

Institute for Development of Freedom of Information

Access to Public Information in Georgia



Report Summarizing 2010 – 2015

The research was implemented in the framework of the project - Database of Public Information - www.opendata.ge.

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Forward

The Project "Public Information Database - opendata.ge" was one of the longest and the most successful projects of the Institute for Development of Freedom of Information (IDFI). The project was launched in 2010 with the initiative of the Open Society Georgia Foundation and its implementation was made possible by the financial support of Open Society – Georgia Foundation and Open Society Foundations. IDFI would like to express its gratitude to the Open Society Project Foundations for actively supporting the activities undertaken within the project in the duration of five years.

In our opinion the activities launched in 2010 had important positive impact on access to public information in Georgia as well as accountability of public institutions and enhancing control leverages in the hands of civil society.

Direct and indirect effects of the project can be summarized as follows:

- ca.30,000 Freedom of Information (FOI) requests were sent to public institutions;
- Quality of access to information was improved;
- First Georgian database was created - opendata.ge;
- Hundreds of research documents and articles were published on the issues of public interest;
- Standards for proactive disclosure and electronic request of public information were established;
- Standard of Open Data is being implemented;
- Draft law on Freedom of Information has been elaborated;
- Recommendations of IDFI were taken into consideration in the process of Civil Service Reform;
- As a result of strategic litigations conducted by IDFI number of important precedential decisions have been rendered by the courts improving the environment of access to public information in Georgia;
- Public awareness has increased as a result of trainings, meetings, discussions, seminars, lectures held on the topics of freedom of information and civic engagement;
- Within the framework of the project - Open Government Partnership (OGP) - IDFI has successfully advocated for higher standards of freedom of information;
- Findings of various research papers produced by IDFI have been cited in U.S Department of State Annual Country Reports on Human Rights Practices;
- OpenData.ge is widely acknowledged as the first and one of the most successful platforms of public information in Georgia.

Information and experience obtained within the project "Public Information Database - www.opendata.ge" were a solid resource for dozens of projects implemented by IDFI since 2010. The above-mentioned project contributed to the development of other activities of the Institute in the fields such as: open governance and fight against corruption, e-governance, public policy, economic and social policy, freedom of media, freedom of internet, etc.

In 5 years, the Institute has sent more than 30,000 FOI requests to more than 300 public institutions within the project "Public Information Database - www.opendata.ge". Moreover, received information was analyzed and tens of thousands of documents and data were uploaded to the webpage for public use, hundreds of administrative appeals were filed and court litigations conducted; researches, blogs and articles were published, and public meetings, presentations, discussions and lectures were conducted. Undoubtedly successful implementation of all the activities listed above would be impossible without the professionalism, expertise and active involvement of the people who have put great effort in the project along with the IDFI team. IDFI would like to express its gratitude to these individuals for their work - with the assistance of these individuals successful implementation of the project was made possible:

Since 2010 people working on "Public Information Database - www.opendata.ge" have been: Levan Avalishvili, Giorgi Kldiashvili, Nata Kobakhidze, Teona Akubardia, Sandro Kherodinashvili, Mariam Gabashvili, Ani Mdinaradze, Davit Dolidze, Sergi Jorbenadze, Tea Tseradze, Marika Kechakmadze, Tamar Iakobidze, Konstantine Janjghava, Goga Tushurashvili, Teona Turashvili, Salome Chukhua, Tamar Tolordava, Nino Tsukhishvili, Eric Jackson, Iuri Chekurishvili, Tatia Eliadze, Nino Merebashvili, Ucha Seturi, Sandro Rochikashvili, Levan Khutsishvili, Nino Kavtaradze, Mariam Levidze, Sopho Ananiashvili, Mariam Alughishvili, Londa Beria, Nana Makharashvili, Eliza Kokeladze, Salome Tarkhnishvili, Khatia Nikolaishvili, Nata Dzvelishvili, Rati Papunashvili, Elene Tskhadadze, Davit Maisuradze, Mariam Kvezereli, Tamar Sartania, Saba Buadze, Ket Topuria.

Policy Impact of the Project “Public Information Database – opendata.ge”

The project “Public Information Database – opendata.ge”, implemented by the Institute for Development of Freedom of Information (IDFI) since 2010 with the support of Open Society Georgia Foundation and Open Society Foundations, is one of the most enduring, important and successful projects of the Institute. It was mostly merit of the project that IDFI managed to secure its unique place among the Georgian Civil Society Organizations (CSO). The project has developed over the years to include increasingly diverse and comprehensive areas. Since 2010, when the first pilot version of the project was launched until today, it has played a significant role in development of Freedom of Information, as a legal institution in Georgia, as well as in revealing main trends and challenges in terms of access to information, preparing effective mechanisms for civic control, developing accountability and open governance of civil service, and forming active civil society in Georgia.

The goal of the given chapter is to assess and summarize the activities of the project over five years as well as its long-term impact on the Georgian society and public policy. Based on the types of activities, various directions of the project can be distinguished, each with its own set of achievements. Summary of each direction is given below.

- **Monitoring of access to public information;**
- **Analysis and study of public information;**
- **Evidence based advocacy;**
- **Strategic litigation;**
- **Raising social awareness;**
- **International impact.**

Monitoring of access to information

The most significant and major direction of the project is monitoring the level of access to public information in public institutions of Georgia. In order to achieve this goal thousands of requests are sent annually both to central and local government institutions.

The methodology prepared within the framework of the project enables to quantitatively measure the index of access to information in Georgia. Namely, as a result of statistical analysis of the sent and received Freedom of Information (FOI) requests the most open and closed public institutions are revealed. The analysis is based on such criteria as completeness of the information received in reply to FOI request, compliance to the timeframe, requests left unanswered, need for appealing, etc.

Since 2010 IDFI has sent over 30 000 FOI requests to public institutions. Data collected over these years allowed us to make important observations. For instance, it was interesting to compare the situation before and after the Parliamentary Elections in 2012. According to the analysis, right after the elections the index of access to information has improved significantly. However, the trend was not maintained over the next years. Despite this fact, the level of access to information has improved in comparison with 2010 - year when the pilot version of the project started. We believe that, besides possible political reasons, this improvement also derives from the continuance of the project, since as a result of thousands of FOI requests sent over the years, active advocacy process, conducted trainings and improved control from the society many public institutions have considerably improved their internal administrative regulations and the level of management of information.

As a result of quantitative analysis of the information received within the framework of the project the most open and closed public institutions have been revealed on an annual basis. These institutions were awarded with symbolic certificates from IDFI. Since 2012, when the awards were first initiated, this approach has

proved quite successful in terms of improving communication with the public institutions. The awards have increased interest of the media, as well as of public institutions. In particular, the public institutions tended to pay more attention to the requests sent as part of the project as well as to their obligation to release public information in general. Our team believes that such approach not only increases visibility of the project but above all, increases motivation of public institutions to be more accountable and transparent. Bearing this in mind, during our annual assessment we also evaluate entities which have shown either progress or regress as compared to previous years.

Improving level of accountability of public institutions has never been one of the main goals of the project. The project also aimed at providing society access to wider area of public information and granting them easier access with public information as well as promoting existence of informed society in Georgia. In order to achieve this goal, all FOI requests sent and documents received have been regularly uploaded on the electronic database www.opendata.ge. The data base was specially created for the project. It should also be noted that since February 2014 the databases of three partner CSOs (Transparency International-Georgia, Green Alternative, Georgian Young Lawyers' Association) were also incorporated in www.opendata.ge.

Analysis and study of public information

The initial goal of the project was to create electronic database and then record the sent and received information hoping that the media, researchers, students and any interested citizen would use the documents uploaded to the database in their activities. However, the project team soon realized that besides statistical analysis received public information was rich material for content analysis too. Therefore, the analysts of IDFI started to prepare studies based on the received information. Analytical blog of public information was created within the framework of the project, with up to 180 articles published on it since July 2012. The articles published on the blog cover such issues as lawful spending of administrative and budget resources, assessment of effectiveness, efficiency and appropriateness of state social and economic projects, state of affairs in terms of defense of human rights, etc. In most cases the Institute studied the issues of current importance with high public interest. E.g. the practice of awarding bonuses and salary supplements, analysis of state property given for symbolic price, analysis of regulatory policy (CT part LTD., Tbiliservice Group LTD), various statistical analysis (secret surveillance conducted by the Prosecutor's Office, murders as a result of domestic violence, number of civil servants prosecuted for illegal surveillance, number of persons with disabilities, settlements for Internally Displaced People (IDPs), number of families provided with housing, number of people infected with Hepatitis C and HIV/AIDS, number of people fined by the Patrol Police, illegal facts of cutting down trees, fishing and hunting, statistics of drug-related crime, etc.), misconducts linked with the asset declarations of senior officials, the impact of Russian money transfers on stability of Georgian economy, creeping occupation of Georgia following the 2008 war, analysis of lease agreement on Mushtaidi Park, the practice of giving property to the state free of charge, correspondence between the Administrations of President and Government regarding the residence of the President on Atoneli Street, etc.

The blog of the project has become significant source for the media as well as for researchers interested in social, political or economic issues. As of today, the blog has up to 100 followers, around 197,000 views and more than 121,500 unique visitors from more than 85 countries.

Besides blogs and short articles, the analysts have prepared dozens of studies on such topics as construction costs and scheme behind financing the new Parliament building in Kutaisi, sources of construction costs for the Houses of Justice, the institution of advisors in public entities, regulating secret surveillance in Georgia, gender-related statistics of civil servants, the analysis of capital transfers from Georgia to lobbyist companies in the USA, the number of citizens financed by the Ministry of Education and Science for studying abroad, etc.

Evidence based advocacy

The next phase of the project was evidence based advocacy, when the Institute successfully managed to achieve a number of significant changes on legislative level as well as in terms of implemented projects.

One of the biggest achievements in this regards is the amendment made to the General Administrative Code of Georgia in 2012 on proactive disclosure and electronic request of public information. With this amendment, which went into force since September 1st, 2013, modern standards of open governance were implemented in Georgia. Namely, on the one hand, the public institutions undertook obligation to disclose public information in proactively, without the need of sending FOI requests. Information to be proactively published was enshrined in special secondary legal act. In addition for the first time it became possible to send FOI requests electronically – using an e-mail address of a FOI officer, special e-form on a web-page of a particular public institution or citizen's portal www.my.gov.ge. It should also be noted, that while working on the list of information to be proactively disclosed by the public institutions, IDFI relied not only on its own rich practice of many years, but also on the recommendations received from citizens as a result of public discussions.

Another significant achievement in terms of advocacy is drafting a new law on Freedom of Information. As of today, Freedom of Information in Georgia is regulated by chapter 3 of the General Administrative Code of Georgia, and considering existing international practice as well as existing practice in Georgia, the act is quite outdated. For this reason, as a result of active advocacy from IDFI, within the framework of an international initiative “Open Government Partnership” (OGP), the Government took obligation to elaborate a new law on Freedom of Information. The draft law, prepared with the support of Open Society Georgia Foundation (OSGF) and as a result of active involvement of IDFI experts, reflects the experience gained within the scopes of the project www.opendata.ge and the recommendations prepared based on the practice. For instance, one of the most important novelties of the draft law is establishing the office of Information Commissioner. Main mandate of the new institution is monitoring the extent of access to public information in Georgia, revealing cases of misconduct and taking proper action to ensure that the right to public information is well-protected.

It should be noted, that since the launch of the project it aimed at **introducing new standards of access to information in Georgia**. As a result of successful advocacy from IDFI the Open Data standards are being gradually implemented in Georgia. E.g. within the framework of Open Government Partnership (OGP) Action Plan of Georgia for 2014-2015 the recommendations of the Institute were taken into account and an open data portal www.data.gov.ge was created.

One of the successful examples of strategic advocacy of IDFI is a number of significant changes made within the framework of the Intergovernmental Anti-Corruption Council, such as improvement of the mechanisms of whistleblower protection in public institutions, creation of a monitoring system of asset declarations of public officials, prevention of corruption in regulatory bodies, etc. Another important achievement of the strategic advocacy campaigns implemented by the Institute is the concept of Civil Service Reform, prepared with active involvement of IDFI team. The concept of Civil Service Reform includes visions to solve a number of problems revealed within the framework of the project “Public Information Database”, such as improvement of remuneration system in civil service, civil service recruitment regulations and etc.

Strategic litigation

One of the most important directions of the project “Public Information Database” has been strategic litigation. In this regard, IDFI aimed at improving practice of access to public information through litigation setting legal precedents. With this in mind, IDFI had longstanding court disputes with such public institutions as Ministry of Finance of Georgia, Ministry of Internal Affairs of Georgia, Ministry of Economy and Sustainable Development of Georgia, Ministry of Defense of Georgia, Ministry of Internally Displaced Persons from the Occupied Territories, Accommodation and Refugees of Georgia, Ministry of Justice of Georgia, the Penitentiary Department, etc. In these cases IDFI aimed at promoting development of Freedom of Information in Georgia

as well as implementing new approaches for democratic governance. Therefore, the Institute filed court appeals on the refusals from the public institutions to provide information of high public interest. As a result of strategic litigation with various public institutions the court has clearly stated that administrative costs such as, bonuses and salary supplements received by public officials, correspondence on urgent procurements, information on representational costs, costs of business trips abroad, etc. is open public information.

Another important example of successful strategic litigation of the Institute was the case of IDFI vs. Tbilisi City Court, as a result of which statistics of secret surveillance was declared to be public information. Also, as a result of advocacy from IDFI, within the framework of the obligation taken as part of OGP Action Plan, the Supreme Court of Georgia started to proactively disclose statistics of secret surveillance.

Based on the case law of IDFI it should be emphasized that since the Parliamentary Elections in 2012, one of the most important positive changes are to be found in the Judiciary branch. During 2013-2015 judges granted appeals of IDFI on the issues that had always been denied before. This fact should unequivocally be assessed as positive trend and is a proof showing that the long-lasting approach of the Judiciary to make decisions in favor of public institutions has been changing towards impartiality, objectivity and transparency.

Raising social awareness

The problematic cases revealed as a result of continuous monitoring and study during the project often attracted the interest of the media as well as broader society. This way the level of social awareness has substantially increased on such issues as the problems of gender equality and nepotism in civil service, facts of unreasonable spending of budget, practice of management of infrastructure projects and procurements, lack of civic engagement in the decision-making process, etc. The studies prepared within the framework of the project contributed to formation of public opinion, making the need for better regulation more obvious.

At the same time, along with increased visibility of the project, more and more citizens approached IDFI for consultation on FOI related issues. Despite limited human resources IDFI assists every citizen, both in terms of legal consultation and obtaining public information. **For instance, in 2015 on average 30 people approached IDFI per month for consultations, receiving information or legal assistance. Hundreds of FOI questions were sent within the scopes of the project upon requests from citizens or legal entities.** The received information was analyzed and uploaded on Public Information Database.

IDFI is also often approached by researchers, journalists, bloggers and students in order to receive additional information on analytical materials (reports, studies, articles, blogs, announcements) published by the Institute.

IDFI has always believed that improving accountability of the government, promoting transparency of policy-making process and ensuring effective implementation of the reforms could only be possible in the environment of existing active society. Therefore, one of the main goals of the project “Public Information Database – www.opendata.ge” has been increasing civic engagement in the process of controlling government transparency, openness and accountability. With this goal in mind, **the team of IDFI has conducted dozens of trainings and lectures** for civil servants, representatives of local self-governments, journalists, representatives of non-governmental organizations (NGOs), students and pupils on such topics as improving mechanisms of civic engagement, procedures to receive public information, accountable governance and etc.

International impact of the project

The success of the project was one of the significant factors contributing to active involvement of IDFI in “Open Government Partnership” (OGP) Initiative. As a result IDFI became one of the leading CSOs of OGP Georgia. Georgia joined the initiative in 2011. Since 2013 IDFI is a member of Open Government Georgia Forum. In addition the Director of IDFI was selected as a Co-Chairman of the forum in 2013. Within the framework of the

initiative many important changes were implemented in the field of Freedom of Information, such as proactive disclosure and electronic request of public information, creation of Open Data portal, implementing new mechanisms for corruption prevention, etc.

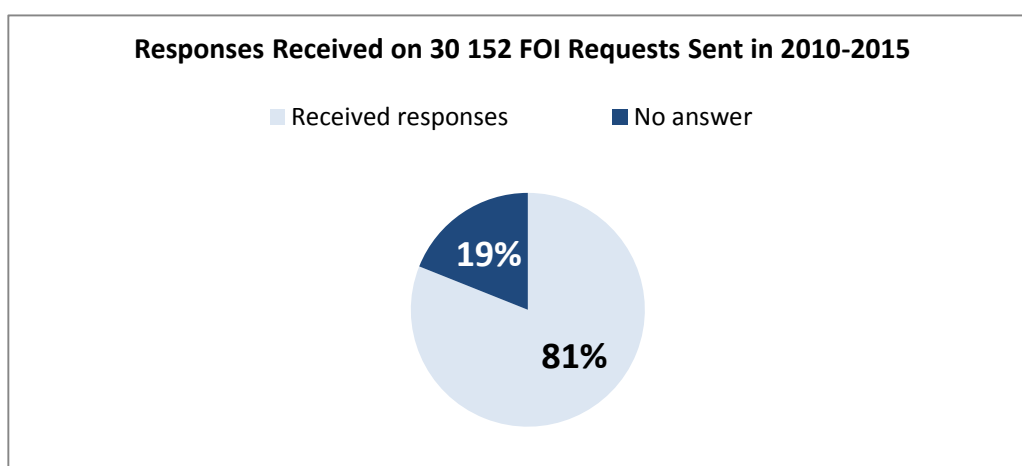
Important indicator of the success and international recognition of the project is the fact that since 2012 statistical data published by IDFI within the framework of the project are included in U.S Department of State annual Country Reports on Human Rights Practices and numerous findings of various studies prepared by the Institute are cited in the reports. For instance, the 2013 report refers to analysis of IDFI on improved access to public information in Georgia. The 2014 report includes observations of IDFI on the existing achievements and challenges in terms of Freedom of Information, such as difficulty to receive business-related electronic correspondence of public officials.

