
The impact of online
Freedom of Information tools:
What is the evidence?

Part 1. Literature review



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Savita Bailur and Tom Longley

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Executive Summary

This review is the first of a three-part study commissioned by mySociety, which asks the overall question ***“In what circumstances, if any, can the FOI [Freedom of Information] tools mySociety builds be shown to have measurable impacts on the ability of citizens to exert power over underperforming institutions?”***. This, Part 1, is a study of the current landscape of academic and policy literature, to ascertain the existing evidence of the impact of a) general FOI tools and b) specific online FOI tools. We find that:

- While academic studies on the impact of FOI are still surprisingly few and far between, many more studies are available as institutional reports (e.g. the 14-country study by the Open Society Foundations in 2006).
- Around the world, government and non-governmental organisations are launching web platforms enabling people to make FOI requests (we found at least 34, at different stages of implementation and use).
- However, studies of online FOI impact are scarce. We only found six such studies of online FOI sites – one brief Spanish-language report on the government sites in Brasil, Chile and Mexico (Fumega, 2014), and other reports of the CSO [Civil Society Organisations] sites in Chile, Spain, Uruguay and the European Union – and one experimental study of 300 emails sent to government offices in Italy.
- This makes it difficult to separate the “added value” of online requests and responses from that of offline ones.
- In theory, online FOI should reflect the same benefits found for ICTs in general transparency and accountability literature: ease of access, ease of request and response, the “multiplier” effect of many groups accessing the same information, building on it and sharing it, the “glare effect” of information being much more visible, and generally beating the path to accountability.
- However, both offline and online, FOI faces similar challenges: impact and the transition from transparency to accountability; equitable access, security and privacy; cost and time burden both to requester and responder; institutional and public perception; and complex roles of CSOs and the media.
- From five of the studies on digital FOI, we find that administrative silence is common online as well as offline. Silence comprised 65% of responses to email requests in Italy (2013); 54% of responses in Spain in 2013; 57% in Spain in 2014 and 62% in Uruguay (2013). Responses are not analysed in the Fumega (2014) study.
- While there may be some indication of improved transparency, there is no such movement towards accountability as yet.
- We need more research on online FOI sites, and the specific value of ICTs.

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1. Introduction

1.1 Background

- “Secrecy, being an instrument of conspiracy, ought never to be the system of regular government”, wrote the political reformer Jeremy Bentham in 1839. The fight against government secrecy and for transparency, while always a concern, has largely gained momentum from the 1990s onwards. Today, “openness” is a buzzword – we hear of open data, open government, open development. Within the “open” movement, a citizen’s right to (government) information, also known as “access to information” or “Freedom of Information” (the term used throughout this paper) plays a key role. Sweden was a very early outlier in implementing Freedom of Information legislation in 1766, but the majority of countries recognized FOI as a right, largely from the 1990s onwards. While by 1990, only 13 countries had implemented FOI legislation, between 1990 and 2000 inclusive, 20 additional countries had done so and between 2000 and 2014, another 65 countries joined them, bringing the total at the time of writing to 98 countries, with many other countries in the process of implementing legislation.¹
- However, as the Scottish Information Commissioner, responsible for implementing FOI in Scotland, stated: “passing the law may be the easy part. Making the legislation work and judging its impact is fraught with difficulties” (Dunion, 2011, p. 197). It is here that the role of new technologies, particularly the internet, becomes interesting. It is no coincidence that the majority of FOI laws have been passed in the “information age” when, in theory, accessing information is not only cheaper and faster, but it is easier, again in theory, to use that information to hold governments or associated public institutions accountable. Transparency, accountability, participation and empowerment can be facilitated by technology – again in theory.
- Today, the global FOI community is immense: within its wide scope can be found the FOIA Advocates Network; national government FOI sites including those in Brasil, India, Mexico, Canada, Chile and Honduras; infomediaries such as <http://foidirectory.co.uk/> in the UK; the iFOA letter generator mainly aimed at journalists; and MuckRock in the USA. FOI indices and ratings to measure the level of FOI in a country illustrate what a critical component of governance FOI has become (FOIANet, 2013; <http://www.rti-rating.org/>; UNDP, 2006). Non-governmental FOI sites are being planned or have been started in Argentina, Australia, Austria, Bosnia, Brazil, Canada, Chile, Croatia, Czech Republic, Germany, Georgia, Guatemala, Hungary, Israel, Italy, Kosovo, Liberia, Macedonia, New Zealand, Norway, Romania, Serbia, South Africa, Spain, Switzerland, Tunisia, Uganda, Ukraine, United Kingdom, Uruguay and the European Union (more details in Appendix A and B).
- In the four broad areas defined by UNDP for assessing the status of FOI in a country, “access to ICTs” is considered a central factor (UNDP, 2006), while in a regional “stock-take” conducted by FOIANet in 2013, access to ICTs, especially the internet, is mentioned as part of the SWOT (strengths, weaknesses, opportunities and threats) in each of the seven broad geographical areas surveyed (FOIANet, 2013). Yet, evidence or even preliminary research on

¹See http://www.rti-rating.org/country_data.php for a complete and searchable list.

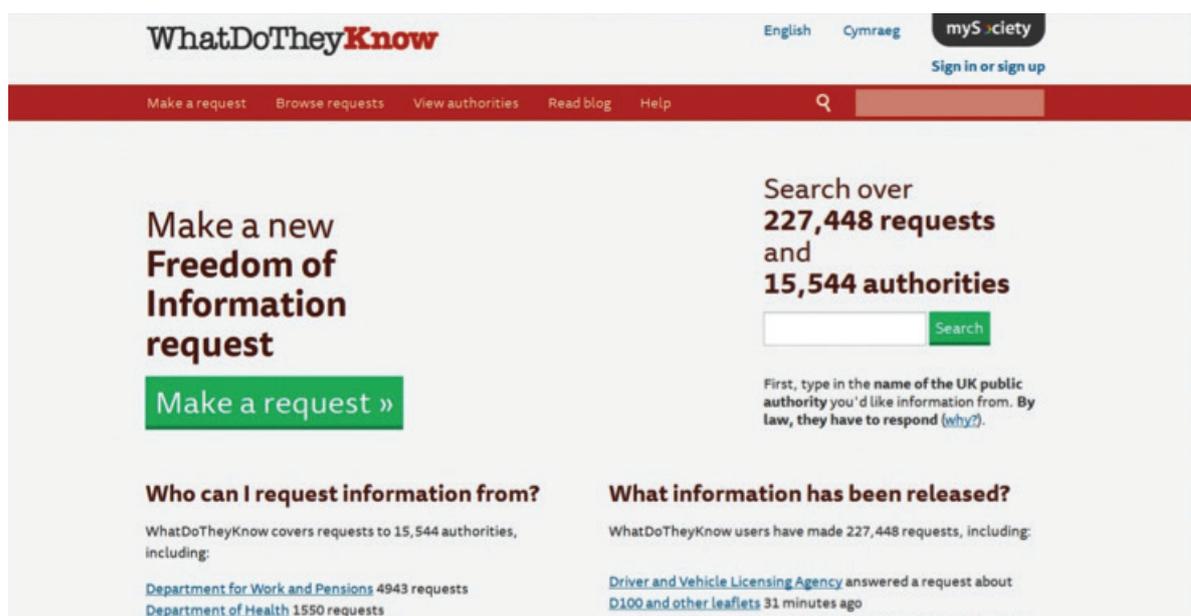
²FOIANet is an international information-sharing network of those working on FOI, largely comprising civil society organisations, but also lawyers, academics and information commissioners. It currently comprises around 600 members (see <http://www.foiadvocates.net>).

the impact of these “new” technologies on FOI is scarce. To what extent is the role of ICTs an important contributing factor to the success of FOI? What is the added value of online FOI tools?

1.2 Aim of this report

- mySociety, a UK-based organisation, has commissioned this research to understand the impact of new technologies on FOI. mySociety is well-known within a field loosely defined as “civic tech”. Its tagline is a fair summary of its work: “we make websites and tools that empower citizens in the UK and around the world ... For communities. For opening democracy. For getting things changed”.³ mySociety is the project of a charity called UK Citizens Online Democracy (UKCOD), and operates as a not-for-profit organisation. It has created some of the earliest and best-known websites to monitor parliamentary debates, to enable people to get in touch with their elected representatives and to facilitate the reporting of local problems such as rubbish collection, broken streetlights and so on to local authorities.
- Their focus on FOI began in 2007–8 with the launch of the UK website WhatDoTheyKnow.⁴ The site is an intermediary between citizens and public institutions, enabling citizens to make FOI requests online for free, and publishing both requests and answers online. The WhatDoTheyKnow homepage looks like this:

Screenshot of WhatDoTheyKnow, 2 October 2014



- From this screenshot, it is evident how the site makes FOI transparent, accountable, empowering and participatory: citizens ask questions directly, or browse previous responses, potentially ensuring government efficiency and cost savings. The information they obtain empowers them to take the action they need, and exchanges and answers are published online ensuring an audit trail.

³<https://www.mysociety.org/>. Projects include TheyWorkForYou, WriteToThem, FixMyStreet and FixMyTransport – see <https://www.mysociety.org/projects/>.

⁴The idea for the website which became WhatDoTheyKnow was chosen from mySociety’s 2006 call for proposals. Work on it began in 2007. For more see <https://www.mysociety.org/2006/09/27/the-mysociety-call-for-proposals-the-winner-and-runners-up/>.

- In response to interest from organisations in other countries, mySociety began offering Alaveteli,⁵ an improved version of the software on which WhatDoTheyKnow is built, to be used and customized in any country. The Alaveteli software is open source, and therefore free for anyone who wishes to use, modify or contribute to it. At the time of writing Alaveteli has been implemented in more than 20 countries (the exact number is uncertain as they are various stages of installation), as well as an EU-wide platform.⁶ The Spanish version, TuDerechoaSaber [YourRighttoKnow] looks like this:

Screenshot of TuDerechoaSaber, 2 October 2014



- A full list of Alaveteli instances is available in Appendix A. The creators of Alaveteli outline that it:
 - “Automates the process of helping people write messages to the relevant authority – no manual intervention is required to assist people to send their request
 - Eliminates the need to find the contact address for an authority
 - Supplies guidance about how to make a good request as the user is actually composing their message
 - Uses simple, plain language and avoids legal jargon
 - Encourages users to think of using FOI as a ‘normal’ thing that any citizen can do
 - Encourages and enables users to look for existing information before they make an FOI request, which can actually lead to a quicker result
 - Offers various features designed to make it easier to find information previously known only to authorities
 - Automatically publishes all requests made through the site, and all government responses (hiding requests is possible too)
 - Publishes FOI responses instantly – as soon as a public authority sends a reply to a request, it appears online

⁵<https://www.mysociety.org/projects/freedom-of-information/alaveteli/>.

⁶<http://www.access-info.org/>.

