



Funded by  
the European Union



# ACCESS TO INFORMATION SELF- ASSESSMENT TOOLKIT

FOR FOI OFFICIALS





Funded by  
the European Union



# ACCESS TO INFORMATION SELF-ASSESSMENT TOOLKIT FOR FOI OFFICIALS

---

This Toolkit is developed and published by the Freedom of Information Center NGO (FOICA) within the “Advanced Access to Information and Beneficial Ownership Transparency in Armenia” project: The Project is supported by the Eastern Partnership: Open Door Grants, Sub-grants provided under the [EU for Integrity Programme](#). The content of the Toolkit is solely the responsibility of the FOICA and does not necessarily reflect the views of the European Union:

© FREEDOM OF INFORMATION CENTER

YEREVAN 2023

## TABLE OF CONTENT

<u>INTRODUCTION .....</u>	<u>3</u>
<u>SECTION 1. FORMATION OF PREREQUISITES FOR THE PROPER FULFILMENT OF ACCESS TO INFORMATION RESPONSIBILITIES.....</u>	<u>5</u>
1.1. THE FREEDOM OF INFORMATION (FOI) OFFICIAL .....	5
1.2 THE TRAINING OF FOI OFFICIAL .....	7
1.3. THE REGISTRATION AND CLASSIFICATION OF INFORMATION .....	8
1.4. THE REGISTRATION AND STATISTICS OF INFORMATION REQUESTS.....	11
<u>SECTION 2. THE PROACTIVE PROVISION OF INFORMATION: PUBLICATION OF INFORMATION ON THE INITIATIVE OF INFORMATION HOLDER.....</u>	<u>15</u>
2.1. THE PUBLICATION OF INFORMATION ON THE INFORMATION HOLDER'S INITIATIVE.....	15
2.2 THE QUALITY AND ACCESSIBILITY OF THE PUBLISHED INFORMATION.....	17
<u>SECTION 3. THE REACTIVE PROVISION OF ACCESS TO INFORMATION: RESPONDING TO REQUESTS AND PUBLICATION OF INFORMATION ON THE INITIATIVE OF INFORMATION HOLDER.....</u>	<u>20</u>
3.1. THE AVAILABILITY OF GENERAL PROCEDURES TO RESPOND TO REQUESTS .....	20
3.2. THE RESPONSE TO THE INFORMATION REQUEST .....	22
3.3. THE REFUSAL TO PROVIDE INFORMATION.....	25
3.4. TO AVOID COMMON MISTAKES IN PRACTICE, THE FOLLOWING SHALL BE PAID ATTENTION TO .....	27
<u>ATI SELF-ASSESSMENT QUESTIONNAIRE.....</u>	<u>30</u>



## INTRODUCTION

The Toolkit is a self-assessment work tool used in the field of access to information (hereinafter ATI). Its goal is to define the minimum criteria/issues, by the compliance of which the information holder can carry out the state assessment of access to information, including:

- to what extent it has the necessary resources/prerequisites to properly fulfill the access to information responsibilities,
- How adequately it fulfills the responsibilities in the field of access to information.

Accordingly, the Toolkit accessibly presents the steps that the information holder shall implement to make its activities in the field of access to information comply with the RA Law “On Freedom of Information,” as well as international standards.

The main addressees of the Toolkit are:

- State and local self-government bodies,
- state or community institutions and organizations.

However, to the extent relevant to them, other bodies that are considered as information holder by the RA Law “On Freedom of Information” can apply the Toolkit.

In the Toolkit, the terms are used in the same sense as in the RA Law “On Freedom of Information.” Accordingly,

- **State and local self-government bodies**, state institutions, organizations financed from budgets, as well as organizations of public importance and their officials that are in possession of information are considered as information holders.
- **Non-governmental organizations** that have a monopoly or dominant position in the product market provide services to the public in the fields of healthcare, sports, education, culture, social security, transport and communications, and utilities are considered as organizations of public importance.
- **Information**-data on a person, object, fact, circumstance, event, occurrence, and phenomenon that are obtained and formed in accordance with the

procedure provided by the legislation, regardless of the form of their management or the medium (text, electronic documents, audio or video recordings, tapes, blueprints, schemes, notes, maps) are considered as information.

