

# Institute for Development of Freedom of Information



## Access to Public Information in Georgia (2010 – 2016)

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## Foreword

Institute for Development of Freedom of Information (IDFI) has been monitoring access to public information in Georgia since 2010. Over the years the monitoring activities of IDFI have played significant role in development of freedom of information in Georgia, in identifying main trends and challenges in terms of access to information, in developing effective mechanisms of civic control, as well as in development of accountability of public sector and open governance.

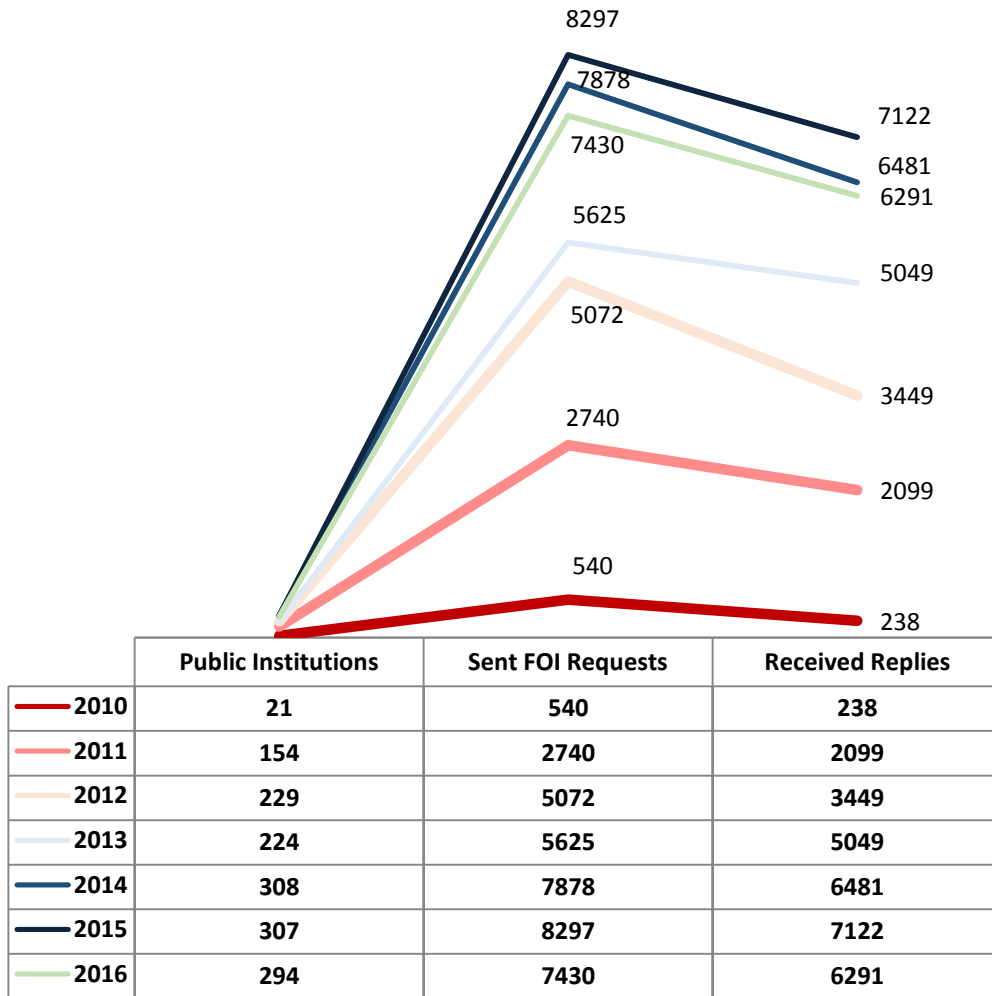
This report assesses access to information in Georgia in 2016, the practice of strategic litigation of IDFI concerning access to information, as well as analysis of trends of access to information in 2010-2016.

### Practice of Disclosure of the Public Information in 2010-2016

Within the framework of monitoring conducted by IDFI in 2010-2016, a total of **37 582** Freedom of Information (FOI) requests were sent to public institutions, and **30 729** replies were received.

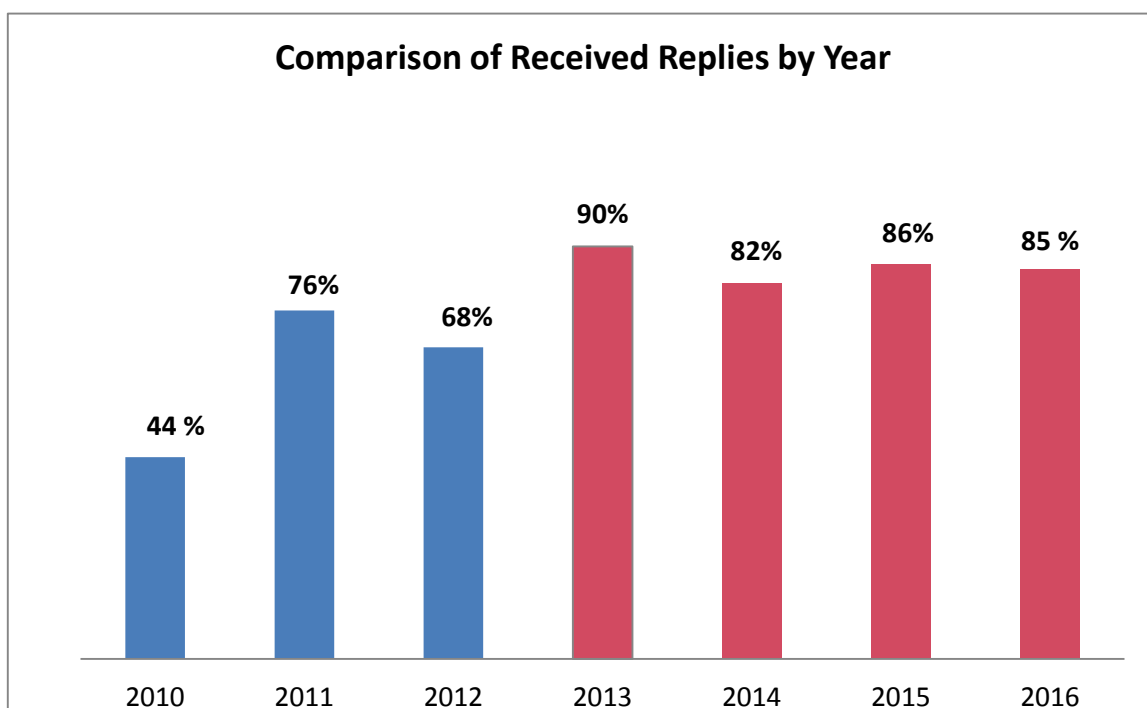
The statistics compiled by IDFI over the course of 6 years shows that the number of replies given by public institutions to FOI requests has been steadily increasing. Therefore, the data received by IDFI has been increasing too. This data is available on a web-pate ([www.opendata.ge](http://www.opendata.ge)) created in 2010, which allows visitors to get more information about issues of their interest.

### Comparative Analysis of Access to Information



It should be noted that the dynamics of comparison between sent requests and received replies often varied. In particular, only 44% of replies were received to the requests sent in 2010. In the framework of the project of 2011 the indicator increased to 76%, and in the period starting from October 2011 up to March 2012 it decreased to 68%.

Overall, during monitoring conducted in 2010-2016 **the highest rate of received information (90%) was in 2013**. In 2014 this indicator was decreased to 82%, while in 2015 the share of received replies was 86%. In 2016 the number of received replies decreased again and was 85%.



IDFI has been assessing the replies received and actions of public institutions according to the following categories:

- **Complete reply** – Exhaustive information received from a public institution in reply to a request;
- **Incomplete reply** – Information received from a public institution partially covering the request;
- **Refusal to provide public information** – refusal to disclose information by the public institution with the relevant explanation, which according to IDFI is unreasonable;
- **Unanswered response** – Inaction of the public institution, namely, evasion of public information disclosure. Legally such action is equaled to a refusal, however, IDFI compiles a separate statistics of such cases;
- **No information kept at the institution/no action taken** – Explanation of a public institution that the requested document is not kept at the entity, was forward to another public institution or no action had been implemented.

**The data provided on the diagrams below does not include the replies stating that requested document was not kept at the entity or no proper action had been implemented by a public institution.**

There is interesting trend while comparing the responses received from public institutions in 2010-2016. The lowest indicator of complete responses (33%) as well as the highest indicator of requests left without reply (48%) was in 2010. In every year since 2010 the complete responses outnumbered requests without replies.

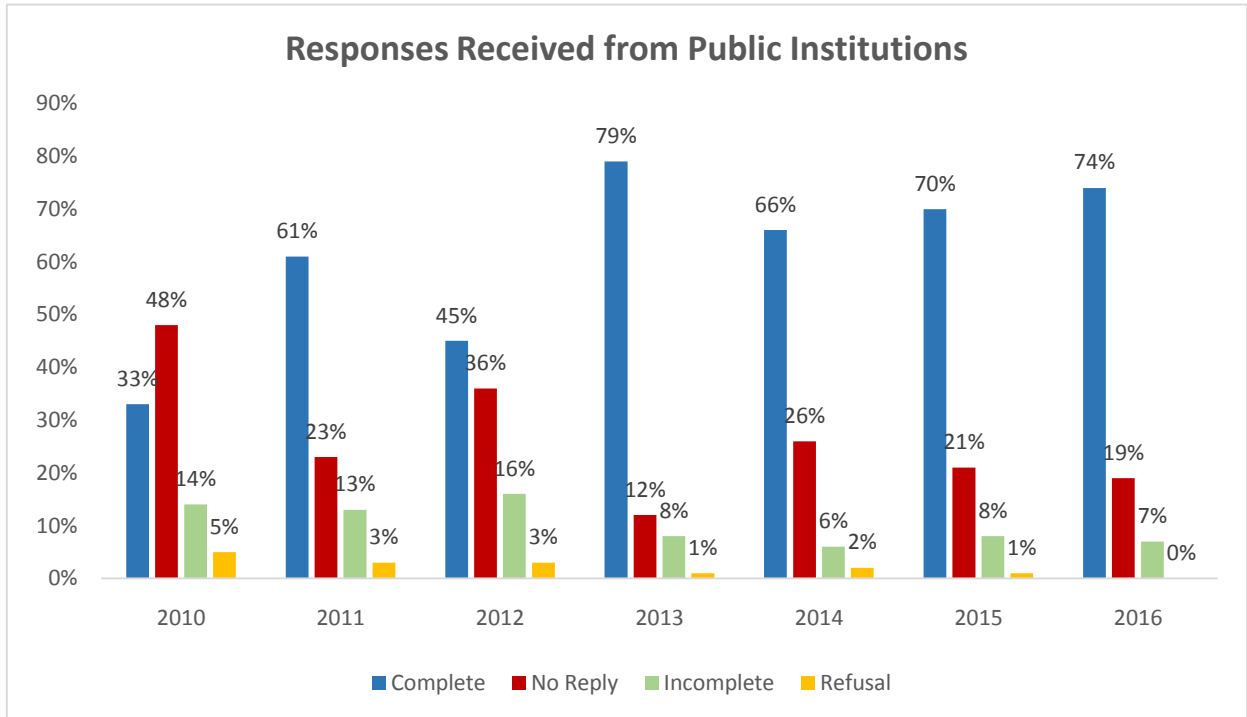
The average share of received responses in 2010-2016 is 60%; however, as shown on the chart, the situation has been often changing.

Although the number of requests left without reply has decreased, over the past 7 years on average more than a quarter of requests (26,5%) were not given any response, which is quite high indicator.

There is a positive trend in cases of incomplete replies and refusals. The highest share of incomplete responses (16%) was in 2012, however since 2013 such cases have not been more than 8%. As for refusal to release public information, during the first year of monitoring such cases were 5%, while in 2016 this indicator has decreased to 0,4%.

Comparing the data in 2010 and 2016 we can see that the share of complete responses has increased 2,2 times, requests without response decreased 2,4 times, incomplete responses decreased 2 times, while refusal to provide public information decreased from 5% to 0,4%. **We believe that one of the reasons behind such positive trend is continuous monitoring from IDFI, raising awareness activities, as well as the tradition to encourage public institutions which have distinguished themselves by ensuring access to information.**

However, the practice has been often changes over the past years. In 2016 a fifth of FOI requests was still left unanswered; a number of public institutions with high indicators of transparency in the past years, have become totally nontransparent. This indicates the need to continue monitoring of access to information, as well as awareness raising and advocacy activities.



It is also interesting to compare situation in 2010-2012 and in 2013-2016, which will show trends of different administrations in terms of access to information.

As the monitoring has shown, at the initial stage of the new administration (in 2013) the political changes had positive impact on accountability of state institutions and access to public information. In this period the indicator of complete responses increased from 45% to 79%, while requests without reply decreased from 36% to 12%.

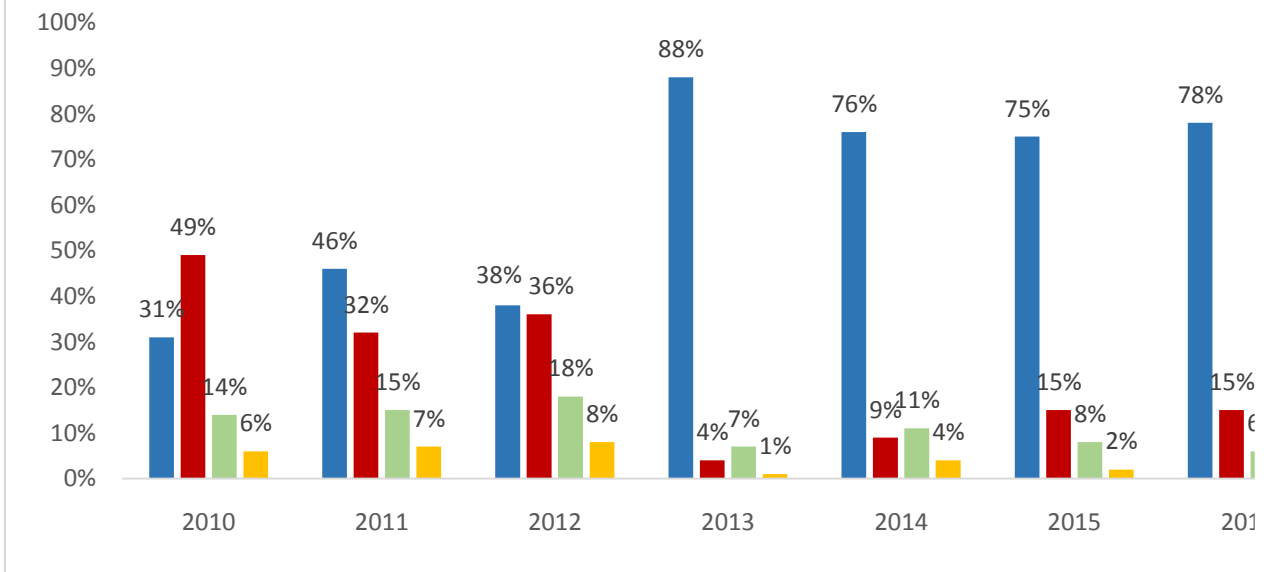
Unfortunately, the subsequent monitoring by IDFI has revealed that **in case of a number of public institutions improved quality of access to information was connected with recent political changes when public institutions had less incentives to hide any kind of information.** In 2014 the indicator of complete responses decreased from 79% to 66%, while requests without reply increased up to 26%.