- Provides a search engine to search for words and phrase of interest
- Provides a browsing interface to increase the chance of finding interesting materials that users weren't specifically looking for
- Integrates well with social media – provides attractive material for users of Facebook, Twitter etc. to link to
- Has good Search Engine Optimization to make information show up well in search engines
- Provides a powerful alerting system so users can get sent email alerts whenever information is released that contains words or phrases they care about" (mySociety, no date).
- Yet, despite mySociety's investment in WhatDoTheyKnow and Alaveteli, as yet there has been little research into the impact of these tools. To some extent, this isn't unusual in such a young field. Even WhatDoTheyKnow, the earliest of the FOI sites, is only six years old. The site has become widely used in the UK – over 200,000 FOI requests have been submitted through it, and on an average week over 100,000 people visit it to rummage through the public archive of FOI requests and responses. It appears successful, with a scale of interest that makes evident its virtues of ease of use, openness of process and searchability.
- But has anything changed as a result of its presence, if indeed the implementers set out to change anything at all? To what extent are claims that it has a role to play in realising open, transparent and accountable government valid? Are citizens from all parts of society using it; of those who do use it, can it be said that they better informed, empowered, and participating meaningfully in a democracy? How does this particular model of engagement between government and citizens travel to other national contexts, with their social, technical and economic differences? Are there better and more effective ways that FOI requests can be made and a change realized? These questions aren't easily answered. We also need to think about why it is important to ask these questions at all. One of the reasons is that so much "civic tech" is being launched across the world on a daily basis (many by techies who want to "give back to society") but with very little critical analysis on impact, scalability and sustainability.
- The aim of this research is to address these issues and ascertain: ***"in what circumstances, if any, can the FOI tools mySociety builds be shown to have measurable impacts on the ability of citizens to exert power over underperforming institutions?"***. This initial report is the first of three:
 - this literature review of the evidence on FOI online to date
 - findings ascertained from qualitative research (semi-structured interviews) conducted with Alaveteli and other online FOI implementers (as a type of control group) to gauge their sense of impact and methods of measurement
 - a brief list of critical success factors (CSFs) for those likely to implement online FOI tools in the future.
- It can be read independently, or as a precursor to the subsequent empirical research and strategy document of CSFs derived from analysis.

1.3 Methodology

In order to undertake this initial review methodically and comprehensively, a precise set of keywords were used in the literature search. These were: "Freedom of Information", "right to information",

“access to information”, “transparency”, “accountability”, and “citizen engagement”. Searches were made in journals of international development, political science, governance and public policy, and information systems.

- We also used the same search terms in “grey literature”, i.e. publications by governments, funders, CSOs and others. We aimed to reference papers published from 2004 onwards, giving a ten year retrospective from the current day, but some papers precede 2004 as they were cited in more recent publications.
- At this stage we should clarify that while there are many ways of referring to Freedom of Information – including “access to information” and “right to information” – for consistency and ease of use, we have used the phrase “Freedom of Information” or the abbreviation “FOI” throughout. Also, “online” is interchangeable with “digital”, “ICTs” and “technology” – ICTs and technology do not always equate to “online”, but they are increasingly synonymous. We do discuss the more hybrid forms of FOI tools which go beyond the internet, employed in countries such as India, for example, and which aim to reach out to those on the technological periphery.

1.4 Report structure

- The next section frames FOI within the discourse of transparency and accountability. We begin (Section 2.1) with the broader assumptions of T&A and expectations about ICTs/ the internet within this field (2.2). We find that the same assumptions transfer to FOI (Section 2.3), yet concrete evidence of the contribution of ICTs remains elusive. Section 3 analyses FOI impact and challenges – in each theme, first in general, then specifically in terms on online tools/ICTs. Section 4 discusses the challenges of separating the added value of ICTs from that of general FOI implementation, as well as some of the unforeseen challenges to ICTs. Section 5 concludes, drawing together common themes, highlighting the gaps in the literature so far, and signposting future directions.

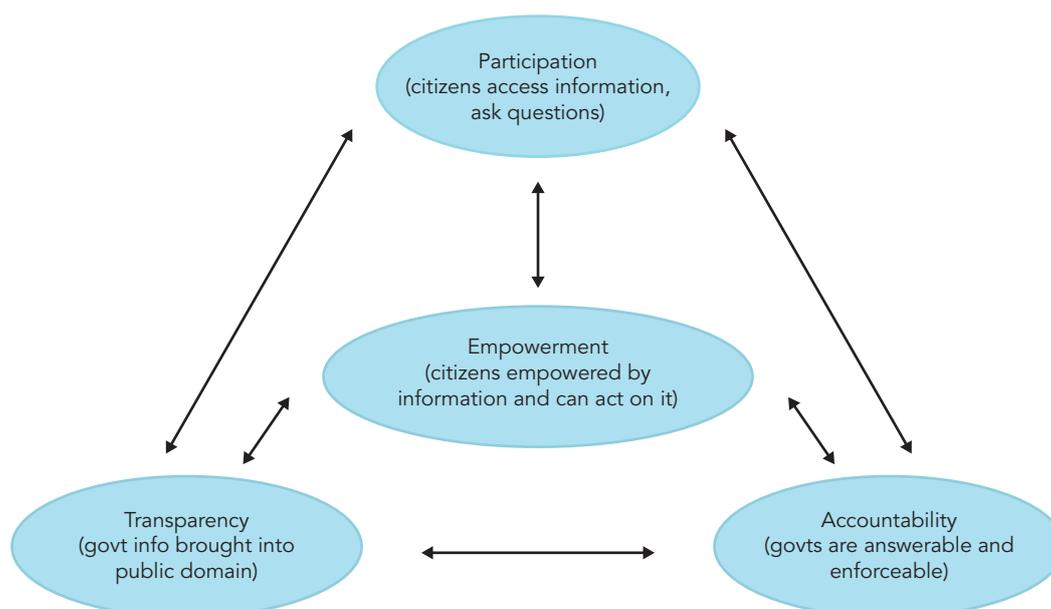
2. FOI in the discourse of transparency and accountability

- Our research question specifically sets the use of online FOI websites in the context of the exercise of citizen power over underperforming institutions: of accountability. Commonly, the other bookend to accountability is transparency. In this section we define and examine these terms, and relate them to FOI and technologies.

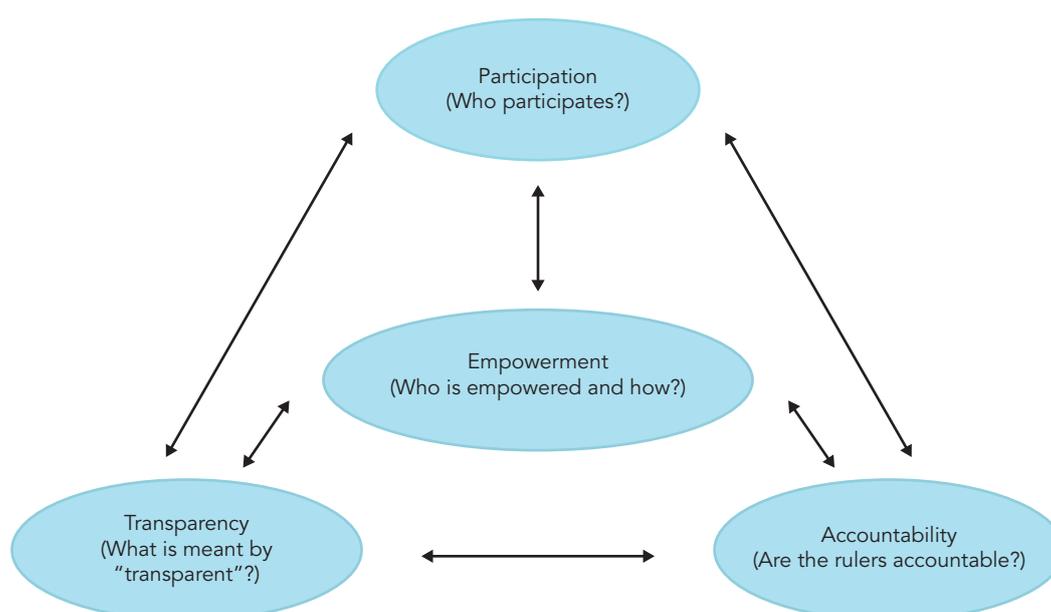
2.1 Transparency and accountability

- “Government ought to be all outside and no inside ... Everybody knows that corruption thrives in secret places, and avoids public places, and we believe it a fair presumption that secrecy means impropriety”, said US President Woodrow Wilson in 1912 (cited in Wilson and Hale, 1918). Wilson’s statement, like Bentham’s above, and re-iterated by many others⁷ implies that transparency will expose secrecy, corruption and inefficiency, and bring about a more representative, participatory democracy (Bannister and Connolly, 2011; Gaventa and McGee, 2013; Hood, 2006; Joshi, 2013; Roberts, 2010; UNDP, 2006).
- Transparency is a nebulous term, but definitions include:
 - “any attempts (by states or citizens) to place information or processes that were previously opaque in the public domain, accessible for use by citizen groups, providers or policy-makers.” (Joshi 2013, p. 31)
 - “the right and the ability of citizens (and organisations, where relevant) to access government information and information about government” (Bannister and Connolly, 2011, p. 5) and
 - the “means to achieve the end of a more responsive state that more effectively achieves democratically agreed-upon ends” (Fenster, 2010).
- However, Jonathan Fox (2007) makes the insightful point that “transparency” can be just as opaque as clear – the former when information is merely made available – transparency in name only; it then needs to be analysed and made accessible in order to become “clear” or “real” (our interpretation) transparency. Also, transparency may not necessarily be beneficial, depending on the information. There are different *levels* and types of transparency, both points which become relevant when we discuss ICTs, including those which help people make FOI requests.
- Transparency is ineffective without accountability – the relationship between the power holder (account provider) and delegator (account demander). And the evolution from transparency to accountability is equally dependent on a number of factors, not least of which is citizen participation – the presence of bodies and movements who question, engage in sufficient collective action and decision-making, and have the power to impose sanctions of one kind or another (Fung, 2006). Schedler divides accountability into *answerability* and *enforcement* (Schedler, 1999): governments need to be answerable, but their responses also need to be monitored and enforced – again, subtle but important distinctions between the two.
- The theory is as below (Figure 1):

⁷T&A literature is liberally peppered with maxims such as “sunlight is the best disinfectant” (Louis Brandeis); “information is the currency of democracy” (Thomas Jefferson), “power concedes nothing without demand” (Fredrick Douglass), and “secrecy reduces the information available to the citizenry, hobbling their ability to participate meaningfully” (Joseph Stiglitz), amongst many others.

Figure 1: *The assumed relationship between participation, empowerment, transparency and accountability*

- But the questions remain:

Figure 2: *Questions on the assumptions between participation, empowerment, transparency and accountability*

- Next, we look at how ICTs fit in this quadrangular relationship.

2.2 Technologies, transparency and accountability

- "Government 2.0" (Nath 2011), "we-government" (Linders, 2012), and of course "open government" (Bannister and Connolly, 2011; Lathrop and Ruma, 2010): all are commonly heard terms. ICTs can be seen in an optimistic light, a tool for "good governance", "reducing potential for corrupt behaviors [sic], enhancing relationships between government employees and citizens, allowing for citizen tracking of activities, and by monitoring and controlling behaviors [sic] of government employees" (Bertot et al 2010, p. 265). The prevailing policy perspective can tend to be that "the interactivity of the Internet is expected to make

governments more responsive to the needs and demands of citizens. More information delivered in a more timely fashion to citizens is expected to increase the transparency of government and to empower citizens to monitor government performance more closely” (Wong and Welch, 2004, p. 276).