**The Toolkit is composed of two parts:**

1. sections that present the minimum steps the information holder shall take to properly fulfill its responsibilities in the field of access to information,
2. a questionnaire that corresponds to the steps mentioned in each section, and by answering its questions with a simple “yes” or “no,” the information holder can assess whether it is adequately fulfilling the responsibilities in the field of access to information.

Part 1 of the Toolkit has three sections:

- The first section presents the steps that the information holder shall take to ensure the proper fulfillment of its responsibilities in the field of access to information.
- The second section presents the steps that the information holder shall take when publishing information on the initiative of information holder (proactive provision of information).
- The third section presents the steps that the information holder shall take upon receiving an inquiry (reactive provision of access to information).

In each section, the steps are presented in the order that is most effective to be carried out. By the terms “information holder” or “state bodies” used in the Toolkit, all the addressees of the Toolkit are meant, i.e., state and local self-government bodies, state or community institutions and organizations.


## SECTION 1. FORMATION OF PREREQUISITIES FOR THE PROPER FULFILMENT OF ACCESS TO INFORMATION RESPONSIBILITIES

### 1.1 THE FREEDOM OF INFORMATION (FOI) OFFICIAL

**1.1.1** First of all, the information holder shall appoint an FOI official by making an appropriate decision.

---

**1.1.2** The FOI official shall be someone who, on the one hand, has sufficient authority to make decisions and coordinate the activities of the departments of the information holder in the field of access to information, and on the other hand, has sufficient capacities and skills to provide advice to other departments of the information holder and deal with access to information issues. For example, in practice, the press secretary of the public relations department is often appointed as the FOI official. The head of staff/general secretary or their deputy, in some cases one of the deputy heads of the information holder or their assistant or advisor can be appointed as the FOI official.



**1.1.3** In case of not appointing an FOI official, the head of the state body is responsible for access to information. However, in practice, it is not effective to assign the role of the FOI official to the head of the information holder, as the FOI official:

- ✓ Ensures the fulfillment of the responsibilities of the information holder in the field of access to information provision.
- ✓ Explains in a more comprehensible way the procedure, conditions and forms of providing information to the information seeker.
- ✓ Processes the statistical and summary data of the inquiries received in the forms and in the manner defined by this Toolkit.

**1.1.4**

The means to contact the FOI official (e-mail address and working telephone number) shall be published on the official website of the information holder in a separate section on access to information (see Chapter 2.1.1 of this Toolkit).

## 1.2 THE TRAINING OF FOI OFFICIAL

**1.2.1** The candidate for the FOI official shall familiarize themselves with the RA Law “On Freedom of Information” and this Toolkit before assuming the powers of the FOI official.

After assuming the given powers in a maximum period of one month, and then regularly (at least once every three years) shall be trained in the field of access to information and other fields indirectly related to it (publicity and transparency, personal data protection, etc.).

**1.2.2** Through the FOI official, the information holder shall organize regular training courses in the field of access to information for the officials/employees directly related to the fulfillment of the information holder’s responsibilities in the field of access to information.

**1.2.3** The training can be carried out with the involvement of non-governmental organizations operating in the field of access to information, as well as the authorized body for personal data protection (for more information on the training courses carried out by the authorized body for personal data protection, see Section 6 of the Guidelines on Processing Personal Data by State Bodies).



## 1.3 THE REGISTRATION AND CLASIFICATION OF INFORMATION

### 1.3.1

The information holder shall know exactly what information it is in possession of. For this purpose, the information holder shall compile a list of the data under its control.

