



**ANALYSIS ON ACCESS TO INFORMATION PROMISING PRACTICES AND EXPERIENCES
REGARDING GROUPS IN VULNERABLE SITUATIONS**

Produced by

ICIC – Gender and Groups in Vulnerable Situations Working Group

Directed by

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I. Introduction

The ICIC Working Group (WG) on Gender and Groups in Vulnerable Situations was established in 2022 as an initiative that seeks to incorporate the specific needs of certain social groups in relation to the Right of Access to Public Information (“ATI”). Its main object of study is social vulnerability, against which it seeks to promote concrete actions to advance the inclusion of the perspective of gender and groups in vulnerable situations (“GVSs”) within ATI policies.

At the present time, the WG is coordinated by the Guarantor of the Right of Access to Information of the City of Buenos Aires, Argentina and the National Secretariat of Access to Information of the Office of the Comptroller General (CGU), Brazil and it consists of the following Members: National Information Commission of Nepal, the Freedom of Information - Project Management Office of the Philippines, Ombudsman Peru, Institute for Transparency, Access to Public Information and Personal Data Protection of the State of Mexico and Municipalities (Infoem), Mexico, National Institute for Transparency, Access to Information and Personal Data Protection (INAI) of Mexico, Information Regulator of South Africa, Office of Government Information Services - United States of America, Commission for Administrative Justice of Kenya, Institute of Transparency, Access to Public Information, Protection of Personal Data and Accountability of the Mexico City (INFO CDMX) and Commission of Access to Administrative Documents of Portugal.

Four products were proposed:

- I. A conceptual framework on Gender and GVSs -which considered the production of other transnational networks, experts on the subject and the regional literature of the members of the WGs, to adopt a common concept on social vulnerability and identify the most frequently occurring GVSs;
- II. An analysis framework for the identification, categorization and comparison between different practices in the field of the right of ATI regarding gender and groups in vulnerable situations;
- III. A first survey on the state of the situation, good practices and challenges in the field of ATI regarding gender and GVSs carried out among the members of the ICIC; and
- IV. A document that analyzes the state of the situation based on the information collected, which identifies and selects promising practices and experiences, as well as the challenges to the policies designed by government authorities. Finally, it



formulates a series of recommendations aiming to reduce the gap in the right of ATI in terms of Gender and Groups in Vulnerable Situations.

This last document corresponds to the fourth product of the WG. To carry it out, first of all, a synthesis of the information collected in the surveys, relevant to the objectives of this document, will be presented. Secondly, promising practices and experiences reported by ATI authorities in the surveys will be presented. Finally, the challenges encountered both in the implementation of these practices and experiences and in the development of the WG activities will be pointed out, and recommendations and conclusions will be established.

The WG aims to promote the collection of data and the exchange of experiences as a means to encourage the adoption of promising practices and experiences in favor of the well-being of our communities. Progress will include the sharing of knowledge and practices, greater awareness of the importance of gender and of GVSs in access to information, and better management, administration, and preservation of information.

II. Methodology

This document on ATI practices and policies, designed with a gender perspective and the inclusion of GVSs, is intended to be a continuation of the products previously prepared by the WG. In the first place, the conceptual framework made it possible to define social vulnerability, identify the main sources that cause it and the groups it tends to affect, and reach a common understanding of social vulnerability as:

A situation and a multidimensional and multicausal process, in which the exposure to risks, the inability to respond and adapt of individuals, households or communities, who may be harmed, injured or damaged by changes or the maintenance of external and/or internal situations that affect their level of well-being and the exercise of their rights (Busso, 2005, p.16). [It is understood that] (...) it derives from social structures, which distribute power unequally between individuals and groups and in which some people do not have access to sufficient services and support from the State (Holmes & Jones , 2013).

Moreover, the WG understands GVSs as: "groups and communities that suffer discrimination and exclusion (social, political and economic) due to unequal power relations in the economic, political, social and cultural dimensions". (NARA, 2021); that "for reasons inherent to their identity or condition, and by omission or action of state agencies, they are deprived of the enjoyment and exercise of their fundamental rights and lack attention and satisfaction of their specific needs" (Ministry of Justice and Human



Rights of Argentina, 2011, p.11). As a consequence, "they require the attention and implementation of necessary or urgent actions, as well as measures and policies, by the Obligated Subjects" (INFOEM, 2022).

In particular, the WG understands that it is more appropriate to refer to these groups as "Groups in Vulnerable Situations " than "Vulnerable Groups", for which reason the term "Groups in Vulnerable Situations" will be adopted for the development of this document. This is in accordance with what is expressed in the conceptual framework, since this concept is dynamic and implies the possibility of changing said situation and because it contemplates, beyond the identity of the group, unequal power relations and the deprivation of rights by state action or omission.

In addition, in line with the conceptual framework, this document will consider in its development the concept of "poverty" since it is frequently associated with social vulnerability, as it can be constituted as one of the multiple causes of social vulnerability as a multifactorial phenomenon. In turn, social vulnerability is itself a critical dimension in the dynamics of poverty and in the "risk of future poverty". Poverty can be understood as "the condition characterized by a severe deprivation of basic human needs, including food, drinking water, sanitation facilities, health, housing, education and information. Poverty depends not only on monetary income but also on access to services" (UN, 1995).

Secondly, through the survey it was possible to collect information on the main challenges, obstacles and barriers faced by GVSs and women in the exercise of the right of ATI. In turn, the ICIC members' practices and policies to maximize these groups rights of ATI were identified and certain shared experiences on this subject were observed.

Of the total of 85 members that make up ICIC, 32 authorities responded to the survey (a figure that represents almost 38% of the total number of members). The continent that provided the most responses was America, with 14 respondents (43.7%), followed by Europe (21.9%) and Africa (18.8%). The continents with the fewest respondents were Oceania (9.3%) and Asia (6.3%).¹

¹ The authorities that responded the ICIC Survey were: Institute for Transparency, Access to Public Information and Personal Data Protection of the State of Mexico and Municipalities (Infoem), Bangladesh Information Commission, Access to Public Information Unit of Uruguay, Institute of Transparency, Access to Public Information and Protection of Personal Data of the State of Jalisco, Institute of Access to Public Information of the State of Guanajuato, Office of the Ombudsman New Zealand, Commissioner for Information of Public Importance and Personal Data Protection Serbia, Information and Privacy Agency Kosovo, Office of the Victorian Information Commissioner Australia, Freedom of Information-Program Management Office (FOI-PMO), Philippines, Commission of Access to Information of Public Interest and Public Documents of Ivory Coast, Ombudsman's Office of Ecuador, Council for Transparency of Chile, National Authority for Transparency and Access to Information of Peru, Ombudsman of Peru, National Authority for Transparency and Access to Information of Panama, National Institute for Transparency, Access to Information and Personal Data Protection (INAI) of Mexico, Guarantor of the Right of Access to

Percentage of respondents per continent

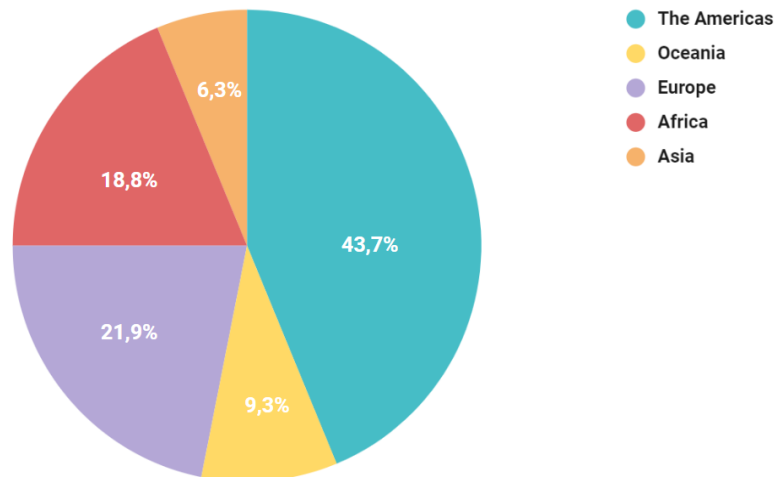


Figure 1. Percentage of respondents per continent

In addition, for the analysis of the information reported in the surveys, the distinction between Latin America and English-speaking America is used for the American continent. Latin America comprises the set of countries of the American continent in which languages derived from Latin (Spanish, Portuguese and French) are spoken, as opposed to English-speaking America (RSA, 2023).

This document is based on the information obtained from the survey responses, which was later supplemented with additional information provided by respondents on the promising practices and experiences reported in terms of ATI for these groups. It should be noted that, because this document aims to highlight practices that can be emulated by

Information of the City of Buenos Aires, Information and Privacy Commission of New South Wales, Australia, Agency for Protection of the Right to Free Access to Public Information of the Republic of North Macedonia, Agency for Protection of the Right to Free Access to Public Information, Information and Data Protection Commissioner of Albania, Commission On Administrative Justice (Office of the Ombudsman) of Kenya, National Authority for Data Protection and Freedom of Information of Hungary, Ethiopian Institution of Ombudsman, Right to Information Commission of Ghana, National Secretariat of Access to Information of the Office of the Comptroller General of Brazil, Institute of Transparency, Access to Public Information, Protection of Personal Data and Accountability of Mexico City, Office of Government Information Services (OGIS) of the United States, Information Regulator of South Africa, Information Commissioner's Office of the United Kingdom of Great Britain and Northern Ireland, Commission of Access to Administrative Documents of Portugal and National Authority for Access to Information of Tunisia.



other jurisdictions, the selection of best practices excluded practices that are implemented within the framework of regional or international alliances.

Based on the information collected, the WG had set out to select good practices and experiences. In the definition of a good practice, monitoring and evaluation is essential, considering its impact, effectiveness and results (SEGOB & CESUP, 2014). Although the WG intended to categorize the reported practices according to their outcome, the scarcity of information on the impact and results of these practices made the task difficult. In some cases, the surveyed authorities even reported their own difficulties in measuring the influence of their actions on the guarantee of the right of ATI in relation to gender and GVSs.

For its part, the concept of promising practices includes those actions designed and implemented for the management of a project, process or program, which have innovative theoretical or methodological elements that may or may not be based on evidence. Unlike “good practices”, promising practices have not yet been evaluated (SEGOB & CESUP, 2014). Notwithstanding this, they can be systematized to provide valuable lessons and recommendations (USAID, 2012, cited in (SEGOB & CESUP, 2014). For their part, the experiences constitute useful strategies, not only to obtain inspiring success stories, but also as unique data collection tools that can guide policy and practice by helping local stakeholders adapt in real time as they search for solutions to emerging problems (Woolcock, 2015).

The WG opted to make a selection of practices and promising experiences and not of good practices due, once again, to the difficulties in gathering information.

In order to analyze the practices and experiences and to determine those that stand out as promising, the WG established certain selection criteria, disregarding the result criteria for the reasons mentioned above. The criteria selected do not depend exclusively on the information of results in their evaluation.

The chosen criteria for the definition of promising practices and experiences were: reproducibility or adaptability, sustainability and participation.

Reproducibility/adaptability: refers to the ability to reproduce, replicate or transfer the action or policy to different contexts and situations, totally or partially. It is related to the ability to adapt to changes in the circumstances of the environment in which it is implemented and to the needs, characteristics and demands of the GVSs to which it is addressed.

Sustainability: concerns the ability to implement a given action or public policy over time, in the short, medium and long term.



Participation: observes the possibility of involvement of individuals who are part of a GVSs in the design or implementation of actions of public policies affecting that GVSs.

Thus, in this document, practices and experiences that present at least one of the aforementioned criteria are identified as “promising”. A subsection on promising practices and experiences can be found in the relevant sections of this document. They are presented under the title or name of the action and the name of the information agency that reported said practice or experience.

Given that one of the purposes of the document is to highlight practices that can be emulated by other jurisdictions, the selection of promising practices was based on practices carried out at a local or jurisdictional level and not on those implemented within the framework of regional or international alliances. Also, only practices and experiences carried out by state agencies were selected. Practices and experiences developed entirely by civil society organizations were excluded, although civil society practices that had the intervention of state agencies were considered.

In addition to the selection of promising practices in the field of ATI regarding gender and GVSs, the WG identified and highlighted practices and experiences aimed at GVSs that were identified with the highest prevalence globally based on the information provided by the respondents to the survey (that is, more than 70% of the jurisdictions): people with disabilities, children and adolescents, the elderly, people living in poverty, victims of gender violence, and migrants, refugees and political exiles. Notwithstanding this, the document has a section on practices and promising experiences directed towards GVSs that were not identified with the highest prevalence globally based on the reported data.

Additionally, the WG highlighted the public policies on ATI rights aimed at indigenous communities inspired by the fact that, in 2021, UNESCO declared the Decade 2022-2032 as "International Decade of Indigenous Languages", looking to create a global community for the preservation, revitalization and support of indigenous languages throughout the world.

