.



Author(s)

Marie Chêne, Transparency International,
tihelpdesk@transparency.org

Reviewer(s)

Robin Hodess, Ph.D., Transparency International

Date

29 November 2012

SUMMARY

A growing number of countries have adopted ATI legislation in the past two decades. Most recent and progressive laws share a number of similarities and common elements, establishing a general presumption in favour of the maximum disclosure of information, subject to exceptions clearly defined by law.

Procedures for requesting information should be clear and simple, and information should be provided for free (or at a reasonable cost) and within a reasonable timeframe. ATI laws typically provide for internal and external complaint/review mechanisms to challenge refusals or when requests for information have not been dealt with adequately. The state should not only guarantee the right to information but also put effective systems in place to give effect to this right. Features of the stronger laws further include that they establish robust oversight bodies, often in the form of an independent information commission.

Serbia, India and Slovenia are assessed as having strong access to information regimes. In the Arab world, the adoption of ATI laws is still lagging compared to other regions of the world, with only Yemen, Jordan and Tunisia having recently enacted such legislation.

1 KEY FEATURES OF ATI LAWS

Freedom of information as an anti-corruption tool

Freedom of Information (FOI) laws¹ providing the public with a general right to access official information are largely viewed as an effective remedy against corruption, contributing to reducing corruption and improving accountability. Yet, there is still relatively little (and contested) evidence of the impact and effectiveness of such approach to corruption.

Anecdotal evidence confirms the potential of such an approach for reducing corruption and increasing accountability, as reflected by two case studies conducted in India and South Africa (Calland 2010). In India, a nationwide campaign led by grassroots and civil society organisations resulted in the passage of a landmark Right to Information Act in 2005. Since then, access to information laws are successfully used to expose corruption in the use of public funds for service delivery and brings greater transparency and accountability to the government. In South Africa, access to information on decision-making processes made it possible for a community to exercise public pressure and challenge decisions made about resource allocation.

While relatively scarce, empirical evidence on the effectiveness of FOI laws is also emerging. A 2006 paper found that countries with greater transparency, as measured by the existence of FOI laws, tend to have lower corruption rates and better governance (Islam 2006). More recent findings also confirm that the existence of freedom of information laws is positively correlated with lower levels of corruption and a significant positive trend in controlling corruption across countries (Mungiu-Pippidi 2011). The study further suggests that the adoption of FOI laws could be more effective than other institutional anti-corruption policies, such as anti-corruption agencies, Ombudsmen and ratification of the United Nations Convention against Corruption (UNCAC), as

only FOI was found to be a significant determinant of either control of corruption or change in control of corruption.

This correlation is largely and increasingly being recognised worldwide. Regional and international standards are starting to emerge in this area. International anti-corruption conventions such as the UNCAC and the African Union Convention on Preventing and Combating Corruption provide international standards for guaranteeing the right to access to information. The UNCAC makes several references to public reporting and participation. In particular, article 10 of the UNCAC calls state parties to adopt procedures and regulations allowing members of the public to obtain information on the organisation, functioning and decision-making processes of its public administration. The African Union convention also states that each state party shall adopt measures to give effect to the right of access to any information that is required to assist in the fight against corruption and related offences (Mendel 2008).

The right to access information is also recognised in the Universal Declaration of Human Rights as well as the International Covenant on Civil and Political Rights. Some transition countries in Latin America and Central and Eastern Europe have included this right in their constitution, while some “older” democracies consider amending their constitution to do so (Mungiu-Pippidi 2011).

Consistent with these trends, a growing number of countries have adopted access to information legislation in the last two decades. In 1990, only a dozen countries had ATI laws. By the end of 2003, 46 countries had implemented some form of FOI, and today more than 90 countries have laws granting their citizens a right to access information (Calland 2010).

Underlying principles for access to information legislation

Although FOI laws vary greatly across countries, there are a number of similarities and common elements. ATI legislation usually establishes a

¹ *Freedom of information and access to information laws both refer to laws granting citizens access to official information, but ATI seems to be the prevailing terminology of choice among activists and experts.*

general presumption in favour of the disclosure of information, subject to exemptions. The underlying principle is that of maximum disclosure, with any restriction to the right to information provided by law (Mendel 2008).