In 2010-2016 there were different trends in terms of access to information by categories of public institutions.

In case of the Ministries the highest indicator of complete responses in 2010-2012 was only 46%. In 2013 the index increased up to 88%. However, in the following years a number of Ministries ceased publicizing the type information which was released by them in early 2013. This had negative impact on rating of complete responses which decreased to 76% in 2014 and 75% in 2015. In 2016 the situation is slightly better and complete responses were given in 78% of cases.

Therefore the indicator of requests left unanswered by the Ministries has varied. In 2013 it amounted to 4%, the next year (2014) it increased up to 9%, while in 2015 increased up to 15%. In 2016 the share of unanswered requests remains 15%.

## Responses Received from Ministries including Offices of State Ministries and Ministries of Adjara AR

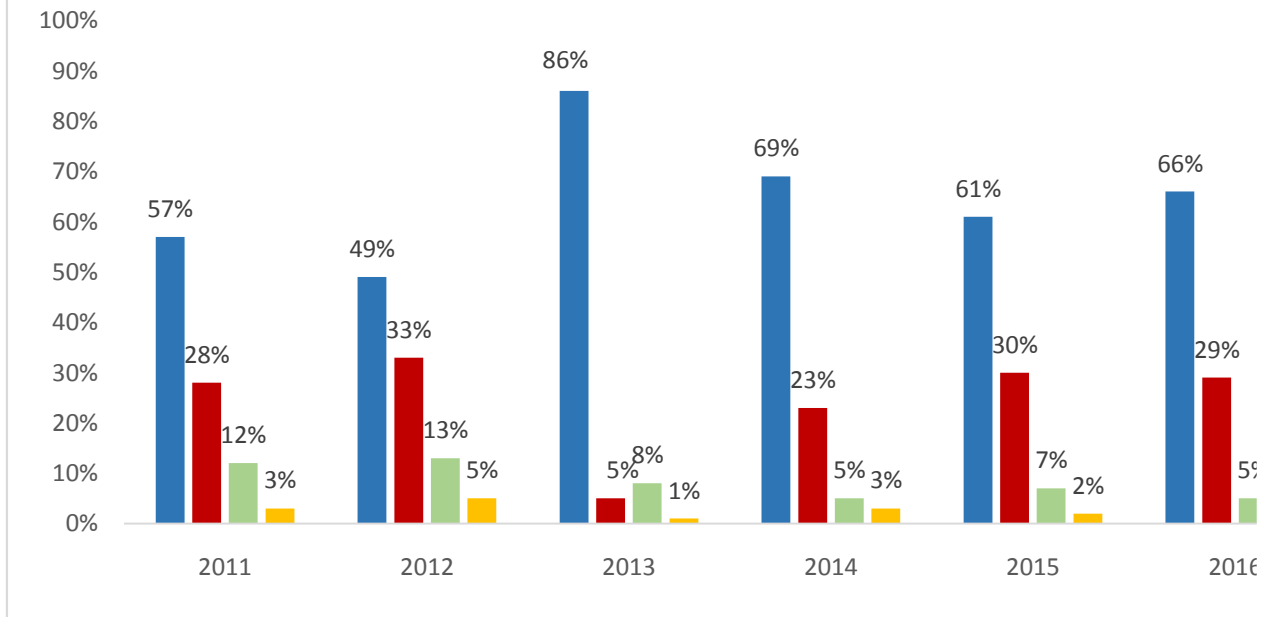


In case of the Legal Entities of Public Law subordinated to the Ministries and the sub-agencies, the lowest indicator of complete replies (49%) and the highest indicator of requests left without reply (33%) was in 2012, while the highest indicator of complete replies (86%) and the lowest indicator of unanswered requests (5%) was in 2013.

It should be noted that starting from 2014, the worsening of general index of access to information was especially due to a great number of public institutions that left FOI requests unanswered, which equals to refusal in legal terms. In particular, in 2014 the indicator of complete replies in case of sub-agencies decreased to 69%, while the number of unanswered requests increased up to 23%. The negative trend continued in 2015 and the rate of complete replies amounted to 61%, while the unanswered replies reached 30%. In 2016 the situation slightly improved and complete replies increased to 66%, while unanswered requests decreased to 29%.



## Responses Received from Ministry Sub-agencies

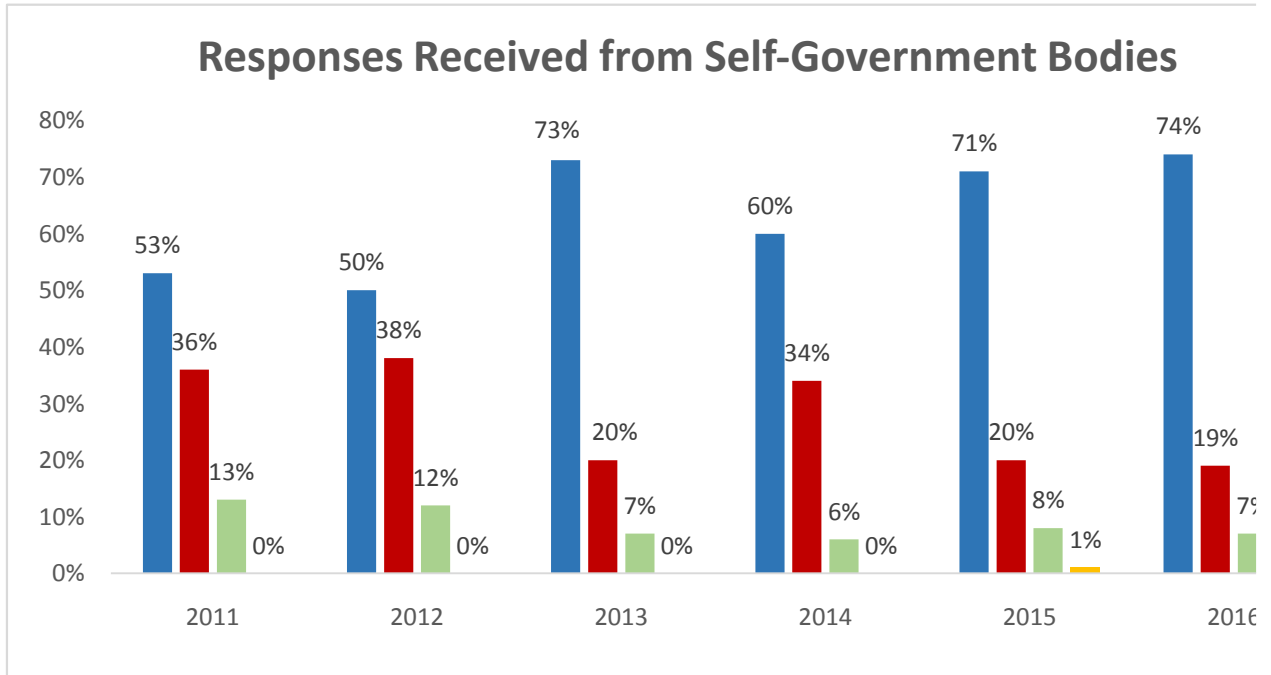


In the framework of the projects implemented in 2011-2012 the indicator of complete replies by the local self-administration bodies ranged between 50%-53%, and the indicator of requests without reply was 36%-38%. Interestingly, during the indicated period the local self-administration bodies showed higher level of accountability, compared to the central state institutions.

In 2013 the indicator of complete replies by the local self-administration bodies increased up to 73%, and the indicator of the requests left without reply decreased to 20%. During the following year (2014) the indicator of complete replies amounted to 60%, and the indicator of requests left without reply was 35%.

Improvement of general indicator of availability of the information in 2015 was mostly due to significant increase of complete replies by the local self-administration bodies. In 2015 complete replies of self-administration units compared to the previous year increased by 11%, and the requests left without reply decreased by 14%. The positive trend continued in 2016, when complete replies amounted to 74%, and unanswered requests – to 19%.

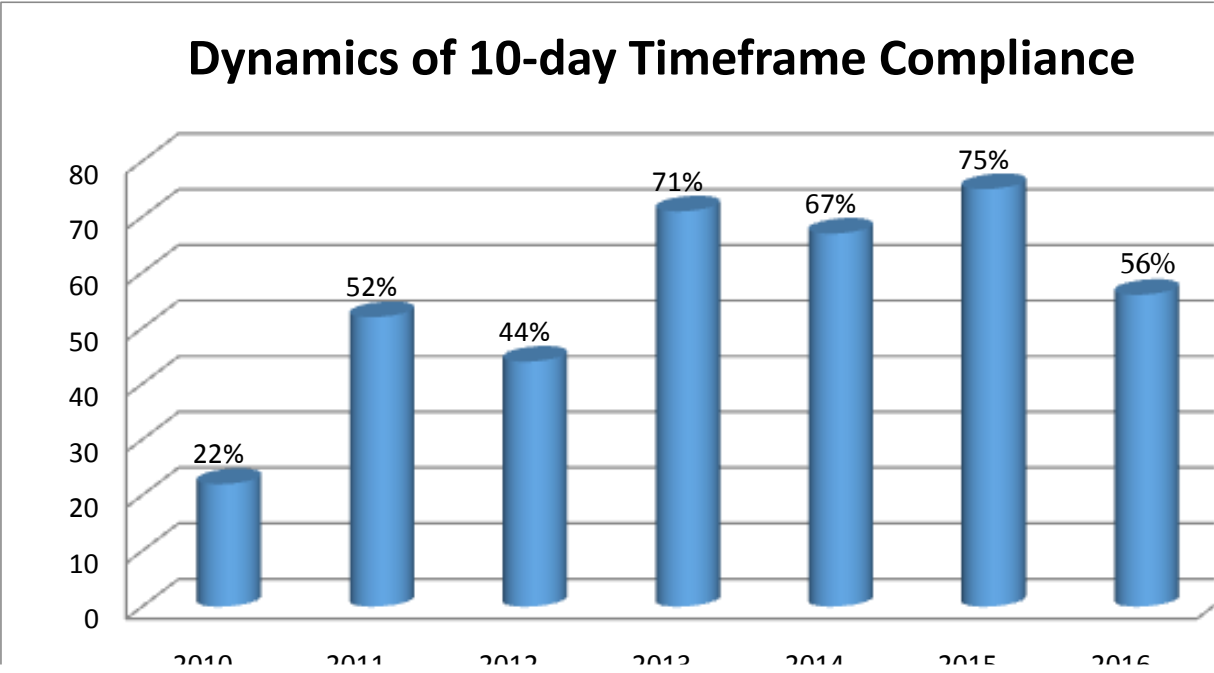
The fact shall be indicated that elections of self-administration units were held in summer 2014, therefore, the project of 2015 coincided with the early phase of the political changes in the local self-administration bodies. Therefore it can be assumed that similar to central public institutions the elections had positive but not consistent effect on access to information in self-government entities. It should also be noted that **self-government bodies is the only case when complete replies in 2016 (74%) exceeds the indicators of previous years. Also, in case of unanswered requests (19%) self-government bodies show the lowest indicator in 2016.**



#### ***The Practice of Complying with the Period of Disclosure of Information in 2010-2016***

According to the Georgian legislation, a public institution is obliged to disclose public information immediately. At the same time, a period of 10 days for disclosure can be established if the information needs processing. Considering the fact that the information requested by the Institute in 2010-2016 was sizeable in most cases, for the purposes of statistical analysis the Institute had decided to consider the 10 day-period as compliance of the timeframe.

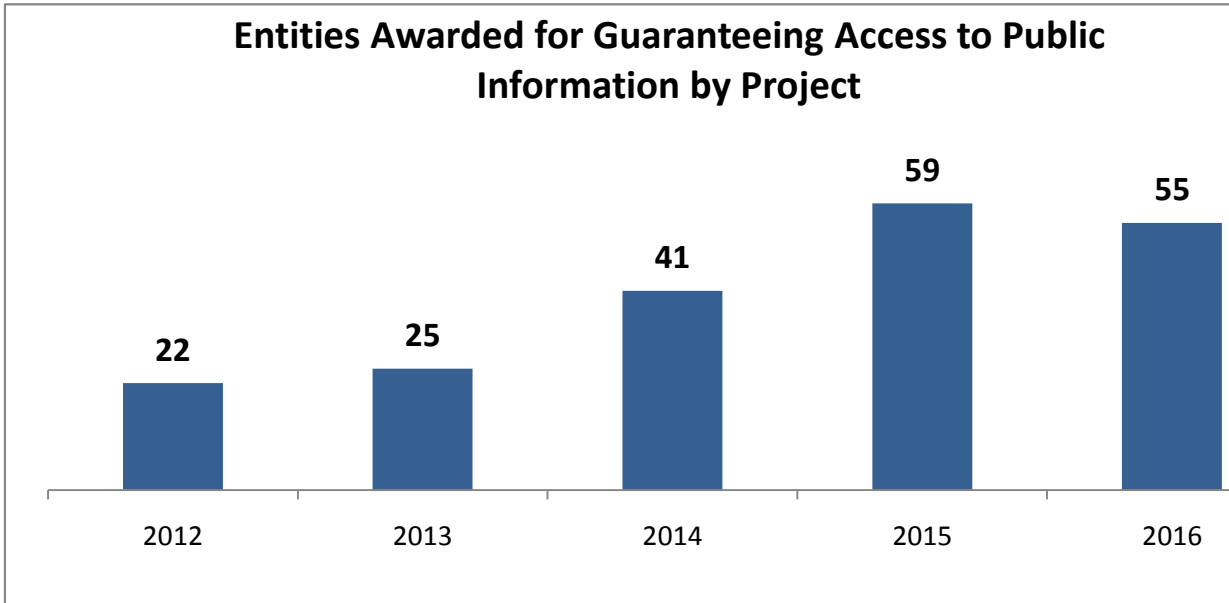
According to projects carried out in 2010-2015, the highest rate of timeframe compliance falls on the year 2015 (January-November) with 75% of timely replies. 2010 was the year with the lowest rate of compliance (22%). **In 2016 as compared to previous years the rate of timeframe compliance has worsened considerably and amounted to only 56%.**