III. Groups in Vulnerable Situations and Access to Public Information

A. Information collected through surveys

First, the surveyed authorities were asked to select which of the following groups are considered GVSs in accordance with their local and/or national legislation. The main groups identified were: people with disabilities (selected by 90% of the total respondents); children and adolescents (selected by 81%); the elderly (selected by 78%); people living in poverty (selected by 78%); victims of gender violence and/or domestic abuse (selected by 75%); and migrants, refugees and political exiles (selected by 75%).

The following graph shows the answers received, as a percentage of all answers received.

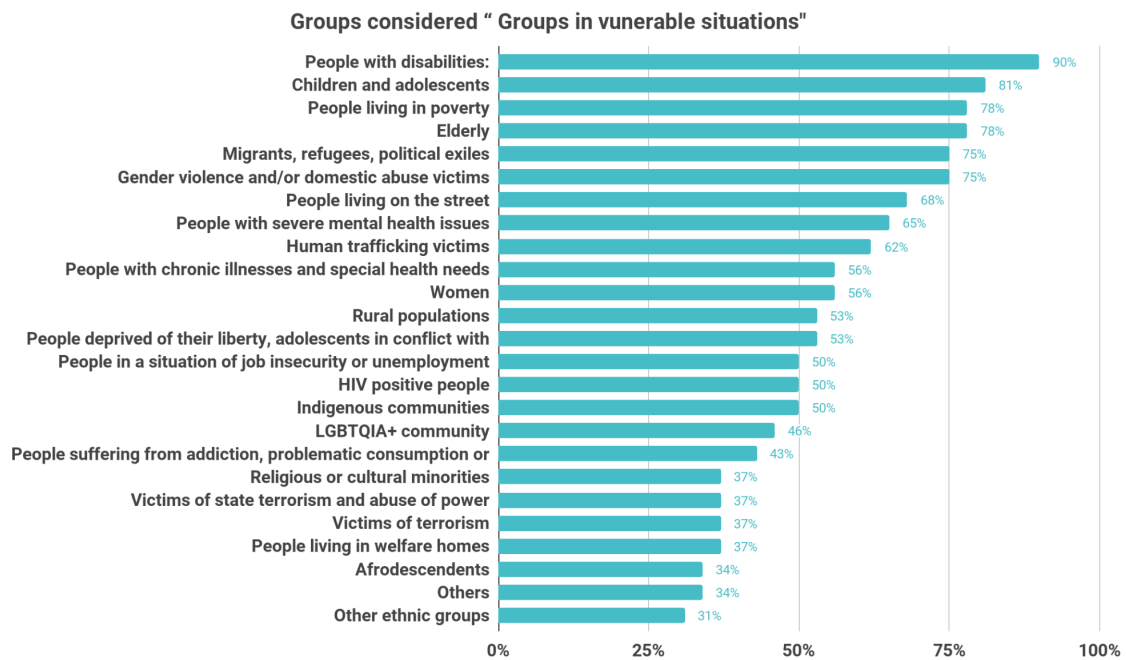


Figure 2. Groups considered "Groups in vulnerable situations"

When analyzing these results by region, differences are noted with respect to the selected groups with the highest prevalence (that is, identified by more than 70% of the respondents in each region). On the one hand, authorities in Africa mainly identified the following groups: people with disabilities (100% of the total), children and adolescents (83.33% of the total), and the elderly (83.33% of the total). Respondents from Latin America mainly considered: children and adolescents (100% of the total), the elderly (100% of the total), people with disabilities (100% of the total), migrants, refugees, political exiles (100% of the total), people living in poverty (84.61% of the total),

indigenous communities (84.61% of the total), and Afro-descendants (84.61% of the total). All authorities surveyed in Asia (100% of the total) considered it important to identify: people in a situation of poverty, people in a situation of job insecurity or unemployment, rural populations, people with disabilities, people with chronic illnesses and special health needs, and people living in the streets. Regarding Europe, people living in poverty, people with disabilities and people with chronic illnesses and special health needs were identified by 87.70% of the respondents, and homeless people by 75%. All the authorities surveyed in Oceania (100% of the total) considered it important to identify indigenous communities. For their part, all respondents (100%) from English-speaking countries of the Americas selected migrants, refugees, and political exiles.

The second question attempted to determine which of the groups identified as GVSs face the greatest difficulties in exercising their ATI rights. The surveyed authorities mainly considered people living in poverty (identified by 75%), people with disabilities (identified by close to 72% of the total) and rural populations (identified by 65% of the total). In contrast, the groups with the lowest concentration of responses (selected by less than 10% of the total) are religious and cultural minorities and LGBTQIA+ communities.

The third question on the survey asked what the main challenges faced by GVSs are regarding the exercise of ATI rights. Four response options were offered: "Lack of legal knowledge of the right of ATI", "Accessibility", "Implementation and enforceability of the right" and "Absence of spaces or mechanisms to actively participate in public decision-making processes"; and an "Other challenges" option, with the space to provide more details. The following graph illustrates the distribution of responses.

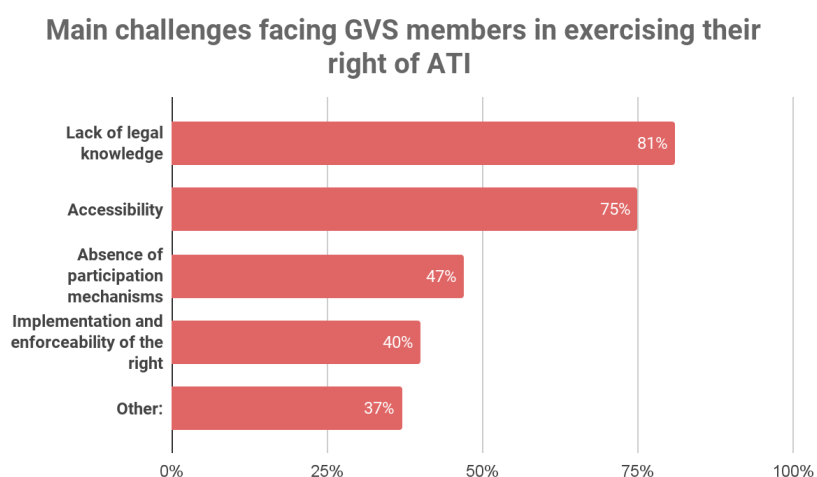


Figure 3. Main challenges facing GVS members in exercising their right of ATI²

² This question was not answered by all the surveyed authorities. The graph was made based on the responses received, which do not represent all of the authorities surveyed.

The fourth question referred to the collection of information and/or specific data on how the members of GVSs exercise the right of ATI in the surveyed authorities' jurisdictions. The majority (59%) reported that they do not collect this information. The remaining 41% answered that they collect this data through ATI request forms, surveys, networking with Civil Society Organizations and/or through specific workshops.

The fifth and sixth questions examined whether the right of ATI guarantee for GVSs is included in the agenda and/or priorities of the surveyed authorities' jurisdictions and, if so, what its degree of priority is: high, medium or low. 72% answered that it is a subject included in the agenda and then, when asked about the assigned priority, 52% answered that it is high, 35% that it is medium and the remaining 13% that it is low.

The next question sought to identify practices or public policies that the jurisdictions have implemented to guarantee the right of ATI to GVSs. In this sense, authorities were asked about the existence of these practices along with examples, providing four closed-answer options: "Written guides in a simple format and accessible language that offer relevant and useful information for women", "Activities aimed at citizens (such as workshops, training, visits to community centers for women, etc.)", "Free and accessible communication channels to make inquiries and report missing public information regarding groups in vulnerable situations" and "Others".

The following graph illustrates the distribution of responses:

Implemented practices and policies to guarantee ATI rights to GVSs

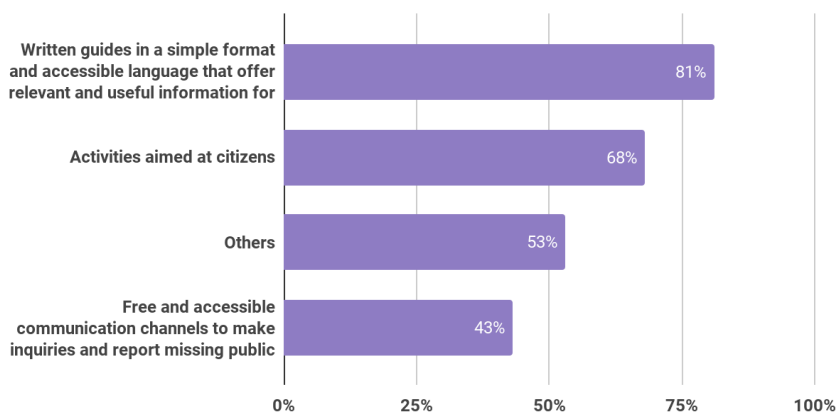


Figure 4. Implemented practices and policies to guarantee ATI rights to GVSs



Afterwards, respondents were asked for more information on these implemented practices and policies, along with their achieved and/or expected results. Responses to these follow-up questions are presented in the next section.

Lastly, the survey inquired about the main challenges jurisdictions face in planning and developing these policies. This point will be addressed in the last section of this document.

B. Promising practices and experiences

B.1. Practices reported by specific groups with the highest prevalence globally

1. Indigenous peoples

Promising practices and experiences

❖ ATI Forms in Native Languages - Ombudsman of Peru

The government of Peru has implemented and distributed standard forms for submitting ATI requests. This form is available in the Quechua language (indigenous language), which allows some GVSs to access said form in their native language.

The link in which this information is found is the following:
<https://www.gob.pe/institucion/cultura/informes-publicaciones/1128711-formato-d-e-acceso-a-la-informacion-publica>

According to the National Institute of Statistics and Informatics (INEI), the household census carried out in 2017 determined that 20.1% (1,653,662 people) of heads of households learned Quechua as their first language, 2.8% (229,019 people) learned Aymara, 0.7% (55,543 people) learned a language from the Amazon and 76.4% (6,279,210) learned Spanish. Likewise, it showed that in comparison with the 2007 census, the heads of households who have Quechua as their mother tongue grew by 1.6 percentage points, while those who learned to speak Spanish in their childhood decreased by the same amount. Thus, in order to preserve said indigenous language, it is of the utmost importance that the State adopts measures that allow its conservation, such as the creation of ATI forms in Quechua, which in turn facilitates the exercise of their right to know.

❖ Data recollection about the use of the ATI system by indigenous people from the unified system to request information from agencies and entities of the Federal Executive Branch - National Secretariat of Access to Information of the Office of the Comptroller General of Brazil (henceforth, CGU)



It should be noted that Brazil has a centralized platform for registering requests for access to information, which encompasses all 319 agencies and entities of the Federal Executive Branch. The system was launched on May 16, 2012, since the beginning of the Brazilian Access to Information Law. The database allows data cross and analysis of requests for information, appeals and their respective responses, to investigate the exercise of the right to Information on specific topics.

Searching for keywords related to indigenous subjects and tribes, 2,367 requests were identified over the 11 years of the Brazilian Law on Access to Information (LAI). It is a small percentage compared to the total amount of requests for information, approximately 0.2% of the total. Therefore, considering that the population living in indigenous areas represents approximately 0.5% of the Brazilian population, the number of requests for information on the indigenous theme is statistically relevant, if compared to the census distribution.

Despite the small number of requests, it is important to note that among the citizens that declared their ethnicity when making requests for information about indigenous subjects between 2012 and 2023, 6.2% of them declared themselves as indigenous. It seems undoubtful that the unified system for requesting information played an important role to make the right to information also available for indigenous people. The system, either available on the Internet for anyone, or accessible through smartphones, may be considered a good practice adopted by the Office of Comptroller General (CGU – Brazil), to seek the universalization of the right to information. However, the numbers are still very timid, and there is enormous room for evolution of the practices adopted in Brazil for the exercise of the right of access to information by indigenous peoples.

In addition, the analysis of the issues on which the requests for information dealt with, allows us to identify the main themes demands. Although there is a generic classification, used by most people, which can distort the statistics (50.4%), one can observe the interest of the applicants in: health (6.5%); public services (5.0%); social protection (4.3%); agriculture (4.1%); human rights (3.6%); environment (2.7%); higher education (2%); security and public order (1.7%); and others (19.5%).



❖ **Web tool for visualizing data on indigenous COVID-19 cases and deaths - APIB, National Secretariat of Indigenous Health of the Ministry of Health (SESAI/MS) National Committee for Indigenous Life and Health. CGU Brazil³**

APIB has developed a web tool for visualizing data on indigenous COVID-19 cases and deaths, published by the National Secretariat of Indigenous Health of the Ministry of Health (SESAI/MS) and data collected by the National Committee for Indigenous Life and Health, formed by the following organizations: APOINME, ARPIN sudeste, ARPINSUL, COIAB, Comissão Guarani Yvyrupa, Conselho do Povo Terena, e ATY GUASU.

The web tool helped the public oversight of the impact of the COVID-19 pandemic for indigenous people, also allowing public oversight of the government's action to confront and prevent the disease.