In 2014 the web-page of the project OpenData.ge was included in the international impact assessment of FOI platforms, conducted by a British organization mySociety. The study was based on findings from 27 FOI platforms from Europe, South Africa, the US, the UK, Canada, etc. **As a result of comparative analysis of international practice, the success of OpenData.ge was noted in a number of areas.** As the study demonstrated, while establishment of FOI platforms dates back to 2007, most platforms were developed quite recently, between 2011 and 2013. In this light, as Georgian OpenData.ge has been first launched in 2010, it is one of the oldest FOI platforms available. Georgian OpenData.ge has been mentioned in the impact assessment study as one of the successfully developing FOI platforms which is not based on Alaveteli software developed by MySociety. As for research activities, Georgian OpenData.ge is mentioned as a case when the authors of the platform prepare analytical material based on received public information on their own, thus preparing ready stories for media coverage and making the data easily accessible for bigger number of people. Moreover, Georgian OpenData.ge has been viewed as one of the good examples of CSO partnership, when three other CSOs joined the platform three years after its launch.

Thus, successful implementation of the project has considerably contributed to increased importance of Freedom to Information related topics in Georgia both at the domestic and international level.

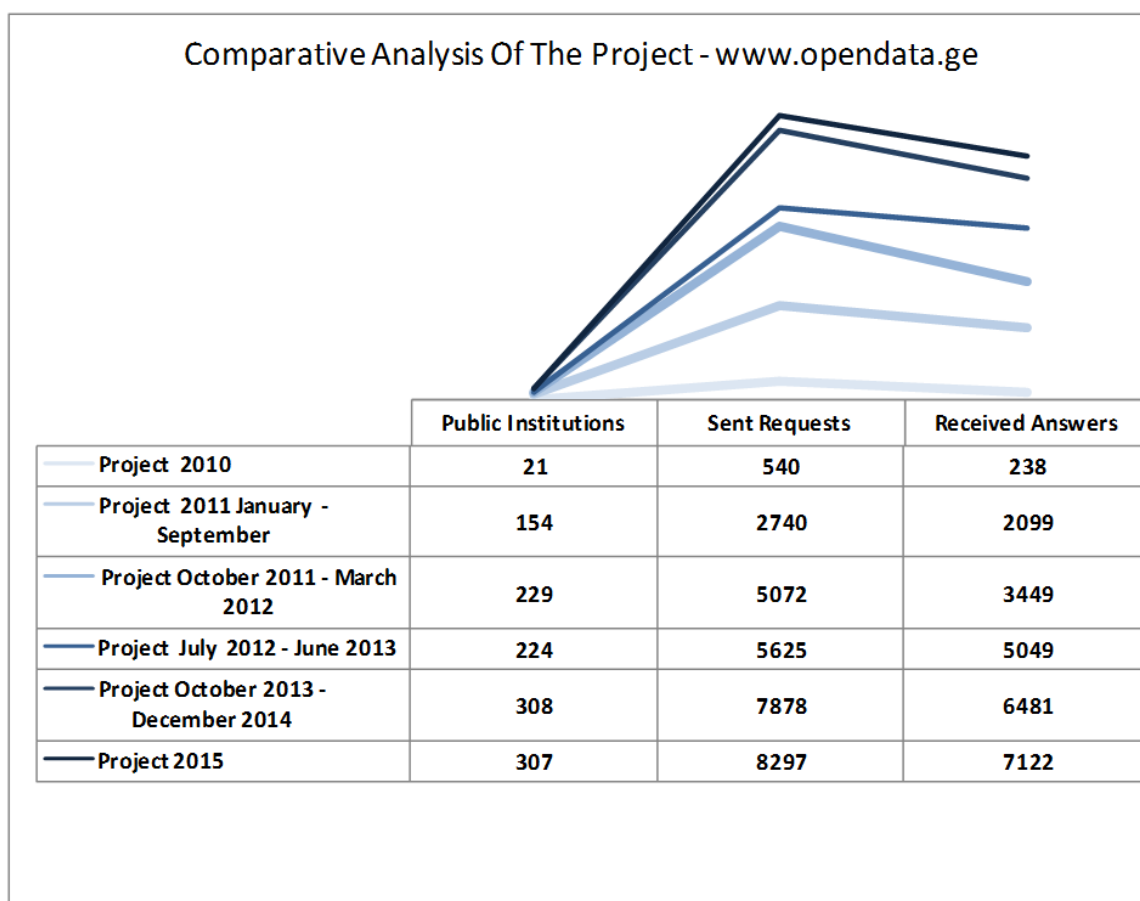
Practice of Disclosure of the Public Information in 2010-2015

Within the framework of the projects implemented by IDFI in 2010-2015, **30152** Freedom of Information (FOI) requests were sent to public institutions, and only **24 438** replies were received.



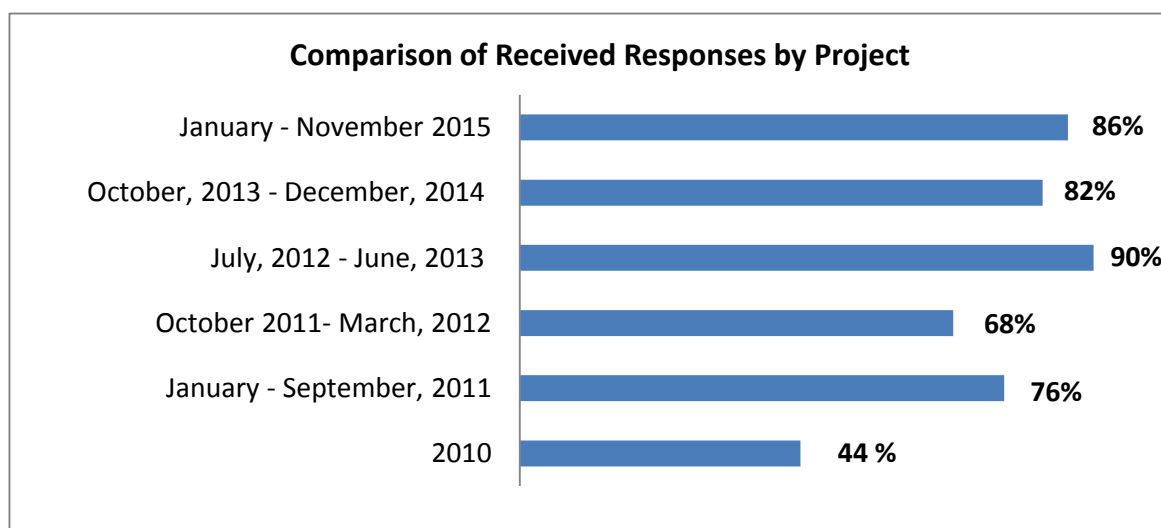
In 2010, in the framework of the pilot project, only 540 FOI requests were sent by IDFI to 21 public institutions. Statistics of requested public information significantly increased during the following projects, and in 2015 there were 8 297 requests for public information sent to 307 public institutions.

According to the statistics carried out by IDFI during 5 years, the number of replies to the requests for public information has been gradually increasing. Therefore, the amount of the information received by the Institute and uploaded to the webpage (www.opendata.ge) increased as well, thus giving the webpage visitors opportunity to learn more about the issues of their interest.



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

Among the projects implemented in 2010-2015 by IDFI, **the highest indicator (90%) of replies received to FOI requests was in the period between July 2012 and June 2013**. In the framework of the subsequent project (October 2013 – December 2014) the indicator decreased to 82%, and in 2015 (January-November) the indicator of received replies was 86%.

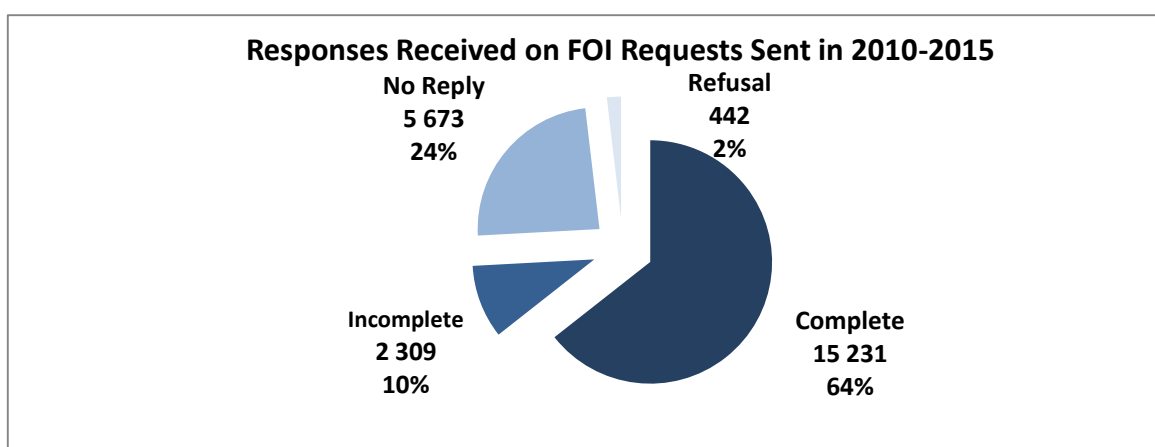


IDFI has been assessing the replies received and actions of public institutions according to the following categories:

- **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.

As a response to 30 152 requests sent to the public institutions during 2010-2015, IDFI received 15 231 complete replies, incomplete replies were given to 2 309 requests, there were 442 refusals, 5 673 requests were left unanswered, while in 6 497 cases public entities stated that they had not implemented any particular action or did not have the requested information.

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.



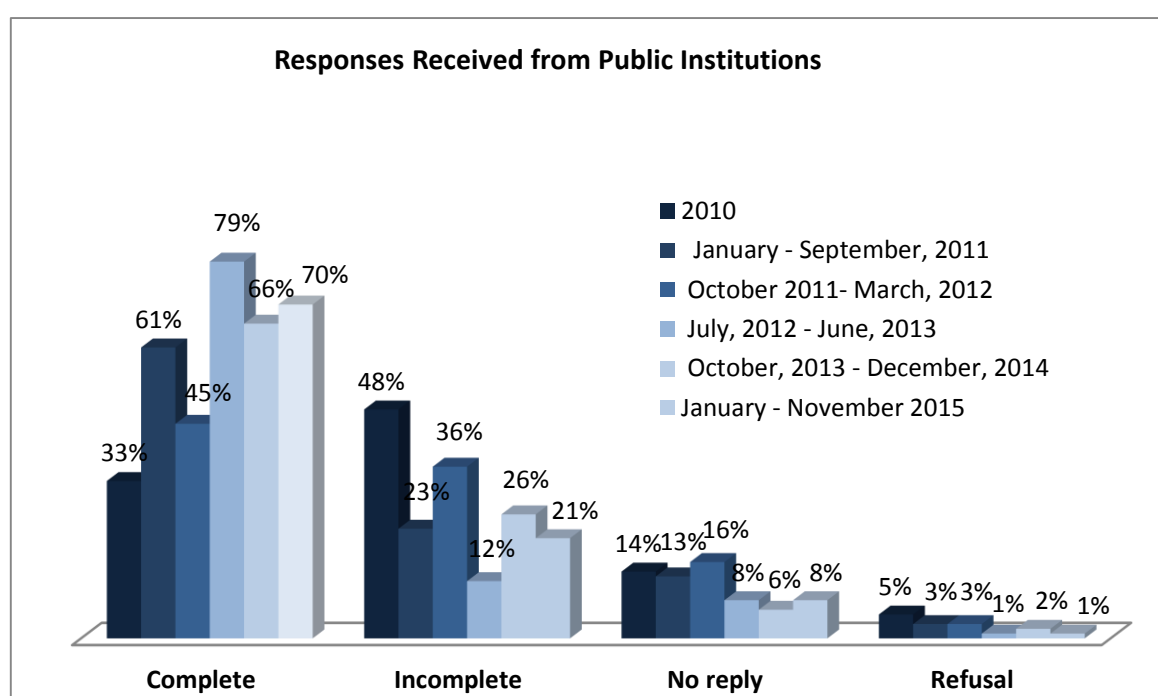
During 2010-2015, the lowest (33%) indicator of the complete replies received by IDFI and the highest indicator (48%) of the unanswered requests were revealed in 2010.

In the framework of the project of 2011 (January-September), the indicator of complete replies increased up to 61%, and the requests left without answer decreased to 23%. In the period between October, 2011 and March 2012 the situation in term of access to public information has worsened again and the indicator of complete replies decreased to 45%, while the requests without reply increased up to 36%.

The period of implementation of the next project (July 2012 – June 2013) coincided with the change of the government through Parliamentary Elections held on October 1st, 2012. The research carried out in the framework of this project showed that initially the political changes had positive impact on accountability of the state institutions and access to public information. In particular, the indicator of complete replies increased up to 79%, and the number of unanswered requests decreased to 12%.

Unfortunately, the monitoring of access to public information implemented by IDFI in the framework of the next project has clearly shown that **in case of a great number of public institutions, the improvement in terms of access to information was associated with initial stage of the new government, when the public institutions had less motivation to conceal any information.** In particular, the 79% rate of complete replies at early stage of political changes decreased to 66% in the framework of the following project (October, 2013 – December, 2014), while the number of unanswered replies increased up to 26%.

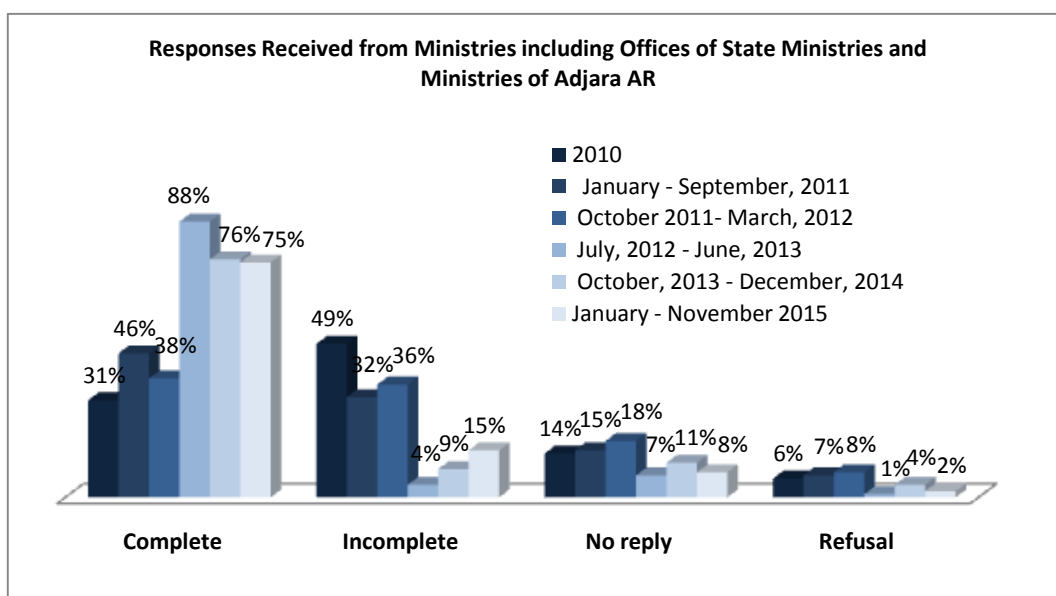
Total indicator of complete answers received in 2015 (January-November) has increased by 3% as compared to 2014 and amounted to 70%, while the requests left without reply decreased by 5% and amounted to 21%.



In the framework of the projects implemented in 2010-2015, there were different trends of access to information in terms of categories of public institutions.

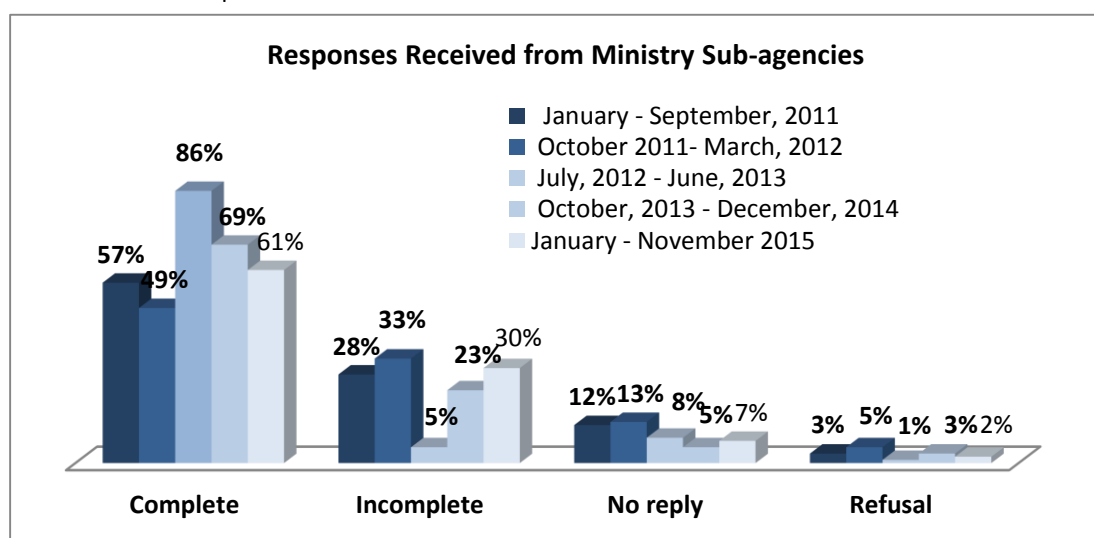
In case of the Ministries, the highest indicator of the complete replies was only 46% during the projects implemented in 2010-2012. In the period between July 2012 and June 2013 the indicator increased to 88%. However, during the following projects the Ministries did not provide the kind of information, which was disclosed in details by them in the beginning of 2013. This trend had negative impact on the rate of complete replies which has decreased to 76% in the period between October, 2013 and December, 2014 and further decreased to 75% in 2015 (January-November).

The rate of the requests left unanswered varied correspondingly. While the rate was 4% in the project during July 2012 – June 2013, it increased up to 9% in the period between October, 2013 and December, 2014 and further up to 15% in 2015 (January - November).



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 during the period starting from October, 2011 up to March, 2012. As for the highest indicator of complete replies (86%) and the lowest indicator of requests left without reply (5%) were revealed in the period between July 2012 and June 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 the period between October 2013 and December 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%.