***The Trends of Improving Access to Public Information***

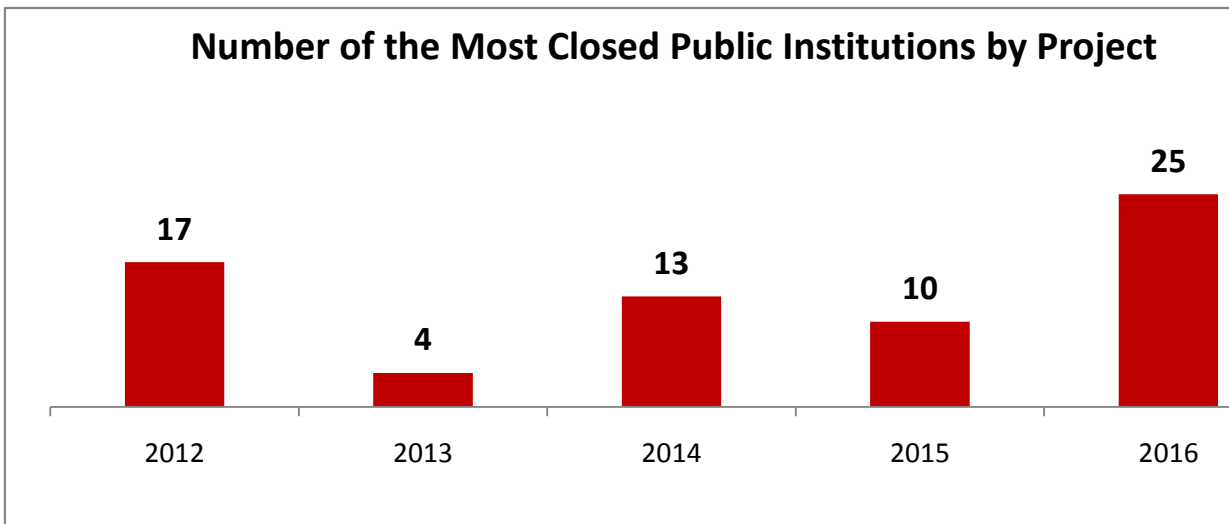
Since 2011 IDFI has established the practice of awarding public institutions with appropriate certificates based on statistical data acquired throughout the project. This practice is in line with international practice that promotes high standards of accountability and competitiveness among public institutions. Since 2011 relevant certificates are being awarded to those public institutions that replied to the requests completely, as well as the ones that did not ensure access to public information.

It is important to note that the number of public institutions awarded for completely replying to the requests has been increasing annually. Despite the fact that the indicators of access to information in Georgia vary throughout the projects, the data provided in the study shows that the tradition of awarding certificates had increased the motivation of the public institutions to comply with all the requests of IDFI within the period determined by the legislation. In 2016 the number of awarded public institutions slightly decreased and was 55.



#### *The Most Closed Public Institutions in 2010-2016*

As we mentioned above, since 2011 IDFI has been naming the public institutions with lack of accountability, the ones which did not fulfill the obligations defined by the law and did not ensure provision of public information. The least number (4) of public institutions in terms of limiting access to public information was named in 2013, while a record high (25) was in 2016.



Since 2012 IDFI has been naming the most closed public institutions in terms of access to public information. However, in 2016, IDFI named not only one entity but an entire system of Ministry of Justice, as the most closed system.

## The Most Closed Public Institutions

2012	• Ministry of Defense
2013	• Georgian National Energy and Water Supply Regulatory Commission
2014	• Penitentiary Department
2015	• Ministry of Economy and Sustainable Development of Georgia
2016	• System of the Ministry of Justice

### Access to Public Information in Georgia in 2016

IDFI analyzed access to information in Georgia in 2016 based on the replies to FOI requests sent to **294 public institutions**. These public institutions can be grouped as follows:

- **29** central public institutions (the Parliament, Administrations of the President and Government of Georgia, Ministries, Government of Adjara A/R and Ministries of Adjara A/R);
- **71** LEPLs and sub-agencies of Ministries;
- **28** independent bodies (independent LEPLs, regulatory commissions etc.);
- **142** representative and executive bodies of self-government entities (City Halls, Municipal Administrations, Municipal Councils);
- **9** Administrations of the State-Representative Governors;
- **10** state universities;
- **5** other public institutions (3 courts, 1 N(N)LE and 1 state-owned LTD)

### Requested Public Information

**In 2016 IDFI has sent 7,430 FOI requests to 294 public institutions.** There was no expectation that the requested information contained any classified or closed personal information.

Within the framework of the project, the Institute sent standardized FOI requests to public institutions. The abovementioned questions were sent in different forms to different institutions. While formulating the questions, IDFI considered the information published proactively which was provided on the websites of these institutions in compliance with the August 26, 2013 Decree of the Government of Georgia.<sup>1</sup>

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<sup>1</sup> There have been a number of significant changes in the Georgian legislation in terms of access to information over the last years. The General Administrative Code of Georgia has enshrined the notions of proactive disclosure and electronic request of public information. Therefore, the law introduced obligation of public entities to disclose information of high public interest on their electronic resources. On August 26, 2013 Decree #219 of the Government of Georgia on Electronic Request and Proactive Disclosure of Public Information

The majority of the standardized questions sent by IDFI to public institutions were related to the management of administrative funds, staff, electronic correspondence and other issues related to transparent governance.

In 2016 IDFI requested the following information as standardized FOI requests:

- **Urgent Procurement**
- **Advertising costs**
- **Bonuses**
- **Salary supplements**
- **Official visit costs**
- **Roaming costs**
- **Representation costs**
- **Purchased and replaced cars**
- **Costs of fuel consumption**
- **Remuneration of freelance workers**
- **Costs of consulting services**
- **The number of staff and freelance employees**
- **The number of dismissed employees by reasons of dismissal**
- **The information on professional experience (CV) of advisors of heads of public institutions**
- **Legal acts and explanatory notes regarding bonuses and salary supplements of officials.**
- **Legal acts on appointment of advisors to heads**
- **The number of employees in Public Relations Department and their remuneration**
- **The number and costs of PR meetings**
- **The number of public consultations**
- **Strategy of communication and involvement of private and non-government sector in the reform process**
- **Stages of ongoing reforms and meetings organized in order for involvement of private and non-government sector**

Local self-governments were additionally sent the following standardized FOI requests:

- **Number of N(N)Les and LTDs founded by the municipality**
- **Number of employees in N(N)Les and LTDs**
- **The employee lists (including remuneration) of N(N)Les and LTDs**
- **Financial and Narrative reports of N(N)Les and LTDs**
- **Salary costs of N(N)Les and LTDs (each separately)**
- **Surveys and public discussions organized by council of civic advisors**
- **Joint meetings with bureau of municipal council held by request of council of civic advisors**
- **Petitions, projects, recommendations submitted by the council of civic advisors**

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was adopted. The mentioned bylaw regulates such issues of proactive disclosure as the list of information to be disclosed, timeframes, public institutions obliged to disclose information proactively etc.

- **Reports of activities by members of municipal council**
- **Report on procurement in 2015 submitted to the municipal council**
- **Legal acts adopted in accordance with Article 85, paragraph 5 of Local Self-Government Code**

In case of state universities the following FOI requests were additionally sent:

- **Income generated from student fees**
- **Costs related to scientific-research activities**
- **Events financed by initiative of student self-governments**
- **Students sent for studies to foreign universities as part of exchange programs**
- **Costs related to scholarships of excellent students**
- **Grants received from abroad**
- **Statistical data of alumni employment**

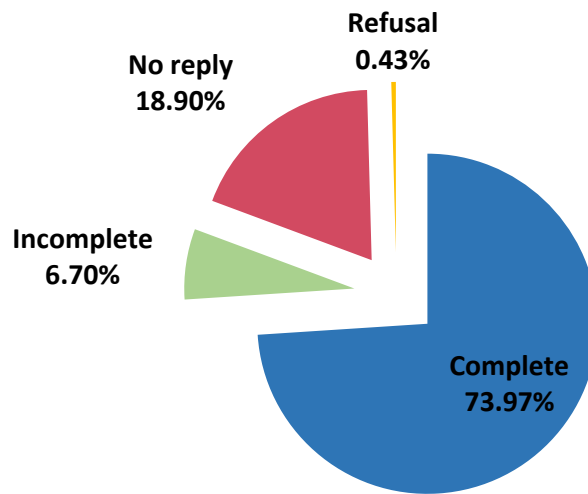
In addition to standardized requests, due to high public interest IDFI sent FOI requests to various public institutions regarding the issues that were directly related to their field of activity. The questions from citizens and interested parties received by IDFI were also included. Some of the non-standard questions were: awards given by the President of Georgia; Statistical data of citizens of Georgia illegally detained at the so called administrative borders of Tskhinvali and Abkhazia; information about implementation of universal health program; video penalties on the vehicles in temporary ownership of the MPs; documentation on procurement of clothes for Georgian sportsmen participating in Summer Olympics etc.

## **Statistics of Public Information Received in 2016**

**On 7,430 requests sent to 294 public institutions, IDFI received 4,458 complete responses, 404 incomplete responses, and 26 refusals. 1,139 requests were left unanswered and in 1,403 cases, the institutions stated that they had not conducted specific activities, or did not have requested information.**

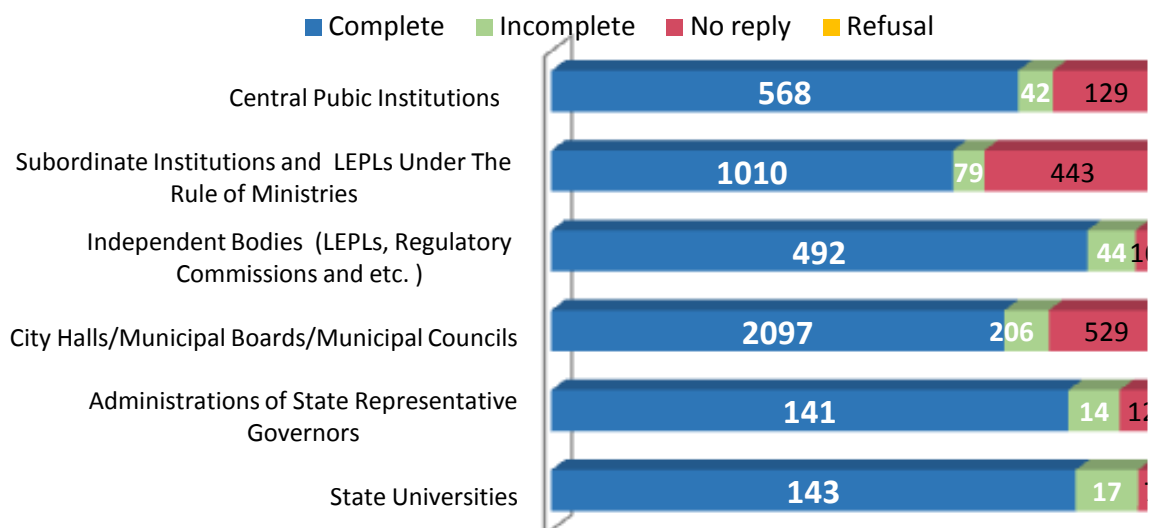
The responses indicating that no specific activities were conducted or that the institution did not have the information, is neither included in the indicators in the diagram below, nor in the indicator on the access to information. Therefore, in case of 294 agencies, the data represent replies to 6,027 FOI requests sent by the Institute.

## Received Responses



According to the categories of public institutions, the biggest share of unanswered requests falls on LEPLs and sub-agencies of Ministries. These entities were sent a total of 1540 FOI requests in 2016, out of which 443 requests were left unanswered, while in 8 cases the Institute received refusal note on the requested information.

## Received Responses According to the Categories of Public Institutions



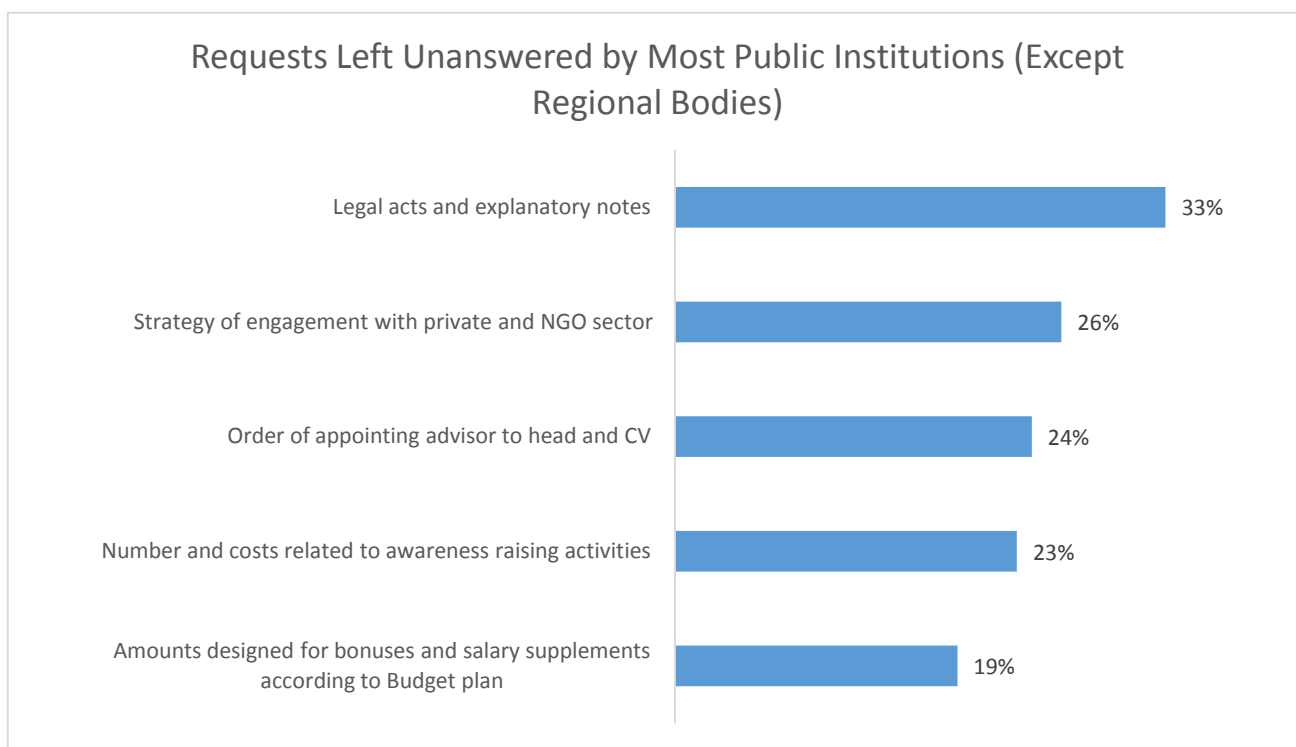


## The Most Closed Public Information in 2016

Monitoring has revealed interesting trends in terms of those standardized FOI requests that were not provided by public institutions (where no reply or refusal was received). The most public institutions (except regional bodies) – 33% - did not answer to the request of information about **legal acts of bonuses and salary supplements to public official, with corresponding appendices and explanatory notes.**