The first cases were recorded in May 2020, and over the first four months (May to August 2020), the tool made it possible to identify the discrepancies between the official data and the counts made by the indigenous people themselves through the National Committee for Indigenous Life and Memory). The government continued to publish weekly reports on COVID-19 cases and confirmed deaths, available at: https://www.gov.br/saude/pt-br/coronavirus/informes-tecnicos/informes-saude-indigena?b_start:int=0.

The tool was updated until November 2022, and SESAI/MS published weekly reports until April 2023.

❖ **DAI Plan - National Institute of Transparency, Access to Public Information and Protection of Personal Data of Mexico (henceforth, INAI) and Institute of Transparency, Access to Public Information and Protection of Personal Data of the State of Mexico and Municipalities (henceforth, Infoem)**

The National Plan for the Socialization of the Right of Access to Information (DAI Plan) is a national public policy of the National Transparency System of Mexico that, through the socialization of the right of ATI and of the use of public information, mainly in social GVSs, seeks to contribute to inclusion and the reduction of the inequality gap in the exercise of other fundamental rights.

³This action was reported by the information agency but was not carried out by them. It was carried out by a civil society organization based on data published by the government and the National Committee for Indigenous Life and Health.



It is an effort that promotes the organization for collective action, the generation of leaders and capacities, as well as the incidence in the solution of the country's main public and community problems.

In the case of Infoem, the DAI Plan was specifically directed at the Mazahua Indigenous population in the municipalities of Ixtlahuaca, Atlacomulco, San Felipe del Progreso and San José del Rincón in the State of Mexico.

The work of socialization of the right of ATI mainly includes the work carried out by facilitators, once the target population and the appropriate strategies to achieve it have been defined and identified. The team involved is comprised of public servants of the National Institute of Transparency, Access to Public Information and Protection of Personal Data; the Institute of Transparency, Access to Public Information and Protection of Personal Data of the State of Mexico and Municipalities; government representatives such as Town Halls, and representatives of the private initiative, of educational Institutions and civil society organizations.

The methodology includes:

1. To identify the main public issues and community problems that afflict the target population.
2. To translate said problems into information needs.
3. To transmit the knowledge and skills to allow the target population to adequately exercise their right of ATI (taking into account not only making ATI requests but also consulting information that is already published in the SIPOT or in regulated entities' websites).
4. To obtain the necessary information to evaluate the situation to be addressed, as well as the authorities' performance in relation to its solution.
5. To teach the target population how to take advantage of the information received through the ATI system in order to ask authorities to solve these problems.

This practice is currently in process, so there are no concrete results yet. However, it is intended to achieve a social benefit in the indigenous population, since by exercising their right to information, decision-making and quality of life will improve, and people will be able to solve problems in their communities.

For its part, the IACIP of Guanajuato reported the implementation of the DAI Plan through the Citizen Conference for the Socialization of the Right of Access to Information aimed at women in vulnerable situations in the municipality of León,



which will be described in more depth in the section of this study focused on gender.

❖ **Translation of the Law on Access to Public Information of Panama - National Authority for Transparency and Access to Information of Panama (henceforth, ANTAI)**

The National Authority for Transparency and Access to Information is working on the translation of Law 6 of January 22nd, 2002 (Transparency Law) into indigenous languages.

❖ **Workshop seminar "Access to Information, Indigenous Peoples and Sustainable Development" - National Authority for Transparency and Access to Information of Panama (ANTAI)**

Through the workshop seminar "Access to Information, Indigenous Peoples and Sustainable Development", an attempt will be made to carry out a co-creation exercise with the 12 representatives of indigenous peoples in Panama. It is expected to provide knowledge about the National Authority for Transparency and Access to Information to the indigenous population of the Ngäbe-Buglé Region, specifically the District of Mironó.

❖ **"Transparency within everyone's reach" - Institute of Transparency, Access to Public Information and Protection of Personal Data of the State of Jalisco, Mexico (henceforth, ITEI)**

This project aims at contributing to the social equality of the GVSs of said entity for the full exercise of the rights of ATI and protection of personal data.

Project website: <http://micrositios.itei.org.mx/alalcanceetodos/>.

For indigenous peoples and communities, it includes actions such as events and actions, a register of interpreters and translators of indigenous languages, training, dissemination materials, agreements and documents of interest.

❖ **Actions with cultural and linguistic relevance - Institute of Transparency, Access to Public Information, Protection of Personal Data and Accountability of the Mexico City (henceforth, INFO CDMX)**

The Law of Transparency, Access to Public Information and Accountability of Mexico City, in its sections 3, 12 and 14, establishes that the fundamental right to public information of native peoples and native neighborhoods and settled



resident indigenous communities in Mexico City, will be executed in their language, when requested. The Institute must implement the necessary actions so that the obligated subjects, to the extent of their budgetary capacity, attend to and resolve matters in the language of the original towns and neighborhoods, and indigenous communities residing in Mexico City, making it accessible and seeking to coordinate with the corresponding instances for translation into the indigenous language of the original towns and neighborhoods and resident indigenous communities of Mexico City, when so requested.

In recent years, actions with cultural and linguistic relevance have been carried out, such as those referred to below:

- Various requests for review have been resolved in indigenous languages and in an easy-to-read format.
- Within the framework of the “Ask in your language” campaign, videos in native languages were generated and hosted: <https://infocdmx.org.mx/PreguntaEnTuLengua/>
- In 2022, the translation-interpretation of dissemination materials in native languages began. The materials will be presented in 2023.

❖ **Access to Information Guidelines No. 8. Access to records of Indigenous Australians and migrants who were in the care of state foster homes - Information and Privacy Commission of New South Wales, Australia.**

Government and non-governmental agencies in Australia hold records on approximately 500,000 people who were in institutional care as children during the 20th century. These difficult experiences were acknowledged in the Australian Government's National Apology to Forsaken Australians and Former Migrant Children in 2009, in the Royal Commission Report on Institutional Responses to Child Sexual Abuse in 2017 (Royal Commission Report) and in numerous other parliamentary, governmental and non-governmental studies and programs. An important issue that emerges from all of them is the need for more guidance and accompaniment to ensure that those who were in foster care can more easily access information and records related to their time in state care, in homes and private orphanages, and also migrant children who arrived in Australia.

This guide focuses on accessing historical records relating to children or youth who were in some form of state care in the past, for example in foster homes and orphanages, in any case where a record entry is retained or made, whole or in part. Individuals should be aware of and be assisted in asserting their existing



rights to request amendment or annotation of records containing their personal information, as well as to request the review or appeal of decisions denying access, amendment, or annotation.

These guidelines focus on strengthening and improving access to Stolen Generations' records for survivors and descendants. The important role that access to historical records plays in revealing the truth, in collective memory, in healing intergenerational trauma, and in reparation and compensation for the survivors of the Stolen Generations and their families is recognized.

In developing and publishing the guidelines, the New South Wales Information and Privacy Commission consulted the main bodies responsible for access to information. Agencies have reported that the guide provides a more permissive framework to facilitate ATI in circumstances where the indigenous community has not been in a position to effectively communicate the value of the information to them. It was reported anecdotally that the strategy was effective and well received by the indigenous community, and it enhanced their knowledge about the right of ATI, which was previously limited. It was promoted through indigenous councils and home care support groups.

More information can be found here: [LINK](#)

- ❖ **Guides in Te reo Maori and New Zealand Sign Language - Office of the Ombudsman New Zealand⁴**

2. People with disabilities

Promising practices and experiences

- ❖ **Consultation with persons with disabilities on the draft Access to Information Regulations 2021 - Commission On Administrative Justice (Office of the Ombudsman) Kenya.**

The Commission held a meeting with Persons with Disabilities on December 6, 2021 as part of the main stakeholders in the public participation forum related to the draft General Regulation on Access to Information 2021. The meeting focused on comments from people with disabilities in relation to the challenges they face when accessing information from public entities.

⁴ The surveyed Authority did not provide any further information on this practice.



In this context, on Saturday, October 23rd, 2021, the Commission participated in the 10th edition of the Desert Wheel Race held in Isiolo County. The event, organized by the Northern Nomadic Disabled People's Organization (NONDO), was held under the theme: Access to Assistive Technology for People with Disabilities.

❖ **"Transparency within everyone's reach" - ITEI Jalisco, Mexico**

This project aims at contributing to the social equality of the GVSs of said entity for the full exercise of the rights of ATI and protection of personal data. Project website: <http://micrositios.itei.org.mx/alalcanceetodos/>. Includes the following actions:

- Hearing disability: events and actions, list of facilitators of Mexican sign languages, training, dissemination materials, agreements and documents of interest.
- Visual impairment: events and actions, register of interpreters and translators, training, dissemination materials, agreements and documents of interest.
- Motor disability: events and actions.

❖ **"Support Guide for the care of people with hearing disabilities v1.0" - ITEI Jalisco, Mexico**

ITEI developed this document addressed to the personnel that integrates the transparency units of the regulated entities of the state of Jalisco, and it served as a tool to facilitate the attention of people with hearing disabilities who came to exercise their rights of ATI and personal data protection.

❖ **Development of the Braille version of the Access to Information Act 989 - Right To Information Commission Ghana**

The Commission is collaborating with the Mampong School for students with visual disabilities to prepare the Braille version of Law 989 on access to information.

❖ **Prints in Braille - INFO CDMX, Mexico City**

The following materials were printed in the Braille reading-writing system:

- Executive guide for the protection of human rights related to the use of personal data:
https://infocdmx.org.mx/images/biblioteca/2021/VF_GUIA_PROTECCION_DH_DP.pdf



- Children's story: "A bike path for Paula": https://infocdmx.org.mx/images/biblioteca/2021/SubeteBiciInformacion_CicloviaPaula.pdf
- Protocol for openness and transparency in the face of risk: prevention, reaction and recovery: https://www.infocdmx.org.mx/images/biblioteca/2021/Protocolo_Apertura_Transparencia_Riesgo.pdf
- Special report. Opening in COVID19: Programs and social actions in CDMX: https://www.infocdmx.org.mx/images/biblioteca/2022/Reporte2A_osCovid19-.pdf
- Public information and personal data protection request forms: https://infocdmx.org.mx/iaipdf/doctos/formato_acceso_dp.pdf

❖ **Online accessibility - INFO CDMX, Mexico City**

The Integra2 tool came into operation in 2022, in accordance with agreement 3186/SO/22-06/2022, dated June 22nd, through which the Plenary of the Institute approved the signing of the Specific Agreement between the State Commission for Access to the Public Information of Sinaloa ("CEAIP") and INFO CDMX. The agreement sought to establish collaboration and cooperation between the parties in order to jointly coordinate the use and implementation of the aforementioned accessibility online tool for people with disabilities, designed by the CEAIP. The tool offers a voice reader, screen color contrast, enlargement and separation of images, reading guide and other useful functions on obligated subjects' websites and/or online portals referred to in the Law of Transparency, Access to Public Information and Accountability of Mexico City.

During 2022, 2,945 visits to the institutional website were registered through the use of the web accessibility platform, highlighting content navigation through voice, contrast and without animations.

The tool is available on the Institutional Portal: <https://www.infocdmx.org.mx/>.

❖ **Events aimed at people with disabilities - INFO CDMX, Mexico City**

Events aimed at people with disabilities were held: "Let's talk about inclusion and protection of personal data for people with disabilities" (https://www.youtube.com/live/t_ri5mfyPkY?feature=share) and "Right of access to information for people with disabilities" (<https://www.youtube.com/live/9wf8-gKg55w?feature=share>).

❖ **Guide with recommendations on accessibility for local agencies - INFO CDMX, Mexico City**



The INFO CDMX produced a document with recommendations for the accessibility of materials for use by people with disabilities, as a product of a specialized technical advisory workshop to guide various local public agencies.

❖ **Accessibility of official websites - National Authority for Data Protection and Freedom of Information Hungary**

Its tool is the accessibility of the public bodies' websites, which they carried out according to research, at a technical level, on local authorities' websites in a comprehensive research project that ended in 2022.

❖ **FOI Bridging Program for and with people with disabilities - Freedom of Information, Philippines (henceforth, FOI)**

An online conversation was held in which experts from the Department of Social Welfare and Development and the Department of Labor and Employment talked about their public services, their initiatives for the general well-being of people with disabilities. A video recording of the initiative is available at:

<https://www.facebook.com/foiph/videos/1986136238442345>

❖ **Signing of a Memorandum of Understanding with state authorities in charge of students with visual and hearing disabilities. Information and Data Protection Commissioner of Albania, (henceforth, IDP)**

A Memorandum of Understanding was signed with the two state authorities in charge of students with visual and hearing disabilities. The signed document outlines several joint initiatives that will be carried out, such as: organization of specific training courses; production of brochures; adaptation of the IDP website to facilitate access for this GSV; among others.

The IDP is in the process of launching the initiatives detailed in the Memorandum. ATI claims presented by aforementioned GSV will be prioritized, awareness-raising activities will be organized that will benefit the needs of this group, promotional videos, brochures and the websites will be adapted to their needs. A video was also prepared on the occasion of Data Protection Day on January 28th, in which a sign language interpreter appears: <https://youtu.be/CA82nXxoWWo>.

