

Access to Information (ATI)

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This desk research focuses on finding how Access to Information (ATI) (or, also referred to as Right to Information (RTI), or Freedom of Information (FOI)) is organized in Europe

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INTRODUCTION

In 1766, Sweden was the first country in the world to adopt a law giving individuals the right to access information held by public bodies; It took nearly two centuries before the next such law was adopted in Finland in 1951 ([Anders Chydenius Foundation, 2006](#)).

Massive growth in the number of national laws giving individuals the right to access information held by public bodies took place over the past 3 decades ([World Bank, 2014](#)).

Number of reasons determined such developments. The collapse of authoritarianism and the emergence of new democracies gave rise to new constitutions in the beginning of the 90s that included specific guarantees of the right to information.

Furthermore, the older democracies saw the enactment of legislation. For example, the [Freedom of Information Act](#) was approved in the United Kingdom in November 2000, after nearly 20 years of campaigning.

In addition, the international donors, such as [the World Bank](#) and [International Monetary Fund](#) started to adopt greater openness policies, and to urge countries to adopt access to information laws within the frames of transparency and reduction of corruption.

Over approximately the same period, right to access to information has come to be recognized as a human right under international law, a significant normative development.

The original guarantees of freedom of expression found in the Universal Declaration on Human Rights (UDHR) [article 19](#) and the [International Covenant on Civil and Political Rights \(ICCPR\)](#) refer not only to the right to 'impart' information and ideas, but also to the right to 'seek' and 'receive' information.

Later, the regional counterparts of these global instruments-namely the European Convention on Human Rights (ECHR) ([Article 10](#)), the African Charter on Human and Peoples' Rights (ACHPR) ([Article 9](#)) and the American Convention on Human Rights (ACHR) ([Article 13](#)) employed similar terms.

In 2006, for the first time, right to access to information was given formal international legal recognition, by the InterAmerican Court of Human Rights in the [2006 case](#) of *Claude Reyes and Others v. Chile*" and then, in 2009, by the European Court of Human Rights.

In 2011, the UN Human Rights Committee further defined the right of access to information in its [General Comment](#) on Article 19 of the ICCPR and urged the states to proactively adopt relevant laws. It stated:

“To give effect to the right of access to information, States parties should proactively put in the public domain Government information of public interest. States parties should make every effort to ensure easy, prompt, effective and practical access to such information. States parties should also enact the necessary procedures, whereby one may gain access to information, such as by means of freedom of information legislation. The procedures should provide for the timely processing of requests for information according to clear rules that are compatible with the Covenant. Fees for requests for information should not be such as to constitute an unreasonable impediment to access to information. Authorities should provide reasons for any refusal to provide access to information. Arrangements should be put in place for appeals from refusals to provide access to information as well as in cases of failure to respond to requests.”

The aforementioned normative developments resulted in the inclusion of targets to ensure advancement of ATI on a global scale, within the framework of international development agendas.

In 2015, the UN integrated the right to information as part of its Sustainable Development Goals (SDGs), to be reached by 2030. [SDG 16](#) goal - with an overarching aim to build peaceful, accountable and inclusive societies - aims to ensure public access to information and protecting fundamental freedoms, in accordance with national legislation and international agreements ([UNESCO, 2019](#)).

According to [UNESCO](#), the UN's designated agency tasked to monitor progress in this area, the number of laws that specifically guaranteed the rights of citizens to access government information went from 40 in 2009, to 126 laws adopted worldwide in 2019.

Despite this, the challenges remain. The [2019 UNESCO research](#) on implementation of SDG 16.10 demonstrates that while there is progress, governments can still introduce and improve ATI laws, as well as their implementation.

The current data do not adequately monitor the extent to which these laws are implemented and, at the same time, there is widespread evidence suggesting a growing hostility towards the media and journalists, including violence and abusive treatment ([SDG16 Data Initiative, 2019](#)).

Furthermore, the COVID-19 pandemic has highlighted the problems that persist with regards to the access of information, especially, in times of crisis. The pandemic disrupted normal

administrative procedures, including those relating to information, such as the processing of requests for information or ensuring that relevant information is still being recorded ([UNESCO, 2020](#)).