- The causal argument is that:
 - transparency will have positive effects on government
 - therefore it should be encouraged, preferably by using ICTs, and
 - this will forge closer connections between citizens and governments (Grimmelikhuijsen, 2012).
 - In theory, transparency is one of the intrinsic characteristics of ICTs because of the ease of storing, disclosing, analysing and reporting on data (Grimmelikhuijsen, 2012; Meijer, 2009; 2012).
 - As a result, it is possible to perform more complex tasks, computations and extrapolations, making it easier to understand the data through visualization and to disseminate it. Wittemyer et al (2014) specify the benefits of ICTs in T&A as reducing the distance between government service provider and citizen by:
 - Providing greater access to decision makers and information through platforms for raising issues and concerns
 - Enabling horizontal, downward, and upward flows of information, providing the potential for *all parties* to be transparent and accountable
 - Providing multiple-platform opportunities for disseminating and interacting with information
 - Providing visual tools for citizens to access government data and, as a result, simplifying traditionally presented government information (e.g., budgets)
 - Providing analytical tools for citizens to use (e.g., to make comparisons year-on-year or with other departments or states)
 - Producing real-time opportunities for citizen interaction and feedback
 - Enabling discussion through platforms among geographically disparate citizen populations, governments, and CSOs
 - Generating the “glare effect”: using ICTs to attract media attention to publicize causes, draw attention to government behaviour, and garner immediate responses. (Wittemyer et al, 2014)
- We can see how much of this is reflected in Alaveteli’s design, with its easy access to government data, the searchable public archive, the potential for a virtual community of support, the “glare effect” which media and civil society can pick up on, and so on.
- But with all the aforementioned potential, what does the reality look like? Deeper questions and challenges exist for many online T&A initiatives (see Avila et al, 2010; Bertot et al, 2010 and Wittemyer et al, 2014 for several examples).
- Many of these initiatives are young, and sometimes under-researched, while barely sustaining themselves both financially and socially. Just as with the assumptions of T&A in general, there are also concerns that these potential benefits of ICTs could remain just that – *potential* benefits.

- The value of ICTs may be overstated. Grimmelikhuijsen cautions that ICTs become “a panacea for all kinds of ‘diseases’ in the public realm, such as low citizen trust, corruption, bad performance, low accountability and power abuse by public officials” (Grimmelikhuijsen 2012, p. 293). The counter-argument is that none of these are inherently technological issues, but political, institutional and social (Gigler and Bailur, 2014). ICTs amplify existing non-ICT behaviour and processes.
- Transparency can easily be limited to Fox’s (2007) opaque rather than clear transparency (the provision of PDF documents for example, instead of machine-readable formats, a criticism frequently made by open data proponents).
- ICTs can also be misused to “drown” people in information – i.e. quantity, but not necessarily quality (O’Neill, 2002). Governments need to move from opaque to clear transparency (where it is appropriate – a challenging decision in itself), and secondly, other actors also need to be present to translate the opaque into clear transparency – people such as CSOs, the media and “techie” activists. Disclosure of documents is not sufficient to cause change. As Grimmelikhuijsen (2012) points out, raw data needs to be processed, digested and interpreted (and as he says, one of the key attributes of ICTs is the *unintentional* transparency after the analysis and interpretation has been undertaken).
- Even if clear transparency is present, the evolution to accountability is dependent on Schedler’s (1999) factors of answerability and enforcement. Grimmelikhuijsen (2012) makes the point that although there was initial media attention, the expectations of transparency after the Wikileaks incident did not happen due to a lack of either.
- Too much transparency could result in government processes appearing even more irrational (Grimmelikhuijsen, 2012). Bauhr and Grimes (2013) argue that transparency can lead to indignation or resignation and there is always the danger that fatigue results in the latter. Costa (2012) states that transparency in government processes may even result in better knowledge of who to bribe.
- Other unintended consequences may occur from transparency (and are possibly one of the reasons behind government reticence). For example, online crime maps and school ratings are likely to impact on demand and supply of housing in neighbourhoods. This behavioural consequence of course predates the internet, but the latter can amplify and accelerate behaviour (Grimmelikhuijsen, 2012).
- Similarly, in terms of accountability, ICTs should facilitate both Schedler’s (1999) answerability and enforcement (also called soft and hard accountability by Fox, 2007).
- In practice, the very nature of amplification of information and ease of access of ICTs may mean a rise in expectations and citizen demand, without the corresponding increase in resources; improved, efficient and responsive back end processes (Grimmelikhuijsen, 2012; Heeks, 1998; Shepherd et al, 2011); or simply, a lack of sanctions or enforcements. Technology moves faster than bureaucracy or judiciary.
- So finally, while it is understandable that ICTs can contribute to transparency, the conceptual challenges are more to do with transparency and accountability themselves (and the answerability and enforcement dimensions of accountability) than the ICT component. Wittemyer et al’s (2014) list is all about the process benefits of technology – indisputable if the technology works well. But what is the end impact? We can already see how FOI online, as a very specific tool within the broader discourse of government transparency and

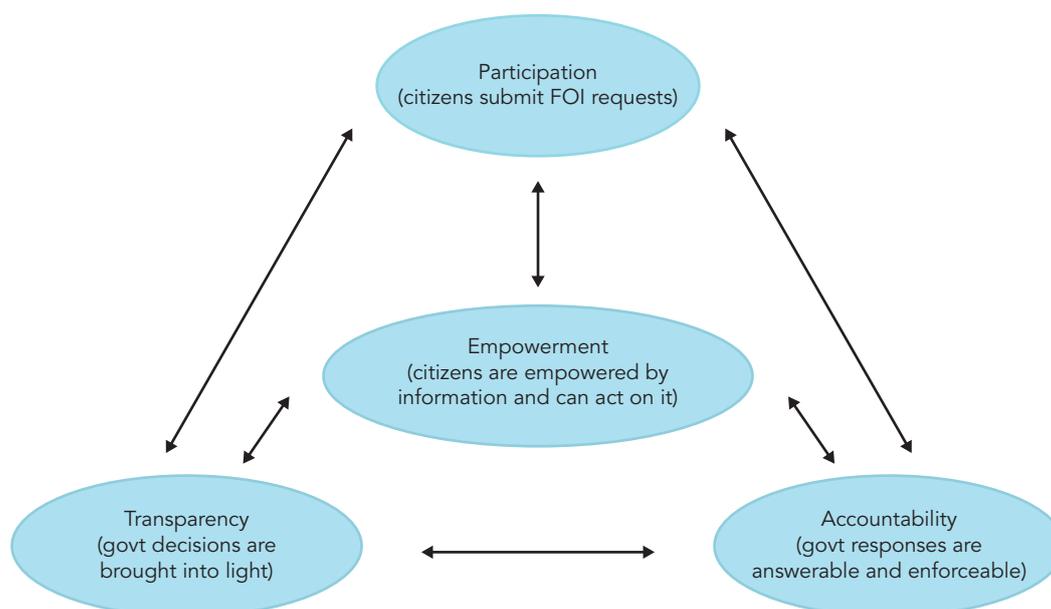
accountability, may face similar expectations and challenges. We examine these in further detail in the next sections.

2.3 FOI and FOI tools online

- Freedom of Information usually equates to a model which provides a universal right of access to documents in the possession of government departments and agencies, and imposes on such entities additional obligations to publish and make available specific information. FOI comprises the following elements:
 - Freedom of and access to information is a citizen right, usually (but not always) supported by an FOI law
 - Citizens have access to all government documents, subject to exceptions in the interest of national security, international relations and/or privacy
 - A time limit of 10–30 days is imposed for the government entity to respond (depending on the country)
 - Appeals processes are in place for FOI requests which are refused
 - FOI legislation may have application within a specific jurisdiction, such as the national/federal government, or a local administration. There may be numerous, overlapping FOI laws in any given country
 - Many countries (e.g. UK, Scotland, India) have appointed national and/or regional/state level Information Commissions and Information Commissioners to act as an ombudsman.
 - Although it is often possible to contact government representatives through email, a very small proportion of countries which have FOI laws have online FOI sites – the focus of this paper.
- FOI legislation is very much based on the principles of transparency and accountability mentioned in Section 2.1, e.g. the New Zealand Official Information Act states that its purpose is to “increase the availability of official information to promote more effective public participation in the making and administration of laws and policies [and] to promote the accountability of Ministers of the Crown and officials” (Ministry of Justice, no date); India’s Right to Information (RTI) Act, passed in 2005, says it is an Act “to promote transparency and accountability in the working of every public authority” (Government of India, 2005).
- If transparency in general is more “proactive”, FOI veers towards “reactive” transparency, where information is provided on request (Marshall, 2013; Menapace et al, 2013).
- The aims of FOI summarized from policy and academic papers are to:
 - Increase government transparency
 - Increase the rights of citizens
 - Increase awareness of these rights
 - Result in a broader informed citizenry
 - Control public corruption
 - Increase government accountability
 - Increase public trust
 - Improve quality of government decision making

- Relating back to the broader T&A literature and Figures 1 and 2 above, we see this:

Figure 3: *The relationship between FOI assumptions and broader T&A theory*



- What is the evidence that these FOI aims have been realized? The same hypothetical benefits of ICTs as discussed in the case of T&A in Section 2.2 apply: making FOI requests more accessible, faster and cheaper; enabling the multiplier effects by publishing the process and response; and more awareness and debate. But do these occur in practice?

3. Evidence of FOI impact: in general, and online

3.1 Impact and the transition from transparency to accountability

3.1.1 FOI in general

- FOI legislation can be launched with initial enthusiasm or under pressure, but then undergo revisions to restrict operation when politicians start to feel the pain, or simply suffer from bureaucratic neglect when starved of resources. Based on the Australian experience, Snell developed a four-stage typology: initial “optimism,” increasing “pessimism,” giving way to “revisionism” designed to alter the FOI law, normally to limit its scope or performance, and then later a return to the “fundamentals” of FOI (cited in Hazell and Worthy, 2010).
- A major 14-country study of FOI⁸ (Open Society Foundations, 2006) found evidence that FOI laws did make a difference to the extent that response rates were three times higher in countries with a law than those without.
- However, the study found that even in countries with FOI laws, response rates were low. 56% of requests made in countries without Freedom of Information laws went unanswered, and 38% of requests made in countries with Freedom of Information laws went unanswered. Also, perhaps surprisingly, countries transitioning to democratic rule at the time (Armenia, Bulgaria, Peru, Mexico, and Romania) had a higher response rate than France or Spain. However, this may not be surprising, as these countries had a higher rate of incidence of NGO involvement in FOI than France or Spain, and in addition, the study stated that other outlets may be available in the latter two countries, such as proactive disclosure online.
- The study also found that the same pairs of requests (i.e. two people making the same request) got inconsistent responses; that oral silences were more common than written refusals; and that discrimination played a role (those who identified themselves as journalists or NGO requesters received responses between 26 and 32% of the time, whereas those who identified themselves as businesspersons received responses 19% of the time).
- In the UK, a major two year study was conducted by Hazell et al (2010) with 56 officials in eight British central government departments, 90 officials and others across 16 local authorities and 30 MPs, peers and officials at Westminster as well as journalists, requesters and campaigners. In addition, an online survey of 200 FOI requesters and detailed document analysis were undertaken. The authors found a gradual increase in FOI requests between 2005 and 2009, the majority of the requesters as members of the public, a predominance of specific, localised requests, some journalist use, and business use at a greater level with central rather than local government level. Hazell et al (2010) do find greater levels of transparency, mixed evidence of accountability, and less on improved decision-making or public awareness and understanding.
- The most well-known of FOI “successes” is the MPs’ expenses scandal revealed in 2009 (Brooke, 2011), followed by disclosures about police handling of the Hillsborough disaster in which 96 soccer fans lost their lives (Cherry & McMenemy, 2013; Worthy and Hazell, 2013). In Scotland, cases include parents who used FOI to acquire demographic and financial information to challenge the basis on which rural schools were being closed, as well as information on over 800 young patients with learning disabilities being inappropriately housed in care homes for the elderly (Dunion, 2011).