The campaign group Article 19 has published a number of principles that set out best practice standards for right to information legislation (Article 19 1999):

- **Maximum disclosure:** FOI law should be guided by the principle of maximum disclosure.
- **Obligation to publish:** Public bodies should be under obligation to publish key information.
- **Promotion of open government:** Public bodies must actively promote open government.
- **Limited scope of exceptions:** Exceptions should be clearly and narrowly drawn and subject to strict “harm” and “public interest” tests.
- **Processes to facilitate access:** Requests for information should be processed rapidly and fairly and an independent review of any refusals should be available.
- **Costs:** Individuals should not be deterred from making requests for information by excessive costs.
- **Open meetings:** Meetings of public bodies should be open to the public.
- **Disclosure takes preference:** Laws which are inconsistent with the principle of maximum disclosure should be amended or repealed.
- **Protection for whistleblowers:** Individuals who release information on wrongdoing – whistleblowers – must be protected.

Key features of ATI laws

Based on these principles, FOI laws typically include a series of key features that make these standards operational (Mendel 2008; Frankel 2001; Right2Information website).

Scope

Who can request information?

According to the Open Society Justice Initiative’s 10 principles, anyone may request information, irrespective of nationality or profession or the intended use of the information (Open Society Justice Initiative 2008). The applicant should not be required to justify his or her request for information and the burden of proof should lie with the public authority, which needs to justify its decision for withholding information (Frankel 2001).

Consistent with this principle, in most countries reasons for a request may not be demanded, preventing discrimination on the basis of the possible use of the information for certain campaigns. In India and Mexico, requests can be made anonymously, preventing any form of discrimination.

What information can be requested?

The right to information typically applies to all records held by public authorities, whether created by them or supplied by third parties, but there are variations in the way different laws define information, be it “records”, “documents” or “official information”. The majority of ATI laws are limited to information held or controlled by the public body. According to the World Bank, access should apply to all information held, regardless of form, source, date of creation, official status, whether it was created by the body that holds it and whether it is classified (World Bank 2004).

Some laws provide only for “access to documents”, whereas other laws, especially those adopted more recently, provide for a broader “access to information”, often in addition to documents. The growing trend is to adopt a flexible approach to ATI that grants access to both documents and information. For example, some recent ATI laws, such as the [Council of Europe Convention on Access to Official Documents](#), have opted for a broad definition of official information, and subject “all information recorded in any form, drawn up or received and held by public authorities” to disclosure.

Laws providing access to documents typically only require the production of existing documents. By

contrast, most laws providing access to information require authorities to search documents and compile information from various documents if the requested information has not already been compiled. The campaign group Right2Information recommends that public authorities be required (at a minimum) to provide full documents if so requested, rather than summaries and information compiled from existing documents.

In many countries, “documents under preparation” are excluded from the coverage of the ATI law. Activists are concerned that this approach may result in automatic withholding of information, even where there is a very strong public interest in disclosure. Such a provision can also potentially be abused, for example by claiming that living documents such as databases are excluded from the access regime (Right2Information website). India’s Right to Information Act provides a good model in this respect. The Act contains neither exclusion nor an exception for documents under preparation but requires that all public authorities publish all relevant facts *while* formulating important policies.

Most recent ATI laws also apply to emails and electronic records, or do not explicitly exclude them.

In addition, many FOI laws also place an obligation on public bodies to publish key information proactively. Proactive publication of information should include, for example, information about the public body’s structure, finances, services, rules and regulations, decisions, and policies, as well as a guide to the information it holds and mechanisms for public participation (World Bank 2004). The information should be current, clear and in plain language (Open Society Justice Initiative 2008).

Which public institution are covered?

The public bodies covered by ATI legislation varies across countries. For example, at one end of the spectrum, India’s Right to Information Act applies to all public authorities at the national, regional and local level, while the US legislation restricts ATI coverage to executive agencies of the federal government (Coliver 2010). In principle, all entities that are part of the executive branch should be

covered. In addition, ATI legislation coverage should extend to the legislative and judicial branches, subject to certain exceptions, as well as constitutional and statutory bodies (World Bank 2004).

The general trend is towards increasing the scope of bodies covered by ATI laws, with more recent laws applying to more bodies. Most progressive ATI laws tend to cover all government and administrative bodies at the national, regional or local level; all legislative and judicial bodies; state-owned companies; and private bodies that perform public functions or receive substantial government funding.

Procedures

Procedures for accessing information are defined by law, without requesters being required to justify their request.