❖ **"Digital Inclusion Challenge", accessibility in official websites - ANTAI Panama**

The Authority is part of the institutions that have acquired the commitment of the strategy for inclusion and accessibility of government websites called "Digital Inclusion Challenge" for government entities, which has implemented accessibility standards on all websites for people with disabilities.



❖ **Web accessibility - Commission of Access to Administrative Documents of Portugal**

The “*Mais transparencia*” and “*Dados.gov.pt*” websites facilitate access for citizens with disabilities.

❖ **Web accessibility - ITEI Jalisco, Mexico**

The ITEI website is a communication channel for accessing essential information, it also has a section that clearly and simply explains the procedures for placing an ATI request, as well as what to do if it cannot be accessed. Finally, said page has a WEB ACCESS accessibility badge, which guarantees that people with disabilities can access online content, to obtain information and communicate through this digital medium. Accessibility to such content is a human right.

❖ **International Day of Persons with Disabilities - National Authority for Access to Information of Tunisia**

INAI-Tunisia, since its creation in 2017, has been strongly involved, each year, in the organization of the International Day of Persons with Disabilities (every year on December 3rd). To this end, INAI-Tunisia has been involved, along with other partners, in the organization of various events to popularize the right of ATI for the benefit of this GSV.

❖ **Standard Transparency Portals with sign language- National Authority for Transparency and Access to Information of Peru (henceforth, ANTAIP)**

Development of standard transparency portals with the inclusion of sign language.

3. Children and adolescents

Promising practices and experiences

❖ **"Queremos saber" Program - Access to Public Information Unit of Uruguay (henceforth, UAIP)**

It includes workshops aimed at children and adolescents of the “Propia” Program of the Institute for Children and Adolescents of Uruguay. In these workshops, after a brief theoretical introduction, ATI requests are submitted to the corresponding agency either online or in paper.

For children and adolescents, work was carried out under the slogan "We can also learn to participate", the group of children and adolescents from the Propia - INAU group in the city of La Paz, accompanied by educators, built spaces for participation on topics of their interest. In these spaces, a set of workshops were developed in which they learned about the interests of this population, and they



were taught how to exercise the Right of Access to Public Information as a tool for participation.

The groups of Propia-INAU constitute a network throughout the country with more than 2,500 participants. There is a group that accompanies the process and that also acts as an advisor when transmitting the experience to other children and adolescents. To access the videos of children and adolescents: <https://www.gub.uy/unidad-acceso-informacion-publica/comunicacion/campanas/queremos-saber>

In 2016, work continued on this project and the goal was to reach more groups and different parts of the country within the framework of INAU's Child and Adolescent Participation Program ("Propia"). Thus, we came to work with six more groups from the regions of Sarandí del Yi, Young, Florida, Sarandí Grande, Rocha and Minas; the workshops had the participation of 220 children and adolescents.

The "Queremos Saber" project received an honorable mention in the 2016 Inter-American Award for Innovation for Effective Public Management from the Organization of American States (OAS).

❖ **Contest to be Commissioner and Children's Commissioner and be part of the Plenary Girls and Boys - INFO CDMX, Mexico City**

The Call for the Contest to be Commissioner and Children's Commissioner and be part of the Children's Plenary INFO-INAU 2022 is integrated into a national contest and focuses on promoting the importance of privacy and protection of personal data among minors, as part of the civic education campaign for the exercise of the right to the protection of personal data, paying special attention to the principles of non-discrimination, inclusion and pro-person, as well as the rights of children, in the development of the contest. Likewise, through the contest, we sought to encourage creativity and interest in children and adolescents in participating in personal data protection issues.

On June 23rd, the Institute held the Single Session of the Children's Plenary INFO CDMX 2022, aiming to raise awareness and sensitization among children about the importance of protecting their personal data, as well as the danger of sharing personal information through social networks and new technologies. The winners of the contest to be Commissioner for Children and to be part of the Children's Plenary INFO 2022 participated in this session. A plenary session of this Guarantor was simulated. The event can be viewed at the following link: <https://www.youtube.com/live/7XXWqKg1R6Y?feature=share>



❖ **Written story “A bike lane for Paula” - INFO CDMX, Mexico City**

The INFO CDMX produced a written story for raising awareness of the right of access to information for children called “A bike lane for Paula”. It’s been published in a written version (PDF): <http://bit.ly/3ec6pol>, and as an audio book: <http://bitly.ws/DMbj>

The story is being translated to 4 indigenous languages: mixe, náhuatl, tsotsil y mixteco.

❖ **“Plaza Sésamo: Monstruos en Red” microsite - INFO CDMX, Mexico City**

The Plenary of the Institute approved the signing of an Agreement to grant the authorization of a non-exclusive license, free of charge, for the public communication of the work "Sesame Street: Monsters on the Internet". The agreement was signed by both the National Institute for Transparency, Access to Public Information and Protection of Personal Data and INFO CDMX.

The signing of this agreement represented the opportunity to carry out an innovative and educational program aimed at children in Mexico City, promoting learning regarding the culture of privacy and protection of personal data in a fun way.

The television series consists of 26 episodes, lasting 12 minutes each, including animations, songs, and videos, and was viewed by more than two thousand users.

More information at: (<https://infocdmx.org.mx/monstruosenred/inicio/>)

❖ **Online Youth Program. INFO CDMX, Mexico City**

Awareness talks are held for children and youths of Mexico City:
<https://www.infocdmx.org.mx/index.php/juventudes-en-linea.html>

❖ **"One for all and all for one! For Ethics and Citizenship"- CGU Brazil**

The CGU has a program aimed at children and adolescents called "One for all and all for one! For Ethics and Citizenship". Through a partnership with the most popular children's comic characters, "Turma da Mônica", the program teaches children and youths about their right to ATI and how to access public information, among other rights and values, in an educational and informal way.

❖ **"Monitoring of school lunches" - CGU Brazil**



The CGU has an active ombudsman program "Monitoring of school lunches", aimed at children and adolescents in public schools. The project aims to encourage students to monitor and evaluate the quality of the meals served at school, using a mobile application. The objective is to monitor, with the help of the affected public, the national school feeding policy.

- ❖ **Workshops on Access to Information in Schools- Information and Privacy Agency Kosovo⁵**

4. Elderly people

Promising practices and experiences

- ❖ **Development of a guide for elderly people in CABA - Guarantor of the Right of Access to Information of the City of Buenos Aires, Argentina (henceforth, OGDAl in its Spanish acronym)**

The development of a digital and physical guide that compiles all useful and necessary information for the elderly population in the City of Buenos Aires regarding the exercise of rights and important services for this group, such as pensions and retirement benefits, disability support, health, active aging, among others. Additionally, it provides tools to facilitate their digital inclusion, enabling them to enhance their accessibility to information and communication technologies. The guide includes a specific section with relevant information aimed at older women. Visits and workshops will be conducted with elderly individuals, for example, in senior centers

- ❖ **Paper Applications - Office of Government Information Services, National Archives and Records Administration, United States of America (henceforth, OGIS)**

Inclusion of a postal address for paper submissions.

The Office of Government Information Services (OGIS), the FOIA Ombudsman, has observed that, within the scope of the U.S. Freedom of Information Act (FOIA), lack of Internet access appears to be the main systemic barrier. Groups with limited or no ability to use the Internet (incarcerated, homeless, elderly) may be

⁵ The surveyed Authority did not provide any further information on this practice.



vulnerable in an environment where the common practice is for federal agencies to disseminate information electronically. Additionally, OGIS has observed that mail delivered by a postal system is often delayed or obstructed for incarcerated individuals. These observations are not based on empirical research, but rather on the assistance that OGIS has provided in response to more than 31,000 requests for assistance since 2009.

The U.S. Department of Justice advises all 121 U.S. federal agencies subject to FOIA to include a mailing address for paper mailings. Groups in vulnerable situations, especially older people, can use postal mail to exercise their FOIA rights.

Because there are 121 federal agencies administering FOIA, there is no generalized result nor has there been an empirical study.

5. People living in poverty

There is no specific practice reported targeting people in a situation of poverty. However, taking into account the concept provided by the UN mentioned in the "Methodology" section, which considers the severe deprivation of basic human needs including the lack of monetary income and access to services, such as education , health, etc., the following practices can be identified.

Promising practices and experiences

❖ “Queremos saber” Project - UAIP Uruguay

This project was Intended for adults in a context of social and educational vulnerability.

The challenge was to work in the field of Formal Education, with an adult public through the Rumbo Program of CETP - Universidad Tecnológica del Uruguay, which allows students over 18 years of age to complete the initial stages of their university level studies through participating in a hybrid modality.

The “Queremos Saber” Program operated within the “Citizen and Labor Education” Module, contributing to the construction of citizenship. For this purpose, the adaptation of in-person workshop contents and the use of the educational platform as a space for exchange and to make multimedia teaching materials available were coordinated with the teachers.



Three in-person workshops were developed, reaching the Rumbo groups of the Technical School of Paso Carrasco y Suárez, in Canelones. Likewise, in Montevideo we worked with the Rumbo groups from the Cerro and La Teja neighborhoods.

As the age of these adult students ranges from 18 to over 50 years, the program focused on the exercise of rights in the context of daily adult life and responsibilities. The workshops were carried out with an outstanding level of interest and participation that deserves to be highlighted, since this face-to-face instance was not mandatory.

The areas of interest related to public information touched on by the project were very broad, ranging from participants' experiences as adults facing the State to decisions of government management, such as closure or changes in the operation of important services for citizens. Familiarization with digital media enhanced the activities carried out, since students were able to submit ATI requests without having to travel to the agencies.

The team that participated was the Public Information Access Unit (UAIP) and the teachers from the centers that collaborated with the initiative.

❖ **Caravan for Transparency and Privacy - INAI, Mexico**

The Caravan for Transparency and Privacy is a project focused on going directly to different vulnerable communities, distributed throughout the national territory, where an information module is installed that guides people and provides alternatives that facilitate the exercise of their ATI rights.

After identifying a lack of awareness of this human right in these communities, counseling was designed in different languages that allowed a direct link with the population, so that it was possible to empower them through the knowledge and appropriation of their rights. This promoted the creation of bonds of trust between communities, generating a replicating effect that encouraged the people who received advice to share their experience with their close circle.

In this way, personalized work with communities in conditions of vulnerability or marginalization opened the door for many of the counselees to achieve a greater chance of demanding compliance with their rights and having a better quality of life.

We propose to add the telephone and personal attention lines offered by the CAS and the use of sign language, or translation support into indigenous languages, when required.

❖ **"ACCEDE Program" - ITEI Jalisco, Mexico**



ACCEDE is a program that arises from ITEI's motivation to reach out to all people who are in areas with little or no connectivity, or who live in a situation of vulnerability, so that they know and make the most of the benefits of access to public information and the protection of personal data to solve their problems. Its objective is to spread the culture of transparency as a tool for the claim, empowerment and protection of GVSs rights.

Website: <https://www.itei.org.mx/v3/micrositios/accede/index.php?slug=index>

❖ **Manual for the development of social services for vulnerable groups in local communities - Agency of the Republic of North Macedonia for the Protection of the Right to Free Access to Public Information.**

The government of the Republic of North Macedonia prepared a Manual for the Development of Social Services for Vulnerable Groups in Situation of Social Vulnerability in Local Communities, which aims to strengthen the capacities of institutions and organizations at the local level for planning, development and provision of social services and free access to information for people in vulnerable situations within the communities.⁶

6. Victims of gender violence or sexual abuse

Promising practices and experiences

❖ **Information for victims of domestic violence - Commission of Access to Administrative Documents of Portugal**

In accordance with Article 11 of Law No. 112/2009, of September 16th, which approves the legal regime applicable to victims of domestic violence, the State provides the victim with adequate information for the protection of their rights, such as support services and legal means available. The State guarantees that the aforementioned information is provided promptly and in a language that the victim can also understand.

❖ **Efficient channels (websites and organizations) to consult and communicate information related to missing women - Republic of North Macedonia Agency for Protection of the Right to Free Access to Public Information⁷**

Described above.

⁶ This practice is not carried out exclusively by the information agency in question.

⁷ This practice is not carried out exclusively by the information agency in question.



7. Migrants, refugees and political exiles

Promising practices and experiences

❖ **Priority in fast processing of requests for information for non-U.S. citizens who need their immigration file for a court hearing - OGIS, United States of America⁸**

Non-U.S. citizens who need their immigration file for a court hearing before a U.S. immigration judge must use the formal ATI process to access that file, and have priority for faster processing by the U.S. immigration office, U.S. Citizenship and Immigration Services (USCIS). The main reason is that there is no site or other self-service method available to non-US citizens to obtain their immigration records. Instructional link available at <https://www.uscis.gov/records/request-records-through-the-freedom-of-information-act-or-privacy-act>

Non-U.S. citizens who must appear before a U.S. immigration judge do not have to wait as long as in other circumstances to obtain their immigration records before appearing in U.S. immigration court. (The Office of Government Information Services (OGIS), the FOIA Ombudsman, does not oversee the USCIS program, but assists non-U.S. citizen requesters who seek assistance with ATI requests.)