⁸Argentina, Armenia, Bulgaria, Chile, France, Ghana, Kenya, Macedonia, Mexico, Nigeria, Peru, Romania, South Africa, and Spain.

- In India, there is a general feeling that the RTI [Right to Information] Act has improved the quality of life of marginalized communities to a certain extent (CUTS, 2010; Roberts, 2010; Srivastava, 2010). One study finds that the Central Information Commission has provided details of decision making processes, cabinet papers, records of recruitment, selection and promotion of staff, documents on tender processes and procurement procedure, lists of beneficiaries of government subsidized schemes, such as food grains supplied through ration shops, water and electricity, domestic gas, educational and health facilities, shelter for the poor, muster rolls under employment guarantee schemes, passports, pension funds, birth certificates, income tax refunds and so on (CUTS, 2010).
- Other high-profile successes in India have been reported, such as when information revealed that 87% of wheat and 94% of rice meant for the poor was siphoned off by shopkeepers and food grain officers, and steps taken to streamline the system. In 2007, data obtained under RTI inspired citizens to question elected representatives and stop a scam worth over Rs. 6,000 crores [roughly US \$1 billion] in the Crawford Market redevelopment in Mumbai (Gandhi, 2007). RTI has also been used to question decisions behind NREGA [The National Rural Employment Guarantee Act]. Baisakh reports that villagers of Elengabalsa, in the state of Orissa, filed an RTI application to ask the number of job cards issued in the village; why all the households, who by this time should have got the cards, had not received them; and which officers were guilty of violating the provisions of the Act (Baisakh, 2007). Srivastava sees this as an indication that “the RTI Act worked as a miracle. The Panchayat authorities issued 40 job cards within seven days of the RTI application. People do feel more empowered. Their bargaining power vis a vis public officials has increased manifold” (2010, p. 14).
- However, in many of these cases we do not know the chain of events or factors leading to the eventual result, or even if they have been accurately reported. Obtaining successful results from FOI requires a number of pre-conditions – whatever the local context, the process can be complicated if you cannot access the internet, know the law, be specific about what you are looking for, have some sense of which body holds the information, or have the resources (both time and money) to pursue the case, particularly if one has to go through an appeals process (Ewart, 2011; Hazell et al, 2010).
- Delays, non-responsiveness, and the ineffectuality of the appeals process are frequently raised as issues, whether in the UK (Hazell et al, 2010), Scotland (Cherry and McMenemy, 2013), India (Roberts, 2010) or Spain (TuDerechoaSaber, 2014). In the case of India, it is argued that the Central Information Commission has failed to provide even basic information, such as the exact number of applications, decisions and rationale behind what decision was eventually taken, and status of cases and appeals still pending (Srivastava, 2010). Srivastava finds that at Maharashtra State Information Commission, 16,500 appeals cases are waiting to be heard, while in the state of Bihar, around 9,000 cases against denial of information have been filed. Heather Brooke, the journalist who played a key role in exposing the MP expenses scandal in the UK, echoes these statistics in her statement that “sadly, the conclusion one comes to after trying to get information legitimately is that the law is largely a waste of time” (Brooke, 2011, p. 17).
- The general conclusion from researchers is that, to date, FOI Acts appear to have failed to create a more open culture (Grimmelikhuijsen, 2012; Hazell et al, 2010; Worthy, 2012). From the UK research, the conclusion is that it “has not caused a ‘chilling effect’ or altered government effectiveness and decision-making” (Hazell et al, 2010, p. 256).

3.1.2 Online FOI

- There appears to be very little academic literature on the impact of online FOI tools. We found one brief Spanish-language study of the government sites in Brasil, Chile and Mexico (Fumega, 2014), and studies from implementers of online FOI requests in Chile (the CSO rather than government site – more on this in Section 3.5.2), Italy, Spain, Uruguay, and in the EU. In the former study Fumega (2014) outlines the process and stakeholders involved in establishing e-SIC in Brasil (based on interviews and data from the Contraloría General de la Unión or CGU), the *Portal de Transparencia* in Chile (based on data from the *Portal* and interviews with the Consejo para la Transparencia) and InfoMex in Mexico (based on Instituto Federal de Acceso a la Información or IFAI). Although some statistics on requests including demographics (explored further in Section 3.2.2) are provided, there is no data on responses, impact and transition to accountability.
- On the other hand, in the remaining studies on Italy, Spain, Uruguay and the EU, there is no data on demographics, but there is data on requests and response rates, broadly summarized as:

Table 1: Findings from online FOI requests (at the time of writing)

Country	Alaveteli?	Requests made	Time period	% of successful/satisfactory responses	% of unsuccessful/unsatisfactory responses ⁹	% of "mute silence" ¹⁰
Chile	No	996	February 2011–April 2012	80%	20%	20%
European Union	Yes	53 ¹¹	2011–2013	52.8% (35% fully; 16% partly)	39.6%	7%
Italy ¹²	No	300	January–March 2013	23% (13% fully; 10% partly)	12%	65%
Spain (2014)	Yes	654	1 January–31 December 2013	13%	30%	57%
Spain (2013)	Yes	567	20 March 2012–31 December 2012	13%	33%	54%
Uruguay	Yes	179	October 2012–January 2013	19%	19%	62%

Source: Access Info Europe (2014b); Marshall (2013); Menapace et al (2013); Scrollini and Rodríguez (2012); TuDerechoaSaber (2013); TuDerechoaSaber (2014)

- While in most cases above, request rates are fairly high, given the longevity of the sites and/or period of analysis, what is more problematic is the response rate – Spain's TuDerechoaSaber in both its 2013 and 2014 publications finds "un silencio masivo" on the part of the state in

⁹Includes refusals or requests to resubmit.

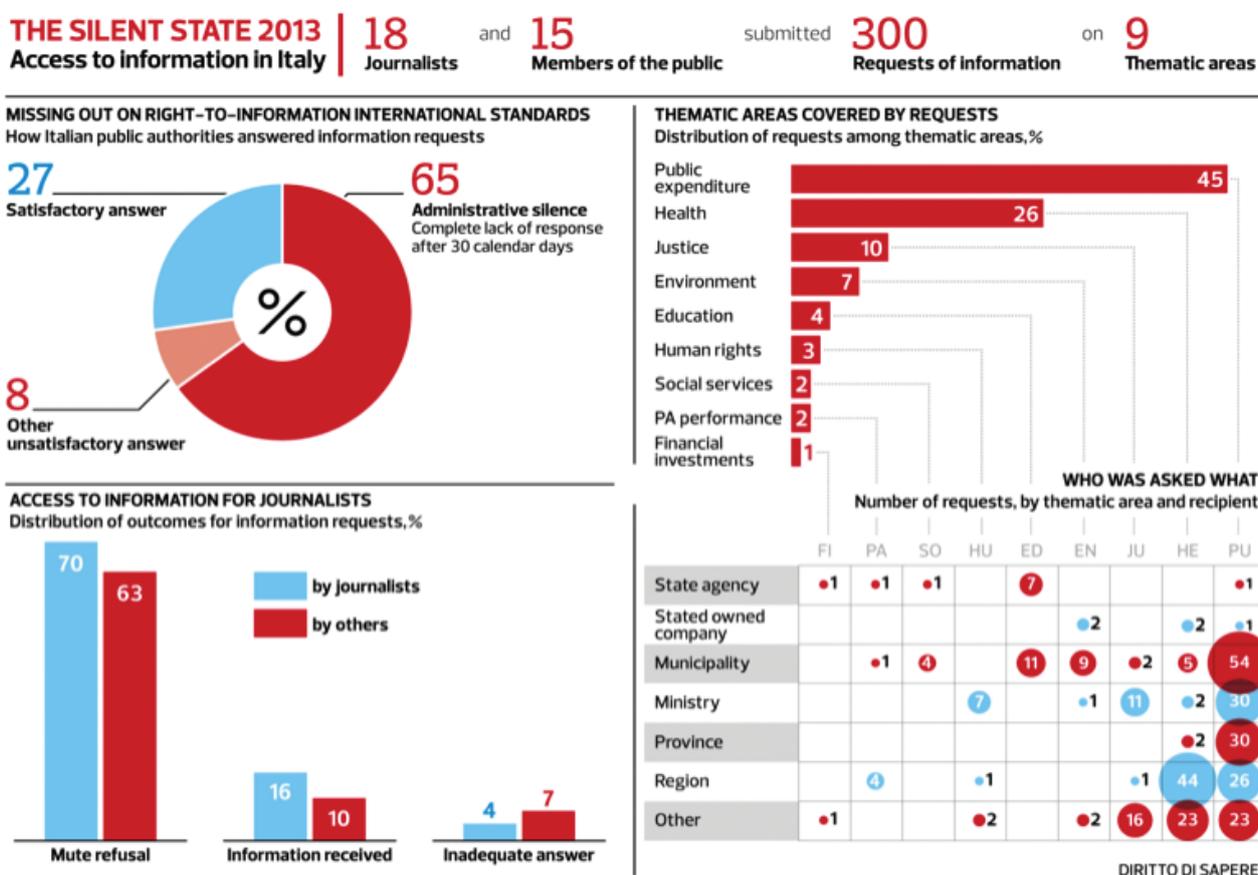
¹⁰Failure to reply at all within required time period.

¹¹Does not indicate all requests through site.

¹²Requests sent through email rather than online site.

terms of responses, while Scrollini and Rodríguez (2012) find that “largely the Uruguayan state still ignores users” and Menapace et al (2013) label Italian government responses to emails as representative of “the silent state”. In fact, of all these, the Spanish study being the only one which has been conducted in two consecutive years, finds an increase in the government non-response rate from 54% in 2012 to 57% in 2013.