To properly implement the listing of the information, it will be more effective for the listing to be organized by the FOI official with the involvement of the information holder's staff. Particularly, on the instructions of the FOI official and within the period specified by the FOI official, each employee/department/board of the information holder shall submit to the FOI official the list of data on a person, object, fact, circumstance, event, occurrence, and phenomenon that are obtained and formed in accordance with the procedure provided by the legislation, by specifying the following for each of them:

- ✓ The legal act, within the framework of which these data were obtained or formed,
- ✓ The status of the data (whether the data are considered confidential, and whether the availability of the data is restricted somehow),
- ✓ The legal act that defines the status of the data as confidential.

## A Sample of the Information List

*The information included in the sample is assumed, written as examples and taken from the legal acts of different general fields, so it is not complete (exhaustive), and may not correspond to the information of any ATI body.*

	INFORMATION	LEGAL BASIS	STATUS	LEGAL BASIS
1.	Budget	The RA Law “On the State Budget” of 2023, Appendix 1, Table 1, line	Non Confidential: Public	_____
2.	The copy of the employee’s identity document	The RA Labor Code, Article 89, Part 1, Clause 1	The status is determined by the will of the employee.	The RA Labor Code, Article 134
3.	The employee’s salary	The RA Law “On the Remuneration of Persons Holding State Positions and State Service Positions”	Not confidential: Public	_____
4.	Data obtained during the interview from the asylum seekers in the RA	The RA Law “On Refugees and Asylum,” Article 51	Confidential	The RA Law “On Refugees and Asylum,” Article 51, Part 9
5.	Information related to state codes for presidential, governmental or other forms of special communications	The RA Law “On State Secrets”	Confidential	The RA Law “On State Secrets,” Article 7, Part 2, Clause 1 and Article 10, Part 2, Clause 31 of the list approved by the RA Government Decision 173-N, dated 1998.

**1.3.2** If the legal basis for obtaining or forming any data is not clear, an appropriate note shall be made, indicating, if possible, under what conditions these data were obtained or formed.

---

**1.3.3** The information holder shall compare the lists received from each employee/department/board, separate the data that have legal basis to obtain or form data from those that do not have such legal basis, and exclude the repetition of the same data obtained or formed on the same legal basis and having the same status in the list of data with legal basis.:


---

**1.3.4** The final list of data, which has a legal basis to obtain or form data, is the list of information held by the information holder within the Law “On Freedom of Information.”

---

**1.3.5** In the list of data available to the information holder, the data that do not have any confidential status by legal acts are considered as public information.

---



## 1.4. THE REGISTRATION AND STATISTICS OF INFORMATION REQUESTS

**1.4.1** The information holder shall clearly separate the written or verbal requests from other inquiries, including the requests received through hotlines or social networks and similar sources from other types of queries, comments and requests for advice received through the same sources.


---

**1.4.2** The management of the statistics of Information requests shall be entrusted to the FOI official.

---

**1.4.3** Regardless of the fact which department of the information holder (employee, official) responded to the verbal requests, the FOI official shall be informed about the verbal requests (or about the number of verbal requests, if the department responding to the verbal requests (employee, official) independently records the verbal requests) as soon as possible, but not later than the publication date of the statistics on the requests.

---



**1.4.4**

The information holder shall ensure that when compiling the statistics of requests, the requirements for the content of the statistics defined by the Law “On Freedom of Information” and Decision 1204-N are met, including:

- ✓ the statistics include the total number of verbal requests,
- ✓ the statistics include the total number of written requests,
- ✓ the statistics include the number of written requests that have been fulfilled,
- ✓ the statistics include the number of refused written in requests (as well as partially refused, taking into account the possibility of refusing some part of the inquired information),
- ✓ the statistics include the number of forwarded written requests,
- ✓ the statistics include the grounds for refusals.

**1.4.5**

It is preferred (unless there is a more convenient way of accounting for requests) that an information holder include the word "Request" in the subject line when entering/recording a request for information in a document management system, including Mulberry's electronic system.

**1.4.6**

The information holder shall link the request response to the entered request or include the words “Request Response” in the subject line when entering/registering the response.

1.4.7

The information holder shall include the words “Refusal of Request” in the subject line when entering/registering the response to the inquiry in case of refusal to provide information.

1.4.8

When forwarding a request, the information holder shall include the words “Request Forwarding” in the subject line of the response to the request in the document management system.