❖ **Provision of relevant information for migrants - Commission of Access to Administrative Documents of Portugal**

Pursuant to Portuguese law, the High National Migration Commission makes available to migrants, their associations and other communities all relevant information for the exercise of their rights and obligations as citizens (Decree-Law no. 31/2014, February 27, article 3, § 2, h)).⁹

❖ **Access to Information Guidelines No. 8. Access to records of Indigenous Australians who were in the care of state foster homes - Information and Privacy Commission of New South Wales, Australia.**

This practice was described above. It aims to assist people who arrived in Australia as child migrants.

⁸ This practice is not carried out by the information agency but was reported by the agency.

⁹ This practice is not carried out exclusively by the information agency in question.



8. Afro descendants

Promising practices and experiences

❖ **“DAI para quilombolas” Project - CGU Brazil**

The “DAI for quilombolas” project works in the sense of seeking information so that the administration improves the mechanisms for disseminating information, but also to directly and actively inform communities about their rights.

Quilombolas are people from regions reminiscent of quilombos, which were communities formed by fugitive slaves at the time of slavery in Brazil.

Its purpose is to investigate the exercise of the right of ATI by the Quilombolas. In addition to documentary research, field work is being carried out to learn about its main challenges when it comes to accessing information and public services.

B.2. Other reported practices that refer to unidentified groups in vulnerable situations within those with the highest prevalence globally

❖ **“Training for lawyers of the Argentine LGBT Federation” - OGDAL Government of the City of Buenos Aires**

The OGDAL provided training for lawyers from the Argentine LGBT Federation on the operation of the ATI requests and claims systems of the Government of the City of Buenos Aires. The workshop focused particularly on the problems that people from the LGBTI+ community go through and on finding in the right of ATI a strategic tool to exercise other human rights.

The workshop gave rise to an extensive conversation between the participating lawyers and the OGDAL team. The LGBT Federation has extensive experience working on the protection of human rights and many of its lawyers had prior experience with the city's ATI regime. The workshop allowed the OGDAL team to take note of some persistent obstacles in terms of active transparency and ATI regarding LGBTI+ issues, especially regarding access to information that may contain sensitive data related to gender, sexual orientation, or health issues.

❖ **Support for the project "Legal education of Roma students, community and health mediators to facilitate access to justice for their community" of the organization Roma Versitas Albania - Information and Data Protection Commissioner of Albania (henceforth, IDP)**



The Office of the Information and Data Protection Commissioner of Albania provided support to the organization Roma Versitas Albania within the framework of its project “Legal education of Roma students, community and health mediators to facilitate access to justice for their community”. This cooperation focused on the development of training with students and members of the Roma and Egyptian community, on the knowledge of the constitutional rights of access to public information and the protection of privacy and personal data. In this activity, the participants became familiar with the legislation in both areas of activity of the Commissioner's Office, with the functions and role of the institution, and with practical cases directed at or involving members of this community.

❖ **Guide to the Law on Free Access to Information of Public Importance in the Languages of National Minorities - Commissioner for Information of Public Importance and Personal Data Protection Serbia**

The Guide makes it easier for national minorities to exercise the right to access information of public importance.

❖ **Short videos produced in local languages explaining procedures for accessing information - Right To Information Commission Ghana¹⁰**

❖ **Plain and accessible language guides to explain the procedure of accessing and requesting public information - Bangladesh Information Commission**

The Information Commission formulated three different guidelines: 1) ATI guidelines for applicants; 2) Guidelines on ATI for designated officials; and 3) Guidelines on ATI for authorities. The Information Commission organizes seminars, workshops and awareness programs on the right to information for grassroots communities.

❖ **ATI caravans, workshops and seminars to disseminate the law - Commission of Access to Information of Public Interest and Public Documents of Ivory Coast (henceforth, CAIDP for its French acronym)¹¹**

¹⁰ The surveyed Authority did not provide any further information on this practice.

¹¹ The surveyed Authority did not provide any further information on this practice.



- ❖ **Community radios as free and accessible communication channels to consult and report missing public information related to GVSs - Commission d'accès à l'Information d'Intérêt public et aux Documents Publics - CAIDP Ivory Coast¹²**

- ❖ **Agent training programs to provide information to people living in rural areas across the country - Bangladesh Information Commission.¹³**

- ❖ **Freedom of Information Act brochures in local languages - FOI Philippines**
Brochures on the Freedom of Information (FOI) Act were distributed in local languages of the different regions of the Philippine archipelago. Available at <https://foi.gov.ph/resources/templates>

- ❖ **Decalogue of Open Reconstruction. INFO CDMX, Mexico City**
This tool was co-created in October 2022. It aims to strengthen public institutions so that people and institutions are able to face crises, meet the Sustainable Development Goals of the UN 2030 Agenda and generate democratic resilience with transparency, empathy, accountability and dialogue. It was developed with an inclusive approach.
a. <https://www.infocdmx.org.mx/micrositios/2023/decalogoreconstruccion/inicio/>
b. <https://www.infocdmx.org.mx/micrositios/2023/decalogoreconstruccion/decalogo/>

- ❖ **Talk to promote access to information for relatives of persons deprived of their liberty - FOI Philippines**
On June 25, 2022, in the city of Muntinlupa, this talk was held within the framework of the FOI Bridging Program, together with the beneficiaries of the Philippine Jesuit Prison Service (PJPS) Foundation. In collaboration with the Correctional Office (Bureau of Corrections (BuCor) and the Department of Social Welfare and Development (DSWD), each agency shared their main public services and programs for families of persons deprived of liberty. The key participants in this activity were PJPS recipients and scholarship recipients.
The FOI Bridging Program is one of the initiatives of FOI Philippines to promote a stronger and deeper participation of each sector of society in access to public information. As a program that connects timely, accurate, and relevant information, its goal is to improve citizens' interaction with the government and exercise their right to freely obtain information. Video of the talk available at:

¹² The surveyed Authority did not provide any further information on this practice.

¹³ The surveyed Authority did not provide any further information on this practice.



https://www.facebook.com/watch/?extid=CL-UNK-UNK-UNK-IOI_GKOT-GK1C&mbextid=2Rb1fB&v=380442397410527

❖ **Meetings with civil society organizations of Indigenous Peoples, People with Disabilities and the Elderly - FOI Philippines**

A webinar was developed, presented by the Project Management Office of the Right of Access to Information (FOI-PMO) in collaboration with the Presidential Communication Operations Office (PCOO), the National Commission for Indigenous Peoples (NCIP), the National Council on Disability Affairs (NCDA), the National Council for the Aging (NCSC), the Commission on Human Rights (CHR) and the Philippine Registry of Interpreters for the Deaf (PRID). Webinar available at:

<https://www.facebook.com/foiph/videos/436119544754964>

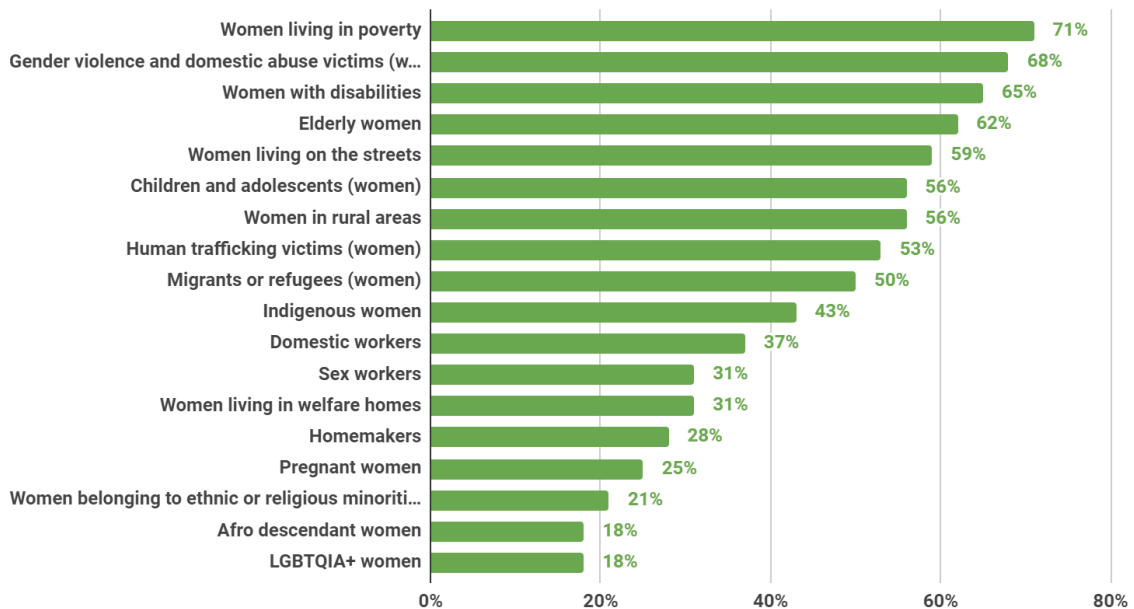
IV. Gender and Access to Public Information

A. Survey Data Analysis / Survey Observations

First, the surveyed authorities were asked to select groups of women in situations of vulnerability that they considered required a more urgent response regarding the guarantee of their ATI rights. The main groups identified were women living in poverty (selected by 71% of the surveyed authorities), women victims of gender and/or domestic abuse (selected by 68%), and women with disabilities (selected by 65%).

The answers obtained in percentage terms are shown below.

Groups of women that require a more urgent response regarding ATI rights



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Figure 5. Groups of women that require a more urgent response regarding ATI rights

When analyzing the data obtained by region, certain differences are observed. The main groups identified by more than 70% of the authorities in Africa were Women in poverty (83.33% of the total), and Children and adolescents (83.33% of the total). Regarding Latin America, the most selected groups were Women with disabilities (84.62% of the total), Women in poverty (84.62% of the total), and Indigenous Women (77% of the total). Likewise, all of the authorities surveyed in Asia (100% of the total) considered that Women with disabilities, Women in poverty, Rural Women, and Women living on the streets are groups to be taken into account. Regarding Europe, the group identified by 71% of the surveyed authorities is Women in poverty, while in Oceania no group has been identified by more than 70% of the respondents. For their part, the English-speaking countries of the Americas did not select any of the listed groups.

The second question asked about the main challenges that women face in the exercise of the right of ATI. Four closed response options were offered: "Lack of legal knowledge of the right of ATI", "Accessibility", "Implementation and enforceability of the right" and "Absence of spaces or mechanisms to actively participate in public decision-making

¹⁴ This question was not answered by all the surveyed authorities. The graph was made based on the responses received, which do not represent all of the authorities surveyed.

processes”; and a blank space to point out “other challenges”, providing more details. Accessibility and lack of legal knowledge of the right of ATI were the main challenges selected, with 68% and 65% respectively.

The following graph shows the data distribution for this question:

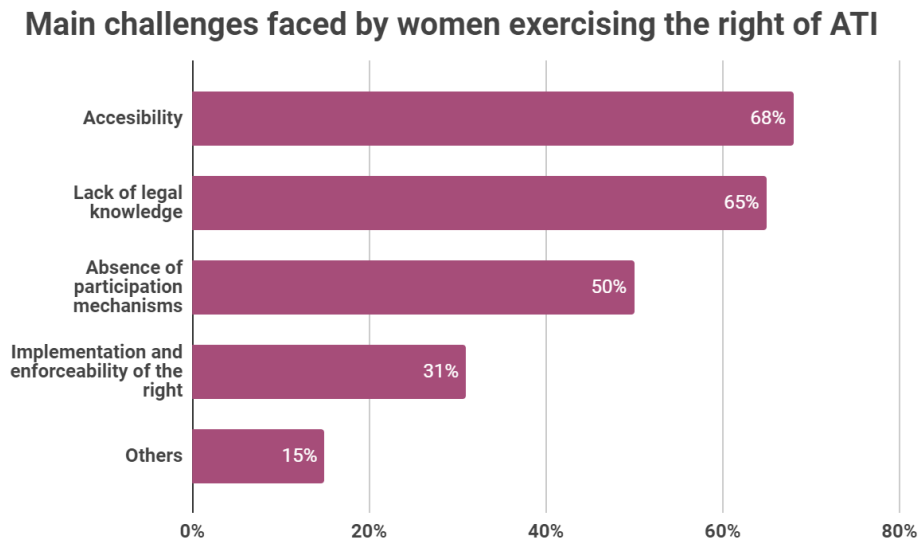


Figure 6. Main challenges faced by women exercising the right of ATI

The third question referred to the collection of information and/or specific data about how women exercise the right of ATI in the jurisdiction of the surveyed authorities. The majority (66%) answered that they do not collect this type of data. The remaining 34% reported collecting them through the AT request forms, surveys and/or specific studies.

The fourth and fifth questions examined whether the guarantee of the right of ATI for women is included in the surveyed authorities’ agenda and/or priorities and, if so, what the degree of priority is: high, medium or low. The majority (56%) reported that it is a topic included in the agenda and then, when asked about the assigned priority, 50% responded that it is high and 50% that it is medium.

