# Assessing Information Disclosure Practices

FOI Compliance

(AID-FOI TOOL)

#### Element 1: Leadership

### **Indicator 1**: Level of commitment of agency leaders to institutionalize FOI within the agency.

		Always	Sometimes	Rarely	Never	Not Applicable
1.	Agency leaders (top or middle managers) provide guidance to the team implementing the FOI (e.g. attending meetings of the FOI team, responding to their questions, issuing directives to support FOI implementation within the agency)	/				
2.	Agency leaders (top or middle managers) provide resources for successful FOI implementation (e.g. annual financial budget, people to implement FOI, equipment necessary).	/				
3.	Agency leaders (top or middle managers) provide timely decisions on FOI matters (e.g. approval of requests, directives to personnel for compliance.)	/				
4.	Agency leaders (top or middle managers) provide motivation to the FOI implementation team in the agency to encourage successful FOI implementation (e.g. giving encouragement or recognizing FOI team's work).	/				
5.	Agency leaders (with authority regarding agency policy) actively participates in the crafting of the agency's FOI guidelines).	1				
6.	Agency leaders (with authority regarding agency policy) reviews compliance to FOI guidelines).	/				
7.	Agency leaders (with authority regarding agency policy initiates review of agency policy when certain inefficiencies are observed.	/				
Cor	nments					
Me	ans of Verification (e.g. minutes of meetings, agency b	oudget, inte	roffice commu	nication, po	olicy pronou	ncements)

## Element 2: Strategic and Policy Framework, Guidelines and Procedures Indicator 2: Presence of whole-of-agency policy, strategy, guidelines and procedures regarding FOI implementation

	Yes	No	NA	Comments
The agency's strategic plan includes provisions related to FOI implementation (e.g. transparency, access to information).  The agency's strategic plan includes provisions related to FOI implementation (e.g. transparency, access to information).	/			
The agency has issued specific guidelines for FOI (e.g. FOI manual)	/			
3. The agency FOI guidelines are accessible to all in digital format and downloadable from the agency's website.	/			
4. The agency FOI guidelines are accessible to all in hardcopy and available to citizens.	/			
5. The agency FOI guidelines have very specific provisions on				
a. How FOI will be implemented	/			
b. Who is responsible for its implementation	/			
c. How citizens can request information	/			
d. How long requests can be processed	/			
e. How citizens can complain if their request is not responded to	/			
6. The agency policy has been disseminated to all officials within the agency.	/			
7. Agency employees handling data and information are all oriented with how the agency policy works.	/			
8. The agency has disseminated the FOI policy to all its customers/constituents.	/			
9. The agency has proactively informed all its customers/constituents about the policy.	/			
The agency has written guidelines for receiving FOI requests, including				
a. Determining what constitutes a request	/			
b. Providing acknowledgment of receipt	/			
c. Assisting the requester	/			
11. The agency has written guidelines for processing requests, including				
a. Coordination within the agency in responding to the request	/			

		Yes	No	NA	Comments
	b. Timeframes	/			
	c. Cost determination	/			
	d. Fee collection (when applicable)	/			
	e. Transfer of request from one office in the agency to another (when applicable)	/			
	f. Transfer of request to another agency (when applicable)	/			
12.	The agency has written guidelines for responding to requests (e.g. granting or denying), including				
	a. Process for determining release of information	/			
	b. Means for providing the requested information	/			
	c. Means for providing notice of denial	/			
	d. Reason for denial of information requested	/			
13.	The agency has written procedures for logging in and tracking requests and responses including				
	a. Updating the log/tracker to keep it current	/			
	b. Tracking a request in one central recording system	/			
	c. Detailing the request from submission to processing to resolution, including transfers and internal reviews	/			
14.	The agency has written guidelines for the internal review of FOI requests, including				
	a. Receiving requests for review	/			
	b. Reviewing agency's motives for initial decisions	/			
	c. Issuing findings and decisions	/			
15.	The agency has written procedures on processing requests, including				
	a. Identifying who in the agency holds the information	/			
	b. Searching and finding information	/			
	c. Determining release	/			
	d. Deciding on redactions	/			
	e. Deciding on denials	/			
16.	The agency has written procedures in transferring requests to other agencies, including				

		Yes	No	NA	Comments
	a. Identifying the correct agency	/			
	b. Transferring the requests	/			
	c. Providing notice of transfer to the requester	/			
17.	The agency has written procedures for issuing and servicing responses, including				
	a. Provision of requested documents	/			
	b. Notice and collection of fees where applicable	/			
	c. Sending notices of denial	/			
	d. Sending notices of the requester's right to appeal	/			
18.	The agency has written procedures in capturing the following information				
	a. Number of requests	/			
	b. Number of transfers	/			
	c. Number of denials	/			
	d. Reasons for denial	/			
	e. Number of days to respond to requests	/			
19.	The agency has written procedures on proactive disclosure (i.e. not just responding to FOI requests but providing information to citizens on a regular basis) including				
	Identifying and listing documents that will be proactively disclosed	/			
	b. How the documents will be disclosed (e.g. website, notice boards)	/			
	c. Regularity in the disclosure of the documents	/			
	d. Format of the document when disclosed (e.g. PDF, MS word, spreadsheet)	/			
	e. People responsible in the disclosure process	/			
	f. Publishing information that is often requested through the FOI channel	/			
20.	The agency has record management policy in dealing with paper-based information.	/			
21.	The agency has record management policy in dealing with digital information.	/			
22.	The agency has written guidelines in record management (regardless of format) including				