- For example, in Romania, the state of emergency [presidential decree](#) included a provision extending the time period for responding to freedom of information requests from 10 days to 20 days. Responses to journalists are supposed to be handled in a day.
- The Italian government [said](#) that from March 8 to May 31 action on requests that are “not urgent and cannot be postponed” is suspended. The government doesn’t specify whether COVID-related requests fall under the “urgent” category. And, therefore, with information officers working remotely, without access to physical documents, the likelihood of replies is diminished.

Also, in responding to the COVID-19 outbreak, many governments have taken measures that limit access to information held by public bodies relating to the pandemic and other crucial areas of public interest ([Article 19, 2020](#)).

- For example, in Serbia, the state of emergency doesn’t officially modify access to information, but with civil servants out of their offices, the system’s functioning is limited. A request from [Transparency Serbia](#) challenging an official statement that the number of ventilators/respirators in medical facilities is a “state secret,” has not been answered.

Considering the growing concerns for access to information in the context of the pandemic, various civil society and non-governmental organisations in Europe [urged](#) that governments immediately restore laws and practical systems for implementing access to information to pre-pandemic levels and improve them in line with international standards and best practice.

In the light of the pandemic, members of the Groups of Friends on the Safety/Protection of Journalists also [called on](#) all states to protect journalists’ and media workers’ safety, safeguard a free and independent media and ensure unhindered access to information, both online and offline.

COUNCIL OF EUROPE

The Council of Europe 2009 Convention on Access to Official Documents (CETS No. 205), also known as the [*Tromsø Convention*](#), is the first binding international legal instrument which recognises a general right of access to official documents held by public authorities.

The Convention establishes a right to request “official documents”, which are broadly defined as all information held by public authorities, in any form;

- The right can be exercised by all persons with no need to demonstrate a particular interest in the information requested;
- There may be no charges for filing requests and viewing documents;
- The right applies to all bodies performing administrative functions and States may optionally add legislative and judicial bodies as well as private bodies performing public functions;
- There is a limited list of exceptions (12 in total) which must be subject to public interest and harm tests;
- Requestors have a right to a fast and low-cost review process and shall always have a right of appeal to a court or another independent and impartial body.

This treaty was opened for signature on 18th June, 2009. Any of the 47 member states of the Council of Europe can sign the Convention.

By 2020, 18 countries have signed the convention but only 10 have ratified it (Bosnia, Estonia, Finland, Hungary, Lithuania, Montenegro, Norway, Moldova, Sweden and Ukraine).

The treaty entered into force only by the end of 2020, when Ukraine, 10th country, signed and ratified it. This was the minimum number of countries necessary to ratify it in order for this legal document to enter into force.

Many countries have not signed the treaty for various reasons. For example, the states are obliged to meet the minimum legal requirements in their national laws. Some countries, such as for instance, Austria, do not meet even the minimum requirements.

Other countries, such as the UK, do meet the standards and maybe even more in certain areas. But already in 2009 Britain announced that it would not sign the convention. As explained by the critics, the British Government planned to introduce several national laws which would not meet or go against the convention obligations.

See chart of signatures and ratifications of Treaty 205 [here](#).

[Access Info](#) has been advocating the ratification of this treaty with civil society organisations, information commissioners, and lawyers.

EUROPEAN UNION

The right of access to EU documents is guaranteed by the Treaty on the Functioning of the European Union (Article 15) and by the [Charter of Fundamental Rights of the European Union \(Article 42\)](#). The Article 42 grants a right of access to documents held by European Union institutions to “[a]ny citizen of the Union, and any natural or legal person residing or having its registered office in a Member State.”

2014 [EU Human Rights Guidelines on Freedom of Expression Online and Offline](#) further underlines that the right to freedom of expression includes freedom to seek and receive information (article 14).

The mechanisms for making documents requests and the rules on exceptions are developed in [Regulation 1049/2001 regarding access to Parliament, Council and Commission documents](#) – this is the EU’s equivalent of an access to information or freedom of information law.

The EU right of access to information covers documents held by the three main decision-making institutions of the European Union, such as European Parliament, Council and Commission.

In order to ensure that the right of access is fully respected, a two-stage administrative procedure applies, with the additional possibility of court proceedings or complaints to the Ombudsman.

The EU does not have competence to harmonize national laws on access to information and only relates to access to documents held by the European institutions.

The authorities of EU countries are bound to comply with the Charter of Fundamental Rights only when implementing EU law. Fundamental rights are protected by the country's constitution.

The right of access to official documents is not an absolute human right and may be restricted in some circumstances prescribed by the Regulation 1049/2001.