\* The sample form developed by the Freedom of Information Center of Armenia can be used as an exemplary form of the statistics management: <http://www.foi.am/hy/research/item/2377/>



## SUMMERY. SECTION 1

### STEP 1

Have an FOI official.

### STEP 2

Provide the FOI official with proper ATI knowledge and skills.

### STEP 3

Have a list of managed and classified information, which, if the information is confidential, also includes a reference to the legal norm defining the status of the information

### STEP 4

Separate the written or verbal requests from other inquiries.

### STEP 5

Have a system to register the written requests and their responses, as well as the verbal inquiries.

### STEP 6

Manage the statistics of the Information requests and publish them regularly.

## SECTION 2. THE PROACTIVE PROVISION OF INFORMATION:

### Publication of Information on the Initiative of Information Holder

#### 2.1. THE PUBLICATION OF INFORMATION ON THE INFORMATION HOLDER'S INITIATIVE

2.1.1

A separate section on access to information shall be available on the official website of the information holder. This section may be titled "Information," "Access to Information," "Right to Information," etc.; however, the title shall be clear enough to indicate that it is related to the right to access to information:

2.1.2

In the case that any information subject to mandatory publication is considered confidential by any legal act, that information shall not be published, instead, it shall be stated that this information is not published according to a specific norm of a specific legal act.

2.1.3

The information (questions and their answers) that the information holder has received regularly, five or more times (frequently asked questions) shall also be published in a separate section on Access to information on the official website of the information holder



## 2.1.4

The following information (information subject to mandatory publication) shall be published in a separate section on access to information on the official website of the information holder:

- ✓ the activities and services performed (to be performed) for the public,
- ✓ the budget,
- ✓ the written inquiry forms and advisory instructions to complete them,
- ✓ the staff lists, as well as the officials' first and last names, education, profession, position, telephone numbers of the workplace, e-mail addresses,
- ✓ the recruitment procedure and vacancies,
- ✓ the impact on the environment,
- ✓ the programs of public events,
- ✓ the procedure, day, time and place of the reception of citizens,
- ✓ the pricing procedure, prices (tariffs) in terms of activities and services,
- ✓ the list of the information and the order of its management,
- ✓ the statistical and summary data on the inquiries received, including the grounds for refusals,
- ✓ the sources of processing or obtaining the given information,
- ✓ the data of the person authorized to clarify the given information.

## 2.2 THE QUALITY AND ACCESSIBILITY OF THE PUBLISHED INFORMATION

2.2.1

The published information shall be complete and reliable.

2.2.2

The published information shall be updated (up-to-date); the changes made to the information subject to mandatory publication shall be published within a maximum period of 10 days after the changes have been made.

2.2.3

The published information shall be systematic; the titles of the sections and files of the information holder's website shall be clear enough to indicate that the information subject to mandatory publication by the Law "On Freedom of Information" is published in the given section of the website or is included in the given files.

2.2.4

The published information is presented in uniform formats, complies with the open data standards, is machine-readable, downloadable, copyable and searchable, etc.

2.2.5

The information subject to mandatory publication, even if published in different sections of the website, through active links shall be available in a separate section on Access to information on the information holder's website.

2.2.6

The information holder shall assess the risks of its website's technical failures, ensure the 24-hour operation of the website, ensure that the downtime of the website in terms of technical security planning does not exceed 3 hours per month, immediately or in the absence of such an opportunity, eliminate the technical problems of access to information on the websites as soon as possible, and in the event of a force majeure situation when there is a long-term failure of the websites, provide an alternative option for the publication of information subject to mandatory publication, which is accessible to the public.

2.2.7

The information holder shall ensure that the information subject to mandatory publication is as accessible and available to the people with special needs as possible. In addition, the information holder's website shall be adapted for the visually impaired people; the texts and videos shall be adapted so as to be used in reading programs, and audio materials shall be accompanied by texts and comments presented in a clear and comprehensible way, also being expressed in sign language, where possible.