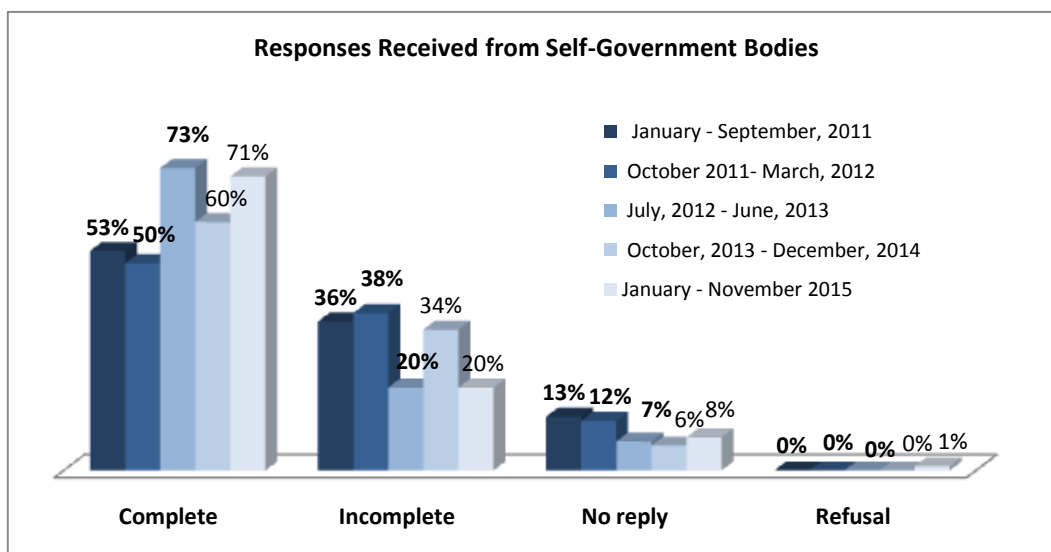
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In the framework of the projects implemented in 2011-2012 the indicator of complete replies by the local self-administration bodies ranged between 50%-53%, and the indicator of requests without reply was 36%-38%. Interestingly, that during the indicated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

In the framework of the project starting from July 2012 up to June 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 project (October 2013 – December 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 (January-November) 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 project (October 2013 – December 2014) increased by 11%, and the requests left without reply decreased by 14%.

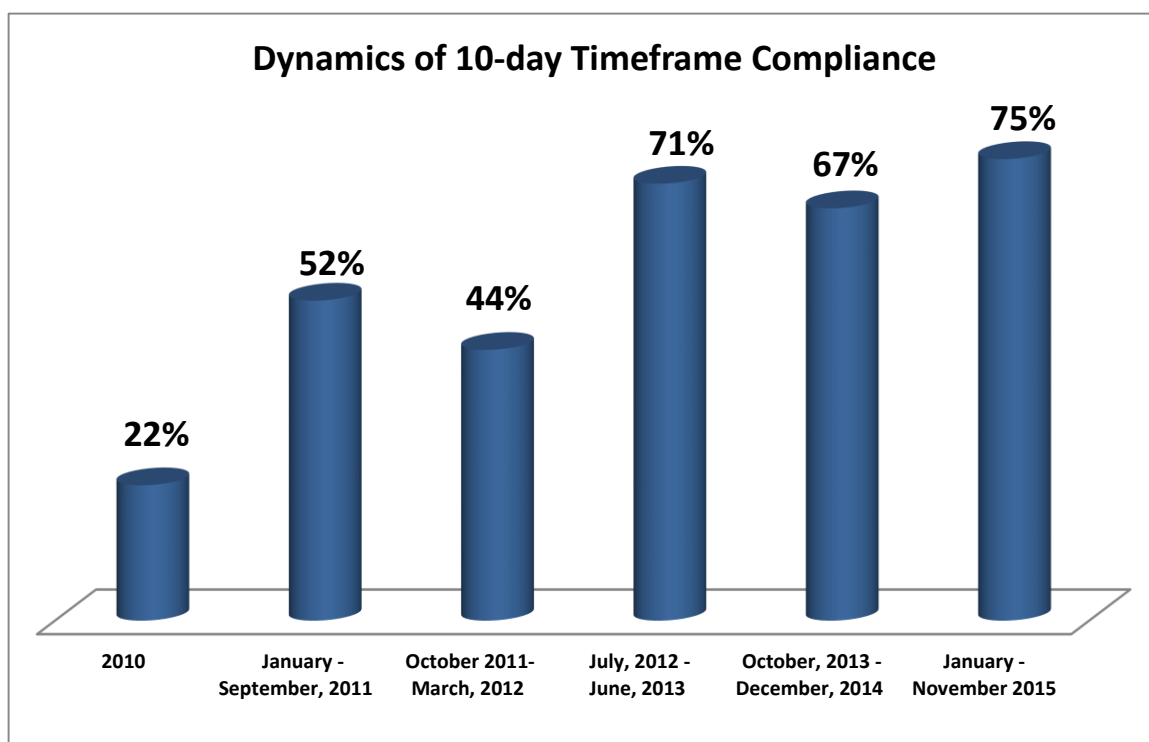
The fact shall be indicated that elections of self-administration units were held in summer 2014, therefore, the project of 2015 (January-November) coincided with the early phase of the political changes in the local self-administration bodies.



The Practice of Complying with the Period of Disclosure of Information in 2010-2015

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 2010-2015 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.

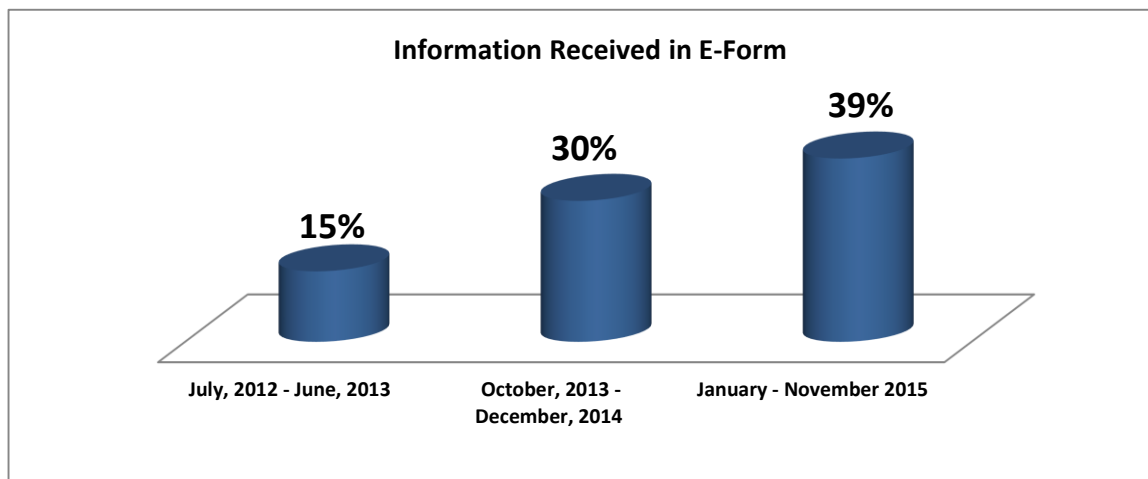
According to projects carried out in 2010-2015, the highest rate of timeframe compliance falls on the year 2015 (January-November) with 75% of timely replies. 2010 was the year with the lowest rate of compliance(22%).



The form of Disclosure of Information in 2012-2015

Georgian legislation gives the right to determine the appropriate form of receiving the information to the author of the request. Since 2012, the Institute has been exercising this right and requesting the information in electronic form (information which was already electronic or could be converted to electronic format).

Despite the fact that the Institute preferred electronic documents, in most cases, the public institutions disclosed the information in printed form, which required additional administrative resources compared to providing information in e-form. However, it should be noted that the practice of disclosing information in e-form by the public institutions improved significantly year by year. The percentage of information received in e-form during the project carried out in July 2012-June 2013 amounted to only 15%, the following project saw an increase up to 30% and in 2015 the percentage of information received in e-form amounted to 39%.

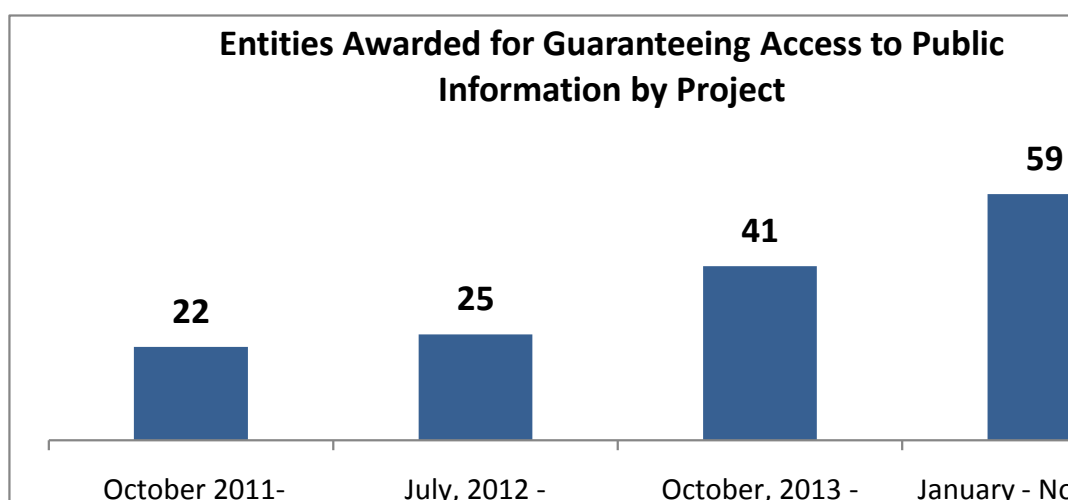


We believe that if the requested public information is in e-form and the author of the request prefers to have the information electronically, the public institution is obliged to meet the request and provide the information in a more efficient manner - electronically to be precise. This will save the administrative resources of the public institution and will also exempt the author of the request from paying the fee for copies of documents, which will ultimately accelerate and simplify the process of disclosure of information.

The Practice of Awarding Public Institutions

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 unfortunately could 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.



The most accountable public institutions in 2010-2015

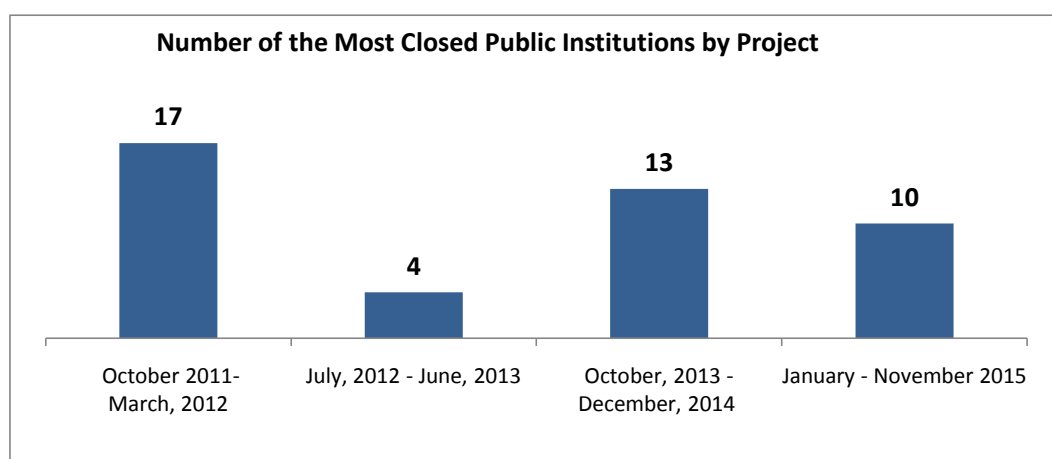
Based on the statistical data acquired throughout the projects carried out in 2010-2015, IDFI has named the most accountable public institutions:

- **Office of Public Defender (Ombudsman) of Georgia**
- **Municipal Board of Dmanisi**

In the period of 2010-2015, the Institute has sent 103 requests of public information to the Office of Public Defender. IDFI received complete replies on 102 of those requests and only one incomplete reply. All the replies were provided within the 10 day period determined by the Georgian legislation.

A total of 81 requests were sent to Municipality Board of Dmanisi in 2010-2015, out of which all the requests were completely satisfied. In 17 cases, the period determined by the Georgian legislation was not respected.

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 highest number (17) of public institutions in terms of limiting access to public information was named in the period between October 2011 and March 2012, while the least (4) – in July 2012 – June 2013.



Starting from 2011 IDFI has revealed the most closed public institutions within the framework of each project.

Most Closed Public Institutions By Project

October 2011 March 2012

• Ministry of Defense of Georgia

June 2012 September 2013

• Georgian National Energy and Water Supply Regulatory Commission

October 2013 December 2014

• Penitentiary Department

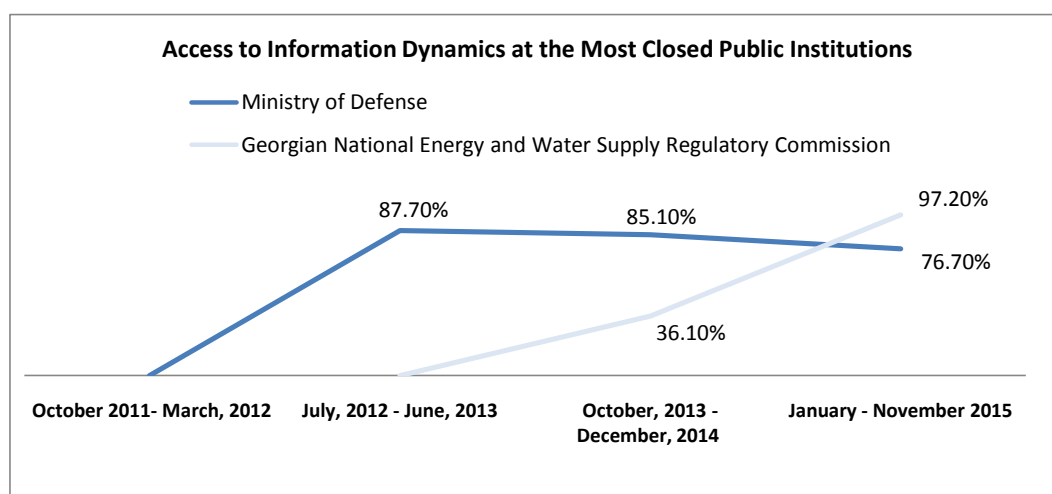
January 2015 November 2015

• Ministry of Economy and Sustainable Development

It should be noted that some of the public institutions named as the most closed ones significantly improved their performance during the following projects. The Ministry of Defense of Georgia, which was named as the most closed public institution in 2011-2012, has increased its level of access to information around 75%-90% during the following projects. In 2012-2013 the Ministry of Defense of Georgia was also named as one of those entities which showed biggest progress in terms of access to information.

The Georgian National Energy and Water Supply Regulatory Commission (GNERC), which was named as the most closed public institution in 2012-2013, has improved its rate of access to information up to 36.1% in 2014, while in 2015 it was already named as one of the public institutions having the biggest progress in terms of access to information.

The Penitentiary Department, named as the most closed public institution in 2014, was reorganized and became part of the structure of the Ministry of Corrections of Georgia. Thus, IDFI does not possess the 2015 data of access to information in case of this particular entity.



Requested public information

In 2015 (January-November), IDFI sent a total of 8 297 requests for public information to 307 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 Georgia¹. **The information that had already been published in detail on the websites was not requested by IDFI. For instance, the Institute did not request the information on salary supplement and bonuses of officials and on communication and official visit costs, if the administrative entity had already published the same information on the website.**

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.

- **Urgent Procurement**
- **Bonuses (separately on each public official)**
- **Salary supplements (separately on each public official)**
- **Official visit costs (according to the categories of expenditure)**
- **Roaming costs (separately on each public official)**
- **Representation costs (detailed information);**
- **Purchased and replaced cars**
- **The list of projects implemented as a part of the state budget program and their success indicators;**
- **Rumination of freelance workers**
- **Costs of consulting services**
- **The number of staff and freelance employees by gender**
- **The number of employees on leading positions by gender**
- **The number of dismissed employees by reasons of dismissal**
- **The information on professional experience (CV) of employed and dismissed public officials.**
- **Professional experience of advisors to heads**
- **Job description of advisors to heads**
- **The copies of correspondence with the Ministry of Finance regarding the changes in the budget**
- **Sent and received letters from the authorized person's email regarding urgent state procurement**
- **Legal acts and explanatory notes regarding bonuses and salary supplements of officials.**
- **Legal acts on appointment of advisors to heads**
- **The copies of contracts for consulting services**
- **Audit reports**

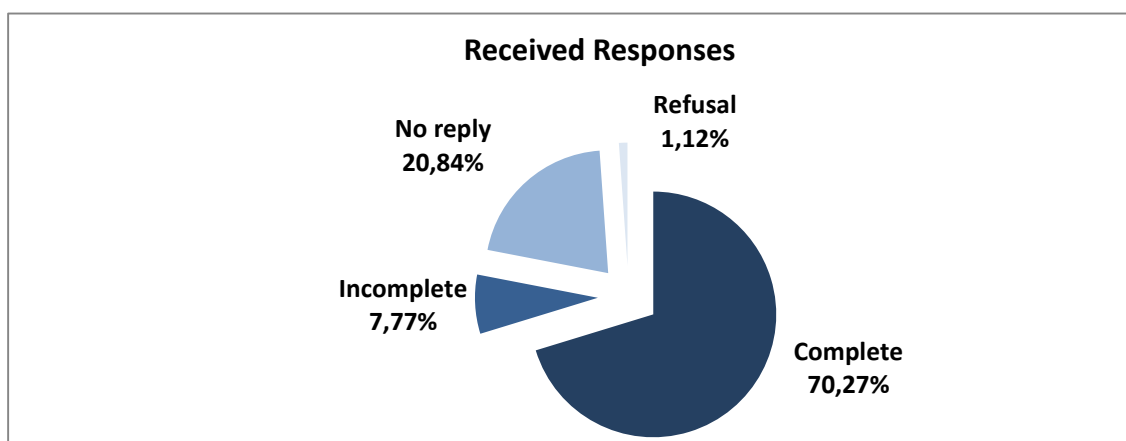
In addition to standardized requests, due to high public interest IDFI sent FOI requests to various public institutions regarding the issues that were directly related to their field of activity. The questions from citizens and interested parties received by IDFI were also included. Some of the non-standard questions were: the statistics of the time spent by ambulances between receiving the call and arriving at the requested place; the number of persons involved in the methadone supplement program; the number of killed and wounded in the peacekeeping mission in Afghanistan and in military activities in Ukraine and the financial support provided for them. In total 645 similar requests were sent.