The next question sought to identify practices or public policies that the jurisdictions have implemented to guarantee the right of ATI from a gender perspective. In this sense, authorities were asked about the existence of these practices together with examples, providing four closed-response options: "Guides in a simple format and accessible language that offer relevant and useful information for the group of women", "Activities aimed at citizens (such as workshops, training, visits to women's community centers, etc.), "Free and accessible communication channels to make inquiries and report missing public information regarding groups in vulnerable situations", "others".

The following graph illustrates the distribution of responses received:

Implemented practices and policies to guarantee the right of ATI for women

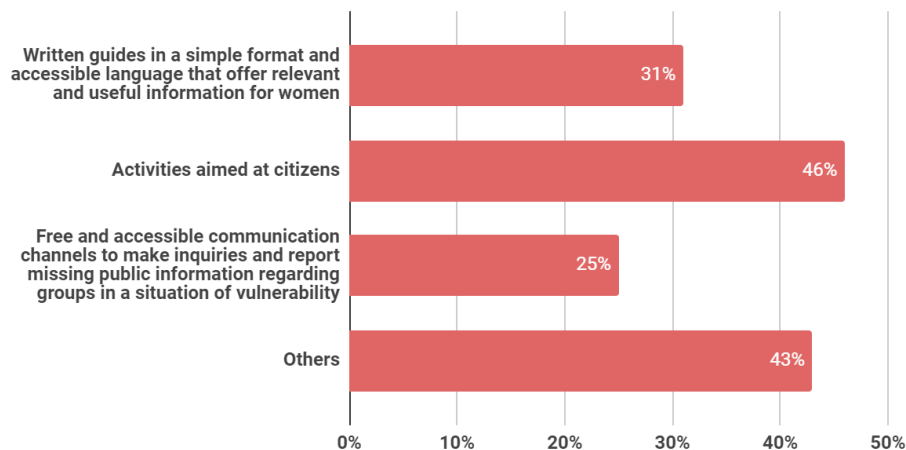


Figure 7. Implemented practices and policies to guarantee the right of ATI for women

Afterwards, the surveyed authorities were requested to provide more information on these implemented practices and policies, along with their achieved and/or expected results. The responses collected will be displayed in the next section.

Lastly, the survey inquired about the main challenges jurisdictions face in planning and developing these policies. This point will be addressed in the last section of this document.

B. Promising practices and experiences

- ❖ **Joint project with the International Development Bank "Right of Access to Public Information with a Gender Perspective in Local Governments" (training workshops for public officials, liaisons, municipalities, local governments and civil society). Council for Transparency of Chile (henceforth, CPLT in its Spanish acronym)**

This project seeks to strengthen the principles of transparency, the correct management of ATI requests, and the implementation of Open Government policies in local governments, favoring closer contact with citizens, especially women. Therefore, this plan consists of developing training sessions in regional capitals and possibly provinces of nine regions of Chile, (according to criteria of



territorial coverage and regional alliances) in terms of transparency, access to information with a transversal gender approach, to deliver competencies, knowledge and skills that allow improving the spaces for citizen participation and integrate public integrity strategies in those institutions that are closest to the citizenry.

The Training Sessions to be carried out are designed on the basis of three methodological blocks. Differentiated training sessions will be held for the following audiences:

1. Training session for municipal and/or regional government liaisons (municipal and regional government officials linked to compliance with transparency law obligations).
2. Training day for Civil Society and public officials linked to gender programs (Prodemu – Sernameg – Universities). Aimed at social leaders, representatives of Civil Society Organizations (OSC), university communities and public officials linked to programs with a gender focus and promotion of rights.

From June to December (2022), 24 trainings were carried out in 10 regions of Chile (Tarapacá, Antofagasta, Valparaíso, RM, Maule, Araucanía, Los Ríos, Los Lagos, Aysén and Magallanes). 1,225 civil servants and officials, representatives of civil society and universities participated.

❖ **Contest "Testimonies of women: The usefulness of public information in our city". INFO CDMX, Mexico City**

The contest aims to promote among women and adolescents the importance of the right of ATI, as well as its usefulness in the exercise of other human rights.

The first edition of the contest was held in 2020. That year, in the context of the COVID-19 pandemic, only two testimonies were received, which made it possible to identify the difficulties of sharing experiences marked by inequality and violence. In 2021, the second edition of the Contest was held, with the participation of 19 contestants. Through this citizen exercise, they referred to their interests, their strategic needs and the challenges they have faced in the exercise of their human right to access public information.

The testimonies are part of a corpus that makes it possible to identify the inequality gaps that women in Mexico City experience in an intersectional way. As part of a commitment to institutional opening, this year the publication of the testimonies was proposed, so that the public can get to know the narratives and



use them for dissemination and academic, cultural, civic education purposes, among others. The publication is integrated and will be presented the following year.

❖ **Guide for Heads of Single Parent Families of the City of Buenos Aires - OGDAL Government of the City of Buenos Aires.**

The OGDAL has developed this guide aimed at women heads of households in single-parent households with the aim of providing them with a tool that allows them to find possible, real and concrete solutions to many of their daily problems. Its development was motivated by the strong impact of the pandemic on this group and encouraged by the understanding of the right of ATI as an instrumental right for the exercise of other rights: access to housing, work, health, education, etc. Thus, it offers information on frequent legal or administrative procedures, social programs, spaces for support and emotional containment, recreational and cultural proposals, among others.

In addition to the publication of the guide online, the OGDAL team carried out workshops on the right of ATI and the content of the aforementioned Guide in different popular neighborhoods of the City of Buenos Aires, in which printed copies of the Guide were distributed.

Likewise, the OGDAL provided training to trainers of the Women's General Directorate on the right of ATI within the framework of the 'Access to Public Information Project for Heads of Single Parent Families in the City of Buenos Aires':

Highly positive feedback has been received from the coordinators and trainers of the organizations with which we have worked together. The number of guides that were distributed in total as of September 2022 is 1,200 physical units. The scope of the guide in its digital version is unknown, since the document has been distributed via email and mobile messaging applications on many occasions, at the request of the trainees.

❖ **Awareness campaigns - Right To Information Commission Ghana**

Public awareness campaigns throughout the country, with women on the front lines educating the public and awareness campaigns in the media with the participation of outlets such as Joy FM, Citi FM, Peace FM, etc.

❖ **Observatory of resolutions on access to public information with a gender**



perspective - INAI, México

The Observatory is a tool to identify and systematize the needs and good practices related to the integration of the gender perspective in the processes of ATI, accountability and protection of personal data; in addition to sharing successful experiences on the subject and issuing recommendations to the National Transparency System.

❖ Workbook Number 14: Women and transparency in Chile. CPLT, Chile

The Workbook addresses the situation and restrictions of women to access the public transparency policy effectively, based on the results of the 2019 National Study on Transparency and Protection of Personal Data and statistical data on ATI requests and claims filed with the Council (between 2015 and 2019 for ATI requests and between 2009 and 2019 for claims).

It analyzes issues such as the ATI requesters and claimants' profiles, perception of corruption, knowledge of the law, among others.

The results show a significant difference between men and women in terms of the possibilities of submitting claims and enforceability of the right of ATI.

❖ Focused inspection with a gender approach. CPLT, Chile

The objective is to evaluate the situation of access and availability of information in public companies, based on the verification of compliance with Active Transparency rules.

Methodological strategy: The information examined corresponds to that reported by public companies on Active Transparency websites, particularly in the sections annual reports, remuneration received in the year by each Director, Executive President or Executive Vice President and Managers responsible for the direction and senior management of the company, and consolidated information on the number of women and men working in the company.

This data was contrasted with those published by the Financial Market Commission (CMF) in order to verify the consistency and completeness of the information published by public companies. Similarly, it was contrasted with data reported by the Public Enterprise System (SEP).

The audits were carried out on November 10th, 11th and 16th, 2022, examining the information corresponding to the monthly payment for September and October, the updating of which was required at that time.

All public companies subject to the Transparency Law to date were audited. In



addition, the Public Enterprise System (SEP) was audited in terms of the Right of Access to Information.

Results:

- Greater male presence at the level of decision-making spaces:
 - Boards: 60% men and 40% women.
 - Managers: 81% men and 19% women.
- Differences are noted at the level of remuneration:
 - women in board positions earn, on average, 32% less than men
 - while those in managerial positions earn, on average, 52% less

❖ **Satisfaction survey for external users and their profiles, considering gender. CPLT, Chile**

The Council for Transparency's users are characterized to address the gaps that may exist in access to the right of ATI.

Results:

- The user profile stayed the same in relation to previous years.
- Different types of users show different characteristics, which means that their needs should be attended to in a differentiated way.

❖ **Efficient channels to consult and communicate information related to missing women - Republic of North Macedonia Agency for Protection of the Right to Free Access to Public Information**

All relevant institutions of the Republic of North Macedonia offer effective channels (websites and organizations) for making inquiries and communicating information related to missing women.¹⁵

❖ **Seminars, workshops and awareness programs for women journalists and grassroots communities - Bangladesh Information Commission**

The Information Commission organizes seminars, workshops and awareness programs on the Right to Information Law of 2009 for women journalists and grassroots communities.

❖ **"Transparency & Silence" - Information Regulator of South Africa.**¹⁶

The Open Society Justice Initiative coordinated a study published in a report titled "Transparency & Silence." It demonstrated the systematic discrimination rural

¹⁵ This practice was reported by the information agency but is not developed exclusively by the information agency in question.

¹⁶ This practice was reported by the information agency but is not developed exclusively by the information agency in question.



black women often experience when trying to request information. The study showed a strong bias by officials against an elderly black rural woman as a requester of information.

❖ **Inclusive and non-sexist communication guide - INAI, México**

On April 19th, 2021, the INAI Inclusive and Non-Sexist Communication Guide was presented, which complies with the provisions of the 2018-2020 Human Rights and Gender Program, the commitments of the HeForShe Campaign and the INAI Human Rights and Gender 2021 – 2024 Program. It became a starting point for INAI staff to have an easily accessible tool, in order to encourage the inclusive and non-sexist use of language in written, oral, visual and gestural communications, thus contributing to the elimination of gender stereotypes, sexist biases and various forms of discrimination that constitute the basis of inequality; in addition to considering conditions and characteristics of GVSs; so that the recognition and respect for their human dignity is reflected in the daily language of this national Institute.

❖ **Digital and gender violence. INFO CDMX, Mexico City**

Events and activities on the Olympia Law and digital violence were held. Its objective is to raise awareness among citizens and provide them with the technical tools and knowledge to understand, prevent and act in a situation of cyberbullying, dissemination of intimate content without consent, extortion in digital media and/or threats of any kind in the digital environment.

Results:

- Workshop "Digital Violence: Olympia Law": with 365 views as of March 27, 2023. <https://www.youtube.com/live/D-SzKbXTDqU?feature=share>
- Digital workshop "Olympia Law and digital violence, a reality": with 537 views as of March 27, 2023. <https://www.youtube.com/live/d6LTLnAzLp8?feature=share>
- Awareness talk "Connecting with your rights: Digital violence and Olympia Law": with 75 views as of March 27, 2023. <https://youtu.be/I3IlwhTk1qw>
- Fourth edition of the 2021 digital workshop: Olympia Law and digital violence. A reality": with 246 views as of March 27, 2023. <https://www.youtube.com/live/flaK1gAcVsw?feature=share>
- Forum "Digital violence: Olympia Law. Challenges and perspectives": with 844 views as of March 27, 2023. <https://www.youtube.com/live/P24gk6UwgFI?feature=share>



❖ **Gender Equality and Non-Discrimination Policy -INAI, Mexico**

On April 6th, 2021, the INAI Plenary issued Agreement ACT-PUB/06/04/2021.07, through which the Gender Equality and Non-Discrimination Policy of the National Institute of Transparency, Access to Information and Protection of Personal Data was approved. This Policy recognizes that gender relations, roles and responsibilities have diverse impacts that greatly influence the access that women and men have to decision-making positions and tools, assets and resources, information and knowledge, as well as on the impact of institutional processes. For this reason, general policies were established to promote an institutional culture that is respectful of human rights, inclusive, free of discrimination and all forms of gender violence.

❖ **Dissemination actions - INAI, Mexico**

With the objective of promoting and disseminating human rights, more than 120 infographic materials related to the International and National Human Rights Days were published electronically, which were disseminated through the Institute's social networks, the intranet and institutional email. Likewise, the Women in Action campaign was carried out, through which 25 infographics were disseminated whose main objective was to socialize among the INAI Community brief biographies of women who throughout history have stood out for being promoters and benchmarks in the issue of human rights. The Directorate of Human Rights, Gender and Integrity has carried out a series of activities such as talks, keynote speeches, workshops, artistic exhibitions, documentary screenings, among others, to commemorate Orange Day against gender violence, in order to promote the right of women to a life free from violence. Remembering the 25th of each month as Orange Day: a day to act, raise awareness and prevent violence against women and girls.