Procedures should be clear and simple, and information should be provided for free (or at a reasonable cost) and within a reasonable timeframe. The Open Society Justice Initiative’s 10 principles specify that the only requirement should be to provide a name, address and description of the information requested, and that requestors should be able to file requests either orally or in writing.

In terms of fees, the principle of “easy access for all” should be applied and costs should be limited to actual cost of access and not exceed reproduction costs. In Mexico and the UK, for example, there are no application fees.

Some countries also have procedures to help people discover what information exists, such as Sweden, where the right to access is linked to a detailed registry system for official documents. In addition, the above mentioned 10 principles consider that officials have a duty to assist requestors, for example by forwarding the request to the appropriate body if it is initially submitted to the wrong body. International standards also include the obligation for public bodies to appoint information officers to assist requestors (World Bank 2004).

Exceptions and refusals

Most FOI laws entail a list of exceptions setting out the circumstances in which requests can be refused, based on an overriding public interest justifying non-disclosure, such as their potential to harm particular interests such as defence, international relations, security, commercially sensitive business information, law enforcement, legal proceedings or individual privacy. These exceptions need to be clearly and specifically defined by law. Refusals must be justified, with a clear statement of the reasons for withholding information (Open Society Justice Initiative 2008).

According to the World Bank, principles guiding the exception regime should meet three conditions (World Bank 2004):

- The law should include a comprehensive list of clear, narrow and legitimate aims that justify a refusal to disclose information.
- Access should be denied only when disclosure would pose a serious risk of harm to such legitimate aims.
- Exempt information should also be disclosed when the benefits of disclosure outweigh the risk of harm to a legitimate aim.

The overriding public interest in releasing exempt information can be particularly relevant for corruption. Information of high public interest may include information relating to the competency for public service of public officials and candidates, the functioning of government and public agencies, and public health issues. Within the framework of anti-corruption, such provisions may be particularly helpful to access information about asset declarations, public officials' salary information, election and political parties' finances, public expenditures, and so forth.

Appeals

In case of refusal, all requestors should have the right to a prompt and effective judicial review of the decision or failure to disclose information. FOI laws typically provide for a complaint mechanism to challenge refusals or when requests for information have not been dealt with adequately. Internal complaint – typically to a higher authority within the same body that originally refused the request – is a

common option, as well as external complaints to an independent oversight body or to the courts.

Sanctions and protections

FOI laws typically provide for sanctions for those who wilfully obstruct access to information, including through the unauthorised destruction of public information. Some laws specify various conducts, while others refer generically to any form of obstructing access. Some recommendations call for having administrative and civil sanctions in place, except for criminal penalties for wilfully destroying or altering records that are subject to a request for information (Organization of American States 2010). In some countries like India, the oversight body can also impose fines or recommend disciplinary actions.

Independent information commission/oversight body

An independent administrative body should be given broad promotional powers to overcome the culture of secrecy, that can exist within public sector institutions along with a budget to effectively fulfil this responsibility (World Bank 2004). Many laws provide for the appointment of dedicated officials – information officers – to assist in the implementation of the law and a central body (information officer or government department) is given the overall responsibility for promoting access to information. Promotional measures undertaken by the information commission/er may include awareness raising efforts, setting standards for record management, a registry of records and documents, training programmes and annual reporting and monitoring.

In practice, there is an emerging trend towards establishing Information Commissions as a model for effective implementation of freedom of information laws. Information Commissions are typically granted an important role in enforcement (hearing appeals against the violation of the right to information), monitoring compliance by public bodies with their obligation, and promoting the right to access information to ensure effective implementation of the law.

Their independence is guaranteed by provisions governing their budgetary autonomy, whom they

receive their power from and to whom they report, the scope of their mandate and their statutory powers, as well as the appointment process of the commissioners, their term limit and procedures for dismissal. Once elected, they should also benefit from immunity from prosecution. Information Commissions should be sufficiently staffed and resourced to fulfil their mandate.

2 COUNTRY EXAMPLES OF ATI LAWS

In 2011, Access Info Europe and the Centre for Law and Democracy launched a global rating of the legal framework for the right to information (RTI) in 90 countries, based on 61 indicators that provide standards for good practice legislation (Please see: <http://www.rti-rating.org/>). With the exception of Finland, the top 20 countries tend to have newer FOI laws (the average age of the laws in the top 20 countries is just five years), reflecting progress made in setting international standards for FOI legislation. Serbia, India, and Slovenia are rated at the top of the index, each with at least 130 points out of a possible total of 150. While this rating provides a good indication of what constitutes a strong FOI legal framework, it does not necessarily reflect the overall culture of transparency in a country in practice, as it is still too early to judge levels and quality of implementation.