¹There 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 was adopted. The mentioned bylaw regulates such issues of proactive disclosure as the list of information to be disclosed, timeframes, public institutions obliged to disclosure information proactively etc.

The Statistics of Public Information Received in 2015

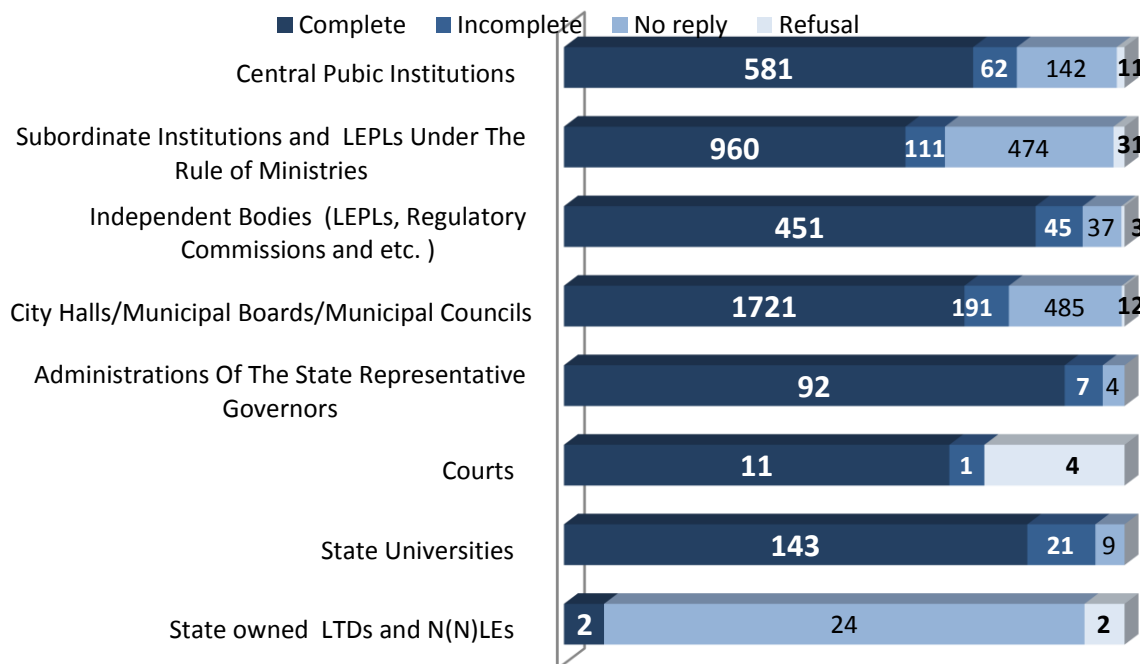
On 8 297 requests sent to 307 public institutions, IDFI received 3 961 complete responses, 438 incomplete responses, and 63 refusals. 1 175 requests were left unanswered and in 2 660 cases, the institutions stated that they had not conducted specific activities, or did not have requested information.

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 307 agencies, the data represent replies to 5637 FOI requests sent by the Institute.



According to the categories of public institutions, the biggest share of unanswered requests falls on state LTDs and N(N)LEs. During the reporting period, IDFI sent 28 such requests in total. Out of 28 requests, 24 were left unanswered and in two cases, the Institute received refusal note on the requested information.

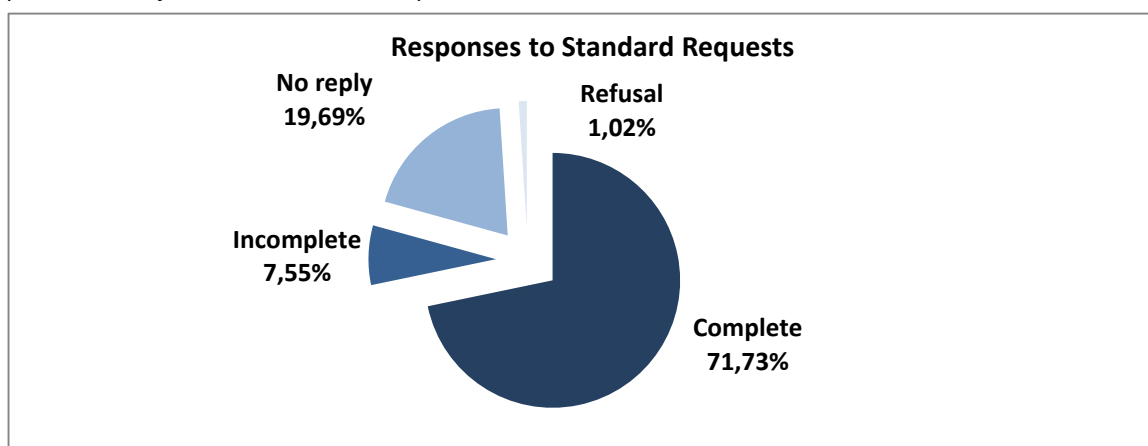
Received Responses According to the Categories of Public Institutions



Responses Received on FOI Requests with Standard Content

As it is mentioned above, various kinds of FOI requests were sent to the public institutions within the scopes of the project, among them were the FOI requests with standard content prepared by IDFI.

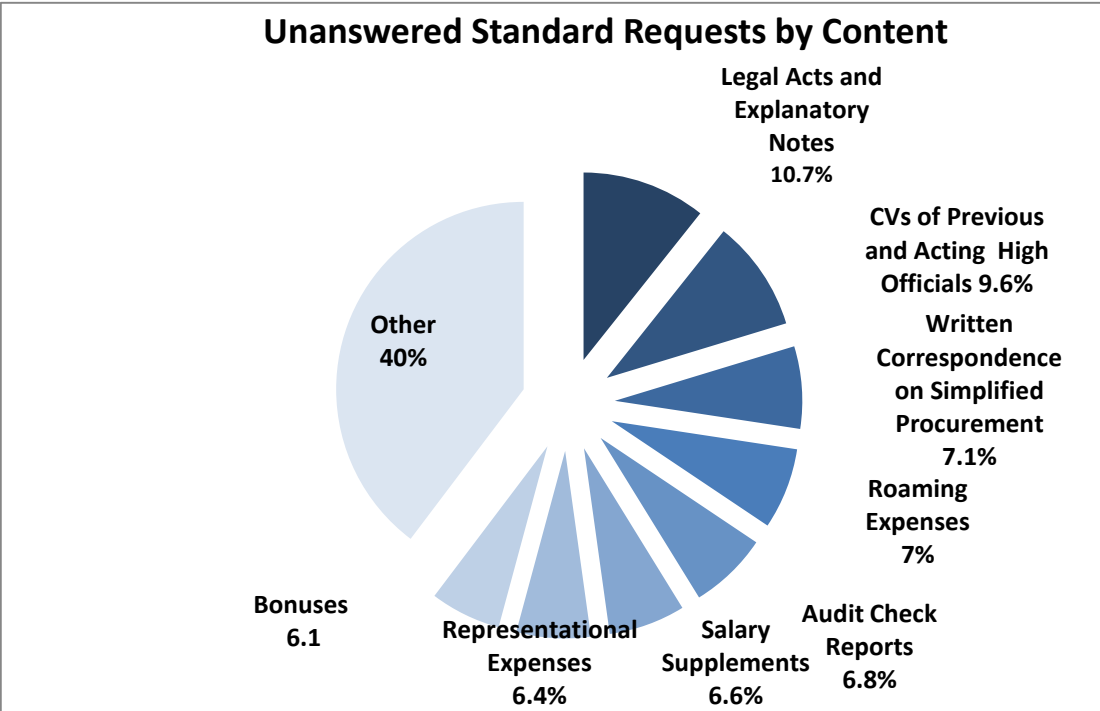
From 5 637 Freedom of Information requests 4 992 are the FOI requests of standard content, from which complete responses were provided to 3 581 requests. Incomplete responses were provided in 377 cases, 51 requests were rejected while 983 FOI requests were left unanswered.



The research revealed interesting indicators on unanswered FOI requests with standard content (when public institutions either did not provide an answer or rejected to answer). **The largest share (10.7%) of unanswered FOI requests with standard content concern the topics of bonus-payments for public officials, on which legal acts, the annexes and copies of the explanatory notes were not provided to IDFI.**

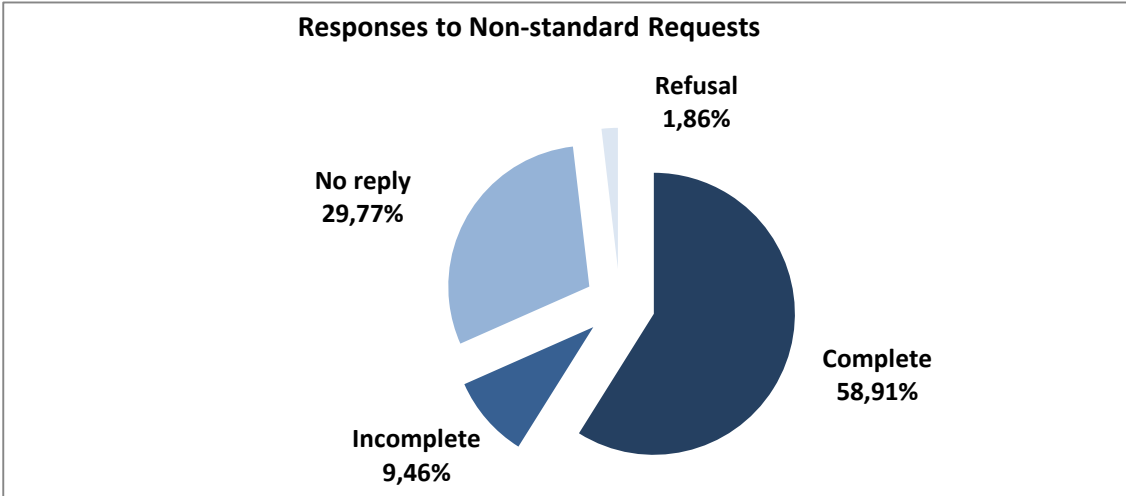
The second most closed type of information (9.6%) is the work experience (CV) of public officials hired or dismissed from public institutions.

As in case of the previous project, it was problematic to the public institutions to answer on the request of IDFI to demonstrate copies of an authorized person's e-mail correspondence for the urgent procurements conducted by the public institutions.



Responses Received on Non-Standard FOI Requests

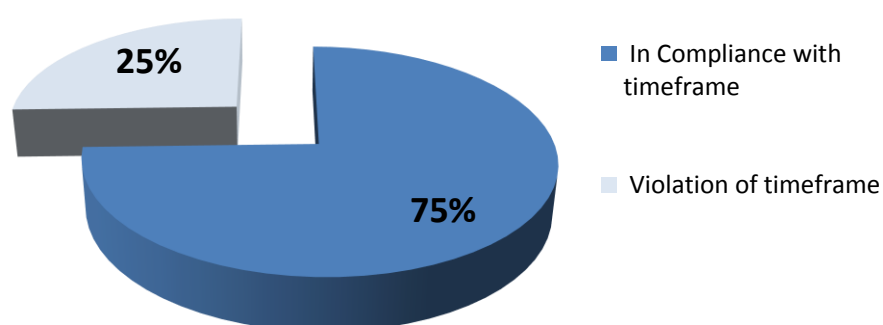
Within the scopes of the project, requests with different content were also sent to the public institutions. These FOI requests concerned the topics of high public interest or were sent due to citizen requests. In total, 645 such requests were sent to the public institutions, from which complete answers were received on 380, incomplete answers were provided on 61 requests, 12 FOIs were rejected while 192 were left unanswered.



Timeframe Compliance

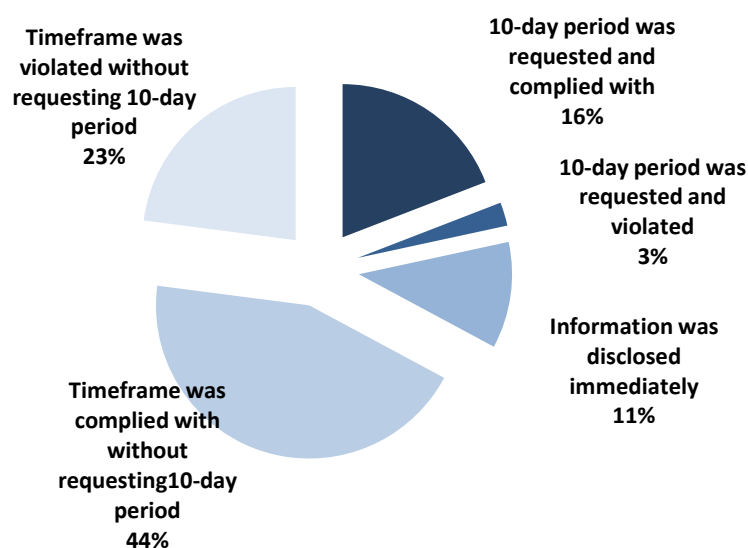
Within the framework of the project, out of 8 297 FOI requests sent to public institutions, IDFI obtained responses in 187 cases within 10 day-period. Including the unanswered requests, 10 day-period regulation was violated in 2 110 cases.

Violation of 10-Day Timeframe Including Unanswered Requests



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 932 cases. The number of applications on which 10 day-period was requested and the information was provided in this period, amounts to 1 587. Regarding the public institutions, 10 day period was requested in 206 cases, however, information was either left unanswered or provided with timeframe violation. In 3 668 cases, 10 day period was not requested, however information was provided from 4 to 10 days, while in case of 1 904 FOI requests, period approved by the law was violated without request of 10 day period.

Request for 10-day Period



Ratings of Access to Information

Data revealed by the project implemented in 2015 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:

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

A similar methodology was used for evaluating access to information in public institutions for the past projects implemented in 2012-2014. 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 2015 (January-November) the most complete answers were provided from the following institutions:

The Most Transparent Public Institutions					
Public Institutions		The Number of Requests	Complete	Time Compliance	Access to Information %
1	National Statistics Office of Georgia	31	31	31	100%
2	Ministry of Regional Development and Infrastructure	29	29	29	100%
3	Ministry of Sport and Youth Affairs	28	28	28	100%
4	Central Election Commission of Georgia	28	28	28	100%
5	Ministry of Internally Displaced Persons from the Occupied Territories, Accommodation and Refugees of Georgia	27	27	27	100%
6	Ministry of Environment and Natural Resources Protection of Georgia	26	26	26	100%
7	Roads Department of Georgia	26	26	26	100%
8	Georgian Civil Aviation Agency	25	25	25	100%
9	Georgian Wine Association	25	25	25	100%
10	National Agency of Execution of Non-Custodial Sentences and Probation	24	24	24	100%

11	National Center for Educational Quality Enhancement	23	23	23	100%
12	National Bank of Georgia	23	23	23	100%
13	Children and Youth National Center	22	22	22	100%
14	Center of Electoral Systems Development, Reforms and Trainings	21	21	21	100%
15	State Audit Office of Georgia	21	21	21	100%
16	Civil Service Bureau	21	21	21	100%
17	Tsageri Municipal Board	20	20	20	100%
18	LEPL Children and Youth Development Center	20	20	20	100%
19	Georgian National Museum	20	20	20	100%
20	National Intellectual Property Center (Sakpatenti)	20	20	20	100%
21	Public Defender of Georgia	20	20	20	100%
22	Tbilisi State Medical University	19	19	19	100%
23	Tkibuli Municipal Board	18	18	18	100%
24	Penitentiary and Probation Training Center	18	18	18	100%
25	The National Parliamentary Library of Georgia	18	18	18	100%
26	Office of the Personal Data Protection Inspector	18	18	18	100%
27	Iv. Javakhishvili Tbilisi State University	18	18	18	100%
28	Tskaltubo Municipal Board	16	16	16	100%
29	The Unified National Body of Accreditation – Accreditation Center	16	16	16	100%
30	Kaspi Municipal Board	15	15	15	100%
31	Government of Adjara AR	15	15	15	100%
32	Ministry of Finance and Economy of Adjara AR	15	15	15	100%
33	LEPL Scientific-Research Center of the Agriculture	15	15	15	100%
34	Georgian Technical University	15	15	15	100%
35	Dmanisi Municipal Board	14	14	14	100%
36	Ministry of Agriculture of Adjara AR	14	14	14	100%
37	Ministry of Labour, Health and Social Care of Adjara AR	14	14	14	100%
38	Vano Khukhunaishvili Center for Effective Governance System and Territorial Arrangement Reform	14	14	14	100%
39	Municipal Board of Zugdidi Self-governing Community	14	14	14	100%
40	Tsageri Municipal Council	14	14	14	100%
41	Khulo Municipal Council	13	13	13	100%
42	Ministry of Education, Culture and Sport of Adjara AR	13	13	13	100%
43	Akhaltzikhe City Hall	13	13	13	100%
44	Ozurgeti City Hall	12	12	12	100%
45	Administration of the State-Representative Governor in Racha-Lechkhumi and Kvemo Svaneti Region	12	12	12	100%
46	Gori City Hall	12	12	12	100%
47	Municipal Board of Mtskheta Self-governing Community	12	12	12	100%
48	Kareli Municipal Council	11	11	11	100%
49	LEPL Legal Aid Service	11	11	11	100%
50	Abasha Municipal Council	10	10	10	100%
51	Zugdidi City Council	11	11	11	100%

52	Administration of State-Representative Governor in Mtsketa-Mtianeti Region	10	10	10	100%
53	Ambrolauri Municipal Council	10	10	10	100%
54	Gori Municipal Council	10	10	10	100%
55	Municipal Council of Gori Self-governing Community	8	8	8	100%
56	Z.Paliashvili Tbilisi Opera and Ballet State Theatre	8	8	8	100%
57	Telavi Municipal Council	8	8	8	100%
58	Municipal Council of Mtskheta Self-governing Community	8	8	8	100%

The Most Closed Public Institutions

Ministry of Economy and Sustainable Development of Georgia

Within the framework of the implemented study IDFI revealed the most closed public institution, which is the Ministry of Economy and Sustainable Development. It was the institution that left biggest number of requests (44) unanswered.