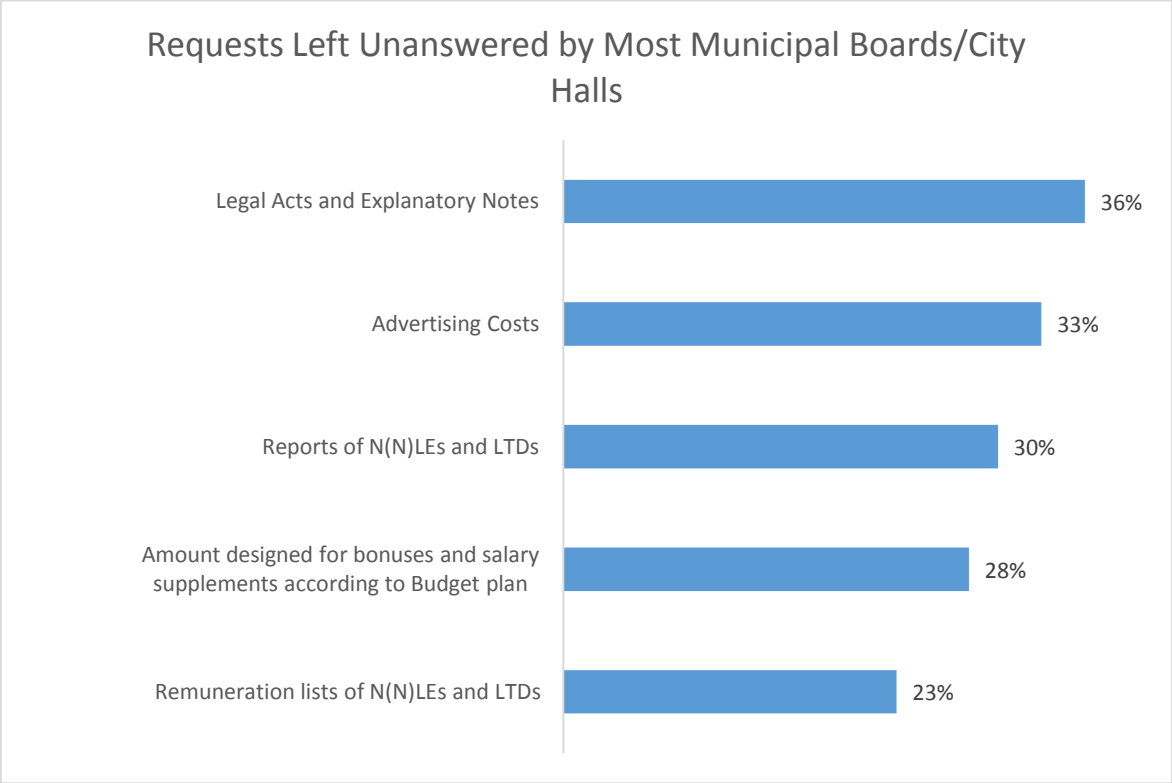
The second most closed public information is strategy of communication and engagement with private and NGO sector in the process of preparing draft law/regulation/reform – this request was left unanswered by 26% of public institutions.

Similar to the previous project, the public institutions still found problematic such requests as CV of advisors to head, as well as legal acts of appointing advisors.



Out of standardized FOI requests sent to executive bodies of self-government (city halls and municipal administrations) in 2016, as in cases of other public institutions, the most public institutions (36%) did not provide any information to the request of **legal acts (including appendices and copies of explanatory notes) on bonuses and salary supplements to public officials.**

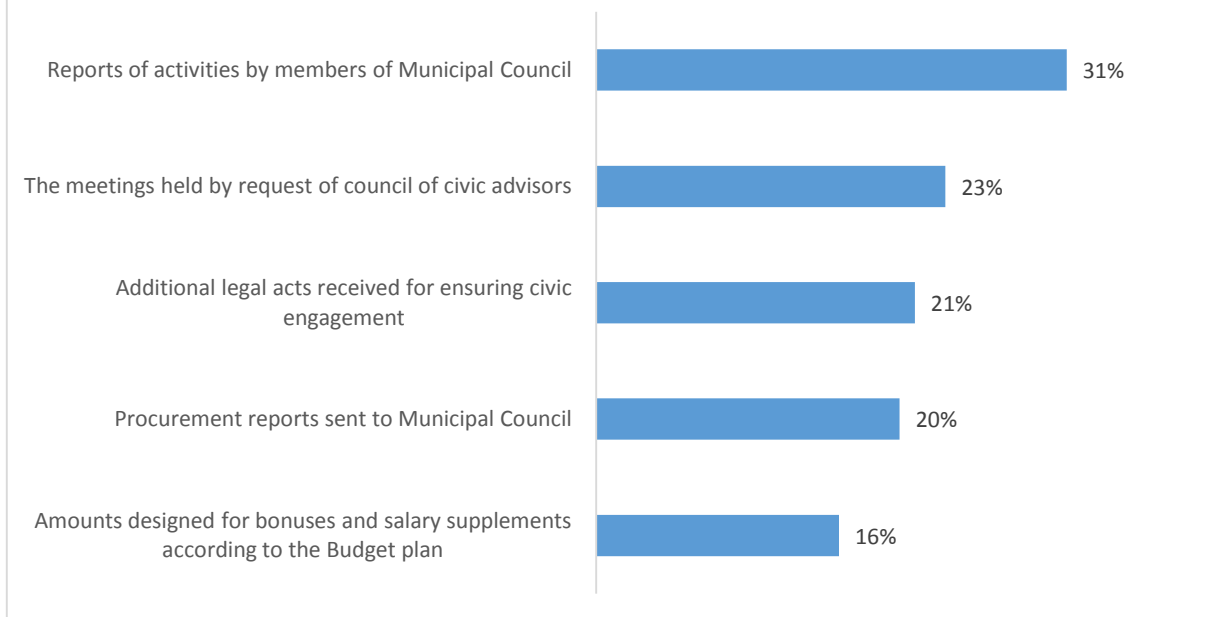
For executive bodies of local self-government the second most problematic request was information about advertising costs.



In case of representative bodies of local self-government (city councils and municipal councils), in 2016 the most public institutions (31%) did not provide information about the reports of members of councils.

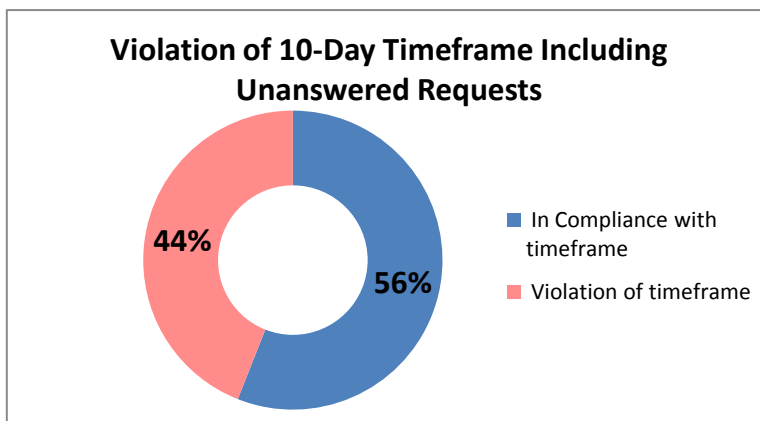
The councils also found problematic the request about number of joint meetings of bureau of council and committee of civic advisors, held by request of council of civic advisors – this request was left without reply by 23% of public institutions.

## Requests Left Unanswered by the Most Municipal Councils

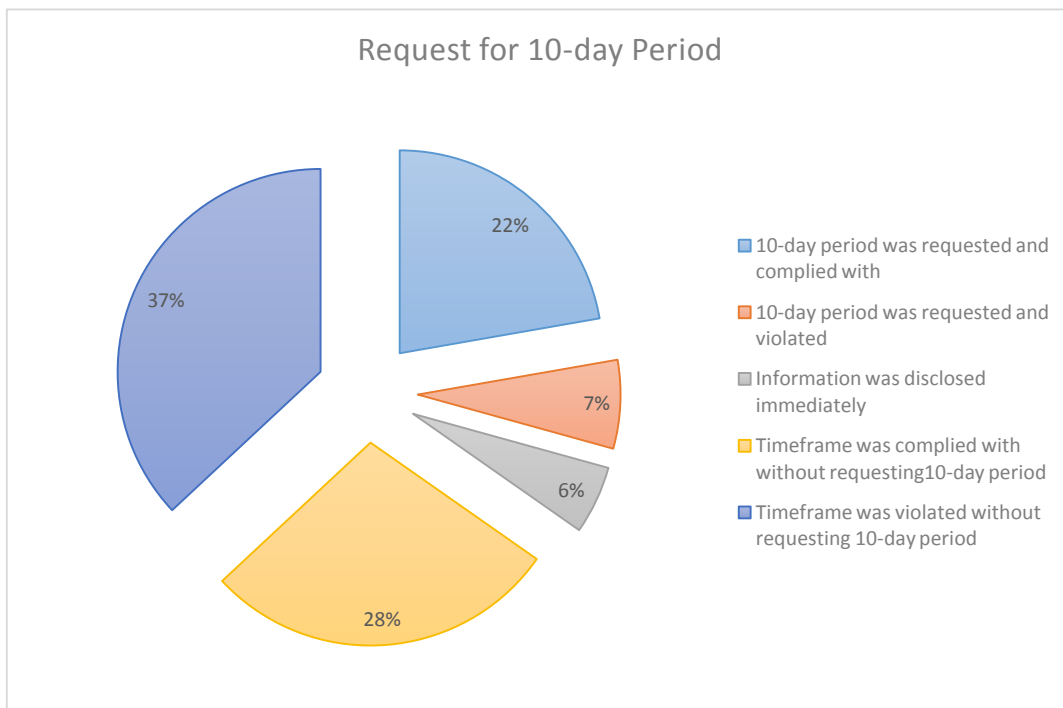


### *Timeframe Compliance*

Within the framework of the project in 2016, out of 7 430 FOI requests sent to public institutions, IDFI obtained responses in 4 161 cases within 10 day-period. Including the unanswered requests, 10 day-period regulation was violated in 3 269 cases.



Assuming that public information is instantly issued if applicant receives the information in 3 days, then responses instantly issued by the central public institutions amounted to 403 cases. The number of applications on which 10 day-period was requested and the information was provided in this period, amounts to 1653. Also, in 524 cases the 10 day period was requested, however, information was either left unanswered or provided with timeframe violation. In 2 105 cases, 10 day period was not requested, however information was provided from 4 to 10 days, while in case of 2 745 FOI requests, period approved by the law was violated without request of 10 day period.



## Ratings of Access to Information in 2016

Data revealed by the project implemented in 2016 allow us to introduce a rating of access to information.

For drawing up the ratings for public institutions the following indicators were used for assessment of access on information:

<b>Coefficients for Assessment of Received Information</b>	
Information is provided completely in compliance with 10-day timeframe	<b>1</b>
Information is provided completely in violation of 10-day time-frame	<b>0,99</b>
Information is provided incompletely in compliance with 10-day time-frame	<b>0,5</b>
Information is provided incompletely in violation of 10-day time-frame	<b>0,49</b>
Information is provided completely after filing administrative complaint	<b>0,6</b>
Information provided incompletely after filing administration complaint	<b>0,3</b>
Unjustified refusal to provide information	<b>0</b>
No reply to request	<b>0</b>

A similar methodology was used for evaluating access to information in public institutions for the past projects implemented in 2012-2015. This allows us to show trends on the cases of specific institutions.

## The Most Accountable Public Institutions

The monitoring carried out by the Institute demonstrated that in 2016 (January-November) the most complete answers with 10 day timeframe compliance were provided from the following 55 institutions:

The Most Transparent Public Institutions					
	Public Institutions	The Number of Requests	Complete	Time Compliance	Access to Information %
1	Parliament of Georgia	31	31	31	100%
2	Ministry of Environment and Natural Resources Protection of Georgia	30	30	30	100%
3	Ministry of Corrections	26	26	26	100%
4	Civil Service Bureau	26	26	26	100%
5	National Intellectual Property Center (Sakpatenti)	26	26	26	100%
6	National Center for Teacher Professional Development	26	26	26	100%
7	Ministry of Internally Displaced Persons from the Occupied Territories, Accommodation and Refugees of Georgia	24	24	24	100%
8	Office of the Personal Data Protection Inspector	24	24	24	100%
9	Mtskheta City Hall	24	24	24	100%
10	Ministry of Regional Development and Infrastructure	23	23	23	100%
11	Georgian Civil Aviation Agency	23	23	23	100%
12	Disease Control and the National Center for Public Health	23	23	23	100%
13	State Audit Office of Georgia	23	23	23	100%
14	National Environmental Agency	23	23	23	100%
15	Municipal Administration of Zugdidi Self-governing Community	23	23	23	100%
16	National Agency of Execution of Non-Custodial Sentences and Probation	22	22	22	100%
17	Legal Aid Service	22	22	22	100%
18	Land Transport Agency	21	21	21	100%
19	Standards and Metrology Center of Georgia	21	21	21	100%
20	National Statistics Office of Georgia	21	21	21	100%
21	Ministry of Health and Social Care of Adjara AR	21	21	21	100%
22	Service Agency of the Ministry of Finance of Georgia	21	21	21	100%
23	Ministry of Sport and Youth Affairs	20	20	20	100%
24	State Hydrographic Service of Georgia	20	20	20	100%
25	Children and Youth Development Fund	20	20	20	100%
26	Georgian National Museum	20	20	20	100%
27	Laboratory of Ministry of Agriculture	19	19	19	100%
28	Center of Electoral Systems Development, Reforms and Trainings	19	19	19	100%
29	Competition Agency	19	19	19	100%
30	Zugdidi City Council	19	19	19	100%

31	Administration of the State Representative Governor in Samegrelo-Zemo Svaneti Region	19	19	19	100%
32	Children and Youth National Center	18	18	18	100%
33	Khobi Municipal Council	18	18	18	100%
34	Administration of the State-Representative Governor in Samtskhe-Javakheti Region	18	18	18	100%
35	Education Management Information System	17	17	17	100%
36	Penitentiary and Probation Training Center	17	17	17	100%
37	The Unified National Body of Accreditation – Accreditation Center	17	17	17	100%
38	National Nursery	17	17	17	100%
39	The National Parliamentary Library of Georgia	17	17	17	100%
40	Gori Municipal Council	17	17	17	100%
41	Akhalsikhe Municipal Council	17	17	17	100%
42	Tbilisi State Medical University	17	17	17	100%
43	Georgian Technical University	17	17	17	100%
44	Municipal Council of Telavi Self-governing Community	16	16	16	100%
45	Municipal Council of Zugdidi Self-Governing Community	16	16	16	100%
46	Municipal Administration of Ambrolauri Self-Governing Community	16	16	16	100%
47	National Security Council of Georgia	16	16	16	100%
48	Information Centre on NATO and EU	16	16	16	100%
49	Vano Khukhunaishvili Center for Effective Governance System and Territorial Arrangement Reform	15	15	15	100%
50	Kareli Municipal Council	14	14	14	100%
51	Chiatura Municipal Council	14	14	14	100%
52	Kvareli Municipal Administration	13	13	13	100%
53	Baghdati Municipal Administration	12	12	12	100%
54	Eurasian Transport Corridor Investment Center	11	11	11	100%
55	Oni Municipal Council	10	10	10	100%

### *The Least Accountable Public Institutions*

Since 2011 IDFI has been naming the most closed public institutions revealed by monitoring. In 2016, in contrast with previous years, rather than naming one public institution, **IDFI has considered the entire system of the Ministry of Justice as the most closed public institution. 12 public institutions under the system of the Ministry of Justice were sent 346 FOI requests in 2016, and none of these were provided with a response.**

During monitoring IDFI also attempted to find out whether the public institutions under the system of the Ministry of Justice would reply to FOI requests sent by citizens and not by IDFI. On September 8<sup>th</sup>, 2016 using electronic portal my.gov.ge, one of the interns/employees of IDFI sent each public institution in the system of the Ministry of Justice FOI request with different content (without identifying IDFI). Unfortunately none of these requests were given replies either.