Underlying principles for access to information legislation

Serbia

Serbia's freedom of information legislation grants any person (including non-citizens and legal entities) the right to file a request for information.

According to the RTI rating, all the bodies and classes of information are included under the scope of the legislation. The right of access applies to the executive, the legislative and the judicial branches, constitutional, statutory and oversight bodies, as well as private bodies performing a public function or receiving significant public funding. The legislation also covers all material held by or on behalf of public authorities that is recorded in any format, regardless of who produced it. The exceptions to the right of

access are consistent with international standards.

Requestors are not required to provide reasons for their requests and there are clear and relatively simple procedures for making requests. Requests may be submitted by any means of communication. Filing requests is free and access to documents is limited to the cost of reproduction and sending. Public authorities have a fixed timeframe in which to respond. If the authority does not have the requested information, it is required to inform the requester of this and to refer the requester to the institution where the information is held.

The law offers an internal appeal which is simple, free of charge and completed within clear timelines (20 working days or less). Requesters have the right to lodge an (external) appeal with an independent administrative oversight body (the [Commission for Information of Public Importance](#)).

Serbia scores particularly high in terms of promotional measures. Public authorities must appoint an authorised official to receive requests and monitor and promote implementation. The public authorities must proactively publish information relating to their powers, duties and organisation, their budget, the types of services they offer, the types of information they hold, and procedures for submitting requests. They must also train their staff on the law and publish an annual report to the Commissioner on their activities relating to the law.

The RTI assessment of Serbia's ATI law can be accessed at: http://www.rti-rating.org/view_country.php?country_name=Serbia

India

While long recognised as one of the most advanced countries in the world in terms of ATI legislation, India scores below Serbia in the RTI ratings, indicating that global standards on the right to access have advanced considerably since India's law was first passed in 2005.

The act applies only to citizens, but includes legal persons and covers all material held by or on behalf of public authorities that is recorded in any format,

regardless of who produced it. The public bodies covered include all public authorities at the national, regional and local level, though intelligence and security organisations are exempt, as well as other research and economic entities. The right to obtain information about private entities performing a public function has been recognised by some high courts, but is not yet integrated into the legal framework.

In terms of procedures, requests can be made through various forms, in writing, electronically or orally, with a minimum of required administrative procedure and without justification of reasons or purpose. Clear and appropriate procedures are in place for situations in which the authority receiving a request does not have the requested information; there is a requirement to directly transfer the request to other relevant public entities within a set timeframe. Access fees do not exceed the cost of reproduction and delivery.

The exceptions to the right of access are consistent with international standards. Authorities may release exempt information if it is in the greater public interest to do so. The law also allows exceptions for releasing information relating to human rights violations and corruption when this information has to do with security and intelligence organisations. There are strong internal and external appeals procedures in place.

India performs relatively well in terms of the independence, powers and mandate of the oversight body, the [Central Information Commission](#) (CIC). The external appellate body has the power to make recommendations and the act also enables Information Commissions to make recommendations to public authorities to improve their performance where monitoring shows that the public authority's practices do not conform with the provisions of the act (for example, to conduct more training or to engage in better record management). In terms of sanctions, the law imposes penalties for delay or non-compliance, including for officials who fail to supply information, delay in providing information, or who wilfully undermine the right to information, including through the unauthorised destruction of information.

The Right to Information Act can be accessed at: <http://www.righttoinformation.gov.in/>.

The RTI assessment of India's ATI law can be accessed at: http://www.rti-rating.org/view_country.php?country_name=India

Slovenia

The Slovenian law covers any information originating from the field of work of the bodies regardless of its origin or form, unless it falls under the exceptions, which are defined by law. Anyone (including non-citizens and legal entities) has the right to file a request, without justifying reasons or purpose. The law is binding for state bodies, local government bodies, public agencies, public funds and other entities of public law, public powers holders and public service contractors.

The exception regime is consistent with international standards; public interest for disclosure prevails over a public interest (or interest of other persons) not to disclose the requested information. In such a case, a public interest test is conducted to help the official persons – the Information Commissioner as the appellate body and the courts in administrative dispute procedures – to decide whether the right of the public to know is stronger than other rights and whether it meets defined exceptions.