- The purpose of the exceptions is to ensure a proper balance between the public and private interest. Exceptions of the right to access official documents are evaluated in the light of three tests: (1) harm test, (2) balancing test and (3) the requirement of approval.
- Besides the exceptions, the Regulation 1049/2001 defines a different regime for access to information about sensitive documents. The category of sensitive documents is created for the purpose of protection of the interests of the European Union or its Member States in the areas of public security, defense and military matters and is regulated by separate rules adopted by the EU institutions.

GLOBAL RIGHT TO INFORMATION (RTI) RATING

Founded by Access Info Europe (AIE) and the Centre for Law and Democracy (CLD), [the Right to Information Rating](#) measures the strength of the legal framework for the right to access information held by public authorities (the right to information or RTI) based on 61 discrete indicators – each of which looks at a particular feature of a strong legal regime for RTI – divided into seven main categories – namely (1) Right of Access, (2) Scope, (3) Requesting Procedure, (4) Exceptions & Refusals, (5) Appeals, (6) Sanctions & Protections, and (7) Promotional Measures.

Top 10 RTI Countries Globally	Bottom 10 RTI Countries Globally
<ol style="list-style-type: none"> 1. Afghanistan 2. Mexico 3. Serbia 4. Sri Lanka 5. Slovenia 6. Albania 7. India 8. Croatia 9. Liberia 10. El Salvador 	<ol style="list-style-type: none"> 1. Austria 2. Palau 3. Liechtenstein 4. Monaco 5. Philippines 6. Tajikistan 7. East Timor 8. Benin 9. Germany 10. Jordan

Europe has some of the best and worst access to information laws in the world: from Austria that sits at the bottom of the global ranking, to Slovenia that has the second-best legal framework in the world.

Top 5 EU countries	Bottom 5 EU countries
<ol style="list-style-type: none"> 1. Slovenia 2. Croatia 3. Finland 4. Sweden 5. UK 	<ol style="list-style-type: none"> 1. Austria 2. Germany 3. Belgium 4. France 5. Bulgaria

See the Global Right to Information (RTI) Rating Map [here](#).

See data by country in the rating [here](#).

SWOT ANALYSIS OF RTI IN EUROPE

Source: [The 2013 Global Right to Information Update](#)

Strengths	Weaknesses
<ul style="list-style-type: none"> ● Largely stable democracies ● High levels of education and engagement in political debate and decision making ● High level of access to the Internet and internet literacy ● Active support from some governments, as part of the open data movement ● Strong independent review bodies in some countries (Germany, Ireland, Portugal, Scotland, Serbia, Slovenia, Switzerland and the UK) as well as effective Ombudsman oversight in Nordic countries and the EU ● In Central and Eastern Europe, RTI is highly valued by citizens who have experienced life under repressive governments ● There has been a long history of respect for RTI in parts of Northern and Western Europe (e.g. Sweden and Finland) 	<ul style="list-style-type: none"> ● Significant problems often exist regarding implementation of RTI laws ● Closed administrative culture in some Southern European countries ● Confidence in democratic systems can lead to complacency in some countries ● Lack of freedom of expression in some countries (with deteriorations in Azerbaijan, Hungary, Russia and Turkey) ● Limited scope of RTI: some countries and the EU restrict access to ‘official documents’ rather than ‘information’ and in some the right does not fully apply to legislative and judicial branches (e.g. France, Germany) ● Civil society is weak and CSOs have difficulty raising funds for work related to democracy
Opportunities	Threats
<ul style="list-style-type: none"> ● Financial crisis has opened debate about corporate transparency thus pushing the boundaries of RTI to include non-State actors ● Concerns about a ‘democratic deficit’ in the EU may lead to new impetus to improve transparency mechanisms to build participation ● Governments are increasingly making use of the Internet to disseminate information ● Some strong national CSO organisations and coalitions ● Civil society movements are using ICTs to make governments more transparent and collaborating across borders, including via making international information requests ● Transparency and corruption are important issues for social movements 	<ul style="list-style-type: none"> ● Privatisation of public bodies and services taking them outside of the ambit of RTI laws ● New economic imperatives for rapid decision-making across countries may weaken political will for RTI ● Negative impact of government spending cuts on bodies in charge of responding to requests ● Difficulties faced by the media including concentration of ownership and limited funds for investigative journalism ● Difficulties in showing impact of RTI work, including because civil society often does not find out how information has been used once access has been gained

LEGAL ANALYSIS: EU COUNTRIES

2017 Access Info Europe [Legal Analysis](#), based on a study of the access to information laws in 11 countries (Austria, Croatia, Finland, Germany, Ireland, Italy, Poland, Slovenia, Spain, Greece, United Kingdom) and that of the European Union, evaluated the extent to which RTI laws provide a right to request the information needed to follow and participate in decision making by public bodies.