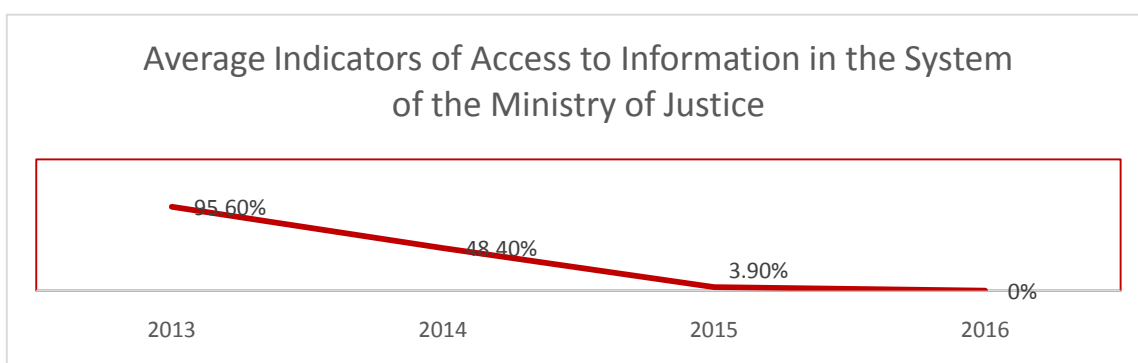
The evident worsening of access to information in the system of the Ministry of Justice has become evident since 2014, when indicator decreased from 95,6% (in 2013) to 48,4%. In 2015 the indicator further decreased to 3,9% and in 2016 it is 0%.

Such negligence of principles of accountable and transparent governance from the public officials of the institutions in the system of the Ministry of Justice is especially surprising taking into account that the Ministry of Justice is a member of supervisory board of international initiative “Open Government Partnership” and at the same time, initiator of a new draft law on “Freedom of Information”.

## The Most Closed in 2016

### System of the Ministry of Justice

N	Public Institution	Number of Requests	No Reply	Access to Information
1	Ministry of Justice	27	27	0%
2	Public Service Development Agency	29	29	0%
3	Legislative Herald of Georgia	29	29	0%
4	Public Service Hall	29	29	0%
5	National Bureau of Enforcement	29	29	0%
6	Data Exchange Agency	29	29	0%
7	Smart Logic	29	29	0%
8	National Archives of Georgia	29	29	0%
9	National Agency of Public Registry	29	29	0%
10	Notary Chamber of Georgia	29	29	0%
11	Training Center of Justice	29	29	0%
12	Center for Crime Prevention	29	29	0%



Apart from 12 public institutions in the system of the Ministry of Justice, there 14 more public institutions out of 294 administrative bodies of Georgia, which totally neglected the obligation of access to public information and left all FOI requests sent by IDFI without replies. In particular, the following public institutions did not provide IDFI with information to any FOI request:



### The Least Accountable Public Institutions in 2016

1	Revenue Service	29	29	0%
2	Municipal Administration of Apindza	25	25	0%
3	Municipal Administration of Bolnisi	25	25	0%
4	Municipal Administration of Sagarejo	25	25	0%
5	Municipal Administration of Kazbegi	25	25	0%
6	Municipal Administration of Kvareli	25	25	0%
7	Municipal Administration of Shuakhevi	25	25	0%
8	Municipal Administration of Tsalka	25	25	0%
9	Municipal Administration of Khoni	25	25	0%
10	Municipal Council of Bolnisi	23	23	0%
11	Municipal Council of Kazbegi	23	23	0%
12	Municipal Council of Shuakhevi	23	23	0%
13	Municipal Council of Tsalka	23	23	0%

### Ratings of Access to Public Information by the Categories of the Agencies

#### Central Public Institutions

Within the framework of the study in 2016, out of Central Public Institutions the most complete replies, with timeframe compliance, were made by Parliament of Georgia, **Ministry of Environment and Natural Resources, Ministry of Corrections, Ministry of Internally Displaced Persons from the Occupied Territories, Accommodation and Refugees of Georgia, Ministry of Regional Development and Infrastructure, Ministry of Sport and Youth Affairs and Ministry of Health and Social Affairs of Adjara A/R.**

Out of 29 central public institutions the lowest rate of access to information received **the Ministry of Justice (0%), the Administration of the Government of Georgia (14.7%) and the Ministry of Internal Affairs (33%).**

### Rating of Access to Information in Central Public Institutions

	Public Institution	The Number of Requests	Complete	Incomplete	Refusal	No reply	Time Compliance	Access to Information %
1	Parliament of Georgia	31	31	0	0	0	31	100%
2	Ministry of Environment and Natural Resources Protection	30	30	0	0	0	30	100%
3	Ministry of Corrections	26	26	0	0	0	26	100%
4	Ministry of Internally Displaced Persons from the Occupied Territories, Accommodation and Refugees of Georgia	24	24	0	0	0	24	100%
5	Ministry of Regional Development and Infrastructure	23	23	0	0	0	23	100%
6	Ministry of Health and Social Care of Adjara AR	21	21	0	0	0	21	100%

7	Ministry of Sport and Youth Affairs	20	20	0	0	0	20	100%
8	Ministry of Agriculture of Adjara AR	20	20	0	0	0	0	99%
9	Ministry of Education, Culture and Sport of Adjara AR	20	20	0	0	0	0	99%
10	Government of Adjara AR	20	19	1	0	0	20	97,5%
11	Office of the State Minister of Georgia on European & Euro-Atlantic Integration	21	20	1	0	0	0	96,6%
12	Administration of the President of Georgia	30	28	2	0	0	8	95,9%
13	Ministry of Labour, Health and Social Affairs of Georgia	27	24	3	0	0	27	94,4%
14	Ministry of Foreign Affairs	28	25	3	0	0	0	93,6%
15	Ministry of Energy of Georgia	20	17	3	0	0	20	92,5%
16	Office of the State Minister of Georgia for Reconciliation and Civic Equality	22	19	3	0	0	0	92,2%
17	The Office of the State Minister of Georgia for Diaspora Issues	19	17	1	1	0	19	92,1%
18	Ministry of Education and Science of Georgia	21	19	1	1	0	0	91,9%
19	Ministry of Agriculture	24	21	0	1	2	23	87,5%
20	Ministry of Finance	29	22	4	0	3	2	81,9%
21	Ministry of Culture and Monument Protection	26	19	4	2	1	25	80,8%
22	Ministry of Defense	27	20	3	0	4	3	78,9%
23	Ministry of Finance and Economy of Adjara AR	28	18	2	0	8	0	67,1%
24	Administration of South Ossetia	29	17	3	0	9	0	63,1%
25	Government of Abkhazia AR	28	16	0	0	12	16	57,1%
26	Ministry of Economy and Sustainable Development of Georgia	29	13	6	1	9	0	54,5%
27	Ministry of Internal Affairs	48	15	2	0	31	1	33%
28	Administration of the Government of Georgia	27	4	0	0	23	0	14,7%
29	Ministry of Justice	27	0	0	0	27	0	0%

The graph below visualizes the percentage change of access to information compared to previous years. Apart from the Ministry of Justice the Administration of the Government of Georgia should also be noted in terms of regress in providing public information - 91,1%\* indicator in 2015 was worsened by 76,4% and amounted to 14,7% in 2016.

In 2016 there is some progress in case of the Ministry of Economy and Sustainable Development of Georgia, which was named as the most closed public institution in 2015. The Ministry has improved its 2015 indicator by 43,7% and showed 54,5% in 2016. The Ministry of Finance also had + 27,7% progress in 2016.

## Trends of Access to Information in Central Public Institutions

	Public Institution	2016	Change	2015	Change	2014	Change	2013
1	Parliament of Georgia	100%	+12%	88%	-3,3%	91,3%	+7,9%	83,4%
2	Ministry of Environment and Natural Resources Protection of Georgia	100%	0%	100%	0%	100%	0%	100%
3	Ministry of Corrections	100%	+18%	82%	-10%	92%	+9,4%	82,6%
4	Ministry Of Internally Displaced Persons From The Occupied Territories, Accommodation And Refugees Of Georgia	100%	0%	100%	0%	100%	+6,2%	93,8%
5	Ministry of Regional Development and Infrastructure of Georgia	100%	0%	100%	+7,7%	92,3%	-7,7%	100%
6	Ministry of Health and Social Care of Adjara AR	100%	0%	100%	+0,1%	99,9%	-0,1%	100%
7	Ministry of Sport and Youth Affairs	100%	0%	100%	0%	100%	+8,3%	91,7%
8	Ministry of Agriculture of Adjara AR	99%	-1%	100%	+2,9%	97,1%	-0,3%	97,4%
9	Ministry of Education, Culture and Sport of Adjara AR	99%	-1%	100%	0%	100%	0%	100%
10	Government of Adjara AR	97,5%	-2,5%	100%	+6,3%	93,7%	+13,7%	80%
11	Office of the State Minister of Georgia on European & Euro-Atlantic Integration	96,6%	+5,3%	91,3%	+1,2%	90,1%	-9,9%	100%
12	Administration of the President of Georgia	95,9%	-0,6%	96,5%	+15,5%	81%	+31,3%	49,7%
13	Ministry of Labour, Health and Social Affairs of Georgia	94,4%	-0,1%	94,5%	+20,5%	74%	-16,8%	90,8%
14	Ministry of Foreign Affairs	93,6%	-2%	95,6%	+12,1%	83,5%	-11%	94,5%
15	Ministry of Energy of Georgia	92,5%	-5,1%	97,6%	+13,3%	84,3%	-8,6%	92,9%
16	Office of the State Minister of Georgia for Reconciliation and Civic Equality	92,2%	-1,8%	94%	+4%	90%	-10%	100%
17	The Office of the State Minister of Georgia for Diaspora Issues	92,1%	-1,1%	93,2%	+13,3%	79,9%	-17,7%	97,6%
18	Ministry of Education and Science of Georgia	91,9%	-4,5%	96,4%	+15,3%	81,1%	+7,8%	73,3%
19	Ministry of Agriculture	87,5%	+4,2%	83,3%	-12,7%	96%	+2,8%	93,2%
20	Ministry of Finance	81,9%	+27,7%	54,2%	+10,9%	43,3%	-26,7%	70%
21	Ministry of Culture and Monument Protection	80,8%	+1,5%	79,3%	-2,5%	81,8%	-9,2%	91%
22	Ministry of Defense of Georgia	78,9%	+2,2%	76,7%	-8,4%	85,1%	-2,6%	87,7%
23	Ministry of Finance and Economy of Adjara AR	67,1%	-32,9%	100%	+11,8%	88,2%	+7,1%	81,1%
24	Administration of South Ossetia	63,1%	-5,3%	68,4%	-31,1%	99,5%	+15,2%	84,3%
25	Government of Abkhazia AR	57,1%	-8%	65,1%	-23,1%	88,2%	-9,3%	97,5%

26	Ministry of Economy and Sustainable Development	54,5%	+43,7%	10,8%	-50,2%	61%	-36%	97%
27	Ministry of Internal Affairs	33%	-3,8%	36,8%	+10%	26,8%	-37,1%	63,9%
28	Administration of the Government of Georgia*	14,7%	-76,4%	91,1%	-74,8%	98,1%	+22,5%	75,6%
29	Ministry of Justice	0 %	-30,5%	30,5%	-45,9%	76,4%	-21%	97,4%

- In the report for 2015 the Administration of the Government of Georgia had indicator of access to information 23,3% instead of 91,1%, because the Administration of the Government of Georgia only provided replies to all FOI requests with 4 month delay, one day before the presentation of the report. Therefore, IDFI was unable to add this data to 2015 report.

### **Legal Entities of Public Law, Sub-agencies and Other Public Institutions**

According to the monitoring in 2016, in the category of Legal Entities of Public Law, Sub-agencies and Other Public Institutions (including sub-agencies of Ministries as well as independent LEPLs, regulatory commission etc – 99 public institutions in total) 100% indicator of access to information was shown in cases of 30 public institutions.

Out of 105 public institutions 12 have left all FOI requests of IDFI unanswered. Apart from 11 public institutions in the system of the Ministry of Justice, there is also Revenue Service among these entities.