		Yes	No	NA	Comments
	a. Creating records	/			
	b. Organizing records	/			
	c. Storing records/preserving records	/			
	d. Retaining records	/			
	e. Securing records	/			
	f. Retrieving records	/			
	g. Accessing records	/			
23.	The agency has written guidelines in records security, including				
	a. Determining classification	/			
	b. Internal access to classified documents	/			
	c. Transmission of classified documents	/			
	d. Creation of index or other forms of identifying classified documents	/			
24.	The agency has written guidelines and procedures in managing paper records, including				
	a. Creation	/			
	b. Records organization	/			
	c. Inventory	/			
	d. Indexing and logging	/			
	e. Access permission	/			
	f. Retention and disposal	/			
25.	The agency has written guidelines and procedures in managing digital records, including				
	a. Creation	/			
	b. Records organization	/			
	c. Inventory	/			
	d. Indexing and logging	/			
	e. Access permission	/			
	f. Retention and disposal	/			
26.	Our data management system is decentralized.	/			
27.	Access to the data of the agency is available for everyone working in the organization.	/			

Means of Verification				
<b>Note:</b> (In the comments column, indicate how this policy,	procedu	ıre or gu	uideline,	, has been implemented, the reasons for
your answer, or a further explanation).				•

Yes No NA

Comments

#### Element 3: Structure, Systems, and Resources

**Indicator 3**: Presence and functioning of structures and systems to ensure effectiveness and efficiency of FOI implementation.

		Yes	No	NA	Comments
1.	One or more agency official has been appointed to handle FOI implementation.	/			
2.	One or more agency official has been informally tasked to handle FOI implementation.	/			
3.	The agency officials handling FOI implementation are also doing other functions besides ensuring the effectiveness and efficiency of FOI implementation.	/			
4.	The agency officials handling FOI implementation have the authority and mandate to perform their functions.	/			
5.	The names of agency officials tasked to handle FOI implementation are made known to the public.	/			
6.	The agency official/s tasked to handle FOI implementation has/have				
	a. The time required to fulfill his/her function	/			
	b. The staff needed to fulfill his/her function	/			
	c. The financial resources needed to fulfill his/her function	/			
7.	The official/s tasked to handle FOI implementation received a specialized training on FOI and access to information in order to effectively do his/her job.	/			
8.	All agency employees are oriented about the FOI policy and their roles in its implementation.	/			
9.	All agency employees receive regular information about the progress of FOI implementation within the agency.	/			

	Yes	No	NA	Comments
10. The agency has training materials related to the agency's FOI guidelines, procedures and processes and these are made available to all employees.	/			
11. Agency official/s tasked to handle FOI implementation has/have regular access to:				
a. Computers	/			
b. Stable internet connection	/			
c. Scanners	/			
d. Photocopiers	/			
12. The agency has created a physical space where citizens can make written FOI requests.	/			
13. The agency has created an online space where citizens can make online FOI requests.	/			
14. One or more agency official has been appointed to handle proactive disclosure of information.	/			
15. One or more agency official has been informally tasked to handle proactive disclosure of information.	/			
16. The agency officials handling proactive disclosure functions are also doing other functions besides ensuring the effectiveness and efficiency of proactive disclosure mechanisms.	/			
17. The agency officials handling proactive disclosure functions have the authority and mandate to perform their functions.	/			
18. The agency official/s tasked to handle proactive disclosure functions has/have				
a. The time required to fulfill his/her function	/			
b. The staff needed to fulfill his/her function	/			
c. The financial resources needed to fulfill his/her function	/			
19. The official/s tasked to handle proactive disclosure functions received a specialized training on open data and proactive disclosure principles to do his/her job.	/			
20. Agency official/s tasked to handle proactive disclosure functions has/have regular access to:				
a. Computers	/			
b. Stable internet connection	/			
c. Scanners	/			

	Yes	No	NA	Comments
d. Photocopiers	/			
21. The agency has an appointed records management.	ed official/s handling /			
22. The agency official/s tasked management has/have	to handle records			
a. The time required to fulfi	Il his/her function /			
b. The staff needed to fulfill	his/her function /			
c. The financial resources no function	eeded to fulfill his/her			
23. Agency official/s tasked management has/have regula				
a. Computers	1			
b. Stable internet connectio	n /			
c. Scanners	/			
d. Photocopiers	/			
24. The official/s tasked to handle received a specialized tr management to do his/her job	aining on records /			
25. The agency has created/maint and facilities for storing paper				
26. The agency has created/ma facilities for storing digital reco				

#### Means of Verification

**Note:** (In the comments column, indicate how this policy, procedure or guideline, has been implemented, the reasons for your answer, or a further explanation).

#### **Element 4: Monitoring**

#### Indicator 4: Presence and functioning of monitoring systems for FOI implementation

		Always	Sometimes	Rarely	Never	Not Applicable
1.	The agency monitors its FOI functions and duties.	/				
2.	The agency issues FOI implementation reports on a regular basis.	/				
3.	The agency's internal audit department includes FOI functioning as part of its auditable areas.	1				
4.	The agency reviews the performance of the personnel assigned to handle FOI implementation to determine how they perform their tasks and functions.	/				
5.	The agency captures statistics on FOI implementation and discloses this to the public.	/				
6.	The agency captures statistics on proactive disclosure implementation and discloses this to the public.	/				
7.	The agency monitors its proactive disclosure practices.	/				
8.	The agency monitors its records management functions and practices.	/				
9.	The agency has designated an official/s who will oversee and monitor FOI implementation.	/				
Cor	nments		1		l	1

Means of Verification (e.g. minutes of meetings, agency budget, interoffice communication, policy pronouncements)

**Note:** (In the comments column, indicate how this policy, procedure or guideline, has been implemented, the reasons for your answer, or a further explanation).