Unfortunately the Ministry for Economy and Sustainable Development refused to publish information in 2014 and 2015; even though it provided the same information in the years before (2012-2013). In 2015 IDFI appealed two times to the Ministry; however, these appeals were not approved. Also in 2014, the Ministry did not respond to the recommendations of the Public Defender as well as IDFI's open letter regarding the violation of the public's right to receive information. It is important to note that on October 28th 2015 Tbilisi City Court completely approved the appeals of IDFI and ordered the Ministry of Economy to respond to all 16 requests for information. In the years of 2013-2015, IDFI and the Ministry of Economy were actively and productively working together on several projects (Support for Transition to Digital Broadcasting, Research on the Effectiveness of State Industries, etc.) Due to such cooperative working experience, it was especially unexpected to encounter cases of disregard of accountability and transparency from the above mentioned Ministry.

The Least Accountable Public Institutions

Out of 286 administrative agencies, 8 institutions completely ignored all requests for information, violated the law by not abiding their duties and did not cooperate with IDFI in 2015. All requests were ignored by 7 agencies belonging to the Ministry of Justice and the Tsalka Municipal Council.

The Most Closed Public Institutions				
N	The Most Closed Public Institutions	Number of Requests	No Reply	Access to Information
1	Tsalka Municipal Council	37	37	0%
2	Center for Crime Prevention	37	37	0%
3	Training Center of Justice	35	35	0%
4	National Archives of Georgia	28	28	0%
5	Notary Chamber of Georgia	28	28	0%
6	Legislative Herald of Georgia	28	28	0%
7	Public Service Development Agency	28	28	0%
8	LEPL "SmartLogic"	26	26	0%

The agencies subordinate to the Ministry of Justice listed above, were distinguished for their high accountability within the years of 2012-2013, however, the level of access to information has considerably worsened in these agencies since 2014, as they left every FOI left unanswered in 2015.

Access to Information Ratings by Project of the Most Closed Public Institutions in 2015			
Public Institution	Project 2015	Project 2013-2014	Project 2012 -2013
Public Service Development Agency	0%	73.3%	99.1%
"SmartLogic"	0%	67.1%	99%
Legislative Herald of Georgia	0%	73.1%	94.2%
Center for Crime Prevention	0%	24.7%	88.3%
Training Center of Justice	0%	19.3%	96.7%
National Archives of Georgia	0%	24%	99.5%
Notary Chamber of Georgia	0%	15.6%	90.6%

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

Central public institutions

Within the framework of the study in 2015, out of Central Public Institutions the most complete replies, with timeframe compliance, were made by **the Ministry of Regional Development and Infrastructure, the Ministry of Sport and Youth Affairs, the Ministry of Internally Displaced Persons from the Occupied Territories, Accommodation and Refugees of Georgia, the Ministry of Environment and Natural Resources, the Government of Autonomous Republic of Adjara and all the Ministries of Autonomous Republic of Adjara.**

Out of 29 central public institutions the lowest rate of access to information received the Ministry of Economy and Sustainable Development (10.8%) and the Administration of the Government of Georgia (23.3%). In case of the Ministry of Economy and Sustainable Development out of 51 FOI requests sent within the scopes of the project 44 requests were left unanswered.

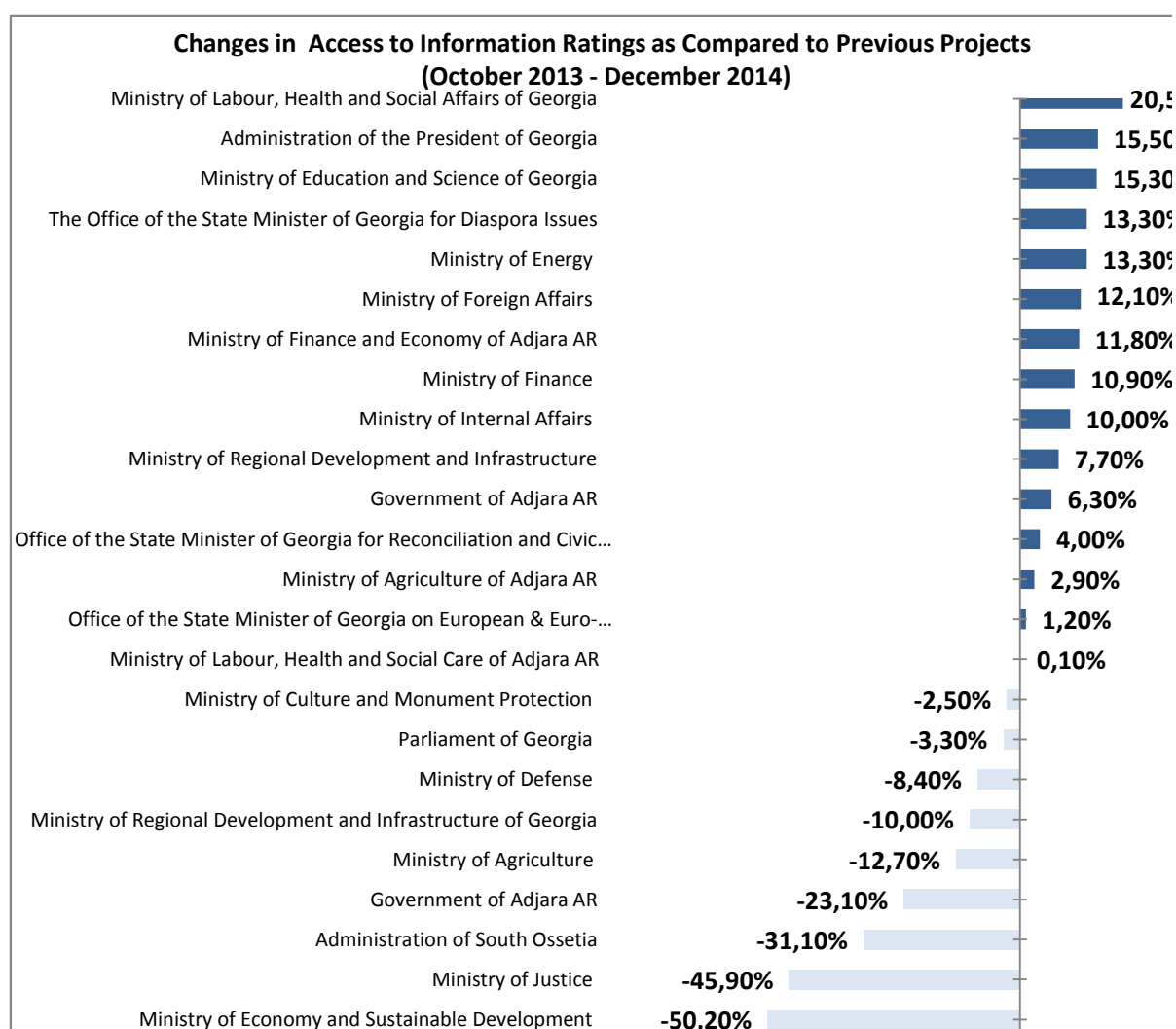
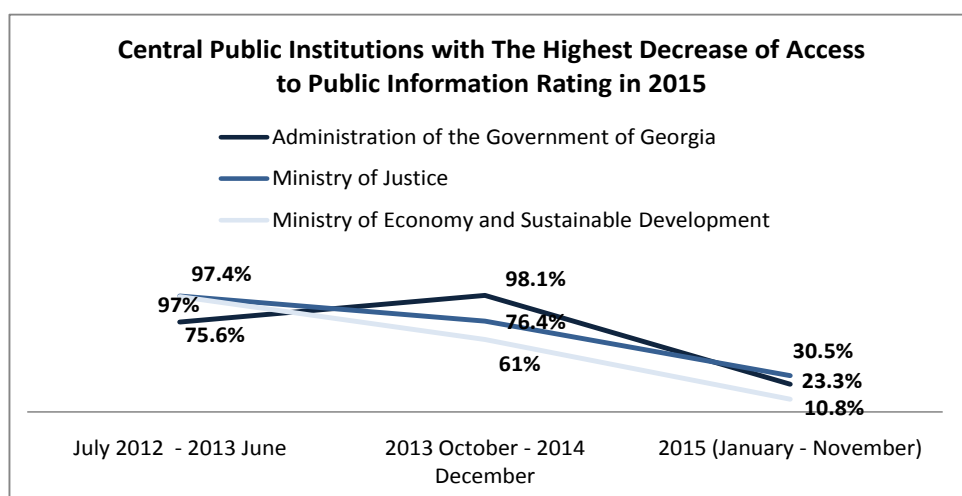
Access to Information Ratings of Central Public Institutions								
	Public Institutions	The Number of Requests	Complete	Incomplete	Refusal	No reply	Time Compliance	Access to Information %
1	Ministry of Regional Development and Infrastructure of Georgia	29	29	0	0	0	29	100%
2	Ministry of Sport and Youth Affairs	28	28	0	0	0	28	100%
3	Ministry of Internally Displaced Persons from the Occupied Territories, Accommodation and Refugees of	27	27	0	0	0	27	100%

	Georgia							
4	Ministry of Environment and Natural Resources Protection of Georgia	26	26	0	0	0	26	100%
5	Government of Autonomous Republic of Adjara	15	15	0	0	0	15	100%
6	Ministry of Finance and Economy of Adjara AR	15	15	0	0	0	15	100%
7	Ministry of Agriculture of Adjara AR	14	14	0	0	0	14	100%
8	Ministry of Labour, Health and Social Care of Adjara AR	14	14	0	0	0	14	100%
9	Ministry of Education, Culture and Sport of Adjara AR	13	13	0	0	0	13	100%
10	Ministry of Energy of Georgia	21	20	1	0	0	21	97.6%
11	Administration of the President of Georgia	18	17	1	0	0	11	96.5%
12	Ministry of Education and Science of Georgia	28	26	2	0	0	28	96.4%
13	Ministry of Foreign Affairs	28	26	2	0	0	2	95.6%
14	Ministry of Labour, Health and Social Affairs of Georgia	49	44	5	0	0	31	94.5%
15	Office of the State Minister of Georgia for Reconciliation and Civic Equality	25	22	3	0	0	25	94 %
16	The Office of the State Minister of Georgia for Diaspora Issues	24	21	3	0	0	11	93.2%
17	Office of the State Minister of Georgia on European & Euro-Atlantic Integration	24	21	2	0	1	14	91.3%
18	Parliament of Georgia	25	21	2	0	2	23	88 %
19	Ministry of Agriculture	30	23	6	0	1	27	83.3%
20	Ministry of Corrections	25	20	1	2	2	23	82%
21	Ministry of Culture and Monument Protection	29	22	2	2	3	25	79.3%
22	The Ministry of Defense of Georgia	37	34	1	1	1	7	76.7%
23	Administration of South Ossetia	19	13	0	0	6	13	68.4%
24	Government of Abkhazia AR	19	12	1	0	6	0	65.1%
25	Ministry of Finance	38	19	11	4	4	6	54.2%
26	Ministry of Internal Affairs of Georgia	59	17	15	2	25	6	36.8%
27	Ministry of Justice	36	11	0	0	25	9	30.5%
28	Administration of the Government of Georgia	32	7	1	0	24	4	23.3%
29	Ministry of Economy and Sustainable Development of Georgia	51	4	3	0	44	7	10.8%

Comparison of Access to Information Figures in 2014 and 2015. (Progress and Regress in Public Institutions)

The graph below visualizes the percentage change of accessible information compared to previous projects (October 2013- December 2014). Attention needs to be paid to the decline in accountability of the Ministry of Justice and the Administration of the Government (the Ministry of Economy is one of the three least accountable public institutions). In spite of the fact that IDFI awarded the Administration of the Government for being the most accountable and transparent institution in 2013-2014, for receiving a rating of 98 % for access to public information, already in the beginning of 2015, the situation changed radically and the Administration left 24 requests unanswered and therefore only received 23 % in the new ratings. Thus, the decline in public accountability was 74.80%. The Ministry of Justice worsened its rating by 45.9% compared to 2014 due to the fact that it left 25 requests of IDFI unanswered. This is surprising because the Ministry of

Justice is supervisory board member of the group of international initiative of the “Open Government Partnership”. In addition, the Ministry of Justice is the initiator of the “Law on Freedom of Information”.



Changing Views on Accountability

IDFI will provide the changing practices of different institutions of making public information available after October 2012. In order to make the changed practices perceivable, we will show different documentation provided for the same requests by the same institutions throughout the years.

For instance, the Ministry of Economy and Sustainable Development provided detailed information about official visits of each public official at the initial stage of political changes, on December 27th, 2012. However, in reply to the same request sent on February 12th, 2014 incomplete information (only summed up data) was provided. As for the identical request sent on March 10th, 2015, it was left without a reply.

On February 7th, 2013 the Ministry of Economy and Sustainable Development provided IDF I with detailed information about bonuses of each public official. **In 2014 the reply to this request was only received upon submitting administrative appeal, and even then, the provided information was incomplete (only summed up data).** In 2015, similar to the previous project, the information about bonuses was provided incompletely and only after submission of administrative appeal.

After the elections in October 2012 the approach of the Ministry of Finance towards disclosure of public information was also changed once again. For instance, on December 25th 2012 the Ministry provided detailed information about the bonuses. In 2013-2014 the Ministry avoided providing detailed information about bonuses and salary supplements and only released summed up, incomplete data. However, the Ministry provided detailed information about bonuses and salary supplements in 2015.

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

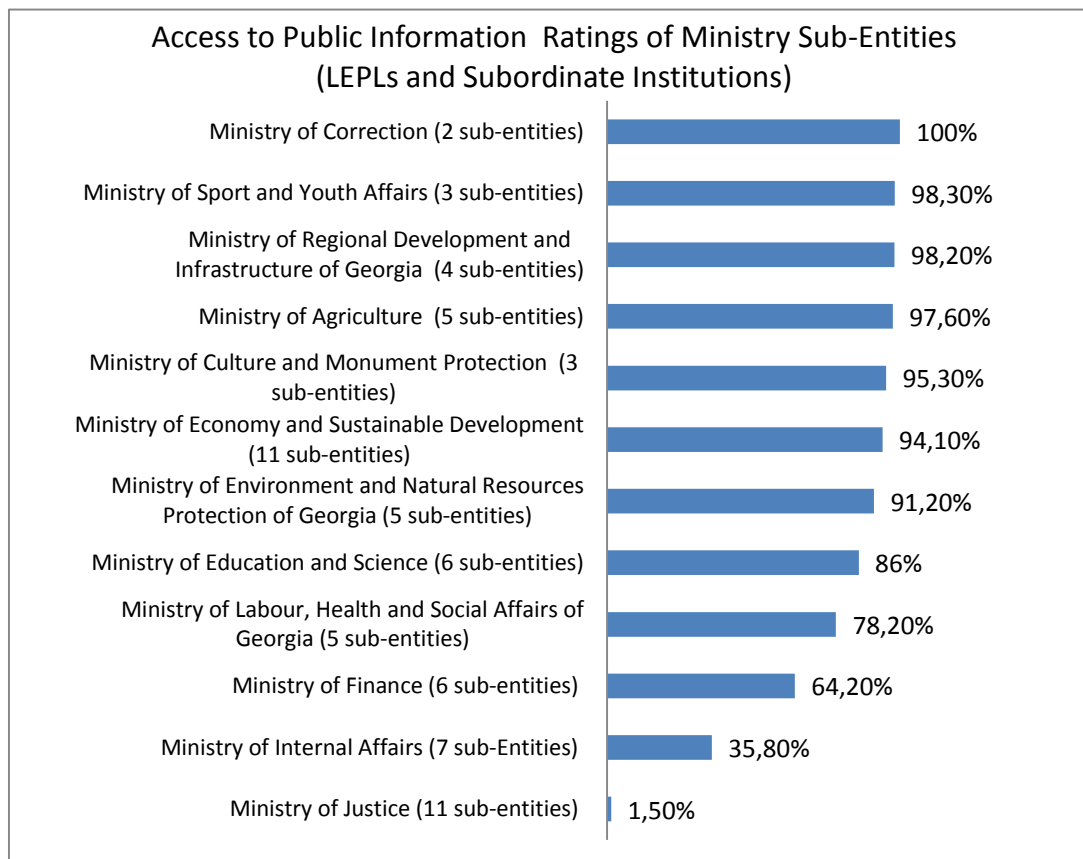
According to the study made in 2015 for this type of organizations (including sub-agencies of Ministries, independent LEPLs, regulatory commissions etc, a total of 105 public institutions) 100% rate of access to information was shown in 24 cases.

Out of 105 public institutions seven entities have left all FOI requests of IDF I unanswered. Besides, the last ten entities in the access to information rating among LEPLs, sub-agencies and other public institutions are sub-agencies of the Ministry of Justice.