Summary of findings:

Europe's Access to Information laws permit requests for decision-making information

- This is true for eight countries (Croatia, Finland, Germany, Ireland, Italy, Poland, Slovenia and, the United Kingdom) and the European Union.
- the countries among the best are Finland, Slovenia and worst Greece and Italy
- In two countries, Austria and Greece, only some information about decision making may be requested, in Austria because there are statutory secrecy provisions which can apply to decision making and in Greece because documents submitted by third parties may not be requested.
- In Spain the law provides public bodies with the option of refusing to process requests where they are for “auxiliary” information, which can include internal reports and communications, although in practice requests are processed and then access is denied.

Decision-making is an exception to the right of access to information in all the jurisdictions surveyed except Poland, but not all of these regimes have a harm and/or public interest test for this exception

- All but two jurisdictions in this study have an exception in their national access to information law that specifically protects the decision-making process. In Finland only some decision-making processes benefit from such an exception, whereas the Polish access to information law does not contain a decision-making exception.
- In most of the jurisdictions surveyed there is a harm test that must be applied when invoking the decision-making exception; such a test does not exist in Austria, Greece, Ireland, and Poland.
- The application of a public interest test when invoking the exception on decision making is obligatory in half of the jurisdictions surveyed. The legal framework is especially weak in Austria and Greece, where there exist neither harm nor public interest tests when denying information on grounds of protection of decision making.

All jurisdictions studied have an exception to protect the privacy of individuals but harm and/or public interest tests are not always mandatory when applying this exception

- Austria's very basic access law does not mention privacy, but Austria does, nevertheless, have data protection regulations. In Austria, Greece and Poland privacy is an absolute exception.
- A positive finding of the legal research comes from Spain where, although there is an absolute exception with regard to sensitive personal data, when it comes to basic identifying information such as names and job titles, this does not fall under the privacy exception and hence can be requested, something important for access to decision-making documents such as minutes of meetings.

There is no obligation to record minutes of meetings held as part of decision making processes

- One of the most significant findings of this study was that in 11 out of 12 jurisdictions surveyed there was found no legal obligation for public institutions to compile or record minutes of meetings related to a particular policy or decision-making process.
- Such an obligation only exists in Greece, where the minutes should include the names of those present.
- Although minutes of meetings may be requested via the access to information laws in all the jurisdictions surveyed, the lack of record keeping obligations threatens to significantly weaken transparency of decision making.

There are either weak or no requirements for proactive publication of information with regards to minutes of meetings and documents submitted by lobbyists

- there is no requirement to make public proactively the core documentation related to decision-making processes. In particular, the study found that no country has clear requirements to publish proactively minutes of meetings related to particular policies or decision-making processes.
- Similarly, with the exception of Poland, no jurisdiction has clear requirements regarding the publication of lobbying activities and documents submitted by lobbyists and external interest groups during a decision-making process.

Recommendations:

- All public bodies which participate in decision-making processes fall under the scope of the national access to information law.
- Harm and public interest tests exist for all exceptions to access to information, including decision making and privacy.
- There is an obligation to record minutes of meetings held as part of decision making processes.
- There is a requirement to publish proactively information about decision making processes, such as minutes of meetings and documents submitted by lobbyists.

CASE STUDY: FINLAND

According to the [Council of Europe](#), Some good state practices exist in terms of ATI in Europe. In Estonia, for example, the [Public Information Act](#) provides for broad disclosure of public information.

In Croatia, Serbia, Slovenia and several other countries there is an independent oversight body - such as an Information Commissioner - responsible for monitoring and enforcing the right to information, while some other countries entrust the Parliamentary Ombudsman with supervision of the right of access to information.

Also, Finland constitutes a good practice study. It ranks 2nd in the 2020 [World Press Freedom Index](#) by Reporters Without Borders (RSF). It also takes place among the top countries in the [RTI rating](#).