- TuDerechoaSaber’s comparative study finds that the greatest use of Alaveteli sites in 2013 was topped by the UK’s WhatDoTheyKnow (77,281 requests), followed by Hungary (1,486), the European Union (844), New Zealand (685), Spain (654), Czech Republic (551), Australia (460), Brazil (283), Uruguay (144), and Tunisia (117) (TuDerechoaSaber, 2014).
- The response rates are fairly proportional to this – the top five initiatives with the greatest response (successful or partially successful) are the Czech Republic, United Kingdom, New Zealand, Hungary, the EU and Australia, all hovering around the 50% mark (TuDerechoaSaber, 2014). The top five for non-responses are Brazil (87.99%), Tunisia (84.62%), Uruguay (68.09%), Spain (57.34%), and the European Union (36.85%). The most-cited “top-performer” of non-governmental sites appears to be the UK WhatDoTheyKnow site which has been used to make 220,897 requests since 2008 (at the time of writing) and has 500,000 visitors a month. Based on FOI use statistics released by central government, rough calculations show that by the end of March 2011, nearly 15% of all FOI requests to central government had been made online through WhatDoTheyKnow.
- In Italy, Diritto di Sapere produced the following infographic after an experiment during which 300 requests were sent by email (as seen in the table above):



- What all sites have found hard to answer so far is what *change* results from use of these sites. Although the Spanish studies appear to provide the longest timespan (the EU data is a selected subset of all requests), there is a lack of long-range research on a) the percentage of successful FOI requests (i.e. where the requester felt satisfied with the information requested) and b) evidence of action from the request.
- What constitutes impact? It can be seen as a spectrum of factors. Firstly, are the sites fairly well used? Secondly, what is the institutional response rate? Thirdly, what is the transition from transparency to accountability? Chile's Acceso Inteligente states that "access to information is guaranteed so individuals are able to exert a tighter control over government's actions. One of Acceso Inteligente's objectives is to generate and incentivize monitoring actions as a follow up to newly generated information" (Marshall, 2014, p. 7), yet there is no evidence that this has happened.

3.2 Inclusivity

3.2.1 FOI in general

- Another question related to FOI impact is whether usage is "equitable". Broadly speaking, and across all countries studied, users appear to be made up from the "general public" (i.e. individuals), Civil Society Organisations, journalists, and the private sector. Yet, first, as stated by Hazell et al (2010), only a fraction of the population in any country make FOI requests. Even if we assume each request has been made by a new person (while in truth, it is mainly a repeated activity), Hazell et al extrapolate that in Australia, Canada, New Zealand and the UK, this equates to only one or two per cent of the entire population.
- Like much political activity, FOI is driven by the small, self-selecting group of "usual suspects" (Worthy, 2012). The Chilean Council for Transparency found that only 23.5% of individuals in their survey were aware of the Access to Information Law, although over 70% wanted to know more about it (cited in Marshall, 2013). In India, Srivastava finds that most applications are by the same people, in urban areas, for personal issues rather than "civic" and notes a "better response from authorities when innocuous information sought" (2010). There are also gender inequalities. In India, it is stated that over 75% applications to date have been filed by men (Srivastava, 2010).
- This perpetuates the broader governance trend, that is that those who participate tend to be those who are already politically interested, motivated, and articulate, and who can afford the time to participate (Cooke and Kothari, 2001).
- It has been suggested that there should be more activism on proactive oral disclosure and physical awareness-raising in relevant locations (e.g. village tea points) if inclusivity is a concern (Calland and Bentley, 2013; Srivastava, 2010). Yet, there is also a reverse argument that too much emphasis on "elite capture" is redundant: "rather like the small group who complain in restaurants, they improve standards for everyone else" (Worthy 2012).

3.2.2 Online FOI

- The general "digital divide" concerns that ICTs exacerbate elite capture apply to FOI online: that too much official investment in online request systems to the detriment of other submission channels could exclude large parts of communities, especially in developing countries. In the case of Acceso Inteligente in Chile, Marshall (2013) states that only 40% of Chileans have access to the internet.

- From her study of e-SIC in Brasil, the *Portal de Transparencia* in Chile and InfoMex (Mexico), Fumega (2014) finds the repetition of online democracy demographics that those using these sites tend to be urban, literate, ICT-literate and male. In InfoMex, 60% of users between 2003 and 2014 are male. Moreover, while 75% of men receive responses, only 25% of women do. The average age range of users is 25–44. In Chile, the greatest proportion of users are from urban areas, and around 40% from the capital Santiago (6142 to date out of 150,000 requests since the *Portal's* launch in 2013). In Brasil, since implementation of e-SIC in 2012, almost 55% of its users (where this information is self-reported) are male, more than half have university degrees, and around 15% from the private sector (again, where reported). In August 2014, 76% of requests came from the 5570 towns and cities of Brasil (Fumega, 2014).
- While of course, such statistics always need more unpacking, there is little literature on what online FOI sites are generally doing to be more inclusive and what impact this is having. On the one hand, there is the argument that online FOI can make it much easier for a citizen to submit a request. On the other hand, it could also be argued that computer literacy, access to technology and so on are needed. Fumega (2014) does suggest more mobile-friendly interfaces but this still requires the service user to have skills and access to internet-enabled mobile phones.
- Open Society Foundations wrote a compelling anecdote of an elderly illiterate Sesotho-speaking South African woman who “attempted to submit 20 oral requests, 10 in person and 10 by telephone. All her attempts to submit in person were unsuccessful: on three occasions she was given telephone numbers of other people who might assist. In total, she was unable to submit 15 of her 20 requests. The other five, all telephone requests, resulted in refusals to accept (in two cases) and oral refusals (in three). Officials were often evasive, referring her to others within the same office or to other offices. She was frequently refused entry to public buildings or was immediately directed elsewhere. As a result of the cultural and language diversity of South Africa, which boasts 11 official languages, she was not able to communicate requests with government bodies in the regions where her language, Sesotho was barely spoken. When she found officials who spoke Sesotho, in the Sakhisizwe municipality located in the Eastern Cape province, they refused to assist her further in submitting requests to the appropriate department” (Open Society Foundations, 2006, p. 93). To what extent would an online site help such a requester? On the one hand, it would expose the silence more explicitly by being online (the “glare” effect). On the other hand, she would still need an infomediary to help her access and navigate through the site, and to champion her cause.
- There is some literature on attempts to develop hybrid and outreach FOI infomediaries, such as call centres. For example the state government of Bihar, one of India’s poorest states, established Jaankari, an RTI call centre in 2007. Call centre operators act as intermediaries filling in forms online while talking to the caller (Kumar, 2010; One World, 2011; Times of India, 2009). The charge is Rs. 10 – the same as an online application – which gets charged to the requester’s phone bill. OneWorld’s detailed study of Jaankari found an average of 2,068 calls per month in 2011, with 386 as initial applications (which implies that the remainder were queries or appeals) and a five-fold increase in calls from 2007 to 2011. However in a survey of 50 users, it also found that over 60% of users had used Jaankari more than five times and more than 24% more than 50 times, indicating “a strong leaning towards repeat usage” (OneWorld, 2011, p. 33), which implies elite capture. However, as by far the highest number of calls – 940 – during the six month period of research came from a district in Bihar

which also has the largest number of NGOs in the state, there is a high chance that this relates to the use of CSOs as infomediaries (discussed further in Section 3.7). Similar helplines have been established in other states in India – Karnataka, Haryana (Khatry, 2008), Gujarat, Jammu and Kashmir as well as national “RTI on wheels” outreach vans (Dave, 2014), but there is very little on use and success, as well as the key influential role of the infomediaries.

3.3 National security and individual privacy

3.3.1 FOI in general

- National security and individual privacy are the main reasons why FOI requests are refused (the privacy of UK MPs was cited as the main reason that their expenses were not initially revealed). FOI has competing interests of a public’s right to know, against the costs and risks of finding and disseminating that information, effective public admin and the rights of civil servants (Bannister & Connolly, 2011). What institutions should be subject to an access right? Under what circumstances is an institution that is subject to an access law justified in withholding information? (Roberts 2010). This ambiguity is one of the main challenges of FOI.
- On the “demand” side, there are serious concerns that lives may be at risk from making FOI requests and this would subsequently create a strong deterrent to others. This has been reported to be the case particularly in India, where numerous RTI requesters/activists have been killed, it is presumed for exposing corruption after successful RTI requests (Burke, 2010).
- Submitting an FOI request may even be a “last attempt” by government employees (e.g. Jeffrey Scudder, a CIA employee in the USA who believed several CIA documents should have been in the public domain. He filed an FOI request, but then experienced severe personal harassment, eventually leading to dismissal from his job¹³). In many countries (including India, as seen above), there seems to be inadequate legal protection for such requesters.

3.3.2 Online FOI

- The battle between security and privacy continues online. Some state that too much emphasis is placed on privacy in online requests – e.g. Access Info Europe (2014b) notes that names and email addresses of government participants in a council meeting were blanked out “despite the fact that they are government officials working on behalf of citizens”. Some sites shield the requester’s identity (e.g. Chile) while others require identification (e.g. Italy, the EU).
- Where users chose to display their real name, there is some evidence that authorities can tailor their response (and prioritization) according to the background of the requester (Higgerson, 2014). Even when identification is not a legal requirement, some authorities continue to ask for ID (e.g. Chile). Technology does not necessarily provide anonymity.
- Another challenge to privacy is posed by the very speed and multiplier effect of technology mentioned by Wittemyer et al (2014). On the UK site WhatDoTheyKnow, Islington council responded to an FOI request by sending three Excel workbooks which contained a large amount of private data (relating to 2,376 applications for council housing, containing information including name, sexuality to instances of mental illness and/or domestic violence). As requests and responses sent via WhatDoTheyKnow are automatically published online, these Excel workbooks went public instantly. The council sent a ‘replacement’ FOI response

¹³One of the comments below the Miller (2014) article online succinctly states “it’s called the Freedom of Information Act, not the Freedom from Intimidation Act. See the difference?”.

that still contained personal information, this time in the form of hidden Excel tabs. It was only a few weeks later that a WhatDoTheyKnow volunteer found and removed all the data and informed Islington council (Steinberg, 2012). The council made the statement that the person responsible for releasing the information had not had adequate training, which had now been put into place (Williams, 2013). Technology is being implemented so fast, and almost under a pressure to be “transparent” and yet, many in the public sector do not understand exactly what it is capable of, or have sufficient training, an issue discussed next.