2.2.8

The FOI official shall carry out the monitoring of the publication of the information subject to mandatory publication; additionally, they shall ensure that the published information is complete, up-to-date, accessible, systematic, and that it complies with the open data standards.



## SUMMERY. SECTION 2

### STEP 1

Have a separate section on ATI on the official website

### STEP 2

Publish information subject to mandatory publication in a separate section on ATI.

### STEP 3

Ensure that the published information is complete, up-to-date, accessible, systematic, and that it complies with the open data standards.

## SECTION 3. THE REACTIVE PROVISION OF ACCESS TO INFORMATION: Responding to Requests and Publication of information on the Initiative of Information Holder

### 3.1. THE AVAILABILITY OF GENERAL PROCEDURES TO RESPOND TO REQUESTS

**3.1.1**

A written request shall be considered the query by which the applicant seeks or inquiries the information holder any data obtained or formed in accordance with the procedure provided by the legislation. The subject line of the query (application, request) is not important; what is important is that the information holder shall provide some information in the written form. The queries on the provision of information from other state bodies or local self-government bodies or state or community institutions or organizations are not considered requests within the meaning of the Law “On Freedom of Information.”

**3.1.2**

The information holder shall handle the written requests separately from other forms of document management.

**3.1.3**

The department (employee, official) of the information holder, who has been assigned to prepare the response to the request, shall receive the request on the same day or at the latest on the day after the information has been entered onto the information holding body.

**3.1.4**

The requests that have been submitted verbally shall be considered verbal requests, in the event that the provision of the required information can prevent threats to state and public security, public order, public health and morals, the rights and freedoms of others, the environment, and the property of individuals. It is essential to check whether the information holder is also in possession of the relevant information. It is essential to clarify the procedure to process the written requests by the information holder. In case of other verbal requests, the information holder can respond to the verbal request based on its own assessment of resources and capabilities, or suggest that the inquirer submit a written request.

---

**3.1.5**

Regardless of the fact which department of the information holder (employee, official) has been assigned to prepare the response to the inquiry, a copy of the inquiry (including the date of receiving the inquiry, information on the person preparing the response to the inquiry) shall also be submitted to the FOI official of the information holder.

**3.1.6**

Any response to a request (including an intermediate response or refusal) shall be submitted for approval to the information holder's FOI official one day prior to its being sent to the inquirer or at the latest on the same day within the time limits set by the Law "On Freedom of Information."

---

**3.1.7**

Before approving the response to the request, the FOI official shall ensure that the requirements specified in Clause 3.2, Clause 3.3 and Clause 3.4 of this Toolkit and their sub-clauses are met.

## 3.2. THE RESPONSE TO THE INFORMATION REQUEST

**3.2.1** If the requested information is not classified as confidential and is available to the information holder, it shall be provided to the inquirer within a maximum period of **5 days**.

---

**3.2.2** If the requested information has already been published, the information holder shall provide the inquirer with the information on the means, place and date of publication (referring to the means of publication) within a maximum period of 5 days.

**3.2.3** If the information holder is not in possession of the requested information, or its provision is beyond the scope of its powers, it shall notify the inquirer in writing within a period of 5 days after receiving the given written request, and if possible, provide the inquirer with the whereabouts of the information holder who is in possession of the requested information.:

---

**3.2.4** If several questions have been presented in the request, the answers to all the questions shall be included in the response in consecutive numbering.

## 3.2.5

If it is necessary to perform additional work to provide the requested information, the information holder can provide the response to the request within **a maximum period of 30 days** by notifying the inquirer about it within a period of 5 days.

Additionally,

- ✓ when delaying the provision of the inquired information, the intermediate response shall not indicate the need to perform additional work to provide the information, but what specific additional work needs to be performed to provide the requested information,
- ✓ when delaying the provision of the requested information, the intermediate response shall not refer to the maximum possible period of 30 days determined by law, but shall indicate the reasonable period required to perform the additional work to provide the information, prepare and deliver the response; that period may not exceed 30 days after receiving the request.