Public bodies are required by law to proactively publish online and free of charge, key information, programmes, strategies and other documents in their area of work.

In terms of procedures, one can apply for information orally or in writing. However, the applicant can only demand legal protection, as provided by the law, if the information request was filed in writing. Disclosure of information is free, though charges can be applied for reproduction and delivery. If the authority to which information was requested finds that the information exists, but with a different public body, it must transfer the application to the relevant body within three working days of receiving the request and notify the applicant.

Slovenia scores highly in terms of its appeal mechanism and its oversight body, which is an independent [Information Commissioner](#).

More information on Slovenia's Access to Public Information Act can be accessed at: <https://www.ip-rs.si/index.php?id=496>.

The RTI assessment of Slovenia's ATI law can be accessed at: http://www.rti-rating.org/view_country.php?country_name=Slovenia

Overview of ATI legislation in the Arab world

The MENA region is lagging behind in terms of adopting ATI legislation. As of September 2012, only Jordan, Tunisia and Yemen had ATI laws in place. Bills on the right to information have been debated in Bahrain, Egypt, Kuwait, Lebanon, Morocco and Palestine. In Lebanon, a law was drafted in 2009 but has not yet (as of October 2012) been enacted by Parliament. For more background on FOI laws in the Arab world, please see: [Almadhoun, S. 2010. "Status of Freedom of Information Legislation in the Arab World."](#)

In 2007, Jordan's ATI law became the first to be passed in the region. However, it is assessed to be relatively weak, as its adoption was driven by the government rather than civil society (Right2Information website). It also performs relatively poorly in [the RTI rating](#), scoring 56 out of 150 points. In particular, Jordan's ATI law has been criticised for its lack of clarity, the lack of procedural detail and its overly broad exceptions regime.

Yemen's passage of the Law of the Right of Access to Information in April 2012 has been welcomed as a relatively strong legal framework, with broad scope and applicability and a limited range of exceptions. However, [the RTI rating](#) points to a few concerns regarding the potential lack of institutional independence within the oversight body (the Commissioner General for Information) and the absence of a public interest override. The fact that the law's whistleblower protection clause was

significantly weakened is also troubling.

Tunisia's access to information law was passed in May 2011. The [RTI rating](#) identifies weaknesses in several key areas, including a lack of promotional measures, the absence of an independent oversight body, and weak sanctions for violations of the right to information.

3 REFERENCES AND RESOURCES

Further resources and websites

Model laws

Several organisations have developed model freedom of information laws that can help inform the drafting of FOI laws:

Article 19: A Model Freedom of Information Law
<http://www.article19.org/data/files/pdfs/standards/mo-delfoilaw.pdf>

World Bank: Model Freedom of Information Law
www1.worldbank.org/publicsector/LearningProgram/Judicial/ModelFOILaw

Organizations of American States (OAS): Model Inter-American Law on Access to Information.
http://www.oas.org/dil/access_to_information_model_law.htm

The OAS has also developed a 61-page "Commentary and Guide for Implementation for the Model Inter-American Law on Access to Information."

Databases and portals

Right2INFO.org

Right2INFO.org brings together information on the constitutional and legal framework for the right of access to information as well case law from more than 80 countries, organised and analysed by topic. With a focus on good law and practice, the website provides comparative overviews and country illustrations of the current state of the right to information, as held by governments and bodies that perform public functions or operate with public funds. Launched by the Open Society Justice Initiative in

2008, the portal is a collaborative effort, complementing www.freedominfo.org, www.foiadvocates.net and www.access-info.org websites.

<http://www.right2info.org/>

RTI rating

In September 2012, Access Info Europe and the Centre for Law and Democracy launched an improved version of the RTI Rating website. The new website contains updated results on all 93 countries with national right to information laws, searchable by various parameters, including total score and score in each category of the RTI Rating.

<http://www.rti-rating.org/>

World Bank Freedom of Information Laws Database

The World Bank recently posted a detailed database on freedom of information laws in 88 countries. This is not a rating or ranking of the countries, but the database is expected to provide valuable information for comparative research. The database collects information about FOI laws in seven broad categories with 30 subcategories. The broad categories are: legal framework, coverage of information, procedures for accessing information, exemptions to disclosure requirements, enforcement mechanism, deadlines for release of information and sanctions for non-compliance.