Ten Most Open LEPLs, Subordinate Institutions and other Sub-Entities								
	Public Institutions	The Number of Requests	Complete	Incomplete	Refusal	No reply	Time Compliance	Access to Information %
1	National Statistics Office of Georgia	31	31	0	0	0	31	100%
2	Central Election Commission of Georgia	28	28	0	0	0	28	100%
3	Roads Department of Georgia	26	26	0	0	0	26	100%
4	Georgian Civil Aviation Agency	25	25	0	0	0	25	100%
5	Georgian Wine Association	25	25	0	0	0	25	100%
6	National Agency of Execution of Non-Custodial Sentences and Probation	24	24	0	0	0	24	100%
7	National Center for Educational Quality Enhancement	23	23	0	0	0	23	100%
8	National Bank of Georgia	23	23	0	0	0	23	100%

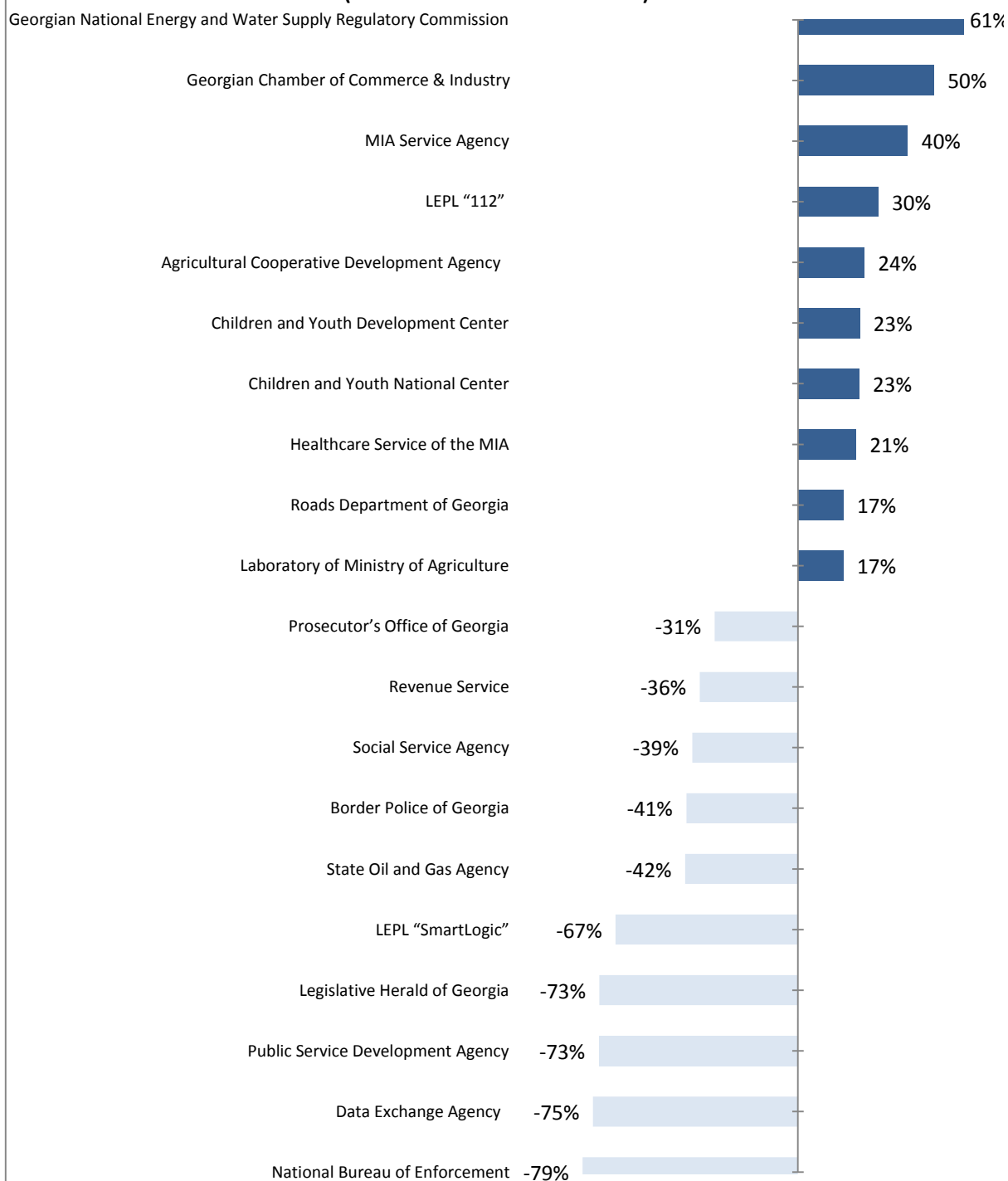
9	Children and Youth National Center	22	22	0	0	0	22	100%
10	State Audit Office of Georgia	21	21	0	0	0	21	100%
Ten Most Closed LEPLs, Subordinate Institutions and other Sub-Entities								
	Public Institutions	The Number of Requests	Complete	Incomplete	Refusal	No reply	Time Compliance	Access to Information %
1	Public Service Development Agency	37	0	0	0	37	0	0%
2	"Smart Logic"	37	0	0	0	37	0	0%
3	Legislative Herald of Georgia	35	0	0	0	35	0	0%
4	Center for Crime Prevention	28	0	0	0	28	0	0%
5	Training Center of Justice	28	0	0	0	28	0	0%
6	National Archives of Georgia	28	0	0	0	28	0	0%
7	Notary Chamber of Georgia	28	0	0	0	28	0	0%
8	Ministry of Justice	38	1	0	0	37	1	2.6%
9	National Agency of Public Registry	29	1	0	0	28	1	3.4%
10	Data Exchange Agency	27	1	0	0	25	1	3.8%

As it was mentioned above, the lowest rate of access to information in 2015 was shown in case of the sub-agencies of the Ministry of Justice (11 public entities in total). The average rate of access to information in 2015 in their case amounts to 1.5%. Other institutions which showed low level of accountability in 2015 are sub-agencies of the Ministry of Internal Affairs (7 entities), the average rating of which amounted to 35.8%. According to the study, on average the highest, 100% level of access to information was shown by two sub-agencies of the Ministry of Corrections of Georgia.



As compared to the project in October 2013 – December 2014, among the LEPLs, sub-agencies and other public institutions the biggest progress in terms of improvement of access to information rate was shown by the Georgian National Energy and Water Supply Regulatory Commission (progress 61%), while the public institution which has most worsened its practice in the same period was the National Bureau of Enforcement (regress 79%).

Changes in Access to Information Ratings as Compared to Previous Projects (October 2013 - December 2014)

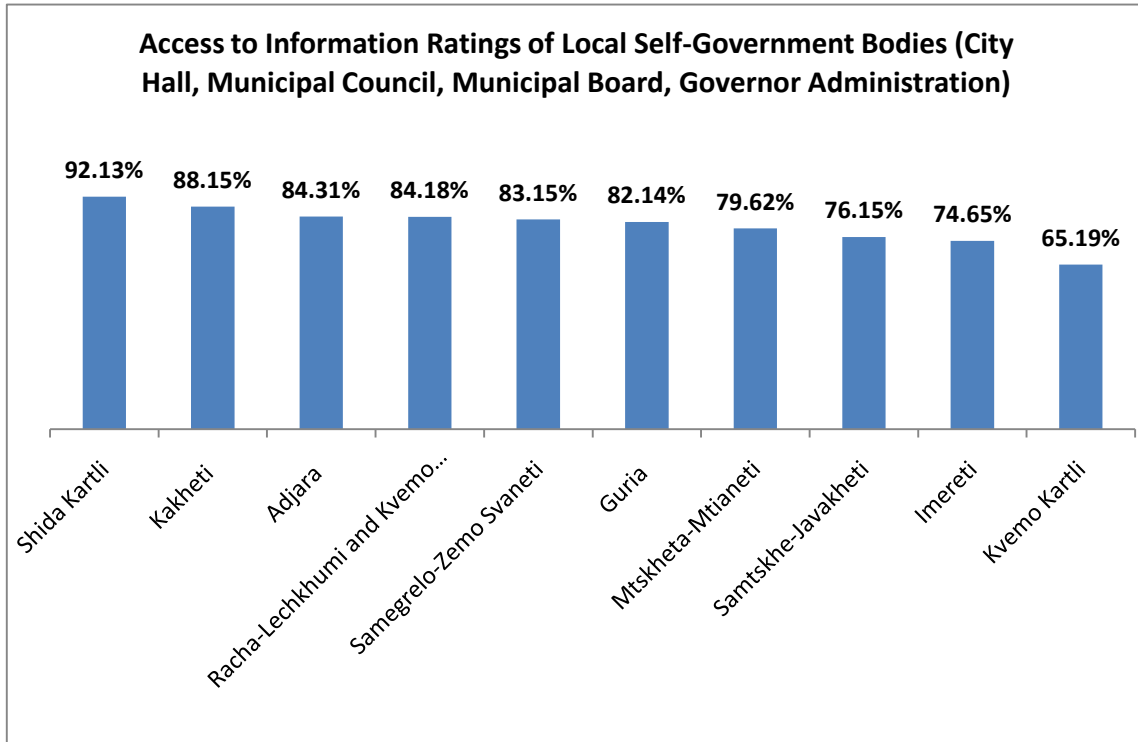


Regional bodies–City Hall, Municipal Boards, Municipal Council and Administrations of State Representative-Governors

Out of 151 regional public institutions 22 have shown 100% rate of access to information. Out of this type of public institutions the Municipal Council of Tsalka is the only one which left all FOI requests sent in 2015 without reply.

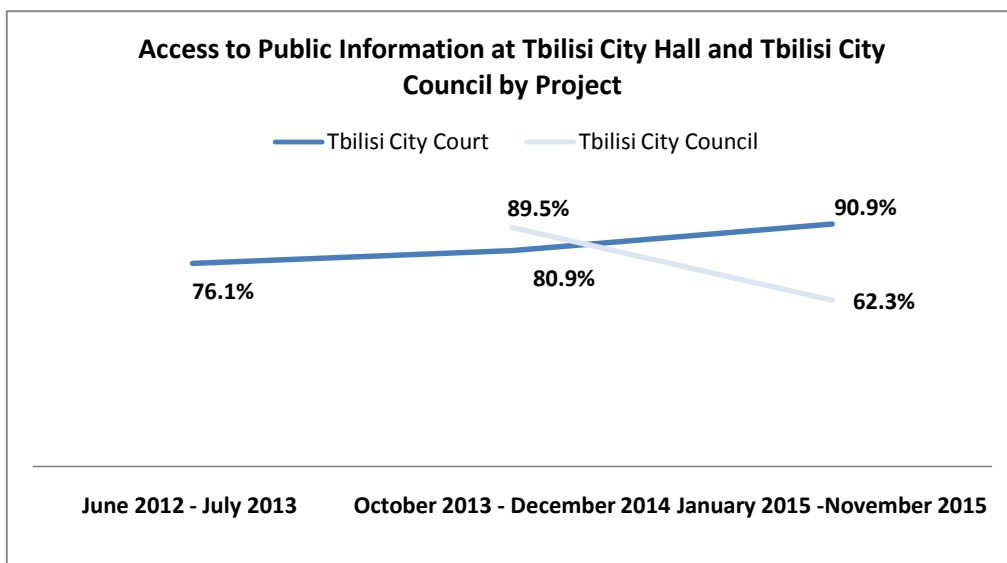
Ten Most Open Local Self-Government Bodies								
	Public Institutions	The Number of Requests	Complete	Incomplete	Refusal	No reply	Time Compliance	Access to Information %
1	Tsageri Municipal Board	21	21	0	0	0	21	100%
2	Tkibuli Municipal Board	19	19	0	0	0	19	100%
3	Tskaltubo Municipal Board	18	18	0	0	0	18	100%
4	Kaspi Municipal Board	16	16	0	0	0	16	100%
5	Dmanisi Municipal Board	15	15	0	0	0	15	100%
6	Municipal Board of Zugdidi Self-governing Community	14	14	0	0	0	14	100%
7	Tsageri Municipal Council	14	14	0	0	0	14	100%
8	Khulo Municipal Council	14	14	0	0	0	14	100%
9	Akhaltzikhe City Hall	13	13	0	0	0	13	100%
10	Ozurgeti City Hall	13	13	0	0	0	13	100%
Ten Most Closed Local Self-Government Bodies								
	Public Institutions	The Number of Requests	Complete	Incomplete	Refusal	No reply	Time Compliance	Access to Information %
1	Tsalka Municipal Council	26	0	0	0	26	0	0%
2	Bolnisi Municipal Board	24	4	1	0	19	0	18.5%
3	Terjola Municipal Council	22	4	1	0	17	5	20.5%
4	Tsalka Municipal Board	28	6	1	0	21	7	23.2%
5	Terjola Municipal Board	25	5	2	0	18	7	24%
6	Khoni Municipal Board	27	7	0	0	20	7	25.9%
7	Mtskheta Municipal Council	17	4	1	0	12	0	26.5%
8	Lentekhi Municipal Board	28	7	1	0	20	8	26.8%
9	Borjomi Municipal Council	22	5	4	0	13	9	31.8%
10	Gardabani Municipal Board	26	7	3	0	16	10	32.7%

According to the regions, in 2015, the highest rate of access to information on average is shown in Shida Kartli - 92.13%. The lowest rate was in Kvemo Kartli - 65.19%. In case of other regions the average rate of access to information varies between 75% and 88%.



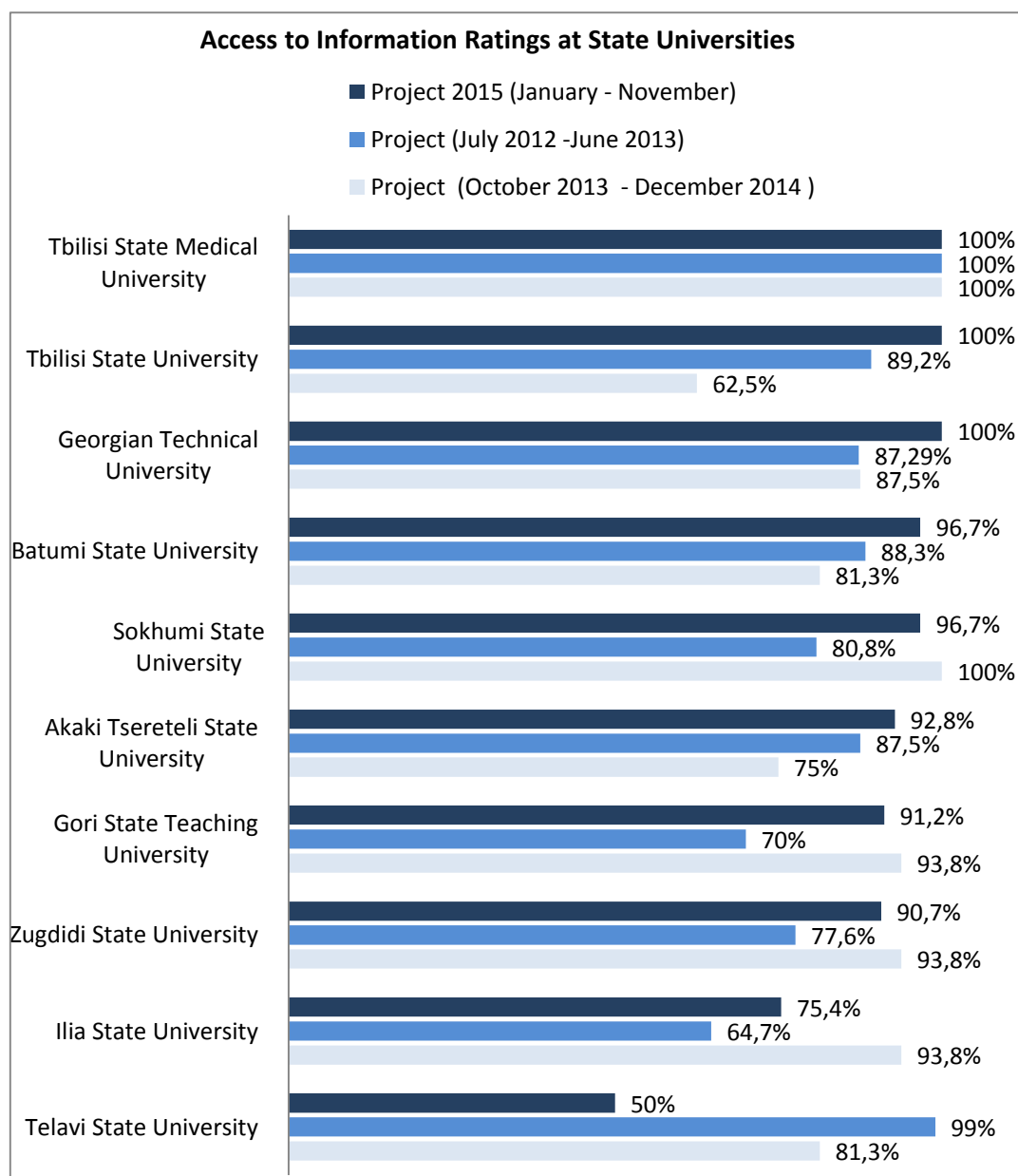
The indicators of Tbilisi City Hall and City Council for making information accessible are characterized by diverse tendencies. The Tbilisi City Hall indicator for publishing information in 2015 was 90.9% Tbilisi City Hall showed 14.8% increase of the rating in June 2012-July 2013 and 10% increase of the October 2013 - December 2014.

The situation differs in Tbilisi City Council. The 2015 indicator of 62.3% is the result of a decline of 27.2 % from the October 2013- December 2014 period. This decline occurred because in 2015, as opposed to previous years, the council did not provide complete information on bonuses and salary benefits to employees, representative expenses, mission expenses, etc.



State Universities

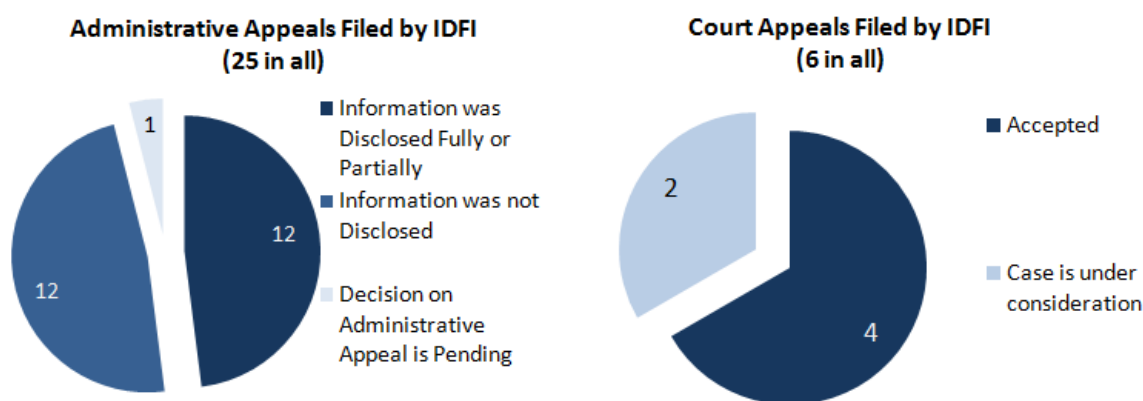
Among the state universities of Georgia the highest 100% rate of access to information has **Tbilisi State Medical University, Ivane Javakhishvili Tbilisi State University and Georgian Technical University**. It is noteworthy, that the Medical University has achieved 100% rate of access to information in all projects implemented during 2012-2015, while Ivane Javakhishvili Tbilisi State University and Georgian Technical University have considerably improved their ratings and it is the first time this year that these two universities achieved 100% rate. In terms of the progress shown as compared this years' project with the project of the previous year, the best improvement was in case of Gori State Teaching University (progress 21.2%).