**3.2.6**

Any response to the information request (including an intermediate response or refusal) shall be sent to the inquirer within a maximum period of 5 days after receiving it, while the response delayed for additional work with an intermediate response shall be sent within the maximum period mentioned in the intermediate response as the deadline. **In practice, it is customary to calculate the 5-day period in working days.**

The calculation of the 5-day period starts from the moment the request is received by the information holder and ends when the information holder sends the response to the request. Accordingly, if the response is in the document management department/secretariat, it is considered that the request is still held by the information holder.

At the same time, after submitting the response to the request to the postal service, the delivery time of the response by the postal service shall not be included within the 5-day period.

**3.2.7**

The response shall be provided in the medium as requested by the inquirer.

If the inquirer has not specified a preferred medium, the information holder can provide the response to the request in the most acceptable medium for it.

### 3.3. THE REFUSAL TO PROVIDE INFORMATION

#### 3.3.1

The refusal to provide information shall be conditioned on the grounds of the information being confidential (its accessibility being restricted). Article 8 of the Law “On Freedom of Information” defines the grounds for refusal to provide information.

#### 3.3.2

The refusal shall contain not only a reference to the grounds for refusal (being confidential), but also shall include the norm of the law according to which the inquired information is classified as confidential (see Clause 1.3.1 of this Toolkit).

#### 3.3.3

The refusal shall include the procedure to appeal it. There is no special procedure for appealing the rejection in the law on Freedom of information, so in this case it should be mentioned about the general possibility and procedure for appealing the rejection, in a superior order or in a judicial order. For example, when it is indicated in what period and to which superior the administrative act can be appealed or when it is indicated, that the administrative act can be appealed to the RA administrative court in accordance with the procedure and within the time limit established by law.

**3.3.4** If part of the requested information is subject to be refused, the rest of the response shall be provided under the same rules and conditions as listed above, by making the refused information illegible (by covering, blacking out or deleting it) without redacting the rest of the information (document).

---

**3.3.5** The response about the refusal shall be provided to the inquirer within a period of 5 days (for the calculation of time periods, see Clause 3.2.7 of this Toolkit).

---

**3.3.6** If there is a fee established by law for the provision of information, and the given fee is not paid, the provision of information shall be refused.

---

### 3.4. TO AVOID COMMON MISTAKES IN PRACTICE, THE FOLLOWING SHALL BE PAID ATTENTION TO

3.4.1

The refusals to provide information shall be separated from other responses to the requests; in particular, if the information holder is not in possession of the requested information and informs the inquirer about it in accordance with Part 10 of Article 9 of the Law “On Freedom of Information,” then it is not considered a refusal. Refusal is when the information holder is in possession of information, but it refuses to provide it to the inquirer.

---

3.4.2

Any grounds to refuse to provide the requested information shall be compared to the grounds for refusal set out in Part 1 of Article 8 of the Law “On Freedom of Information” and shall be consistent with them. Additionally, any refusal to provide information shall include a reference to a specific clause of Part 1 of Article 8 of the Law “On Freedom of Information.”

---

3.4.3

In case of refusal to provide information by the information holder, any referred grounds for refusal shall be accompanied by a reference to the legal act (specific legal norm, specific parts of specific articles of laws), which shall make it clear that the information holder has a responsibility to keep the given information confidential.

---

**3.4.3**

The provision of information shall never be refused because the requested information is personal data. Personal data is the name of the data type, and not the mode. Accordingly, personal data itself is not confidential (personal data can also be publicly available). Therefore, the fact that the information is personal data cannot be a ground for refusal to provide that information.

It should be remembered that personal data is the name of the type of data, not the mode (the data that identifies or enables the identification of a natural person is called "personal data", it is simply the name of the data and does not in itself indicate that the data is a secret). Accordingly, **personal data itself is not a secret** (personal data can also be publicly available); therefore, the fact that any information is purely personal data cannot be a basis for refusing to provide that information (see Clause 3.3.1 of the Toolkit).