❖ **Active participation in the National Program for Equality between Women and Men (PROIGUALDAD) 2020-2024 - INAI, Mexico**

INAI has actively participated in the National Program for Equality between Women and Men (PROIGUALDAD) 2020-2024. In particular, the INAI contributes to the strengthening of Objective 4 aimed at combating the types and modalities of violence against women, girls and adolescents, preserving their dignity and integrity. Specifically, the main action 4.6.4 consists of promoting transparency in the publication of decisions of the judicial powers regarding the right of women to a life free of violence, through dissemination actions that raise awareness on the



relevance of judicial decisions. Within this framework, on January 25th, a Collaboration Agreement was signed with INMUJERES.

❖ **Protocol to incorporate the gender perspective in resolutions on access to information - INAI, México**

As a fundamental and complementary part of the Observatory of resolutions on ATI with a gender perspective, this Protocol was developed to incorporate the gender perspective in resolutions on ATI, which makes it possible to point out the importance of integrating this perspective on the right to access public information and transparency as a key element to make gender inequalities visible throughout the entire process of access to information, and specifically in the construction and dissemination of data; as well as promote the participation of women and other vulnerable sectors in the culture of transparency as a route to guarantee human rights and access to justice.

❖ **Staff training - INAI, Mexico**

Various training actions have been promoted for all personnel in order to improve and develop the skills to act from the perspective of gender, human rights, equality and non-discrimination.

❖ **Actions of the INAI Ethics Committee - INAI, Mexico**

The Statement of Zero Tolerance to Sexual Harassment is an action undertaken by the Ethics Committee of the Institute. Its purpose is to issue a strong message about zero tolerance for these illegal behaviors that constitute one of the many forms of violence that is exercised against women in the world.

In this same sense, there is an Action Protocol for the Attention of Complaints, Suggestions and Queries before the INAI Ethics Committee. The provisions of the Action Protocol are mandatory for public servants of the Institute and are intended to establish a procedure for the attention and follow-up of complaints, suggestions and queries submitted to the Ethics Committee of the National Institute of Transparency, Access to Information and Protection of Personal Data.

Finally, within the work in favor of equality and elimination of violence against women, the Committee issued the Protocol for the Prevention, Attention and Remediation in matters of Sexual Harassment of the National Institute of Transparency, Access to Information and Protection of Personal Data. This protocol's primary objective is to establish the bases for the effective implementation of procedures to prevent, attend to, and punish sexual harassment at the INAI.

❖ **Training "ANTAI in your community" - ANTAI Panama**



A training plan called "ANTAI in your community" was implemented, which seeks to train and provide the necessary tools for women on issues of requesting ATI and on active transparency.

❖ **Physical access and electronic channels for women for consultation and/or dissemination of knowledge - IDP Albania**

Albanian IDP offers both physical access and electronic channels for women to consult and access information and for knowledge dissemination.

❖ **Citizen Days of Socialization of the DAI aimed at women in vulnerable situations in the municipality of León - Institute of Access to Public Information of the State of Guanajuato (henceforth, IACIP)**

Within the framework of the aforementioned DAI Plan, the IACIP Guanajuato developed these ATI Citizen Socialization Days with the general objective of increasing the use of the ATI system by the population in the state of Guanajuato, mainly by women in vulnerable situations of the municipality of León, and with the specific objectives of making the ATI system available to the inhabitants of the San Juan de Abajo, Ampliación San Francisco and León II neighborhoods, expanding and diversifying the system's user base in the municipality of León and promoting the strategic exercise of the right of ATI by young women and heads of family. This is in view of the existing gender gap in Guanajuato regarding the people who assert their ATI right, finding that 84% of the applicants are men against 16% women.

For this, a Local Socialization Network of the Right of ATI was created, which initially is made up of Fundación León, the Municipal Institute for Women of León, and the IACIP. It carried out training workshops for at least 30 ATI facilitators committed to sharing knowledge regarding the search, use and exploitation of public information, and thus to achieving a significant impact on the lives of the beneficiaries.

In order to work with the defined target population and cover the largest number of women heads of household in a situation of vulnerability, it was planned to develop 5 ATI Citizen Socialization Days. The first one was carried out by the INAI, and served as an example to replicate subsequent exercises, which were in charge of the OGL.

Based on the corresponding registers, the initial goal was to work with a total of 100 people whose profile is as follows: Women heads of family. The work was carried out in the municipality of León, Guanajuato with people who belong to the localities: San Juan de Abajo, Ampliación San Francisco and Las Hilamas.

The work of socialization of the right of ATI followed at all times the methodology provided by the INAI within the framework of the DAI Plan. People who were



trained as ATI Facilitators established contact with the target population and subsequently developed a dynamic that sought to address the following procedure: (1) to identify the main public or community problems that afflict the population, (2) to translate said problems into information needs, (3) to transmit sufficient knowledge to allow the population to properly exercise the right of ATI, (4) to obtain the public information necessary to evaluate the situation or problem that is intended to be addressed, as well as the performance of the authorities in relation to the solution of these, (5) to teach the target population to exercise their Right to Petition to ask the competent authorities to solve these problems, and (6) to document this process to know the results achieved.

Through these processes, facilitators achieved rapport with the women heads of family, which made it possible to identify various public problems that affect not only these women, but the entire population of the aforementioned areas, related, for example, to septic tanks, lighting, decent housing, among others.

❖ **Open data portal with a gender approach - Ombudsman's Office of Ecuador**

An activity led by the Ministry of Telecommunications and the Information Society, with the support of the DATALAY Foundation of civil society. The portal with groups of data with a gender focus is available at:

<https://www.datosabiertos.gob.ec/dataset/?q=genero>

❖ **FOI Bridging Program for women in conflict with the law - FOI Philippines**

This program's objective is to strengthen inclusive and participatory governance by training women in conflict with the law to interact with the government and exercise their right to information. Specifically, the main objectives of this program are to familiarize participants with ATI through the FOI Program and the standard e-FOI portal (paper-based mechanism), and the FOI Mobile Application, to familiarize participants with the available information, applicable priority assistance programs, and government services.

More than 50 women in conflict with the law attended and were trained on the basic principles and implementation of the FOI Program/Executive Decree No. 2, s. 2016.

More than 50 women in conflict with the law attended and were trained on how to request or submit ATI requests through the standard portal and e-FOI, as well as through the FOI Mobile App.

More than 50 women in conflict with the law created an information map regarding the appropriate agencies from which they can request information.

More than 50 women in conflict with the law created an information map for selected government agencies on the most relevant or most requested



information by participants.

<https://www.facebook.com/100057656516520/posts/pfbid02YYgUN9hbzHNeMooCuncXG9cZxp9TxRBejmTZZbZgAmpaipkjg5woK5bGgnJRV7cTI/?mibextid=cr9u03>,
<https://fb.watch/m6JmgX0ms0/?mibextid=v7YzmG>

❖ **In-person webinar titled "FOI Liaison Program for Women in Conflict with the Law" - FOI Philippines**

In support of the celebration of National Women's Month, the FOI-PMO Team held an in-person webinar titled "FOI Liaison Program for Women in Conflict with the Law" on March 30, 2022, at the B Hotel in Quezon City.

This webinar is part of FOI Philippines' ongoing efforts to raise inclusive awareness of women's empowerment and access to justice through the right of ATI. It also aims to address cutting-edge issues related to Women in Conflict with the Law and provide a space for dialogue between women's groups and organizations and some selected government agencies.

This free event is held in collaboration with the Philippine Support Agencies Association (PHILSSA), the University of the Philippines Women Lawyers Circle (UP WILOCI), the Philippine Commission on Women (PCW), the Philippine Office of Management and Penology of Jails (BJMP), the Bureau of Corrections (BUCOR), the Correctional Institute for Women (CIW), the Department of Justice (DOJ), the Public Attorney's Office (PAO), and the Philippine Commission on Human Rights (CHR).

V. Challenges

Lastly, the WG identified the challenges encountered while implementing the practices presented in this document. To that effect, the survey included a question referring to the main challenges that stand in the way of implementing practices and policies by guaranteeing ATI rights to GVSs and another question referring to the main challenges to the implementation of practices and policies that guarantee ATI rights for women. The following graphs show the data obtained:

Groups in Vulnerable Situations

Main challenges in planning and developing ATI policies aimed at GVS

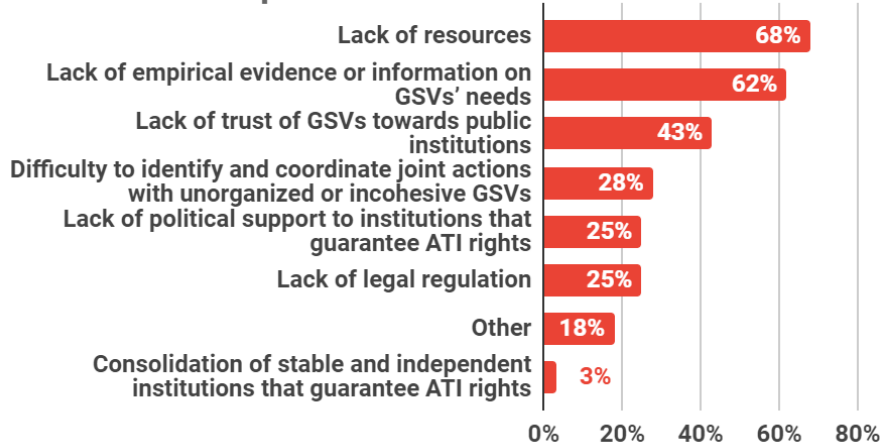


Figure 8. Main challenges in planning and developing ATI policies aimed at GVS

Gender

Main challenges in planning and developing ATI policies aimed at women



Figure 9. Main challenges in planning and developing ATI policies aimed at women

Based on the results collected, it can be seen that both in the implementation of practices and policies to guarantee the right of ATI for GVSs and in the implementation of



practices and policies to guarantee the right of ATI for women, the most frequently reported were, first of all, the lack of resources (68% of those surveyed identified it as a challenge in practices for GVSs and 62% in practices aimed at women). Secondly, the lack of empirical evidence or information about the needs of the group to which the practice is directed (62% of those surveyed identified it as a challenge in practices for GVSs and 56% in practices aimed at women). Regarding the latter, it is related to another of the questions in the survey that aimed to find out if the respondents collected specific information about how women and members of GVSs exercise the right of ATI in their respective jurisdictions. In both cases, the majority of those surveyed answered “no” (59% regarding GVSs and 66% regarding women). In this sense, it would be desirable for the authorities to promote the collection of information on the exercise of the right of ATI by women and GVSs in their jurisdictions to facilitate the implementation of practices and policies aimed at these groups.

The third challenge that was most identified, both in the implementation of the ATI practices aimed at GVSs and those aimed at women, was the lack of trust within the groups regarding government institutions (43% regarding GVSs and 37% regarding women). In this sense, those practices that include the participation of the members of the group in question in their formulation can be helpful.

Other reasons reported based on the response options offered in the survey were the lack of political support for the institutions in charge of guaranteeing this right, the lack of regulation on the matter, the consolidation of stable and independent institutions that guarantee the right of ATI and the difficulties to identify and coordinate joint actions with groups that are not constituted as organized and cohesive collectives.

Finally, the respondents had the possibility to propose, under the option of “others”, other challenges that were faced in the planning and development of these practices and policies. Some of them were the lack of political interest and of a federative coordination strategy regarding ATI and GVSs (CGU Brazil) and the difficulty of changing the authorities’ mind set on these issues (Information Commission Bangladesh).

VI. Recommendations

Recommendations for the inclusion of Groups in Vulnerable Situations and Women in ATI policies.



Based on the promising practices and experiences identified and the challenges to their implementation reported by the surveyed authorities, the WG presents the following recommendations:

- To create participatory strategies so that GVSs and women targeted by ATI policies participate in their creation and design. In this sense, some jurisdictions have carried out the following initiatives:
 - CGU - Brazil. They developed the project "DAI para quilombolas" that seeks to investigate the exercise of the right of ATI by quilombolas through documentary research and field work to learn about their main challenges when it comes to accessing information and public services.
 - Commission On Administrative Justice (Office of the Ombudsman) - Kenya. Within the framework of preparing the draft of the 2021 access to information regulations, the commission consulted people with disabilities about the challenges they encounter when requesting information from public entities.
 - Guarantor of the Right of Access to Information of the Government of the Autonomous City of Buenos Aires. Based on the use of the guides with useful and necessary information for the specific group (heads of single-parent families, and elderly people), an instance of participatory feedback is then sought for the development of the next material.
- To collect and systematize more information on how GVSs and women exercise the right of ATI. Thus, one of the strategies suggested and reported by the surveyed authorities is the incorporation of specific questions in the public information request forms. Collecting this information from the requests makes it possible to identify what information may be useful to provide to these groups. In addition, the development of surveys and/or specific studies in this regard is recommended.
- To generate instances of closeness with GVSs and women in order to strengthen trust and shorten the distance between them and the State. This, in turn, makes it possible to identify what information these groups need to help them with their problems and expand their presence in the territory, breaking down the physical barriers to accessing information.
 - Caravan for Transparency and Privacy - INAI, Mexico. It is a project focused on going directly to different vulnerable communities throughout the national territory of Mexico, where an information module is installed that guides people and provides alternatives that facilitate the exercise of ATI rights.