#### **Ten Most Open LEPLs, Subordinate Institutions and other Sub-Entities**

	Public Institution	The Number of Requests	Complete	Incomplete	Refusal	No reply	Time Compliance	Access to Information %
1	Civil Service Bureau	26	26	0	0	0	26	100%
2	National Intellectual Property Center of Georgia Sakpatenti	26	26	0	0	0	26	100%
3	National Center for Teacher Professional Development	26	26	0	0	0	26	100%
4	Office of the Personal Data Protection Inspector	24	24	0	0	0	24	100%
5	Georgian Civil Aviation Agency	23	23	0	0	0	23	100%
6	Disease Control and the National Center for Public Health	23	23	0	0	0	23	100%
7	State Audit Office	23	23	0	0	0	23	100%
8	National Environmental Agency	23	23	0	0	0	23	100%
9	National Agency of Execution of Non-Custodial	22	22	0	0	0	22	100%

	Sentences and Probation							
10	Legal Aid Service	22	22	0	0	0	22	100%

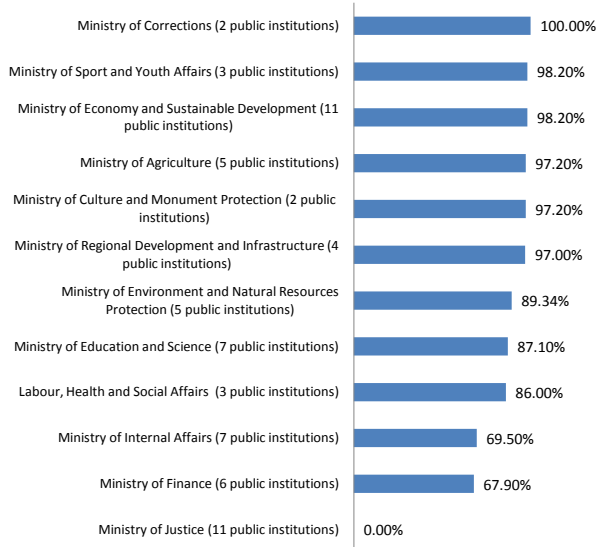
**The Least Accountable LEPLs, Subordinate Institutions and other Sub-Entities**

	Public Institution	The Number of Requests	Complete	Incomplete	Refusal	No reply	Time Compliance	Access to Information %
1	Revenue Service	29	0	0	0	29	0	29
2	Public Service Development Agency	29	0	0	0	29	0	29
3	Legislative Herald of Georgia	29	0	0	0	29	0	29
4	House of Justice	29	0	0	0	29	0	29
5	National Bureau of Enforcement	29	0	0	0	29	0	29
6	Data Exchange Agency	29	0	0	0	29	0	29
7	Smart Logic	29	0	0	0	29	0	29
8	National Archive of Georgia	29	0	0	0	29	0	29
9	National Agency of Public Registry	29	0	0	0	29	0	29
10	Notary Chamber of Georgia	29	0	0	0	29	0	29
11	Training Center of Justice	29	0	0	0	29	0	29
12	Center for Crime Prevention	29	0	0	0	29	0	29

As it was mentioned above in 2016 the least accountable public institutions were sub-entities of the Ministry of Justice (11 public institutions in total). Their average indicator of access to information in 2016 is 0%. According to monitoring in 2016 as in previous year two sub-entities of the Ministry of Corrections received the highest, 100% indicator of access to information.

In 2016, as compared to the previous year, the biggest progress of average indicator (+33,7%) was shown by sub-entities of the Ministry of Internal Affairs - 69,5%.

### Average Indicators of Access to Information in LEPLs and Ministry Sub-agencies



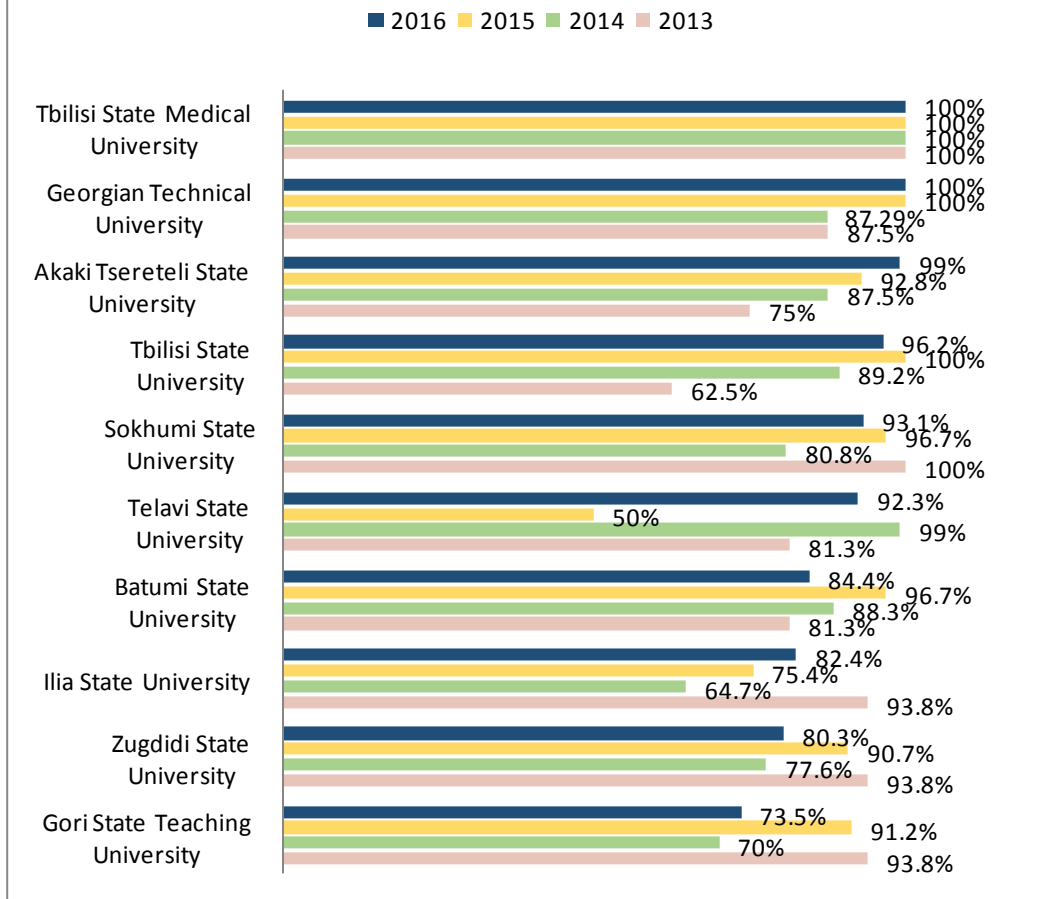
## Trends of Average Indicators of Access to Information in LEPLs and Ministry Sub-agencies

	Public Institution	2016	Change	2015	Change	2014	Change	2013
1	System of the Ministry of Corrections	100%	0%	100%	+33,3%	66,7%	-25,7%	92,4%
2	System of the Ministry of Economy and Sustainable Development of Georgia	98,2%	+4,1%	94,1%	+0,4%	93,7%	-2%	95,7%
3	System of the Ministry of Sport and Youth Affairs	98,2%	-0,1%	98,3%	13,4%	84,9%	-7,1%	92%
4	System of the Ministry of Culture and Monument Protection	97,2%	+1,9%	95,3%	+13,4%	81,9%	-3,25%	85,1%
5	System of the Ministry of Agriculture	97,2%	-0,4%	97,6%	+11,8%	85,8%	-12,1%	97,9%
6	System of the Ministry of Regional Development and Infrastructure	97%	-1,20%	98,2%	+3,9%	94,3%	-2,5%	96,8%
7	System of the Ministry of Environment and Natural Resources Protection of Georgia	89,3%	-1,86%	91,2%	-4,2%	95,4%	1,30%	94,1%
8	System of the Ministry of Education and Science of Georgia	87,1%	+1,1%	86%	-4,50%	90,5%	-2%	92,5%
9	System of the Ministry of Labour, Health and Social Affairs of Georgia	86%	+7,8%	78,2%	-10,5%	88,7%	-4,4%	93,1%
10	System of the Ministry of Internal Affairs	69,5%	+33,7%	35,8%	+15,3%	20,5%	-68,1%	88,6%
11	System of the Ministry of Finance	67,9%	+3,7%	64,2%	-16,6%	80,8%	-8,20%	89%
12	System of the Ministry of Justice	0%	-1,5%	1,5%	-44,3%	45,8%	-49,60%	95,4%

### State Universities

The highest, 100% percent indicator of access to information among State Universities have Tbilisi State Medical University and Georgian Technical University, while Telavi State University has biggest progress (+42.3%).

## Access to Information in State Universities



### City Hall, Municipal Administration, Municipal Council and Governor's Administration

Among 151 regional bodies 16 public institutions showed 100% indicator of access to information in 2016, while 12 institutions left all FOI requests of IDFI without a reply.

Ten Most Open Regional Bodies								
	Public Institution	The Number of Requests	Complete	Incomplete	Refusal	No reply	Time Compliance	Access to Information %
1	Mtskheta City Hall	24	24	0	0	0	24	100%
2	Municipal Administration of Zugdidi Self-governing Community	23	23	0	0	0	23	100%
3	Zugdidi City Council	19	19	0	0	0	19	100%
4	Administration of the Governor of Samegrelo-Zemo Svaneti Region	19	19	0	0	0	19	100%



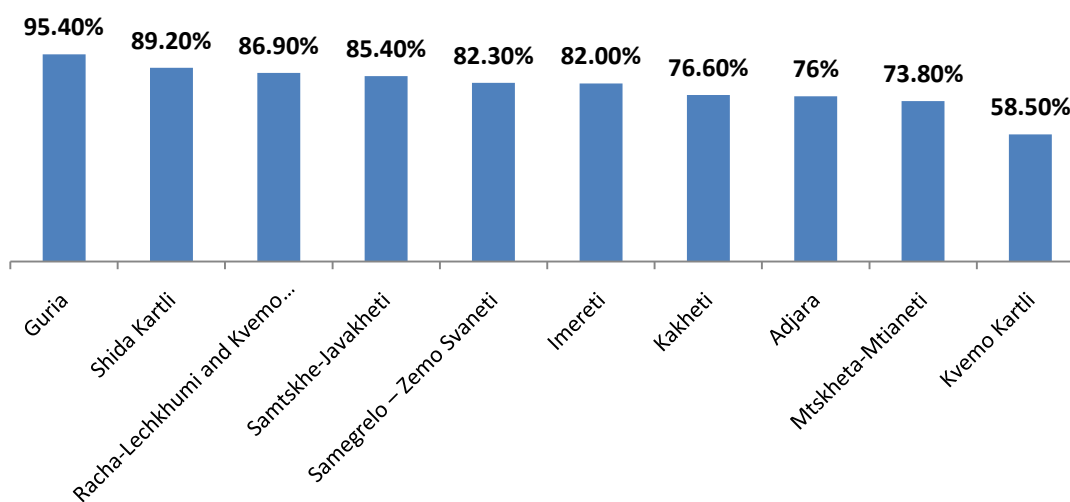
5	Khobi Municipal Council	18	18	0	0	0	18	100%
6	Administration of the Governor of Samtskhe-Javakheti Region	18	18	0	0	0	18	100%
7	Gori Municipal Council	17	17	0	0	0	17	100%
8	Akhalsikhe Municipal Council	17	17	0	0	0	17	100%
9	Municipal Council of Telavi Self-Governing Community	16	16	0	0	0	16	100%
10	Municipal Council of Zugdidi Self-Governing Community	16	16	0	0	0	16	100%

### The Least Accountable Regional Bodies

	Public Institution	The Number of Requests	Complete	Incomplete	Refusal	No reply	Time Compliance	Access to Information %
1	Municipal Administration of Khoni	25	0	0	0	25	0	0%
2	Municipal Administration of Tsalka	25	0	0	0	25	0	0%
3	Municipal Administration of Shuakhevi	25	0	0	0	25	0	0%
4	Municipal Administration of Kvareli	25	0	0	0	25	0	0%
5	Municipal Administration of Kazbegi	25	0	0	0	25	0	0%
6	Municipal Administration of Sagarejo	25	0	0	0	25	0	0%
7	Municipal Administration of Bolnisi	25	0	0	0	25	0	0%
8	Municipal Administration of Aspindza	25	0	0	0	25	0	0%
9	Municipal Council of Tsalka	23	0	0	0	23	0	0%
10	Municipal Council of Shuakhevi	23	0	0	0	23	0	0%
11	Municipal Council of Kazbegi	23	0	0	0	23	0	0%
12	Municipal Council of Bolnisi	23	0	0	0	23	0	0%

Among the regions the highest average indicator of access to information in 2016 was in Guria - 92.13%, while the lowest was in Kvemo Kartli - 58.5%. In 2016 the biggest progress in average indicators, compared to previous year, was in case of regional bodies of Guria (+13,3%).

**Average Indicators of Access to Information in Regional Bodies  
(City Halls, Municipal Boards, Municipal Councils, Administrations of the  
State Representative-Governors)**



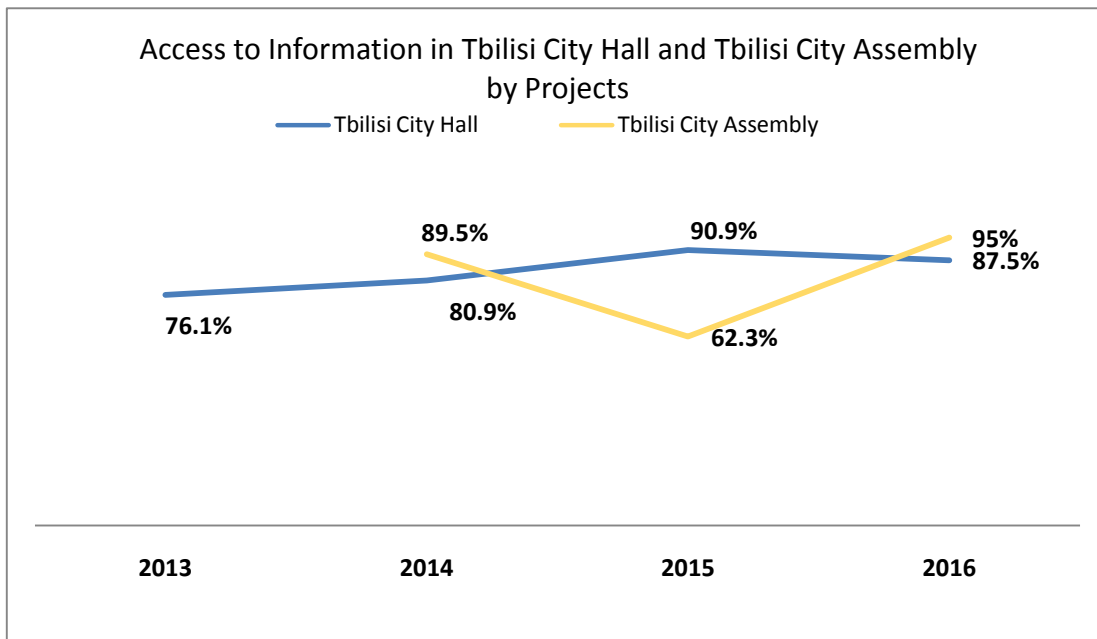
**Trends of Average Indicators of Access to Information in Regional Bodies**

	Region	2016	Change	2015	Change	2014	Change	2013
1	Guria	95,4%	<b>+13,3%</b>	82,1%	<b>+5,8%</b>	76,3%	<b>-10,7%</b>	87%
2	Shida Kartli	89,2%	<b>-2,9%</b>	92,1%	<b>+3,9%</b>	88,2%	<b>+15,6%</b>	72,6%
3	Racha-Lechkhumi and Kvemo Svaneti	86,9%	<b>+2,6%</b>	84,3%	<b>+10,6%</b>	73,7%	<b>-15,3%</b>	89%
4	Samtskhe-Javakheti	85,4%	<b>9,2%</b>	76,2%	<b>+6,2%</b>	70%	<b>-6,7%</b>	76,7%
5	Samegrelo – Zemo Svaneti	82,3%	<b>-0,9%</b>	83,2%	<b>+21%</b>	62,2%	<b>-14,6%</b>	76,8%
6	Imereti	81,7%	<b>+7%</b>	74,7%	<b>+4,5%</b>	70,2%	<b>-16,4%</b>	86,6%
7	Kakheti	76,6%	<b>-11,6%</b>	88,2%	<b>+8,7%</b>	79,5%	<b>-3,3%</b>	82,8%
8	Adjara	76%	<b>-8,3%</b>	84,3%	<b>+28%</b>	56,3%	<b>-25,3%</b>	81,6%

9	Mtskheta-Mtianeti	73,8%	-5,8%	79,6%	+0,7%	78,9%	-6,1%	85%
10	Kvemo Kartli	58,5%	-6,7%	65,2%	+14,7%	50,5%	-2,1%	52,6%

As for access to information in Tbilisi City Hall and Tbilisi City Assembly, there are different trends over the years. In case of Tbilisi City Hall the indicator of access to information in 2016 was 87.5% which is about 3% less than the indicator from previous year.