## SUMMARY. SECTION 3

### STEP 1

It is ensured that the responses to the written requests, which do not require additional work, as well as the intermediate responses and refusals, are provided to the inquirer within a maximum period of 5 days, and the responses to the requests requiring additional work are provided within a maximum period of 30 days.

### STEP 2

It is ensured that the answers to all the questions are included in the responses to the requests containing multiple questions in consecutive numbering.

### STEP 3

It is ensured that the refusals to provide information are based solely because the information is confidential.

### STEP 4

It is ensured that the refusals because the information is personal data are excluded.

### STEP 5

It is ensured that the refusals to provide information contain the legal norm according to which the requested information is classified as confidential.

### STEP 6

It is ensured that in case some part of the requested information is subject to refusal, the rest of the response to the request is adequately provided.



## ATI SELF-ASSESSMENT QUESTIONNAIRE

	Question	Answer/Point	
1.	Has the information holder appointed an FOI official?	YES (1)	NO (0)
2.	Has the FOI official participated in access to information training or learning courses in the past three years at least?	YES (1)	NO (0)
3.	Has the information holder listed and classified the information it is in possession of?	YES (1)	NO (0)
4	Does the information holder separate the written and verbal requests from other applications and inquiries?	YES (1)	NO (0)
5	Does the information holder register the written requests and their responses, as well as the verbal inquiries?	YES (1)	NO (0)
6	Does the information holder manage the request statistics and publish statistical and summary data on the inquiries received, including the grounds for refusal?	YES (1)	NO (0)

7	Is there a separate access to information section on the information holder's website?	YES (1)	NO (0)
8	Is the information subject to mandatory publication published in a separate section on ATI on the information holder's website?	YES (1)	NO (0)
9	Is the information subject to mandatory publication complete, up-to-date, accessible, and systematic and does it comply with open data standards?	YES (1)	NO (0)
10	Were the responses (including intermediate responses or refusals) to all the requests received by the information holder provided within a maximum period of 5 days after receiving the requests? Were the responses to the requests requiring additional work provided within a maximum period of 30 days?	YES (1)	NO (0)
11	Do the responses to all the requests received by the information holder include all the answers to the questions posed by the requests in consecutive numbering?	YES (1)	NO (0)



12	Does the refusal to provide the requested information contain a reference to any of the grounds defined by Clause 1-5 of Part 1 of Article 8 of the Law “On Freedom of Information”?	YES (1)	NO (0)
13	Has there been an inquiry that was refused on the grounds of the information being personal data?	YES (0)	NO (1)
14	Did the refusal to provide the requested information contain a reference to the norm of the legal act according to which the requested information was classified as confidential?	YES (1)	NO (0)
15	In case only some part of the requested information is subject to refusal, has the remaining part of the information been provided to the inquirer, by making the information subject to refusal illegible (covering, blacking out or deleting it) without redacting the rest of the information (document)?	YES (1)	NO (0)

## SUMMARY OF THE QUESTIONNAIRE



**0-5 Points** - **Poor state of access to information:** the responsibilities in the field of access to information are not fulfilled properly or not at all. In terms of access to information, the information holder usually violates the FOI law. It is necessary to implement the actions mentioned in Part 1 of the Toolkit as soon as possible.

**6-10 points** - Fair state of access to information: the responsibilities in the field of access to information are not fulfilled properly or are fulfilled with certain flaws. In terms of access to information, the information holder not always, but often violates the FOI law. It is necessary to review the actions carried out in the field of access to information, edit them in accordance with Part 1 of the Toolkit.

**11-15 points** - **Good state of access to information:** the responsibilities in the field of access to information are mostly fulfilled properly. In terms of access to information, the information holder generally does not violate the FOI law. The information holder can undertake a more comprehensive assessment/self-assessment of the ATI state to further improve its ATI actions.



## FREEDOM OF INFORMATION CENTER

¼ Buzand str, 4<sup>th</sup> floor, Yerevan 0010, Republic of Armenia

[foi@foi.am](mailto:foi@foi.am)

[www.foi.am](http://www.foi.am)

[www.givemeinfo.am](http://www.givemeinfo.am)