<https://www.agidata.org/pam/ProfileListByAbc.aspx>

freedominfo.org

freedominfo.org is a one-stop portal that describes best practices, consolidates lessons learned, explains campaign strategies and tactics, and links the efforts of freedom of information advocates around the world. It contains information on freedom of information laws and how they were drafted and implemented, including how various provisions have worked in practice.

<http://www.freedominfo.org/>

Organisations and networks

Article 19

Article 19 was established in 1987 as an organisation set up to defend the right to freedom of expression and freedom of information. It has offices in Bangladesh, Brazil, Kenya, Mexico, Tunisia, Senegal and the UK.

<http://www.article19.org/>

Access Info Europe (AIE)

AIE is a human rights organisation dedicated to promoting and protecting the right of access to information in Europe and globally as a tool for defending civil liberties and human rights, for facilitating public participation in decision-making and for holding governments accountable.

<http://www.access-info.org/en/home>

The Freedom of Information Advocates Network (FOIANet)

FOIANet is an international information-sharing network of organisations and individuals working to promote the right of access to information. Members of FOIANet are civil society organisations with active programmes to promote the right to know. Among other activities, FOIANet runs a discussion list for news and debate on the right of access to information; there are currently over 400 people on this list, including civil society representatives and lawyers, academics, information commissioners and others with a specialised interest in the right to information.

<http://www.foiadvocates.net/>

ATI-MNA network

The World Bank, in collaboration with the Affiliated Network for Social Accountability – Arab World, is facilitating a “Regional dialogue on supporting coalitions and networking to advance access to

information in MENA". The [network](#) supports knowledge exchange between stakeholders from Jordan, Lebanon, Morocco and Tunisia on access to information.

References

Article 19. 1999. *The Public's Right to Know: Principles on Freedom of Information Legislation*. International Standards Series. London: Article 19.

<http://www.article19.org/data/files/pdfs/standards/righttoknow.pdf>

Article 19. No date. "A Model Freedom of Information Law."

<http://www.article19.org/data/files/pdfs/standards/modelfoiaw.pdf>

Almadhoun, S. 2010. *Status of Freedom of Information Legislation in the Arab World*. Open Society Justice Initiative.

<http://www.right2info.org/resources/publications/Overview%20of%20FOI%20legislation%20in%20the%20Arab%20World%20-%20SA%20-%2002-06-2010.doc/view>

Calland, R. 2010. "Freedom of Information: Review of Impact and Effectiveness of Transparency and Accountability Initiatives." Institute of Development Studies.

<http://www.ids.ac.uk/files/dmfile/IETAAnnex3FreedomofInfoCallandFinal28Oct2010.pdf>

Chêne, M. 2012. *Independent Information Commissions and other Oversight Bodies*. Helpdesk Answer,

Transparency International Accessible on request at: tihelpdesk@transparency.org

Coliver, S. 2010. *The Right to Information and the Increasing Scope of Bodies Covered by National Law since 1989*. Open Society Justice Initiative.

<http://www.right2info.org/resources/publications/coliver-scope-of-bodies-covered-by-rti-laws>

Frankel M, 2001, Central Government Publication Schemes: Good Practice, The Campaign for Freedom of Information, http://www.cfoi.org.uk/pdf/ps_report.pdf

Islam, R. 2006. *slam, R. 2006* http://www.right2info.org/Go_along_with_Better_Governance?r

Economics and Politics 18, no. 2: pp. 121-167.

<http://ideas.repec.org/a/bla/ecopol/v18y2006i2p121-167.html>

Mendel, T. 2008. *Freedom of Information: A Comparative Legal Survey*. Paris: UNESCO.

<http://www.fas.org/sgp/foia/comparative.pdf>

Mungiu-Pippidi A, 2011, *Contextual Choices in Fighting Corruption: Lessons learnt*,

<http://www.oecd.org/countries/zambia/48912957.pdf>

Open Society Justice Initiative. 2008. *Ten Principles on the Right to Know*.

http://www.access-info.org/documents/Access_Docs/Thinking/Principles/JI_Ten_Principles_on_Right_to_Know_2008_countries.pdf

World Bank. 2004. *Legislation on Freedom of Information: Trends and Standards*. PREM Note 93.

<http://www1.worldbank.org/prem/PREMNNotes/premnote93.pdf>

"Anti-Corruption Helpdesk Answers provide practitioners around the world with rapid on-demand briefings on corruption. Drawing on publicly available information, the briefings present an overview of a particular issue and do not necessarily reflect Transparency International's official position."