There is different situation in case of Tbilisi City Assembly. In 2016 the indicator of access to information has improved by 32.7% as compared to previous year and amounted to 95%.



## Court Practice on Disclosure of Public Information

### Introduction

IDFI has been actively engaged in strategic litigation with the hopes to increase the legal bases of access to various types of public information by setting as many legal precedents as possible.

The organization has filed several lawsuits in 2014-2016 that have had noteworthy results.

	Public Body	Subject of Dispute	FOI Date (d/m/y)	Stage
1	Ministry of Internal Affairs	Bonuses and salary supplements of public officials	13.06.2014	Compulsory enforcement
2	Revenue Service	Inspection results of free industrial zones	16.04.2016	Appealed by the defendant
3	Ministry of Economy	Administrative expenses	10.03.2015	Appealed by the defendant
4	Ministry of Justice	Work related email correspondence	10.03.2015	Appealed by IDFI
5	Tbilisi City Court	Court decisions	16.10.2015	Appealed by IDFI

### Specific Court Cases

#### **IDFI v. Ministry of Internal Affairs** <sup>2</sup>

Status: Complete

Stage: Compulsory enforcement

The case of IDFI v. Ministry of Internal Affairs (MIA) was launched in 2014, after the MIA ignored IDFI's freedom of information request on bonuses and salary supplements of Ministry officials.

The courts of all three instances (Tbilisi City Court, Tbilisi Court of Appeal and the Supreme Court) ruled in favor of IDFI and obligated the MIA to disclose public information. However, to this day, the Ministry refuses to comply with the court decision. Moreover, the MIA also refuses to comply with the request from the National Bureau of Enforcement to comply with the court decision.

#### **IDFI v. Revenue Service** <sup>3</sup>

Status: Ongoing

Stage: Appealed by the defendant

The case of IDFI v. Revenue Service was launched in 2015, after the Revenue Service refused to provide IDFI with public information on the inspection results of free industrial zones based on the argument of protecting tax secrets.

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<sup>2</sup> <https://idfi.ge/en/summary-of-the-case-idfi-vs-mia>

<sup>3</sup> <https://idfi.ge/en/free-industrial-zones>

Tbilisi City Court analyzed the legislation on confidential tax information, and concluded that it was not IDFI's intention to receive information about the free industrial zone's finances. As a result, the court found IDFI's claim to be justified, and ordered the Revenue Service to disclose information about its inspection of free industrial zones.

The decision is currently being appealed by the Revenue Service.

#### **IDFI v. the Ministry of Economy<sup>4</sup>**

Status: Ongoing

Stage: Appealed by the defendant

The case of IDFI v. the Ministry of Economy was launched in 2015, after the Ministry ignoring IDFI's freedom of information request on various administrative expenses incurred during the previous year.

Both the Tbilisi City Court and the Tbilisi Court of Appeal concluded that, since transparency was the main principle of the Georgian Budget Code, the information requested by IDFI was public and ordered the Ministry to disclose the requested expenditures.

The decision is currently being appealed by the Revenue Service.

#### **IDFI v. the Ministry of Justice**

Status: Ongoing

Stage: Appealed by IDFI

The case of IDFI v. the Ministry of Justice was launched in 2015, after the Ministry ignored IDFI's freedom of information request on copies of official emails regarding direct procurements conducted by the Ministry.

Tbilisi City Court did not satisfy IDFI's claim, stating that the requested information was not public due to it not having the form of an official document, even though the Georgian legislation clearly states that electronic information related to official duties is public information.

The decision is currently being appealed by IDFI.

#### **IDFI v. Tbilisi City Court**

Status: Ongoing

Stage: Appealed by IDFI

The case of IDFI v. Tbilisi City Court was launched in 2015, after the court refused to provide IDFI with copies of its decisions regarding the cases of former high-level public officials.

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<sup>4</sup> <https://idfi.ge/ge/idfi-vs-ministry-of-economy-and-sustainable-development>

Tbilisi City Court concluded that the decisions on cases of high-level public officials must not be made public for the purpose of protecting personal data, even though court hearings in Georgia are open and the final decisions are also announced publicly.

The decision is currently being appealed by IDFI.

## **Conclusion**

IDFI's court practice has revealed that following problems regarding access to public information in Georgia:

**I. Refusal to disclosure court decisions on cases of high-level public officials** – Common Courts in Georgia refuse to disclose their decision on cases of high public interest, such as that of the former President. This practice does not fall in line with the principle of openness of court hearings guaranteed by the Georgian Constitution. The courts do not employ the balance test between private and public interests and choose to base their arguments solely on personal data protection.

**II. Refusal to disclose email correspondence regarding official duties** – Unfortunately, both public bodies and courts in Georgia consider that work related email correspondence of public officials is not public information. The court has based its decision on the argument that email correspondence must be included in the electronic document management system in order to be considered public information, by which it has narrowed the legal concept of public information.

**III. Refusal to disclose information that may include tax secrets** – Public bodies refuse to disclose any information, including information that is supposed to be public by its nature, related to taxpayers entities based on the argument of protecting tax secrets. In this context, the decision made by Tbilisi City Court in the case of IDFI v. Revenue Service is precedential.

**IV. Refusal to comply with court decisions regarding disclosure of public information** – The fact that public bodies refuse to comply with court decisions that obligate them to disclose public information is a serious problem. In some cases, the public bodies also do not comply with the enforcement measures. These actions should clearly be classified as refusal to comply with a court decision outlined in Article 381 of the Georgian Criminal Code.

The court practice shows that Georgia does not have effective mechanisms of ensuring access to public information. The Georgian government committed to elaborate a new Law on Freedom of Information and mechanisms to ensure access to public information within the framework of various strategies and actions plans, including: the 2015-2016 National Anti-Corruption Strategy of Georgia and Action Plan,<sup>5</sup> 2014-2015 Human Rights Protection Action Plan, 2014-2015 Open Government Partnership Georgia Action Plan,<sup>6</sup> and the Association Agreement between Georgia and the EU. Despite the above commitments, to this day the Georgian government has yet to start elaborating the new Law on Freedom of Information.

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<sup>5</sup> <http://www.justice.gov.ge/Ministry/Index/174>

<sup>6</sup> <http://www.opengovpartnership.org/sites/default/files/OGP%20AP%20GEORGIA.pdf>

## 2016 Rating of Access to Public Information

N	Public Institution	Number of Requests					Time Compliance	Access to Information %
			Complete	Incomplete	Refusal	No Reply		
1	Parliament of Georgia	31	31	0	0	0	31	100%
2	Ministry of Environment and Natural Resources Protection of Georgia	30	30	0	0	0	30	100%
3	Ministry of Corrections	26	26	0	0	0	26	100%
4	Civil Service Bureau	26	26	0	0	0	26	100%
5	National Intellectual Property Center (Sakpatenti)	26	26	0	0	0	26	100%
6	National Center for Teacher Professional Development	26	26	0	0	0	26	100%
7	Ministry of Internally Displaced Persons from the Occupied Territories, Accommodation and Refugees of Georgia	24	24	0	0	0	24	100%
8	Office of the Personal Data Protection Inspector	24	24	0	0	0	24	100%
9	Mtskheta City Hall	24	24	0	0	0	24	100%
10	Ministry of Regional Development and Infrastructure	23	23	0	0	0	23	100%
11	Georgian Civil Aviation Agency	23	23	0	0	0	23	100%
12	Disease Control and the National Center for Public Health	23	23	0	0	0	23	100%
13	State Audit Office of Georgia	23	23	0	0	0	23	100%
14	National Environmental Agency	23	23	0	0	0	23	100%
15	Municipal Administration of Zugdidi Self-governing Community	23	23	0	0	0	23	100%
16	National Agency of Execution of Non-Custodial Sentences and Probation	22	22	0	0	0	22	100%
17	Legal Aid Service	22	22	0	0	0	22	100%
18	Land Transport Agency	21	21	0	0	0	21	100%
19	Standards and Metrology Center of Georgia	21	21	0	0	0	21	100%
20	National Statistics Office of Georgia	21	21	0	0	0	21	100%
21	Ministry of Health and Social Care of Adjara AR	21	21	0	0	0	21	100%
22	Service Agency of the Ministry of Finance of Georgia	21	21	0	0	0	21	100%
23	Ministry of Sport and Youth Affairs	20	20	0	0	0	20	100%

24	State Hydrographic Service of Georgia	20	20	0	0	0	20	100%
25	Children and Youth Development Fund	20	20	0	0	0	20	100%
26	Georgian National Museum	20	20	0	0	0	20	100%
27	Laboratory of Ministry of Agriculture	19	19	0	0	0	19	100%
28	Center of Electoral Systems Development, Reforms and Trainings	19	19	0	0	0	19	100%
29	Competition Agency	19	19	0	0	0	19	100%
30	Zugdidi City Council	19	19	0	0	0	19	100%
31	Administration of the State Representative Governor in Samegrelo-Zemo Svaneti Region	19	19	0	0	0	19	100%
32	Children and Youth National Center	18	18	0	0	0	18	100%
33	Khobi Municipal Council	18	18	0	0	0	18	100%
34	Administration of the State-Representative Governor in Samtskhe-Javakheti Region	18	18	0	0	0	18	100%
35	Education Management Information System	17	17	0	0	0	17	100%
36	Penitentiary and Probation Training Center	17	17	0	0	0	17	100%
37	The Unified National Body of Accreditation – Accreditation Center	17	17	0	0	0	17	100%
38	National Nursery	17	17	0	0	0	17	100%
39	The National Parliamentary Library of Georgia	17	17	0	0	0	17	100%
40	Gori Municipal Council	17	17	0	0	0	17	100%
41	Akhaltikhe Municipal Council	17	17	0	0	0	17	100%
42	Tbilisi State Medical University	17	17	0	0	0	17	100%
43	Georgian Technical University	17	17	0	0	0	17	100%
44	Municipal Council of Telavi Self-governing Community	16	16	0	0	0	16	100%
45	Municipal Council of Zugdidi Self-Governing Community	16	16	0	0	0	16	100%
46	Municipal Administration of Ambrolauri Self-Governing Community	16	16	0	0	0	16	100%
47	National Security Council of Georgia	16	16	0	0	0	16	100%
48	Information Centre on NATO and EU	16	16	0	0	0	16	100%
49	Vano Khukhunaishvili Center for Effective Governance System and Territorial Arrangement Reform	15	15	0	0	0	15	100%
50	Kareli Municipal Council	14	14	0	0	0	14	100%
51	Chiatura Municipal Council	14	14	0	0	0	14	100%
52	Kvareli Municipal Administration	13	13	0	0	0	13	100%
53	Baghdati Municipal Administration	12	12	0	0	0	12	100%



54	Eurasian Transport Corridor Investment Center	11	11	0	0	0	11	100%
55	Oni Municipal Council	10	10	0	0	0	10	100%
56	Kareli Municipal Administration	25	25	0	0	0	0	99%
57	Zugdidi City Hall	25	25	0	0	0	0	99%
58	Tskaltubo Municipal Administration	23	23	0	0	0	0	99%
59	Chokhatauri Municipal Administration	22	22	0	0	0	0	99%
60	Tsageri Municipal Administration	21	21	0	0	0	0	99%
61	Adjara Ministry of Agriculture	20	20	0	0	0	0	99%
62	Adjara Ministry of Education, Culture and Sport	20	20	0	0	0	0	99%
63	Racha-Lechkhumi Governor's Administration	17	17	0	0	0	0	99%
64	Akaki Tsereteli State University	15	15	0	0	0	0	99%
65	Ozurgeti Self-governing Community Municipal Council	14	14	0	0	0	0	99%
66	Dmanisi Municipal Council	11	11	0	0	0	0	99%
67	National Wide Agency	24	23	1	0	0	24	97,92%
68	Scientific-Research Center of Agriculture	24	23	1	0	0	24	97,92%
69	Keda Municipal Administration	24	23	1	0	0	24	97,92%
70	Akhaltikhe Self-governing Community Municipal Administration	24	23	1	0	0	24	97,92%
71	National Center for Educational Quality Enhancement	23	22	1	0	0	23	97,83%
72	Kaspi Municipal Administration	23	22	1	0	0	23	97,83%
73	Tkibuli Municipal Administration	23	22	1	0	0	23	97,83%
74	Maritime Transport Agency	22	21	1	0	0	22	97,73%
75	Gori City Hall	22	21	1	0	0	22	97,73%
76	National Tourism Administration	21	20	1	0	0	21	97,62%
77	National Bank	21	20	1	0	0	21	97,62%
78	Administration of Adjara AR	20	19	1	0	0	20	97,50%
79	National Agency of State Property	19	18	1	0	0	19	97,37%
80	Environmental Information and Education Center	19	18	1	0	0	19	97,37%
81	Batumi City Council	18	17	1	0	0	18	97,22%
82	Tetritskaro Municipal Administration	28	27	1	0	0	0	97,21%
83	Khashuri Municipal Administration	25	24	1	0	0	0	97,00%
84	Kobuleti Municipal Administration	24	23	1	0	0	0	96,92%
85	Chiatura Municipal Administration	24	23	1	0	0	0	96,92%
86	Ozurgeti Self-governing Community Municipal Administration	23	22	1	0	0	0	96,83%
87	Ozurgeti City Hall	23	22	1	0	0	0	96,83%
88	Baghdati Municipal Administration	22	21	1	0	0	0	96,73%
89	Terjola Municipal Council	15	14	1	0	0	15	96,67%
90	Keda Municipal Council	15	14	1	0	0	15	96,67%
91	Office of the State Minister of Georgia on European & Euro-Atlantic Integration	21	20	1	0	0	0	96,62%
92	Sagarejo Municipal Council	14	13	1	0	0	14	96,43%
93	Guria Governor's Administration	19	18	1	0	0	0	96,37%