3.4 Cost, time and burden

3.4.1 FOI in general

- There is often the perception (from the public sector) that FOI is placing an unnecessary burden on government (Worthy and Hazell, 2013). Yet, there is little actual cost and time evidence of this, partly because it is difficult to measure and partly because senior officials only see a few of the requests, which may be propagated negatively by the media (Worthy and Hazell, 2013). Unless a specific information officer is appointed, many government employees absorb FOI duties into their daily work, and in any case the information required may be necessary from a combination of sources, therefore making it hard to track exact costs per department. Cherry and McMenemy (2013) find that of all 32 councils they research in Scotland, none were keeping a record of costs.
- There have been suggestions in the UK and Scotland that requests should be subject to a standard fee to deter frivolous applications. But would this also deter “genuine” applicants? After a fee was applied for non-personal FOI requests in Ireland (€15) in July 2003, usage fell by 83% between 2003 and 2004 (Dunion, 2011; Ewart, 2011; Hazell et al, 2010; Paterson, 2008) although of course, we do not know what types of applicant were no longer making requests. Ireland is now removing this fee, although search costs remain where more than five hours of administrative work are needed (Minihan, 2014).
- Research in Scotland shows that there is very little evidence of the high number of vexatious requests that had been anticipated (Cherry and McMenemy, 2013). The majority of the 32 authorities the authors research receive between one and five “vexatious” requests, and only two authorities receive more than 10 requests over the seven-year survey period (although this could also be down to the lack of a recording culture).
- There is the possibility that cost may be more of a perception (Worthy and Hazell, 2013) and used as an excuse, which a local authority spokesperson in the south east of England admits may be the case (Shepherd et al, 2011).
- What is also certain is that there appears to be insufficient training and awareness of how to answer FOI requests (Shepherd et al, 2011), as seen by the Islington example above.
- Time and cost burden apply to the requester too. The length of time it takes to get a response, and even more to secure a decision from an appeal, devalues the worth of information once it is disclosed; and in any case deficiencies in enforcement mean that authorities can flout the law. The Open Society Foundations study (2006) reports instances of “illegal charges” requested by two municipalities in Peru, even though FOI queries are free in Peru. Or the cost may simply be in terms of the requester’s time – a political researcher in Shepherd et al’s (2011) England study states “I get in touch and say ‘20 days have gone past’ and they just send me something rather than trying to assist me to narrow it down, or help me achieve

what I am looking for because obviously you don't know exactly what form things are kept in." (p. 117). Another states that "any generality they will use to refuse the request instead of clarifying the request" (p. 117). Deterrence appears to be especially the case when trends or extra analysis are required rather than simple information, and yet, often this is the most valuable information.

3.4.2 Online FOI

- How do online FOI tools improve or reduce these costs? In relation to a serial requester who uses WhatDoTheyKnow (and has submitted 78 requests through the site), a Croydon councillor states "lots of requests are for frivolous things which take an army of bureaucrats to deal with. We're now paying officers to deal with FOI requests which the public are no better off for knowing ... some questions stretch transparency too far" (Davies, 2012). The implication is that because online requests are easier, faster and cheaper for a citizen to make, they increase the expectation of response and burden on the government worker. "It takes seconds for a requester to submit their request through the site, and not much longer to send it to several. They don't have to consider what resources will be used in those public authorities to answer the product of their idle curiosity" (Gibbons, 2010). Yet, because there are no comparative studies of general versus specifically online FOI requests, it is hard to say to what extent the internet has increased the burden on government.
- Equally, as illustrated by the online studies so far in Chile, the EU, Italy, Spain and Uruguay, it's just as easy for an institution to delay or ignore the request online as well as offline. Access Info Europe (2014b) states an average response time of 20 days, rather than the legal limit of 15 days, and use of extensions in 30% of cases. Met by non-response or being passed around, even the most persistent requester is likely to give up after a while, as TuDerechoaSaber's citizen shows when he gives up after three attempts (TuDerechoaSaber, 2014).
- In Uruguay's ¿Qué sabés?, Scrollini and Rodríguez (2012) conclude that "largely the Uruguayan state still ignores users". It is simply that this non-response is more transparent on an online, public initiative, and easier to publicize.
- One potential *benefit* is that requests for "illegal charges" which could occur orally or face-to-face (e.g. two cases in Peru documented by the Open Society Foundations, 2006) are highly unlikely to happen on a public site (although they can do if correspondence is taken into a private channel).

3.5 Institutional perception and support

3.5.1 FOI in general

- Researchers commonly agree that institutional buy-in is the most important factor in the success of FOI requests (Cherry and McMenemy, 2013; Hazell et al, 2010; Worthy, 2012). A survey of 522 FOI personnel in 2007 surveyed a range of public authorities in England, Wales and Northern Ireland, predominantly examining perceptions of FOI. The findings in 2007 were "generally positive" with 80% of respondents saying that the act was a "fairly or very good thing for their organisation" (Continental Research, 2007, cited in Cherry and McMenemy, 2013). Understandably, results also pointed to apprehension about time and cost resources, and "wasting time on pointless requests from the public" (Cherry and

McMenemy, 2013) but as seen in the previous section, there is still mixed evidence on whether such requests are common or burdensome enough to justify this.

- Another concern is whether FOI is approached in collaborative or adversarial terms. Too much of the latter can also be seen as antagonism. There is the potential of unintended consequences, such as a non-recording culture coming out of fear, and consequently the loss of an audit trail (Bannister and Connolly, 2011; Hazel et al, 2010; Tromp, 2008). There is some evidence that non-recording became common practice in parts of the Irish public sector following FOI legislation (Molony 2006). Tromp (2008) catalogues a list of avoidance tactics in Canadian government noted by independent watchdogs, e.g. storing the most important information on Post-Its which are then removed before photocopying and sending out the document requested, exchanging information on private Blackberry servers and so on. Visibility on certain issues may take the attention away from others (Strathern, 2000).
- The challenge is that, as such, “the current discourse of transparency produces policies and platforms that are particularly sensitive to government’s mistakes but are often blind to its accomplishments.” (Fung and Weil, 2010, p. 107). Perhaps responses to FOI, in addition to being seen as a citizen “right”, also need to be rewarded or at least acknowledged and publicized when answered on time and in full¹⁴.

3.5.2 Online FOI

- How authorities perceive the use of technology is a key factor in success/failure. As seen above, it could be perceived as facilitating the process a little too much (Davies, 2012; Gibbons, 2010). At the same time, they may simply not be technologically “advanced”.
- From their experience of setting up the Uruguay Alaveteli-based FOI site ¿Qué Sabés? Scrollini and Rodríguez (2012) state that the major challenge was simply getting the logistical data such as email addresses of Uruguayan government offices. “The Uruguayan state is not a small one (albeit the country is small) and emails were not easily available... Many of them did not work as they were either out of date or were not in use by the relevant officers”. Secondly, when the site *did* go live, the authors note that “some offices answered they were not going to answer FOI requests through email (ironically the answers showed they were able to do just that)”. A legal complaint to the Uruguayan FOI regulator resulted in an order to accept the online FOI requests. However, with only 34 fully successful state responses to 179 requests on ¿Qué Sabés? it remains to be seen how positively this regulation and the site in general was accepted (Scrollini and Rodríguez, 2012).
- As for the creation of a non-recording culture, without extra pressure there is little that can be done online as well as offline to mitigate this. Access Info Europe (2014b) note that two online requests for EU minutes are not fulfilled, with the response that this was an oral discussion only. A third request, for the legal opinions given to the council about the terrorist listing of the Iranian PMOI (People’s Mojahedin Organisation of Iran) and Palestinian Hamas organisations, is also given the response that the matter was conducted orally. The report flags this as problematic, given the significance of the issue.
- The tension in online FOI appears to reflect offline institutional perceptions. In publicizing Australia’s Right to Know Alaveteli website, the director of the Australian Centre for Independent Journalism states “anything which puts a rocket under government departments

¹⁴E.g. India’s Ipaidabrike site (<http://www.ipaidabrike.com>) has links to “I did not pay a bribe” and “I met an honest officer” forms.

or exposes them to more scrutiny over their handling of FOI claims can only be a good thing” (Christensen, 2010). Is this approach likely to be more effective than collaborating with government?

- Yet, as seen in Section 3.1.2, institutions seem just as practised at ignoring requests (Italy, Spain, Uruguay). Also, rates of non-response are higher in local authorities than at Ministry level (in Spain, 81% in 2013 – an increase from 70% non-response in 2012) and in Italy, exhibiting the highest rate of written refusals (62%) and second highest for mute refusals (24%).
- Marshall (2013) writes that poorly phrased or unclear requests are less likely to receive an answer and the benefit of previously posted queries is that requesters can also refine queries. However, the TuDerechoaSaber study (2014) states poor responsiveness can’t be attributed to complex questions – in the majority of cases, requests for information were simple, direct and obvious, usually to do with public expenditure (as was the case in 2012), public policies that directly affect them or topics they have had a particular impact in the media.
- The longer term value of FOI sites to government needs to be made clearer – that as an authority replies to one request, it may be helping many more future requesters (Marshall, 2013) and transitioning from reactive to proactive disclosure. Tom Steinberg, the Director of mySociety states “over 30,000 unique visitors a week look at materials on [WhatDoTheyKnow], dwarfing the number of people who actually make FOI requests. We should explain this more loudly and more often so officers can understand that by responding to one irritating request they might ultimately benefit a huge number of people. And when you reply to a request that doesn’t come via this site, you’re correspondingly not helping people who might otherwise have benefitted” (Steinberg, 2010 in Gibbons, 2010).
- If it is felt that technology has lowered barriers “far too much”, there is also opportunity for institutions to be seen to be performing good governance. The functionality of posting all responses to FOI queries on those sites run on Alaveteli software should in theory eventually pay off in terms of reduced requests in the future and allay official fears of a “waste of time and money”. One interesting possibility is that an FOI site started by a CSO may be approached by government either in an advisory capacity or “taken-over” – as we learned in the Practitioner Review that accompanies this document, this appears to have occurred in Chile, where Acceso Inteligente started in 2011, but the government then built the *Portal de Transparencia* in 2013, with advice and input from Acceso Inteligente. The latter has subsequently paused operation. What is the future landscape for non-government and government sites?

3.6 Public perception of government

3.6.1 FOI in general

- One of the aims of FOI listed above is increasing public trust in government. Yet, as also argued, transparency may *not* decrease perception of corruption and increase trust – instead, the opposite may occur (Bauhr and Grimes, 2013; Costa, 2012; Grimmeliikhuijsen, 2012, Tsoukas, 1997). Costa (2012) makes this case measuring corruption perception indices in the first five years after the implementation of FOIA laws, which show that levels of perception of corruption increase (although of course the causality between the two in such a large scale study need to be examined). However, Barrister and Connolly make the point that FOI has

two different outcomes: increase in *awareness*, and increase in *trust*. Perhaps we need to focus on the first before the second can be tackled.

3.6.2 Online FOI

- The first challenge is how many actually use online FOI – while in the UK it may be 15–20% of all FOI requests, Marshall (2013) suggests that in Chile, it is closer to 2% of all FOI requests, although this could be because the initiative was so young, the results being from its first full year of implementation. The Chilean site appears easy to use – in a time controlled study, 100% of those who used Acceso Inteligente successfully completed an information request, as opposed to 60% of those who only used the internet. Could the ease of these one-stop FOI portals encourage more requests, without making them vexatious? (Although again the question arises of what is vexatious!)
- The second challenge is understanding if citizen perceptions of government change after the sites have been used. None of the reports we found collect or show evidence of these, although one can reach conclusions if requests seem to be largely ignored. Scrollini and Rodríguez (2013) state there is some fledgling evidence from the Uruguayan site of “community building”, but there is no evidence in other cases.