- "Queremos saber" Program - UAIP, Uruguay. It includes workshops aimed at children and adolescents of the "Propia" Program of the Institute for Children and Adolescents of Uruguay. In these workshops, after a brief theoretical introduction, ATI requests are prepared, to be submitted online or on paper to the corresponding agency. It strives to reach more groups and different parts of the country within the framework of INAU's Child and Adolescent Participation Program (Propia). This is how they were able to work with six more groups from the towns of Sarandí del Yi, Young, Florida, Sarandí Grande, Rocha and Minas. In addition, this program has workshops for adults in a context of social and educational vulnerability.
- To develop ATI practices accessible to people with disabilities.
 - Web accessibility - INFO CDMX, Mexico City. The Sinaloa State Commission for Access to Public Information (CEAIP) and INFO CDMX jointly coordinate the use and implementation of a web accessibility tool for people with disabilities. It was designed by the CEAIP and offers a voice reader, color contrast on the screen, enlargement and separation of images, reading guide and other useful functions on the pages or Internet portals of the agencies subject to the Law of Transparency, Access to Public Information and Accountability of Mexico City.
 - Impressions in Braille - INFO CDMX, Mexico City. Documents such as the "Executive Guide for the protection of human rights related to the use of personal data", the Children's Story: "A bike path for Paula" and the "Protocol for openness and transparency in the face of risk: prevention, reaction and recovery", "Special report. Opening in COVID19: Social programs and actions in CDMX" and "Application forms for public information and protection of personal data" were printed in the Braille reading-writing system.
 - Signature of Memorandum of Understanding with state authorities in charge of students with visual and hearing disabilities - IDP Albania. After the signing of a Memorandum of Understanding with the two state authorities in charge of students with visual and hearing disabilities, several joint initiatives were agreed to be carried out: organization of specific training courses; production of brochures; adaptation of the IDP website to facilitate access for this vulnerable group; among others. A video was also prepared on the occasion of Data Protection Day on January 28th, featuring a sign language interpreter.
- To ensure that the guides for accessing public information and other pertinent materials are translated into the languages of indigenous peoples and ethnic minorities present in the jurisdictions, and that they are written in clear language.



- Guide to the Law on Free Access to Information of Public Importance in the Languages of National Minorities - Commissioner for Information of Public Importance and Personal Data Protection Serbia. The Guide makes it easier for national minorities to exercise the right to access information of public importance.
- Actions with cultural and linguistic relevance - INFO CDMX, Mexico City. The Institute has resolved various motions to review in indigenous languages and in an easy-to-read format. In addition, within the framework of the "Ask in your language" campaign, videos in native languages were generated and hosted. Likewise, in 2022 the translation-interpretation of dissemination materials in native languages began.
- To conduct training on gender perspective and GVSs for people who work in ATI systems in each of the jurisdictions.
 - "Right of Access to Public Information with a Gender Perspective in Local Governments" - CPLT, Chile together with the IDB. This project consists of developing training sessions in regional capitals and eventually provinces of nine regions of Chile, (according to criteria of territorial coverage and regional alliances) in terms of transparency, access to information with a transversal gender approach, to deliver knowledge and skills that allow improving the spaces for citizen participation and integrating public integrity strategies in those institutions that are closest to the citizenry.
 - Staff training - INAI México. Various training actions have been promoted for all staff in order to improve and develop the skills to act from the perspective of gender, human rights, equality and non-discrimination.
- To forge alliances with social leaders, human rights defenders and civil society organizations that promote the rights of GVSs and women, in order to expand knowledge about the exercise of the right of ATI and its possibilities.
 - "Training for lawyers of the Argentine LGBT Federation" - OGDAL Government of the City of Buenos Aires. The OGDAL provided training for lawyers from the Argentine LGBT Federation on the operation of the ATI requests and claims systems of the City of Buenos Aires. The workshop focused particularly on the problems that people from the LGBTI+ community go through and on finding in the right of ATI a strategic tool to exercise other human rights.
 - "Right of Access to Public Information with a Gender Perspective in Local Governments" - CPLT, Chile together with the IDB. Among the proposed training sessions there is one designed for Civil Society and public officials linked to gender programs (Prodemu - Sernameg - Universities). It is intended for social leaders, representatives of Civil Society Organizations



(OSC), university communities and public officials linked to programs with a gender focus and promotion of rights.

- To provide specialized advice to GSV members in submitting ATI requests.
 - Access to Information Guidelines No. 8. Access to records of indigenous Australians and migrants who were in the care of state foster homes - Information and Privacy Commission of New South Wales, Australia. The need for greater guidance and support is recognized to ensure that those who were in foster care can more easily access information and records related to their time in state care, in private homes and orphanages, and also to migrant children who arrived in Australia.
 - Caravan for Transparency and Privacy - INAI, Mexico. After identifying a lack of knowledge of this human right in local communities, counseling was designed in different languages that allowed a direct link with the population, so that it was possible to empower them through the knowledge and appropriation of their rights.
- To monitor and evaluate the policies of access to information for women and GVSs. Due to the fact that good practices that are oriented in this sense have not been reported, nor has sufficient information been provided on the results obtained, the WG considers it vitally important to emphasize the need to measure the impact of public policies to identify possible aspects to improve and guarantee the effectiveness of the measures implemented.

VII. Next steps

This document developed by the WG is one of the first steps to continue working on tools to narrow the gap in ATI for GVSs and in terms of gender.

Based on the systematized information on the state of the situation of ATI in relation to gender and GVSs and the compilation of practices and promising experiences, this document constitutes valuable input to reflect on possible actions to be developed. to address the challenges identified in the theme. However, the elaboration of the document allowed to notice issues on which the WG can deepen its work.

In this way, the WG proposes as next steps:

- To delve into the categorization between promising practices and promising experiences of the actions collected.
- To identify adequate and reproducible methods by the different jurisdictions for the collection of information on:
 - The GVSs, and within them the groups of women, to whom an ATI action is intended to be directed. For example, how does that group exercise the



right of ATI, what are their specific needs, how the right of ATI could collaborate in satisfying those needs, among others.

- The results and impact of actions in the field of ATI rights regarding the gender issue or aimed at GVSs.
- To specify better criteria for the evaluation of the practices and experiences reported from the collection of information on their results and impact.
- To highlight those practices and experiences that do not meet the selection criteria established, yet offer innovative tools and/or approaches.

VIII. Conclusions

This document analyzes the situation of groups in vulnerable situations, including women, regarding access to public information in different countries in different regions of the world.

To this effect, the WG developed a conceptual framework and produced a survey addressed to ICIC members. At this point, the WG encountered one of the first difficulties in preparing the document, since of the total of 85 members that make up ICIC, 32 authorities responded to the survey (a figure that represents almost 38% of the total number of members). Thus, there were continents with a very low percentage of respondents such as Oceania (close to 10%) and Asia (close to 7%). This was not the only obstacle regarding data collection, since the scant information on the subject was recurrent at different points in the development of the document.

Despite these setbacks, based on the responses reported, the WG found that social vulnerability is a phenomenon that cuts across all continents and that there are groups in vulnerable situations that were consistently identified by members of ICIC, with a higher prevalence at a global level, beyond the regional level. These GVSs were: people with disabilities, children and adolescents, the elderly, people living in poverty, victims of gender violence, and migrants, refugees and political exiles. In addition to these, there were other groups that were also identified as priorities according to each region, such as indigenous communities in Latin America and Oceania and homeless people in Europe and Asia.

Moreover, the collected data revealed that the GVSs that face the greatest difficulties in exercising the right of ATI are people living in poverty, people with disabilities and the rural population. Regarding women in vulnerable situations, the groups that were shown to require a more urgent response regarding the guarantee of the right of ATI were women living in poverty, women victims of gender violence and/or domestic abuse and women with disabilities.



It should be noted that among the main challenges reported for GVSs, including women, the lack of accessibility and legal knowledge regarding ATI was reported. Another issue to highlight, again in relation to the limited availability of information, is that despite the fact that several of the surveyed authorities indicated that policies aimed at vulnerable groups, as well as women, are included in their agenda, most of the respondents stated that they do not collect information and/or specific data about how GSV members exercise the right of ATI in the respective jurisdictions. This constitutes a major obstacle when planning public policies on ATI aimed at GVSs and women, since this translates into a lack of awareness of the population that is the recipient of said public policies.

Regarding promising practices and experiences, this document described different actions referred to by the surveyed authorities, such as guides in a simple format and accessible language, activities aimed at citizens, free and accessible communication channels, among others. Once again, the lack of information regarding the results of these practices was noteworthy. This constitutes a significant difficulty when evaluating and monitoring public policies on ATI aimed at GVSs and women.

Subsequently, surveyed authorities stated that the main challenges they face in planning and developing policies related to ATI for GVSs, including women, consist of the lack of resources and the lack of empirical evidence or information on the needs of the group to which the practice is directed. Here, the difficulty posed by the absence of information in the implementation of public policies to guarantee the right of ATI for GVSs is reiterated. Other reported challenges refer, for example, to the lack of trust within the groups regarding government institutions, the lack of political support for the institutions in charge of guaranteeing this right, and the difficulties in identifying and coordinating joint actions with groups that are not organized as a cohesive collective.

To overcome these challenges, it is necessary to collect empirical information, strengthen trust in government institutions, promote the participation of vulnerable groups targeted by public policies, and address the existent barriers. For this reason, the WG recommends actions such as creating participation strategies so that GVSs and women targeted by ATI policies participate in their creation and design, providing specialized advice to GSV members in submitting of their ATI requests, and carrying out training on the gender perspective and GVSs for people who work within ATI systems in each of the jurisdictions. In particular, regarding the persistent challenge that the lack of information entails, the WG reinforces its recommendation to collect and systematize more information on how GVSs and women exercise the right of ATI, through strategies such as the incorporation of specific questions in the ATI request forms, the development of surveys and/or specific studies in this regard, and the generation of instances of direct contact with GVSs and women to identify the information that these groups need. In addition to the information



related to these groups, the relevance of monitoring and evaluating ATI policies aimed at women and GVSs is underlined.

This document prepared by the WG constitutes one of the first steps to continue working on strategies to narrow the gap in ATI for GVSs and in terms of gender. The WG will continue its work, focusing its efforts on thinking about appropriate methods for collecting information about the groups for which the practices are intended, as well as data and evidence on their development. In addition, it will deepen the categorization of the actions collected, distinguishing between promising practices and promising experiences; it will specify better evaluation criteria for actions in the field of gender and GVSs and the right of ATI, and it will highlight those practices and experiences that, although they do not comply with all selection criteria established, offer innovative tools and approaches.

All these actions will contribute to the planning and development of adequate public policies to guarantee equitable access to public information for all groups in vulnerable situations and women.

ANNEX I

Bibliographic references

Institute of Transparency, Access to Public Information and Protection of Personal Data of the State of Mexico and Municipalities (INFOEM). "Criteria for obligated subjects to guarantee accessibility conditions, so that vulnerable groups can exercise, under equal circumstances, their rights of access to public information and protection of personal data." Official Newspaper "Government Gazette" of the State of Mexico, 2022, available at:

<https://legislacion.edomex.gob.mx/sites/legislacion.edomex.gob.mx/files/files/pdf/gct/2022/septiembre/sep061/sep061e.pdf>



Ministry of Justice and Human Rights of the Argentine Republic, "Groups in a situation of vulnerability and human rights", 2011 available at: http://www.jus.gob.ar/media/1129151/31-grupos_vulnerables.pdf

National Archives and Records Administration. Archivist's Task Force on Racism; Report to the Archivist; April 20, 2021. Available at: <https://www.archives.gov/files/news/archivists-task-force-on-racism-report.pdf>

Royal Spanish Academy and Association of Academies of the Spanish Language, "Pan-Hispanic Dictionary of doubts", 2023, available in: Latin America | Pan-Hispanic dictionary of doubts | RAE - ASALE, available at: <https://www.rae.es/dpd/Latinoam%C3%A9rica>

SEGOB & CESUP, "Systematization and Dissemination of Promising Practices Implemented within the Subsidy Framework of the National Crime Prevention Program (Pronapred) in Targeted Demarcations, Mexico, (2014), available at: Systematization and dissemination of promising practices implemented within the framework of the Subsidy National Crime Prevention Program (Pronapred) in the focused demarcations. (segob.gob.mx). Available at: https://generaconocimiento.segob.gob.mx/sites/default/files/document/digital_library/110/20191024-096-practicas-promisorias-pronapred.pdf

Woolcock, Michael "Making the case for case studies in development practice", in World Bank Blogs, (2015), available at: <https://blogs.worldbank.org/developmenttalk/making-case-case-studies-development-practice>