94	Tbilisi State Universty	18	17	1	0	0	1	96,22%
95	Khulo Municipal Council	13	12	1	0	0	13	96,15%
96	Roads Department	25	23	2	0	0	25	96,00%
97	Public Defender's Office	25	23	2	0	0	25	96,00%
98	Central Election Commission	25	24	0	1	0	25	96,00%
99	President's Administration	30	28	2	0	0	8	95,90%
100	Technical and Constructions Supervision Agency	16	15	1	0	0	0	95,88%
101	Entrepreneurship Development Agency (Enterprise Georgia)	23	21	2	0	0	23	95,65%
102	Georgia's Innovation and Technology Agency	23	21	2	0	0	22	95,65%
103	Agricultural Cooperative Development Agency	22	20	2	0	0	22	95,45%
104	Levan Samkharauli National Forensics Bureau	21	19	2	0	0	21	95,24%
105	Gurjaani Municipal Council	13	12	1	0	0	0	95,15%
106	Tbilisi City Council	20	18	2	0	0	20	95,00%
107	Telavi Self-governing Community Municipal Administration	24	23	0	0	1	0	94,88%
108	Akhaltshikhe City Hall	24	23	0	0	1	0	94,88%
109	Mtskheta Self-governing Community Municipal Administration	24	22	2	0	0	0	94,83%
110	Financial-Analytical Service	19	18	0	0	1	18	94,74%
111	Dusheti Municipal Administration	23	21	2	0	0	0	94,65%
112	National Food Agency	28	25	3	0	0	28	94,64%
113	Gurjaani Municipal Administration	22	20	2	0	0	0	94,5%
114	Culture Heritage Protection Agency	22	20	2	0	0	0	94,45%
115	Mtskheta City Council	11	10	1	0	0	0	94,45%
116	Ministry of Health	27	24	3	0	0	27	94,44%
117	Educational and Scientific Infrastructure Development Agency	18	16	2	0	0	18	94,44%
118	Olympic Reserve Training National Centre	18	16	2	0	0	18	94,44%
119	Dusheti Municipal Council	18	17	0	0	1	17	94,44%
120	Poti City Council	18	17	0	0	1	17	94,44%
121	Kutaisi City Council	18	16	2	0	0	18	94,44%
122	Tsageri Municipal Council	16	14	2	0	0	16	93,75%
123	Ministry of Foreign Affairs	28	25	3	0	0	0	93,64%
124	Georgian National Energy and Water Supply Regulatory Commission	23	21	1	1	0	23	93,48%
125	Lanchkhuti Municipal Administration	23	20	3	0	0	23	93,48%
126	Ninotsminda Municipal Council	15	14	0	0	1	15	93,33%
127	Khashuri Municipal Council	15	13	2	0	0	15	93,33%
128	Khelvachauri Municipal Council	15	13	2	0	0	15	93,33%
129	Akhaltshikhe Self-governing Community Municipal Council	15	13	2	0	0	15	93,33%

130	Tetrtskaro Municipal Council	17	15	2	0	0	0	93,12%
131	Chokhatauri Municipal Council	17	15	2	0	0	0	93,12%
132	Sokhumi State Universty	17	15	2	0	0	0	93,12%
133	State Procurement Agency	21	18	3	0	0	21	92,86%
134	Adigeni Municipal Council	14	12	2	0	0	14	92,86%
135	Sachkhere Municipal Council	14	12	2	0	0	14	92,86%
136	Dedoplistskaro Municipal Council	16	14	2	0	0	0	92,75%
137	Ozurgeti City Council	16	14	2	0	0	0	92,75%
138	Lagodekhi Municipal Administration	24	21	3	0	0	0	92,75%
139	Ministry of Energy	20	17	3	0	0	20	92,50%
140	Lanchkhuti Municipal Council	15	13	2	0	0	0	92,33%
141	Telavi State Universty	15	13	2	0	0	0	92,33%
142	Office of the State Minister of Georgia for Reconciliation and Civic Equality	22	19	3	0	0	0	92,18%
143	Office of the State Minister of Diaspora	19	17	1	1	0	19	92,11%
144	Municipal Development Fund	19	16	3	0	0	19	92,11%
145	Ministry of Education	21	19	1	1	0	0	91,90%
146	Lentekhi Municipal Administration	21	18	3	0	0	0	91,86%
147	Aspindza Municipal Council	14	12	2	0	0	0	91,86%
148	Gori Self-governing Community Municipal Council	14	12	2	0	0	14	91,86%
149	Financial Monitoring Service	18	15	3	0	0	18	91,67%
150	State Agency for Religious Issues	18	15	3	0	0	18	91,67%
151	Kharagauli Municipal Council	12	11	0	0	1	11	91,67%
152	Telavi Municipal Council	18	16	1	0	1	17	91,67%
153	Terjola Municipal Administration	24	21	2	0	1	23	91,67%
154	Tsalenjikha Municipal Administration	23	21	0	0	2	21	91,30%
155	State Fund for Protection and Assistance of (Statutory) Victims of Human Trafficking	22	19	2	1	0	22	90,91%
156	Ambrolauri Municipal Council	11	10	0	0	1	10	90,91%
157	Veterans Affairs State Service	21	18	2	1	0	21	90,48%
158	Zestaponi Municipal Council	15	13	1	0	1	14	90,00%
159	Sighnaghi Municipal Administration	22	19	2	1	0	0	89,95%
160	Zestaponi Municipal Administration	24	21	1	0	2	22	89,58%
161	Academy of the Ministry of Finance	19	17	0	0	2	17	89,47%
162	Intelligence Service	19	17	0	1	1	18	89,47%
163	Borjomi Municipal Council	14	11	3	0	0	14	89,29%
164	Ninotsminda Municipal Administration	23	19	3	0	1	22	89,13%
165	Kutaisi City Hall	25	20	5	0	0	0	89,00%
166	Gori Self-governing Community Municipal Administration	20	16	4	0	0	0	89,00%
167	Shida Kartli Governor's Administration	18	14	4	0	0	18	88,89%
168	Adigeni Municipal Administration	24	21	1	0	2	0	88,67%
169	Chkhorotsku Municipal Administration	24	19	5	0	0	0	88,58%
170	Senaki Municipal Council	17	13	4	0	0	17	88,24%
171	Kobuleti Municipal Council	17	15	0	0	2	15	88,24%

172	Martvili Municipal Administration	23	18	5	0	0	0	88,13%
173	Ministry of Agriculture	24	21	0	1	2	23	87,50%
174	Tbilisi City Hall	28	21	7	0	0	28	87,50%
175	Security Police	21	18	1	1	1	0	87,19%
176	Mtskheta Self-governing Community Municipal Council	15	13	0	0	2	13	86,67%
177	Senaki Municipal Administration	22	17	4	1	0	22	86,36%
178	Tsalenjikha Municipal Council	18	15	1	0	2	16	86,11%
179	Marneuli Municipal Council	15	13	0	0	2	0	85,80%
180	Tianeti Municipal Council	15	12	2	0	1	0	85,73%
181	Samtredia Municipal Administration	24	19	3	0	2	22	85,42%
182	Sachkhere Municipal Administration	24	20	1	0	3	21	85,42%
183	Martvili Municipal Council	17	14	1	0	2	15	85,29%
184	State Security and Crisis Management Council	17	13	3	0	1	16	85,29%
185	Borjomi Municipal Administration	25	19	5	0	1	0	85,04%
186	National Assessment and Examinations Center	20	16	2	0	2	20	85,00%
187	Batumi State Universty	17	14	1	0	2	0	84,41%
188	Mestia Municipal Administration	25	19	4	0	2	23	84,00%
189	National Forestry Agency	27	20	5	0	2	25	83,33%
190	Khelvachauri Municipal Administration	24	19	2	0	3	21	83,33%
191	Akhalkalaki Municipal Council	15	11	3	0	1	14	83,33%
192	Kakheti Governor's Administration	18	13	4	0	1	17	83,33%
193	Vani Municipal Administration	22	18	1	0	3	0	83,23%
194	Tianeti Municipal Administration	22	15	7	0	0	0	83,09%
195	MIA Academy	20	16	1	3	0	20	82,50%
196	Dedoplistskaro Municipal Administration	24	19	2	0	3	0	82,46%
197	Chief Prosecutor's Office	24	18	4	0	2	0	82,42%
198	Ilia State Universty	18	13	4	0	1	0	82,39%
199	Ministry of Finance	29	22	4	0	3	2	81,90%
200	Batumi City Hall	23	18	2	0	3	0	81,74%
201	Akhalkalaki Municipal Administration	23	18	2	0	3	0	81,74%
202	Mestia Municipal Council	20	15	3	0	2	0	81,60%
203	Gardabani Municipal Administration	25	20	1	0	4	0	81,16%
204	Georgian National Communications Commission	22	14	8	0	0	0	80,82%
205	Ministry of Culture	26	19	4	2	1	25	80,77%
206	Office of Resource Officers of Educational Institutions	18	14	1	3	0	18	80,56%
207	Akhmeta Municipal Council	18	14	1	0	3	15	80,56%
208	Khulo Municipal Administration	24	18	3	0	3	0	80,38%
209	Zugdidi State Universty	16	11	4	0	1	0	80,31%
210	Emergency Call Center 112	21	14	6	0	1	0	80,00%
211	Ministry of Defense	27	20	3	0	4	3	78,90%
212	Chamber of Commerce & Industry	22	16	3	0	3	0	78,68%
213	Oni Municipal Administration	23	18	0	0	5	18	78,26%

214	Border Police	19	12	6	0	1	0	78,00%
215	Imereti Governor's Administration	20	14	3	0	3	17	77,50%
216	Mtskheta-Mtianeti Governor's Administration	20	15	1	0	4	16	77,50%
217	Rustavi City Hall	23	17	2	0	4	0	77,43%
218	Sighnaghi Municipal Council	20	14	3	0	3	0	76,65%
219	Marneuli Municipal Administration	25	16	6	0	3	0	75,12%
220	Kvemo Kartli Governor's Administration	18	13	1	0	4	14	75,00%
221	Vani Municipal Council	16	11	2	0	3	0	74,19%
222	Special State Protection Service	20	13	4	0	3	0	74,15%
223	Chkhorotsku Municipal Council	16	10	4	0	2	0	74,13%
224	Gori State University	17	11	3	0	3	14	73,53%
225	Tkibuli Municipal Council	11	8	0	0	3	8	72,73%
226	Dmanisi Municipal Administration	22	16	0	0	6	0	72,00%
227	Ambrolauri City Hall	23	16	1	0	6	17	71,74%
228	Rustavi City Council	18	12	2	0	4	0	71,44%
229	Investigative Service of the Ministry of Finance	17	10	4	0	3	14	70,59%
230	Abasha Municipal Administration	24	16	2	0	6	0	70,08%
231	Telavi City Hall	23	14	4	0	5	18	69,57%
232	Lentekhi Municipal Council	16	10	2	0	4	12	68,75%
233	Adjara Ministry of Finance and Economy	28	18	2	0	8	0	67,14%
234	Social Service Agency	31	20	2	0	9	0	67,03%
235	Agency of Protected Areas	25	11	11	0	3	22	66,00%
236	Kharagauli Municipal Administration	25	15	3	0	7	18	66,00%
237	MIA Service Agency	28	18	0	0	10	0	63,64%
238	Akhmeta Municipal Administration	25	15	2	0	8	0	63,32%
239	South Ossetia Administration	29	17	3	0	9	0	63,10%
240	Investment Agency	27	16	2	0	9	18	62,96%
241	Ambrolauri Self-governing Community Municipal Administration	23	13	3	0	7	0	62,35%
242	ბოჭორბოჭორბი Municipal Council	15	7	4	0	4	0	59,27%
243	State Security Service	19	9	4	6	0	0	57,21%
244	Government of Abkhazia AR	28	16	0	0	12	16	57,14%
245	Tax Ombudsman's Office	15	8	1	0	6	9	56,67%
246	National Oil and Gas Agency	23	13	0	0	10	0	55,96%
247	Ministry of Economy	29	13	6	1	9	0	54,52%
248	Abasha Municipal Council	19	9	2	0	8	11	52,63%
249	State Treasury	20	9	3	0	8	12	52,50%
250	Lagodekhi Municipal Council	19	10	0	0	9	0	52,11%
251	Shota Rustaveli National Science Fund	29	15	0	0	14	15	51,72%
252	Gardabani Municipal Council	19	9	1	0	9	0	49,47%
253	Samtredia Municipal Council	20	8	3	0	9	11	47,50%
254	Tskaltubo Municipal Council	22	10	0	0	12	0	45,00%
255	Khobi Municipal Administration	25	11	0	0	14	0	43,56%

256	Ministry of Internal Affairs	48	15	2	0	31	1	32,98%
257	Kaspi Municipal Council	17	2	5	0	10	0	26,06%
258	Healthcare Service of the MIA	29	5	5	0	19	0	25,52%
259	Poti City Hall	25	4	0	0	21	4	16,00%
260	Government Administration	27	4	0	0	23	0	14,67%
261	Municipal Council of Bolnisi	23	0	0	0	23	0	0%
262	Municipal Council of Kazbegi	23	0	0	0	23	0	0%
263	Municipal Council of Shuakhevi	23	0	0	0	23	0	0%
264	Municipal Council of Tsalka	23	0	0	0	23	0	0%
265	Municipal Administration of Apindza	25	0	0	0	25	0	0%
266	Municipal Administration of Bolnisi	25	0	0	0	25	0	0%
267	Municipal Administration of Sagarejo	25	0	0	0	25	0	0%
268	Municipal Administration of Kazbegi	25	0	0	0	25	0	0%
269	Municipal Administration of Kvareli	25	0	0	0	25	0	0%
270	Municipal Administration of Shuakhevi	25	0	0	0	25	0	0%
271	Municipal Administration of Tsalka	25	0	0	0	25	0	0%
272	Municipal Administration of Khoni	25	0	0	0	25	0	0%
273	Ministry of Justice	27	0	0	0	27	0	0%
274	Revenue Service	29	0	0	0	29	0	0%
275	Public Service Development Agency	29	0	0	0	29	0	0%
276	Legislative Herald of Georgia	29	0	0	0	29	0	0%
277	Public Service Hall	29	0	0	0	29	0	0%
278	National Bureau of Enforcement	29	0	0	0	29	0	0%
279	Data Exchange Agency	29	0	0	0	29	0	0%
280	Smart Logic	29	0	0	0	29	0	0%
281	National Archives of Georgia	29	0	0	0	29	0	0%
282	National Agency of Public Registry	29	0	0	0	29	0	0%
283	Notary Chamber of Georgia	29	0	0	0	29	0	0%
284	Training Center of Justice	29	0	0	0	29	0	0%
285	Center for Crime Prevention	29	0	0	0	29	0	0%