3.7 The role of CSOs

3.7.1 FOI in general

- Two types of FOI infomediaries are always cited in FOI outreach – CSOs [Civil Society Organisations] and the media. Research on the extent of FOI usage, and motivations for using it, across both types of institution, results in mixed conclusions. A US study showed that 6% of FOI requests came from the media, and 2% from non-profit organisations, whereas more than 60% of requests came from commercial interests and the remainder were categorized as “other” (McDonagh, 2013). Similarly low usage by CSOs is reported in Scotland (13% of total requests) and Ireland (11%) (Hazel et al, 2010).
- In the UK, Hazel et al (2010) find that 37% of requests are from charity and campaign workers, the media and political parties, whereas more than 60% do not fall into these categories.
- In terms of appeals, the Scottish Information Commission found 77% of appeals from the public, but only 4% from CSOs (Spence and Dinan, 2011). However, as with all statistics, we would need to analyse the difference in the latter in more detail – it could simply be that CSOs are able to access the information they require more easily first time around, while in general, members of the public are not.
- Overall, however, it seems that CSO usage is low – or at least, if accurately self-reported. Why might this be the case? In Spence and Dinan’s (2011) survey of 705 CSOs in Scotland, 50.8% had made an FOI request, 66.2% agreed strongly it could be a useful tool, and 50.4% said they were likely to use in future. While time, cost, and lack of knowledge about the process were all cited as factors as to why they had not yet used FOI or would not do so, a more revealing finding was that almost half of CSOs (49%) said they were worried that making FOI requests may harm working or funding relations and that an FOI request would be seen as “aggressive or confrontational” (p. 103). One CSO respondent mentions “we have stated verbally that we will use FOI requests to obtain what we require and this has resulted on at least one occasion in a director providing the information required – with a covering note to

state that our demand for information would damage our working relations.” (p. 104). Another states that the implication from local government is “well, if you don’t like [it] you know, we can always retender you ... that language is not uncommon for us now” (p. 104). Another is quoted as saying “we’re looking for funding to be continued, and, um. ... I don’t think they would trust us if we used that (FOI)” (p. 104). And finally: “we have been informed that several public bodies who we have asked for information under the FOI have been apparently offended by the request – that it was none of our business to be demanding such information” (p. 105).

- The implication is that while FOI requests achieve their aim of making local government more transparent and accountable, both survey and interview data suggested fears – but there is no clear evidence on how far this has actually impacted on funding or whether it has remained simply as a threat. The particular irony is that FOI is supposed to make an impact at local level, but that more intimate relationships acquire their own power dynamics.

3.7.2 Online FOI

- The difference online FOI sites make in this area is, again, unexplored. Fumega (2014) finds that self-reported domestic CSOs comprise 0.33% of requesters in Brasil’s e-SIC since its 2012 launch – below the private sector and journalists (international CSO usage is even lower at 0.05%). Potentially, CSOs could be the main users of online sites, yet if the above concerns exist, only a guarantee of anonymity is likely to redress them (yet many governments and the EU¹⁵ are increasingly asking for identifying details when submitting online requests).
- CSOs also may not necessarily use FOI sites, given limited resources, but work on awareness raising of the right itself, e.g. Calland and Bentley (2013) illustrate how the Open Democracy Advice Centre South Africa had to make the decision between improving technological assistance, or working more closely with rural communities, by assisting local groups to identify the issues they wanted to explore and how better access to information could help them achieve that.
- On the other hand, the report on Acceso Inteligente, hosted by the Chilean NGO Ciudadano Inteligente states that “while we think Acceso Inteligente might not be reaching its full potential as a catalyzer of monitoring actions” (Marshall, 2013, p. 20); it also points out that the other initiatives of the NGO (e.g. a TV programme on conflict of interest) could help raise the visibility of the site further.

3.8 The role of the media

3.8.1 FOI in general

- The existence of a free, unbiased and resource-rich press as an infomediary has been often been cited as a key factor in both translating opaque to clear transparency and from transparency to accountability (Paterson, 2008; Roberts, 2010). The US FOI Act actively encourages the role of the media, claiming that “one individual, even a trained researcher, can track down only a limited number of leads upon which to base an FOI request, while newspapers and television stations, with large staffs, can put teams to work on a problem; they also have the resources to pay for the copying costs of large numbers of documents”

¹⁵On April 1 2014, the EU refused to process requests on <http://www.asktheeu.org/> until citizens provided their postal address. Access Info, who run this site, released a statement denouncing this move (Access Info Europe, 2014a).

(cited in Paterson, 2008). Tony Blair, as Prime Minister when the UK FOI Act was passed, was famous for regretting it because “the truth is that the FOI Act isn’t used, for the most part, by ‘the people’. It’s used by journalists ... For political leaders, it’s like saying to someone who is hitting you over the head with a stick, ‘Hey, try this instead’, and handing them a mallet. The information is neither sought because the journalist is curious to know, nor given to bestow knowledge on ‘the people’. It’s used as a weapon” (Blair, 2010, p. 517). Worthy (forthcoming) states that the media has in fact been instrumental in pushing through FOI reform in the UK.

- At the same time, media use of FOI has not been as great as anticipated (Hayes, 2009; Hazell et al, 2010; Michener and Worthy, 2013; Moudgil, 2011; Worthy and Hazell, 2013). First, it has been pointed out that the average 20–30 day time limit on FOI means that the media, usually working under tight time and resource pressures, are likely to look at other means first – so much of the use is likely to be by medium to long-term investigative journalists (no bad thing, but only a proportion of journalism in general). In India, Moudgil (2011) finds that between 1 January and 31 March 2011, 15 articles based on FOI are filed in *Mail Today* and *Times of India* (nine in the former, six in the latter) but only two (one each) are based on requests from staffers itself – the rest picking up stories from CSOs and activists. Secondly, it is cautioned that the media can distort FOI issues by focussing only on the negative or sensationalist aspects of government (Worthy and Hazell, 2013). The essence of FOI is that it’s more about the local – the pothole in the road, the local library, the decision to close allotments, and the local does not make national news (Dunion, 2011; Michener and Worthy, 2013; Worthy, 2012). Third, of course, the media industry needs to be independent enough to challenge government.
- Media use and publicity also depends on budgets – the Telegraph reportedly paid £110,000 [to a “Whitehall mole”] for the disks of MPs expenses which gave it a series of exclusives which the editor described as “money well spent in the public interest” (Tryhorn, 2009). Only a few newspapers have the financial capacity to expend such sums. Finally, the impact of the media also depends on how *other* actors, including the public and government itself, respond to media exposure (Fox 2007; Grimmelikhuisen, 2012; Hazell et al, 2010).

3.8.2 Online FOI

- Once more, there is little on how the media uses online FOI. Initial reports suggest that journalists may be reluctant to use such sites, particularly those sites which publish responses online, for fear of losing a competitive exclusive (Christensen, 2012; Ellis, 2010). Based on IFAI data, Fumega (2014) finds that between June 2003 and February 2014, media users comprise only 12% of InfoMex users (as opposed to 46% academics; 26% companies; and 16% government employees). This figure drops steeply to 0.05% if the majority categories of unreported and “other” are added. In Brasil, journalists comprise 1.27% of e-SIC requesters since the simultaneous implementation of the site and the FOI law in 2012 according to CGU data (Fumega, 2014). However, in both cases, we should bear in mind there may be an issue of unwillingness of journalists to self-report as such.
- Secondly, it is suggested that a “leak” culture still exists in media where journalists have “inside contacts”.
- In addition, the 20–30 day response period still applies online, so provides no guarantee of a quicker response online rather than offline or through email.

- Finally, there is no guarantee that an FOI query made by a journalist will have any better response than one from a normal citizen – in Italy, Menapace et al (2013) find that on the contrary, journalists (who identify themselves as such) receive a higher proportion of “mute silence” (70%) to other users (63%).

3.9 Making assumptions on low FOI request uptake

- An important point on FOI use and therefore impact is that we should not jump to conclusions if FOI requests are not made – online or offline (Hazell and Worthy, 2010; Worthy and Hazell, 2013). The authors use the example of Switzerland, where the Freedom of Information law introduced in 2007 was followed by 20 times fewer requests than the comparative two year period in the UK. They point out that Switzerland’s governance mechanism, closer to direct democracy with the use of referendums, may facilitate the “short route to accountability” (World Development Report, 2004) more than FOI requests could.
- It is also argued that a society with no law guaranteeing access to information may nevertheless operate in a relatively open fashion (Open Society Foundations, 2006). Equally, as discussed above, it is possible to have countries where a law guarantees access to information but this is short-circuited by a culture of secrecy that shapes the governing culture (Worthy and Hazell, 2013).
- All these points on making assumptions based on poor take-up of FOI apply to online interventions too – if online FOI sites are unsuccessful we need to find out *why*. It may not only be because of a failure of the site, but there may simply be other more successful mechanisms for interacting with government.

3.10 Methodological issues in assessing impact

- Related to the above point on the causes of “failure” of FOI, we need to understand better how impact or “success” is measured. Impact (whether in general or online only) is usually measured by asking questions such as how many FOI requests are made; how many are granted; how many are refused; how many are taken to appeal, and how many appeals are successful (Hazell et al, 2010; UNDP, 2006).
- But there are bigger questions such as: what is a request? Who decides whether it is acceptable or not? In all FOI regimes there are problems of defining what counts as an FOI request, and the figures of usage almost certainly understate the real volume of requests. The figures record those requests which the government has decided to treat as formal FOI requests. These are likely to be the more difficult requests; many easy requests, granted informally, do not get counted (Hazell & Worthy, 2010).
- Therefore common indicators used, including the time taken to process requests, the number of appeals undertaken, and the reduction of backlog are not necessarily the most appropriate.
- In addition, sampling is always an issue, as usually only requesters/users are the focus of research (e.g. Hazell et al, 2010 and Hazell & Worthy’s 2010 research) – what happens to those who *don’t* request? (Ewart, 2011). Srivastava estimates that despite the enthusiasm over India’s RTI Act, realistically it is likely that only 10% of India’s population are aware of it (and it is not clear how these figures are arrived at).

- And finally, what mechanisms are there to assess long term impact after initial media attention has died down (e.g. in the case of the UK's MPs' expenses?) We return to the broader "transparency to accountability" debate – we need more research on the link between requesting information and corrective action as a result, but we also need more on the value of ICTs or the internet in doing both.

4. What is the impact of FOI online vs “offline”?

- The key question in this research is *“in what circumstances, if any, can the FOI tools mySociety builds be shown to have measurable impacts on the ability of citizens to exert power over underperforming institutions?”* The reality from this preliminary literature review is that there is scarce rigorous evidence on impact of FOI – in general, and even more so in the case of online tools. Let us return to the list of FOI assumptions, to:
 - Increase government transparency
 - Increase the rights of citizens
 - Increase awareness of these rights
 - Result in a broader informed citizenry
 - Control public corruption
 - Increase government accountability
 - Increase public trust
 - Improve quality of government decision making
- Evidence in the literature cited above suggests that FOI requests and responses can be said to contribute to the first four points to some extent, but there is little evidence that it contributes to the next four, unless high profile cases are involved.
- When we talk about transparency (“any attempts (by states or citizens) to place information or processes that were previously opaque in the public domain, accessible for use by citizen groups, providers or policy-makers.” (Joshi 2013, p. 31), or “the right and the ability of citizens (and organisations, where relevant) to access government information and information about government” (Bannister and Connolly, 2011, p. 5)) and accountability (the relationship between the power holder (account provider) and delegator (account demander))” to some extent the former is being achieved, but there is still a lack of evidence on the latter.
- Technology has the ability to strengthen both, but as yet there are few studies. Those which have been undertaken show that there is no paradigm shift in the use of technology, but perhaps this is expected, as it is still young.
- In addition, there are challenges to understanding the added value of FOI online. The first is that there appear to be no comparative studies of online and offline requests in the same period, to gauge impact of each. In many cases, we do not know the method by which the FOI request was submitted – e.g. in India, is it through an official RTI portal, CSO-run call centres or via some other means? Without the ability to compare, the effect of technology or its absence when submitting FOI requests is challenging to define, let alone appraise – it may be easier to make a request, but does one get a response more speedily and effectively? Are requests made through an online channel more or less likely to be met with procedural obstacles or subject to exemptions? How many others take advantage of the “glare effect” by looking at and using databases of requests and responses which have been published online? There do not appear to be rigorous studies on any of these questions.
- There are simply so few studies of online sites that the first step is to conduct more research on their success or failure – how does the public react, how do other stakeholders react, how do governments react? Crucially, do they react in a different way to “offline” FOI requests? What are the consequences of this?