Case Law and Particularly Problematic Issues Observed During the Reporting Period

during 2014-2015 and discuss the main problematic issues faced by the organization in course of the disputes. Particular attention will be paid to the cases of strategic litigation during which many rulings of precedential importance were made by the courts.

It should be emphasized that during 2015 IDFI filed 25 administrative appeals against the decisions of public institutions. Among them in 12 cases the requested information was provided partially or completely, in 12 cases administrative appeals were left unanswered or public institutions refused to disclose information. Decision on one administrative appeal is still pending. Out of the 12 cases where administrative appeals of IDFI were not granted, the Institute referred cases to the court in those three cases which were of the highest strategic importance. In addition hearings on three appeals filed in 2014 were under consideration during the year of 2015. To date decisions on four appeals have been rendered by the courts. **It should be noted that in all four instances appeals of IDFI were fully granted.**



IDFI vs. the Ministry of Finance of Georgia

The case of IDFI vs. the Ministry of Finance is one of the most important precedential litigations in the field of access to public information in Georgia. The dispute went through all three instances of courts as a result of which many important rulings were made by the judges. The courts ruled that the information requested by IDFI was open public information and made important interpretation regarding the form and procedures of disclosing public information.

The court underlined in its ruling that information on topics like bonuses and salary supplements received by public officials, representation expenses of public entities, travel expenses abroad, urgent procurements and information on replaced transportation means and IT equipment represent open public information and shall be provided to a requester of public information.

The court unambiguously highlighted that the following is open public information and should be disclosed by public institutions in complete form when referred with a FOI request: Information on salary supplements and bonuses of high officials, representational expenses, costs of business trips abroad, information on simplified procurement as well as data on replaced vehicle fleet and IT equipment.

On the given case the court made important ruling regarding the issue of standards and procedures of disclosing public information. In particular, practice of re-directing of applicants to the official website of LEPL Civil Service Bureau www.declaration.gov.ge for receiving information on bonuses and salary supplements of public officials was ruled to be against the requirements of law. The basis for this, as stated by the court, was the fact that asset declarations contain information on the total sum of income received by high officials in the course of one year. Hence based on asset declaration it is impossible to receive information on monthly income of a high officials. Neither is it possible to retrieve information on the components of the total remuneration (i.e. salary, salary supplements and bonuses) from asset declarations.

When looking into the issue of the proactive disclosure of information, the court noted that when an applicant requests public information grouped according to certain criteria, response should not be limited to the content of proactively published information and requested information shall be provided in the form requested.

The court also highlighted that an applicant has the right to choose the form of receipt of public information. Correspondingly, the actions of administrative bodies when they direct applicants to their web-pages instead of disclosing public information in the form requested is illegal. The violation of the requirement of law is particularly severe in cases when information is not published on the web-page completely.

It is noteworthy that the strategic litigation against the Ministry of Finance lasted for more than a year. Regardless of the fact that the information requested by IDFI undeniably constituted open public information Ministry of Finance appealed against the decision of the first instance Court at appellate and supreme courts. As a result, IDFI was able to receive information requested in January of 2014 only in September of 2015. During the litigation process, IDFI expressed a well-grounded doubt that the Ministry of Finance was purposefully delaying disclosure of the requested information, as it might have exposed certain violations and malefactions. The noted suspicion was confirmed in the audit check results of the administrative body. The audit checks revealed violations in the fields which had been the subject of dispute between IDFI and Ministry of Finance for more than a year.

As a conclusion, it must be stressed once again that the case of IDFI vs. the Ministry of Finance is precedential in terms of access to public information as well as transparency and accountability of public institutions in Georgia. The court decision once more time highlights the obligation of public institutions to disclose certain type of public information in the form requested and following the procedures set by the law.

IDFI vs. the Ministry of Internal Affairs

The litigation on the case of IDFI vs. the Ministry of Internal Affairs is particularly important in terms of access to information on bonuses and salary supplements of high officials. In this particular case Tbilisi City Court made reference to the standards set by international treaties as well as Georgian legislation, namely the European Convention of Human Rights, Constitution of Georgia and other national legal acts. As a result, the court made several important rulings.

The court unambiguously highlighted that public is entitled to be informed on the amount of remuneration received by high officials as the data constitutes information of high public interest. The said serves as a rationale for the obligation of high officials to submit asset declarations on annual basis to the Civil Service Bureau. Moreover the existing legislation highlights that public institutions have an obligation not to disclose information containing personal data, except for the personal information of high officials.

According to the ruling of the court, based on the fact that Minister, Deputy Minister and heads of Departments are high officials and consequently have the obligation to submit asset declarations, information on the amount of their remuneration is open public information and anyone interested should have access to the data.

In addition the decision highlights that, remuneration includes in itself information not only on the salary of a public official but on the amount of salary supplements or bonuses received by him/her. **Hence anyone interested should have access to the information on the salary as well as salary supplements and bonuses received by high officials.**

With the aim of receiving information on the salary supplements and bonuses received by high officials IDFI referred to the Ministry of Internal Affairs on 13th of June of 2014. However, the information has not been received as of today as the Ministry of Internal Affairs appealed against the decisions of Tbilisi City Court first at appellate and then to the supreme court (at this stage admissibility of the appeal of the Ministry of Internal Affairs is being reviewed by the Supreme Court. Appealing the decision of the first instance court to the Appellate as well to the Supreme Court by the Ministry of Internal Affairs undoubtedly serves the purpose of delaying the proceedings as there already are rulings made by the Supreme Court regarding the litigation of the similar character, according to which information on bonuses and salary supplements received by the public officials unambiguously constitutes open public information.

IDFI vs. Department of Corrections

IDFI has been conducting court litigation against Penitentiary Department since May 2014, nevertheless the decision of the court on the dispute was not rendered until October 2015. The Department provided IDFI with the requested information only after the ruling of the court went into force.

In the given litigation the court made the ruling highlighting that the following constitutes open public information: information on bonuses and salary supplements received by high officials, copies of higher education diplomas of high officials, information on representational costs, information on the expenses of business trips abroad, data on urgent procurement as well as replaced vehicles and IT equipment.

In addition, regarding the issue of processing information in the requested form the court noted, that the public institution was obligated to process data and provide applicant with the specific information according to criteria listed in the FOI request.

IDFI vs. the Ministry of Economy and Sustainable Development of Georgia

The case of the IDFI vs. the Ministry of Economy and Sustainable Development of Georgia represents yet another successful case of litigation against a public institution. In the given dispute Tbilisi City Court fully granted the appeal of IDFI and held that the data on different administrative expenses which had been systematically requested by IDFI from public entities constitute open public information e.g.: information on audit check results, data on bonuses and salary supplements received by high officials, representation expenses, expenses of business trips abroad, data on simplified public procurements and etc. (14 demands in total).

IDFI hopes that the ministry will not question the ruling of the court and will provide IDFI with the information requested without the further delay of the process. The said is particularly noteworthy considering the fact that IDFI has referred to the Ministry of Economy and Sustainable Development with the purpose of obtaining the information already in March of this year.

It is important to note that the Ministry of Economy and Sustainable Development demonstrated low level of accountability in 2014 as well when our FOI request was left unanswered and requested information was not disclosed regardless of the recommendations made by the Public Defender. In his recommendation Public Defender clearly emphasized that as a result of ignoring the FOI request the Ministry violated right of IDFI to receive public information.

IDFI vs. the Ministry of Justice

Litigation between IDFI and the Ministry of Justice is precedential as the subject of litigation is specific type of public information, which has never been a subject of litigation in Georgian courts before. Particularly, the dispute concerns disclosure of the data sent and received via electronic correspondence conducted using official e-mail accounts. Particularly the request of IDFI concerns e-mail correspondence conducted on the subject of public procurements. The Ministry of Justice refused to provide us with the information about electronic correspondence and resorted to the argument that the mentioned type of information was not covered by the definition of public information enshrined by the Administration Code of Georgia, main argument being that the data requested “did not have the material form of a document”.

IDFI does not share the argument of the Ministry of Justice in the given case, hence the Institute referred the case to Tbilisi City Court. The case is still under consideration. It should be noted that the definition of public information enshrined in Georgian legislation includes any information kept in a public institution, in any form including electronic information received, processed, created or sent by the public entity. Regardless of the unambiguous definition of public information given in Georgian legislation, during the current year number of public entities refused to disclose information on e-mail correspondence conducted by referring to the argument that the information could not be qualified as a document which can lead to legal consequences.

It is noteworthy, that unlike Georgia this issue of access to e-mail correspondence of high officials is no longer disputed in the countries of developed democracies. Unfortunately, practice in Georgia highlights the existing problem of access to information sent and received by public officials via official e-mail accounts

IDFI vs. Revenue Service

The aim of IDFI in the litigation against the Revenue Service was to obtain information on Free Industrial Zones in Georgia. Namely, in April 2015 the Institute sent a FOI requests to the Revenue Service and requested information on the checks of Free Industrial Zones conducted by the Revenue Service. Reports and conclusions reflecting the results of the checks was also requested. Revenue Service refused to provide the information based on the argument that the data constituted tax secret. The decision of the Revenue Service was appealed against in the court. To-date main hearing on the case has not been held.

Administrative Appeals Filed by IDFI

As it was already mentioned above, during 2015 IDFI filed administrative appeals against 25 decisions of public institutions. However, in only 12 cases out of 25, information was provided without the need of further referring cases to the court. In 12 cases administrative appeals were not granted hence no information was provided. Administrative appeal against Tbilisi City Court is to-date under consideration. .

Public entities disclosing information after IDFI filed an administrative appeal were:

1. Ministry of Defense
2. Ministry of Internal Affairs
3. Ministry of Agriculture
4. Office of the Chief Prosecutor of Georgia
5. Council for the State Security and Crisis Management
6. National Communications Commission

7. Revenue Service
8. Financial-Analytical Service
9. National Treasury
10. National Agency for Cultural Heritage Preservation
11. Service Agency of the Ministry of Finance

The fact that the above listed public institutions provided us with the requested information after IDFI filed administrative appeals should be assessed positively as this allowed the Institute to avoid long term proceedings in the courts.

Public Institutions listed below did not grant administrative appeals filed by IDFI, hence no information was disclosed:

1. Ministry of Economy and Sustainable development (two administrative appeals were filed)
2. Ministry of Finance
3. Ministry of Justice
4. LEPL "Smart Logic"
5. Legislative herald
6. Public Service Development Agency
7. House of Justice
8. National Bureau of Enforcement
9. Border Police
10. Land Transport Agency
11. Revenue Service

IDFI referred cases to the courts only in three strategically important cases out of the 12 listed above. The defendants in the cases were the Ministry of Justice of Georgia, The Ministry of Economy and Sustainable Development of Georgia and Revenue Service of Georgia.

It should be emphasized that during the year of 2015 Tbilisi City Court refused to disclose information which had not been denied before. The dispute concerns access to the copies of the rulings and interim decision on the criminal cases against former high officials. Tbilisi City Court refused to disclose said information based on the argument that the information included personal data of the persons involved. IDFI does not share the rationale of the public institution. Constitution of Georgia guarantees principle of publicity of court hearings by stating that court hearing are open to attend and decision are to be announced publicly. Thus, the refusal by Tbilisi City court to disclose information based on the argument that the data constituted personal secrecy is in conflict with the principle enshrined by the condition of Georgia according to which anyone interested shall have the right to attend court hearings.

Special problematic issues revealed within the framework of the project

In the process of requesting public information from administrative entities IDFI observed state entities to be mostly reluctant to disclose information on the topics such as: bonuses and salary supplements received by the public officials, electronic correspondence conducted via official e-mail accounts and information on the advisors of Minister and Deputy Minister.

In addition it should be emphasized that during the current year it was particularly problematic to receive statistical information on the number of complaints received by the Prosecutor's Office of Georgia as well as information on the results of investigations.

It should be also noted that unlike the practice of previous years in 2014 the court accepted appeals of IDFI which were usually denied. This should unambiguously be assessed as positive development and serves as a proof that the court practice of the previous years, when decisions were always made in favor of public entities, is changing towards the goals of objectivity and transparency.

Regardless of the above mentioned it is particularly problematic that litigation against the decision of administrative bodies in the courts are as a rule highly time consuming. This results in the scenario when public interest towards the information under dispute is significantly decreased by the time decisions are rendered by the courts. In the course of the last years IDFI has faced the problem when requesting information from public entities such as Ministry of Finance, Ministry of Internal Affairs, Ministry of Economy and Sustainable Development and Department of Corrections. In the mentioned cases long term, time consuming court litigations were conducted in order to receive information. The mentioned one more time highlights the need of developing efficient mechanisms guaranteeing effective and timely protection of the right to information.

N	Public Institutions	The Number of Requests	Complete	Incomplete	Refusal	No reply	Time Compliance	Access to Information %
1	National Statistics Office of Georgia	31	31	0	0	0	31	100%
2	Ministry of Regional Development and Infrastructure	29	29	0	0	0	29	100%
3	Ministry of Sport and Youth Affairs	28	28	0	0	0	28	100%
4	Central Election Commission of Georgia	28	28	0	0	0	28	100%
5	Ministry of Internally Displaced Persons from the Occupied Territories, Accommodation and Refugees of Georgia	27	27	0	0	0	27	100%
6	Ministry of Environment and Natural Resources Protection of Georgia	26	26	0	0	0	26	100%
7	Roads Department of Georgia	26	26	0	0	0	26	100%
8	Georgian Civil Aviation Agency	25	25	0	0	0	25	100%
9	Georgian Wine Association	25	25	0	0	0	25	100%
10	National Agency of Execution of Non-Custodial Sentences and Probation	24	24	0	0	0	24	100%
11	National Center for Educational Quality Enhancement	23	23	0	0	0	23	100%
12	National Bank of Georgia	23	23	0	0	0	23	100%
13	Children and Youth National Center	22	22	0	0	0	22	100%
14	Center of Electoral Systems Development, Reforms and Trainings	21	21	0	0	0	21	100%
15	State Audit Office of Georgia	21	21	0	0	0	21	100%
16	Civil Service Bureau	21	21	0	0	0	21	100%
17	Tsageri Municipal Board	21	21	0	0	0	21	100%
18	LEPL Children and Youth Development Center	20	20	0	0	0	20	100%
19	Georgian National Museum	20	20	0	0	0	20	100%
20	National Intellectual Property Center (Sakpatenti)	20	20	0	0	0	20	100%
21	Public Defender of Georgia	20	20	0	0	0	20	100%
22	Tbilisi State Medical University	20	20	0	0	0	20	100%
23	Tkibuli Municipal Board	19	19	0	0	0	19	100%
24	Penitentiary and Probation Training Center	18	18	0	0	0	18	100%
25	The National Parliamentary Library of Georgia	18	18	0	0	0	18	100%
26	Office of the Personal Data Protection Inspector	18	18	0	0	0	18	100%
27	Iv. Javakhishvili Tbilisi State University	18	18	0	0	0	18	100%
28	Tskaltubo Municipal Board	18	18	0	0	0	18	100%
29	The Unified National Body of Accreditation – Accreditation Center	16	16	0	0	0	16	100%
30	Kaspi Municipal Board	16	16	0	0	0	16	100%
31	Government of Adjara AR	15	15	0	0	0	15	100%
32	Ministry of Finance and Economy of Adjara AR	15	15	0	0	0	15	100%
33	LEPL Scientific-Research Center of the Agriculture	15	15	0	0	0	15	100%
34	Georgian Technical University	15	15	0	0	0	15	100%
35	Dmanisi Municipal Board	15	15	0	0	0	15	100%
36	Ministry of Agriculture of Adjara AR	14	14	0	0	0	14	100%

37	Ministry of Labour, Health and Social Care of Adjara AR	14	14	0	0	0	14	100%
38	Vano Khukhunaishvili Center for Effective Governance System and Territorial Arrangement Reform	14	14	0	0	0	14	100%
39	Municipal Board of Zugdidi Self-governing Community	14	14	0	0	0	14	100%
40	Tsageri Municipal Council	14	14	0	0	0	14	100%
41	Khulo Municipal Council	14	14	0	0	0	14	100%
42	Ministry of Education, Culture and Sport of Adjara AR	13	13	0	0	0	13	100%
43	Akhaltzikhe City Hall	13	13	0	0	0	13	100%
44	Ozurgeti City Hall	13	13	0	0	0	13	100%
45	Administration of the State-Representative Governor in Racha-Lechkhumi and Kvemo Svaneti Region	12	12	0	0	0	12	100%
46	Gori City Hall	12	12	0	0	0	12	100%
47	Municipal Board of Mtskheta Self-governing Community	12	12	0	0	0	12	100%
48	Kareli Municipal Council	12	12	0	0	0	12	100%
49	LEPL Legal Aid Service	11	11	0	0	0	11	100%
50	Abasha Municipal Council	11	11	0	0	0	11	100%
51	Zugdidi City Council	11	11	0	0	0	11	100%
52	Administration of State-Representative Governor in Mtsketa-Mtianeti Region	10	10	0	0	0	10	100%
53	Ambrolauri Municipal Council	10	10	0	0	0	10	100%
54	Gori Municipal Council	10	10	0	0	0	10	100%
55	Municipal Council of Gori Self-governing Community	10	10	0	0	0	10	100%
56	Z.Paliashvili Tbilisi Opera and Ballet State Theatre	8	8	0	0	0	8	100%
57	Telavi Municipal Council	8	8	0	0	0	8	100%
58	Municipal Council of Mtskheta Self-governing Community	8	8	0	0	0	8	100%
59	National Food Agency	29	28	1	0	0	29	98.3%
60	Municipal Development Fund of Georgia	22	21	1	0	0	22	97.7%
61	Georgian Intelligence Service	22	21	1	0	0	22	97.7%
62	Ministry of Energy of Georgia	21	20	1	0	0	21	97.6%
63	Laboratory of Ministry of Agriculture	20	19	1	0	0	20	97.5%
64	Kareli Municipal Board	20	19	1	0	0	20	97.5%
65	Kvareli Municipal Board	20	19	1	0	0	20	97.5%
66	State-Hydrographic Service of Georgia	19	18	1	0	0	19	97.4%
67	Land Transport Agency	24	23	1	0	0	10	97.3%
68	Georgian National Energy and Water Supply Regulatory Commission	18	17	1	0	0	18	97.2%
69	Education Management Information Center	17	16	1	0	0	17	97.1%
70	Dusheti Municipal Board	16	15	1	0	0	16	96.9%
71	Batumi State University	15	14	1	0	0	15	96.7%
72	Sokhumi State University	15	14	1	0	0	15	96.7%
73	Zugdidi City Hall	15	14	1	0	0	15	96.7%
74	Administration of the President of Georgia	18	17	1	0	0	5	96.5%
75	Ministry of Education and Science of Georgia	28	26	2	0	0	28	96.4%
76	Municipal Board of Gori Self-governing Community	14	13	1	0	0	14	96.4%
77	Public Broadcaster	13	12	1	0	0	13	96.2%
78	Municipal Board of Akhaltsikhe Self-governing Community	13	12	1	0	0	13	96.2%
79	Georgia's Innovation and Technology Agency	13	12	1	0	0	13	96.2%
80	Veterans Affairs State Service	13	12	1	0	0	13	96.1%