- Inevitably, technology provides the same potential benefits to FOI that it provides for T&A in general – returning to Wittemyer et al's (2014) list in Section 2.1 *but* as we have seen, because of the focus of FOI on obtaining state information rather than some other aim, the key challenges are bureaucratic. This is both in terms of official process and public perception and action. However, power dynamics between CSOs and the government, as seen in the Spence and Dinan (2011) research above, and power issues for journalists in not wanting to give up their competitive scoop are also interesting preliminary findings.
- In terms of bureaucratic process challenges, the very few pieces of work on “back end” records management when dealing with FOI requests point out that most efforts to date have focused on the “front end” of making questioning easier for the public. The broader “back end” issues of records management are not given the precedence of front-end public interfaces (Access Info Europe, 2014b; Shepherd et al, 2011). FOI is only as good as the quality of the records and information to which it provides access. Access rights are of limited value if information cannot be found when requested or, if found, cannot be relied on as authoritative. A council officer in Shepherd et al's analysis states “it's not uncommon that we don't have what's been asked for” (p. 116). Skills and training may simply not be in place to answer queries which come in and are known to be republished online. Although the same skills and training are needed to answer offline requests, mistakes are amplified online (such as in the Islington Council case above).
- Related to this, if authorities are tardy with responses and statistics are published on their progress or lack of this, we may need to think deeper about why this is the case – for example, in Goodge's analysis (2011a; 2011b) of how authorities respond to WhatDoTheyKnow in the UK, he finds that the UK Border Agency is ranked second for lateness in responding to queries, but sees this as “almost certainly a reflection of excessive workload and a shortage of staff rather than deliberate obstructionism” (although this is a presumption on his part). However, the very nature of transparency is that at least it raises these issues.
- Hazell and Worthy (2010) do state that there is some evidence that take-up of FOI, both by the public sector and by citizens, may be better where FOI laws were implemented from the 2000s onwards (“the second wave of FOI regimes”) because a broader information culture and more streamlined systems are in place.
- On the other hand, FOI and open data may contravene each other: there may be the tendency to provide responses in formats which favour paper or analogue distribution or PDFs, but which in the digital realm are considerable obstacles to re-use. Amongst many others in the “open data” movement, the Sunlight Foundation makes the plea that “in the United States many draft laws are published as PDFs and some government websites present other material in PDF and Flash formats ... Here at Sunlight we want the government to STOP publishing bills and data in PDFs and Flash and start publishing them in open, machine readable formats like XML and XSLT. What's most frustrating is Government seems to transform documents that are in XML into PDF to release them to the public, thinking that that's a good thing for citizens. Government: We can turn XML into PDFs. We can't turn PDFs into XML” (Johnson, 2009). Most recently, a UK court ruled that FOI requests should be answered in the format that the requester specifies “so far as reasonably practicable”, relating to a 2010 FOI request to Buckinghamshire County Council for information about the 11+ school entry exam which was supplied in 184 PDF pages when the requester solicited an Excel format (McNally, 2014).

- In terms of challenges of bureaucratic perception, both TuDerechoaSaber in Spain (2012; 2013) and ¿Qué Sabés? in Uruguay (Scrollini and Rodríguez, 2012) have shown that email is not regarded favourably by officials (in the case of the former, officials often point users to online forms rather than submitting requests through emails). We have also seen in the case of the AsktheEU.org and MuckRock that extra identification is asked for.
- Whether the community building and “glare effect” is successful with online FOI sites, again, there is little evidence. Scrollini and Rodríguez (2012) are unique in feeling that there is some indication from their Uruguayan site that software is not just a “mere instrument to facilitate requests” but can be seen “as an activist tool”. Their experience from the pilot project is that “we have witnessed the emergence of an online community, and we hope to organise them so eventually they can run the website and provide support to each other when making requests. There is evidence of people following requests and assisting each other in just a few months with little input”.
- Yet what is also clear in the reports from the online FOI sites is that there is, at least initially, a strong need for champions with perseverance and “activist” passion to run the sites. This is linked to the issue of sustainability and the Catch 22 situation of the success of sites – resources are needed to keep them alive, as an actively-used site is likely to build on success, but without evidence of use, other users are less likely to use it, and funders less likely to invest in it.
- Finally, while some of the issues which have arisen are directly connected to the technological element, as iterated, overall the success of FOI online is dependent on the broader FOI culture within the country – does it encourage application and openness? Are the bureaucratic procedures fair, clear and reasonable? Do citizens have to pay a fee and if so, is the fee reasonable and affordable? Are there provisions for urgency? For example, time limits should be reasonably clear. Does the law mandate or encourage a “right-to-know” approach whereby as much information as possible is automatically disclosed in a user friendly and accessible way? Will citizens be entitled to information in the form they request it? Is it an offence to shred records or lie about the existence of records in order to avoid disclosure? How does the citizen enforce the right to information? Will he or she have to go to court, or will there be an independent commissioner, commission or tribunal? Is the enforcement route accessible, inexpensive and speedy? Are there timetables laid down for providing information and strong penalties for failure to meet them? Online FOI inherits all of these issues, and faces particular challenges of its own due to its novelty.

5. Conclusions and further research

- Summing up T&A initiatives in general, Joshi wrote that “despite the popularity of such initiatives, there is little evidence to make emphatic claims about the conditions under which TAs will lead to effectiveness and impact” (Joshi, 2013, p. 30). What we appear to find in this first stage of our research before our empirical work is that while there are benefits of ICTs which apply as to T&A, specifically ease of access, potential speed of request and response, multiplier and glare effects) there are also challenges (user awareness, bureaucratic perception, back-end processes), and the field is as yet too young to have learned collectively from these.
- We need to understand how technology adds to the mix of existing institutional and political FOI challenges. The few online studies conducted do not give a great deal of confidence that public organisations respond particularly well to online queries (although again, it is difficult to say as we have no offline comparator).
- As outlined above, researchers have probed numerous areas of concern with FOI – inclusivity, privacy and security, institutional and public perception and so on – which cumulatively provide a useful framework with which to critique and explore FOI. There are examples of where FOI processes have resulted in disclosures about corruption and the abuse of power, which in concert with public and media pressure have resulted in positive changes of some sort. However, the corpus of rigorous research into the overall impact of FOI itself is small and context-specific: no generalizable conclusions about its overall success or failure can truly be made.
- What is clear is that online FOI inherits both these sets of general (or offline) concerns, along with an even more acute dearth of studies specifically focused on it. The real impact of FOI is local and personal, so we need to understand how the link between the personal to the public is made, that the media plays a complex role and while FOI works to its advantage, there may be a case of “too much transparency” for this competitive industry; that the relationship between CSOs and government is intricate, and that eventually, we simply need more on the accountability aspect (answerability and enforcement) of transparency and accountability, and to move beyond transparency itself.
- Yet the number of FOI sites, including Alaveteli installations, continues to grow around the world, driven by a diverse range of people including self-starting technologists, campaigning CSOs and outfits practising and supporting investigative journalism. With as yet scarce research, this is an opportune time to review the impact of these sites, the challenges they face and the extent to which they “can be shown to have measurable impacts on the ability of citizens to exert power over underperforming institutions” – our overall research question. Our subsequent piece of work elaborates on how we undertake this empirically.

6. References

Citations for the full set of references used in Parts 1 and 2 of this study are available for [download in CSV, BibTeX and RDF formats: <https://drive.google.com/folderview?id=0B6NzFbSua6UvR2xuV0t3NzhweFk&usp=sharing#list>].

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7. Appendix A: List of Alaveteli sites worldwide

Country	Name	URL	Went live
Argentina	Saberes tu Derecho	saberestuderecho.org.ar	Not known (now non-operational)
Australia	Right to Know	righttoknow.org.au	2012
Brasil	Queremos Saber	queremossaber.org.br	2011
Bosnia	PravoDaZnam	pravodaznam.ba	2012
Canada (Quebec)	Je Veux Savoir	jeveuxsavoir.org	2013
Czech Republic	Informace pro všechny	infoprovsechny.cz	2012
European Union	AsktheEU.org	asktheeu.org	2011
Guatemala	Guateinformada	guateinformada.org.gt	2014
Hungary	KiMitTud	kimittud.atlatszo.hu	2012
Indonesia	AksesInfoPolisi	www.aksesinfopolisi.org	Not known (now non-operational)
Israel	Ask Data	askdata.org.il	2013
Italy	Diritto di Sapere	italy.alaveteli.org	Not yet launched
Kosovo	informatazyrtare.org	informatazyrtare.org	2011 (now non-operational)
Liberia	iLab	Not known	Not yet launched
Macedonia	Слободен пристап	slobodenpristap.mk	Not known
New Zealand	FYI	fyi.org.nz	2010
Norway	Not known	mimesbronn.no	Not yet launched
Romania	NuVăSupărați.info	nuvasuparati.info	2013
Serbia	Da Znamo Svi	daznamosvi.rs/sr	2014
South Africa	askafrica.org.za	askafrica.org.za	2014
Spain	Tu derecho a saber	tuderechoasaber.es	2012
Tunisia	Marsoum 41	marsoum41.org	2013
Uganda	Ask Your Gov Uganda	AskYourGov.ug	2014
United Kingdom	WhatDoTheyKnow	https://www.whatdotheyknow.com/	2008
Ukraine	Доступ до правди	dostup.pravda.com.ua	2014
Uruguay	¿Qué Sabés?	quesabes.org	2012

8. Appendix B: List of known national government and other third party sites worldwide

Country	Name	URL	Went live
Austria	Frag den Staat	fragdenstaat.at	2013
Brasil	e-SIC	http://www.acessoainformacao.gov.br	2012
Chile	Acceso Inteligente	acesointeligente.org/AccesoInteligente/#home	2011
Chile	Portal de Transparencia	http://www.portaltransparencia.cl/	2013
Georgia	Open Data Georgia	opendata.ge	2010
Germany	Frag den Staat	fragdenstaat.de	2011
Honduras	Instituto de Acceso a la Información Pública	http://www.iaip.gob.hn/index.php/solicitud-de-informacion	Not known
India	Right to Information	https://rtionline.gov.in/	Not known
Mexico	InfoMex	https://www.infomex.org.mx/gobiernofederal/home.action	2003
Switzerland	Öeffentlichkeitsgesetz	oeffentlichkeitsgesetz.ch	2007
United States	iFOIA	www.ifoia.org/#!/	2013
United States	MuckRock	www.muckrock.com	2010