81	LEPL “National Forestry Nursery”	12	11	1	0	0	12	95.8%
82	Administration of the State Representative Governor in Samegrelo-Zemo Svaneti Region	12	11	1	0	0	12	95.8%
83	Ninotsminda Municipal Council	12	11	1	0	0	12	95.8%
84	Sagarejo Municipal Council	12	11	1	0	0	12	95.8%
85	Levan Samkharauli National Forensics Bureau	27	26	0	1	0	10	95.7%
86	Ministry of Foreign Affairs	28	26	2	0	0	2	95.6%
87	Environmental Information and Education Center	14	13	1	0	0	2	95.6%
88	Georgian National Tourism Administration	22	21	0	0	1	21	95.5%
89	Technical and Constructions Supervision Agency	11	10	1	0	0	11	95.5%
90	Administration of the State-Representative Governor in Guria Region	11	10	1	0	0	11	95.5%
91	Administration of the State-Representative Governor in Samtskhe-Javakheti Region	11	10	1	0	0	11	95.5%
92	Municipal Council of Telavi Self-governing Community	11	10	1	0	0	11	95.5%
93	LEPL Olympic Reserve Training National Centre	20	19	0	0	1	19	95%
94	Eurasian Transport Corridor Investment Center	10	9	1	0	0	10	95%
95	Aspindza Municipal Council	10	9	1	0	0	10	95%
96	Khobi Municipal Council	10	9	1	0	0	10	95%
97	Khulo Municipal Board	19	17	2	0	0	19	94.7%
98	Ministry of Labour, Health and Social Affairs of Georgia	49	44	5	0	0	28	94.5%
99	National Assessment and Examinations Center	27	25	1	0	1	26	94.4%
100	State Fund for Protection and Assistance of (Statutory) Victims of Human Trafficking	26	24	1	0	1	25	94.2%
101	Abasha Municipal Board	17	15	2	0	0	17	94.1%
102	Akhmeta Municipal Council	17	15	2	0	0	17	94.1%
103	Baghdati Municipal Board	17	15	2	0	0	17	94.1%
104	Chkhorotsku Municipal Board	19	17	2	0	0	7	94.1%
105	Office of the State Minister of Georgia for Reconciliation and Civic Equality	25	22	3	0	0	25	94%
106	Sagarejo Municipal Board	16	14	2	0	0	16	93.8%
107	Municipal Board of Ozurgeti Self-Governing Community	16	15	0	0	1	15	93.8%
108	Martvili Municipal Council	16	15	0	0	1	15	93.8%
109	Agency of Protected Areas	27	25	1	0	1	0	93.5%
110	Gurjaani Municipal Council	15	13	2	0	0	14	93.3%
111	The Office of the State Minister of Georgia for Diaspora Issues	24	21	3	0	0	11	93.2%
112	Dedoplistskaro Municipal Council	14	12	2	0	0	14	92.9%
113	Tetritskaro Municipal Council	14	13	0	0	1	13	92.9%
114	Marneuli Municipal Board	23	21	1	0	1	8	92.9%
115	Sachkhere Municipal Council	14	13	0	0	1	13	92.9%
116	Poti Municipal Council	14	13	0	0	1	13	92.9%
117	Kvareli Municipal Council	14	13	0	0	1	13	92.9%
118	Akaki Tsereteli State University	16	14	2	0	0	0	92.8%
119	Agricultural Cooperative Development Agency	13	11	2	0	0	13	92.3%
120	Batumi City Hall	26	23	2	0	1	25	92.3%
121	Educational and Scientific Infrastructure Development Agency	18	15	3	0	0	18	91.7%
122	Information Centre on NATO and EU	12	10	2	0	0	0	91.7%

123	Administration of the State-Representative Governor in Shida-Kartli Region	12	10	2	0	0	12	91.7%
124	Marneuli City Hall	12	10	2	0	0	12	91.7%
125	Municipal Board of Ambrolauri Self-Governing Community	12	10	2	0	0	12	91.7%
126	Samtredia Municipal Board	18	16	1	0	1	17	91.7%
127	Khashuri Municipal Council	12	11	0	0	1	11	91.7%
128	Office of the State Minister of Georgia on European & Euro-Atlantic Integration	24	21	2	0	1	14	91.3%
129	State Regulation Agency for Medical Activities	23	20	2	0	1	22	91.3%
130	Gori State Teaching University	17	14	3	0	0	17	91.2%
131	Tbilisi City Hall	28	24	3	1	0	24	90.9%
132	Adigeni Municipal Council	11	9	2	0	0	11	90.9%
133	Akhaltzikhe Municipal Council	11	9	2	0	0	11	90.9%
134	Chokhatauri Municipal Council	11	9	2	0	0	11	90.9%
135	Bolnisi Municipal Council	11	10	0	0	1	10	90.9%
136	Tkibuli Municipal Council	11	10	0	0	1	10	90.9%
137	Zugdidi State University	18	15	3	0	0	0	90.7%
138	Marneuli Municipal Council	16	14	1	0	1	15	90.6%
139	Lagodekhi Municipal Board	21	17	4	0	0	21	90.5%
140	National Agency of State Property	26	23	1	1	1	22	90.3%
141	Administration of the State-Representative Governor in Kvemo-Kartli Region	10	9	0	0	1	9	90%
142	Dmanisi Municipal Council	10	9	0	0	1	9	90%
143	Kobuleti Municipal Council	10	9	0	0	1	9	90%
144	Gurjaani Municipal Board	20	17	2	0	1	18	90%
145	Poti City Hall	24	21	1	0	2	22	89.6%
146	Dedoplistkaro Municipal Board	19	15	4	0	0	19	89.5%
147	Martvili Municipal Board	19	16	2	0	1	18	89.5%
148	Disease Control and the National Center for Public Health	14	12	1	0	1	13	89.3%
149	Batumi City Council	14	12	1	0	1	13	89.3%
150	Competition Department	9	7	2	0	0	9	88.9%
151	Municipal Council of Akhalkalaki Self-Governing Community	9	7	2	0	0	9	88.9%
152	Khashuri Municipal Board	18	15	2	0	1	17	88.9%
153	Khelvachauri Municipal Board	18	16	0	0	2	16	88.9%
154	Khelvachauri Municipal Council	9	8	0	0	1	8	88.9%
155	The Academy of the Ministry of Finance	17	15	0	0	2	15	88.2%
156	Kutaisi City Council	17	14	2	1	0	17	88.2%
157	Senaki Municipal Board	17	14	2	0	1	16	88.2%
158	Chokhatauri Municipal Board	21	18	1	0	2	19	88.1%
159	Parliament of Georgia	25	21	2	0	2	23	88%
160	State Agency for Religious Issues	9	7	2	0	0	0	87.9%
161	Maritime Transport Agency of Georgia	24	20	2	2	0	24	87.5%
162	Standards and Metrology Center of Georgia	24	20	2	0	2	22	87.5%
163	Digital Broadcasting Agency	24	20	2	0	2	22	87.5%
164	Administration of the State Representative Governor in Imereti Region	12	10	1	0	1	11	87.5%
165	Bagdati Municipal Council	8	7	0	0	1	7	87.5%

166	Telavi City Hall	12	9	3	0	0	12	87.5%
167	Mestia Municipal Council	12	10	1	0	1	11	87.5%
168	Chiatura Municipal Council	12	10	1	0	1	11	87.5%
169	Tianeti Municipal Board	19	15	3	0	1	18	86.8%
170	Office of the Business Ombudsmen of Georgia	15	13	0	0	2	13	86.7%
171	National Security Council of Georgia	11	8	3	0	0	11	86.4%
172	National Forestry Agency	22	18	2	0	2	20	86.4%
173	Dusheti Municipal Council	11	9	1	0	1	10	86.4%
174	Senaki Municipal Council	11	9	1	0	1	10	86.4%
175	Signagi Municipal Council	18	14	3	0	1	17	86.1%
176	Culture Heritage Protection Agency *	24	20	2	2	0	24	85.8%
177	Municipal Council of Ozurgeti Self-Governing Community	14	12	0	0	2	12	85.7%
178	High Council of Justice	10	8	1	1	0	10	85%
179	Akhalkalaki Municipal Council	10	7	3	0	0	10	85%
180	Tianeti Municipal Council	13	10	2	0	1	12	84.6%
181	National Environmental Agency	29	24	1	0	4	25	84.5%
182	Tskhaltubo Municipal Council	16	13	1	1	1	15	84.4%
183	Shuakhevi Municipal Council	13	11	0	0	2	4	84.1%
184	Ministry of Agriculture *	30	23	6	0	1	28	83.3%
185	Lentekhi Municipal Council	9	6	3	0	0	9	83.3%
186	Qedi Municipal Council	12	9	2	0	1	11	83.3%
187	Akhalkalaki Municipal Board	24	19	2	0	3	13	83%
188	National Center for Teacher Professional Development	26	21	1	0	4	22	82.7%
189	State Procurement Agency	20	13	7	0	0	20	82.5%
190	Signagi Municipal Board	20	13	7	0	0	20	82.5%
191	Financial Monitoring Service of Georgia	20	16	1	0	3	17	82.5%
192	Qeda Municipal Board	20	16	1	0	3	17	82.5%
193	Ministry of Corrections	25	20	1	2	2	23	82%
194	Zestaponi Municipal Board	25	20	1	0	4	21	82%
195	Kharagauli Municipal Board	22	17	2	0	3	19	81.8%
196	Administration of State-Representative Governor in Kakheti Region	13	10	1	0	2	11	80.8%
197	Chiatura Municipal Board	16	12	2	0	2	0	80.4%
198	Ministry of Culture and Monument Protection	29	22	2	2	3	25	79.3%
199	Kutaisi City Hall	26	19	3	0	4	22	78.8%
200	Chkhorotsku Municipal Council	14	10	2	0	2	12	78.6%
201	Municipal Board of Telavi Self-Governing Community	16	12	1	0	3	13	78.1%
202	Kharagauli Municipality Council	16	12	1	0	3	13	78.1%
203	Ozurgeti City Council	9	6	2	0	1	8	77.8%
204	Zestaponi Municipality Council	20	15	1	0	4	16	77.5%
205	Ministry of Defense *	37	34	1	1	1	5	76.7%
206	Khobi Municipal Board	28	20	3	0	5	12	76.4%
207	Georgian National Communication Agency *	26	23	2	1	0	14	76.2%
208	Ilia State University	19	11	7	0	1	0	75.4%
209	Samtredia Municipal Council	14	10	1	0	3	11	75%
210	Lagodekhi Municipal Council	17	12	1	0	4	5	73.1%
211	Oni Municipal Council	9	6	1	0	2	7	72.2%
212	Municipal Council of Zugdidi Self-Governing Community	12	8	1	0	3	9	70.8%
213	Investigation Service of Ministry of Finance	22	13	5	0	4	18	70.5%

214	Sachkhere Municipal Board	22	15	1	0	6	16	70.5%
215	Rustavi City Council	20	13	2	2	3	9	69.7%
216	Rustavi City Hall	27	17	3	0	7	20	68.5%
217	Administration of South Ossetia	19	13	0	0	6	13	68.4%
218	Tetritskaro Municipal Board	25	17	0	1	7	18	68%
219	Kazbegi Municipal Board	22	14	2	0	6	8	67.8%
220	Oni Municipal Board	23	15	1	0	7	16	67.4%
221	State Security and Crisis Management Council*	11	7	3	1	0	11	66.4%
222	Vani Municipal Board	24	16	0	0	8	6	66.3%
223	Mestia Municipal Board	25	15	3	0	7	9	65.6%
224	Government of Abkhazia AR	19	12	1	0	6	0	65.1%
225	State Treasury *	19	12	3	0	4	6	64.2%
226	Service Agency of the Ministry of Finance of Georgia *	14	10	2	2	0	7	63.9%
227	Kazbegi Municipal Council	11	7	0	0	4	7	63.6%
228	Mtskheta City Hall	19	11	2	0	6	13	63.2%
229	Tbilisi City Council	12	3	9	0	0	10	62.3%
230	Social Service Agency	36	21	2	0	13	23	61.1%
231	Akhmeta Municipal Board	27	16	1	0	10	11	60.9%
232	Shuakhevi Municipal Board	25	14	2	0	9	16	60%
233	Borjomi Municipal Board	28	11	11	0	6	22	58.9%
234	State Material Reserves Department	12	5	4	2	1	11	58.3%
235	Special State Protection Service of Georgia	29	13	8	0	8	12	58.3%
236	Financial-Analytical Service *	20	11	6	0	3	5	57.9%
237	Kobuleti Municipal Board	26	15	0	0	11	15	57.7%
238	Lanchkhuti Municipal Board	26	15	0	6	5	16	57.5%
239	Vani Municipal Board	20	11	0	0	9	11	55%
240	Ministry of Finance *	38	19	11	4	4	6	54.2%
241	Adgieni Municipal Board	25	13	1	0	11	14	54%
242	Office of Resource Officers of Educational Institutions	27	13	3	6	5	22	53.7%
243	Academy of the MIA	23	11	2	10	0	23	52.2%
244	Georgian Chamber of Commerce & Industry	16	8	0	0	8	8	50%
245	Gardabani Municipal Council	14	5	4	0	5	9	50%
246	Lanchkhuti Municipal Council	20	10	0	0	10	10	50%
247	Telavi State university	20	8	4	0	8	12	50%
248	Tsalenjikha Municipal Board	22	9	4	0	9	6	49.7%
249	Kaspi Municipal Council	18	8	1	0	9	9	47.2%
250	Khoni Municipal Council	24	11	0	0	13	7	45.7%
251	State Oil and Gas Agency	21	9	1	0	11	10	45.2%
252	Ninotsminda Municipal Board	29	11	3	0	15	14	43.1%
253	Border Police of Georgia *	26	8	14	3	1	2	42.1%
254	Revenue Service*	33	12	9	2	10	2	40.6%
255	MIA Service Agency	27	5	4	0	18	0	40.4%
256	Tsalenjikha Municipal Council	19	6	3	0	10	9	39.5%
257	Ministry of Internal Affairs *	59	17	15	2	25	6	36.8%
258	Prosecutor's Office of Georgia *	38	12	11	0	15	10	36%
259	Aspindza Municipal Board	21	7	0	0	14	4	33.2%
260	Gardabani Municipal Board	26	7	3	0	16	10	32.7%
261	Borjomi Municipal Council	22	5	4	0	13	9	31.8%
262	Ministry of Justice *	36	11	0	0	25	9	30.5%

263	LEPL „112“	20	2	8	1	9	0	29.5%
264	Lentekhi Municipal Board	28	7	1	0	20	8	26.8%
265	Mtskheta City Council	17	4	1	0	12	0	26.5%
266	Khoni Municipal Board	27	7	0	0	20	7	25.9%
267	Terjola Municipal Board	25	5	2	0	18	7	24%
268	Administration of the Government of Georgia	32	7	1	0	24	4	23.3%
269	Tsalka Municipal Board	28	6	1	0	21	7	23.2%
270	Healthcare Service of the MIA	23	2	6	0	15	0	21.4%
271	Terjola Municipal Council	22	4	1	0	17	5	20.5%
272	Bolnisi Municipal Board	24	4	1	0	19	0	18.5%
273	Ministry of Economy and Sustainable Development of Georgia *	51	4	3	0	44	7	10.8%
274	National Bureau of Enforcement *	29	2	0	0	27	0	6.8%
275	Security Police	22	1	1	0	20	0	6.7%
276	Data Exchange Agency	26	1	0	0	25	1	3.8%
277	National Agency of Public Registry	29	1	0	0	28	1	3.4%
278	Public Service Hall *	38	1	0	0	37	1	2.6%
279	Tsalka Municipal Council	26	0	0	0	26	0	0%
280	Center for Crime Prevention	28	0	0	0	28	0	0%
281	Training Center of Justice	28	0	0	0	28	0	0%
282	National Archives of Georgia	28	0	0	0	28	0	0%
283	Notary Chamber of Georgia	28	0	0	0	28	0	0%
284	Legislative Herald of Georgia *	35	0	0	0	35	0	0%
285	Public Service Development Agency *	37	0	0	0	37	0	0%
286	LEPL “SmartLogic” *	37	0	0	0	37	0	0%

* Information is provided after submitting Administrative complaint

Note1 The rating does not include replies according to which the requested information did not exist or specific action had not been carried out.

Note2 The rating does not include Public Institutions which were addressed with 5 or less requests during the reporting period.