Below are key conclusions on how access to information is organized in Finland. The full case study is available [here](#).

- The most important player is the state through its various institutions: the state takes responsibility for guaranteeing the freedom of expression for the media and citizens, and for developing a favourable legal environment.
- Legislation regarding the freedom of expression and media freedom are defined explicitly. According to the [Finnish Constitution](#) (731/1999) the freedom of expression belongs to everyone and includes the rights of expression, dissemination and receiving of information and opinions without prior intervention.
- To foster the right of the access to information, the Constitutional principle of everyone's right to freely receive information is linked to the [Act on the Exercise of Freedom of Expression in Mass Media](#) (460/2003) so that all official information in possession of the authorities must be accessible to every citizen without restriction, except cases determined by specific legislation.
- According to the Freedom of Expression Act the direct state interference in the activities of the media is legitimate only if seen unavoidable for protecting state secrets, privacy etc., and must be assessed from the perspective of the freedom of expression.

- In Finland, the protection of privacy has dominated at the cost of freedom of expression in several court cases against the media and therefore created difficulties for the media to intervene in socially important issues.
- Finnish court practices seem to follow the guidelines of the ECtHR more than before also in interpreting the issues of privacy.
- Media policy is directed towards securing the population a plurality of choices among channels, programmes and platforms, and providing access to information in all possible ways.
- Another important purpose of Finnish regulations is securing the transparency of decision-making by providing media and public with access to official information and documentation of public authorities.
- The overall nature of Finnish media policy is consensus based. The most important legislation is usually drafted in special committees which consist of state officials and professionals of respective fields. Routine legislative work is done by Ministries in cooperation with media industry representatives.
- The overall tendency is towards limiting statutory regulation and strengthening media self-regulation and public control.
- Although there is a very favourable legal framework combined with a long tradition of the freedom of speech, economic factors seem to have an increasing influence on the practical implementation of media freedom in Finland.
- The driving force in the Finnish media and communication policies has been based on economic values and on promoting competition in the media and communications markets.

SUCCESSFUL STORIES

Spain: Mar Cabra: Exposing the Misuse of Public Funds

In 2011, a 27-year-old journalist Mar Cabra made requests for information about how EU subsidies had been used in Spain, as Spain is one of the biggest recipients of EU fishing funds. Government departments in Spain refused to provide the information, basing their refusal on Spain's deficient legal framework. The EU's Directorate-General for Maritime Affairs and Fisheries, however, provided her with all the correspondence that they had sent to Spain about that company. The result was a story in [El País](#), Spain's largest national newspaper, which highlighted how fishing companies engaged in illegal activity continued to receive public funding. The issue was later investigated at the EU level and is currently being reviewed in the new EU Common Fisheries Policy.

United Kingdom: The MPs Expenses Scandal

The journalist Heather Brooke worked for years to get this information in the public domain by making FOI requests, and the House of Commons fought hard to keep it secret. But the people's right to know was upheld in 2008. This fundamentally changed how politicians behave; now there is an expectation of transparency and MPs understand that if they misuse our money, public will know about it.

United Kingdom: Airstrikes in Syria despite Commons vote against

British pilots carried out airstrikes in Syria despite the Commons voting against military action in Syria. David Cameron was aware for months that British pilots were carrying out airstrikes in Syria, but failed to reveal this to the House of Commons despite MPs voting specifically against the UK taking part in military missions in the country. This was revealed through an FOI request by the pressure group Reprieve.

Slovakia: The Supreme Court in favour of the right to a healthy environment

Large environmentalist group successfully challenged the government's refusal to disclose information on the forest management plan. Following the Supreme Court's ruling in favour of

the applicants, not only was the information disclosed but amendments were introduced to the relevant act classifying forest management plan as public information.

Uganda: Information Request Produces Long Awaited RTI Regulations

In 2005, Uganda adopted the Access to Information Act. The Government did develop regulations in 2008, but these were never published in the Official Gazette, and so never came into force. The lack of regulations hindered access, as most public bodies would simply not answer information requests. On 25 November 2010, AFIC made an information request to Parliament for copies of the reports ministers were supposed to provide under Section 43, detailing the compliance of their ministries with the Act. After back and forth communications, AFIC did not get the reports they had requested, because they were nonexistent due to noncompliance by ministers. But the request later led to the adoption of the Access to Information Regulations under Section 47 of the Access to Information Act, which was a considerable success.

Australia: RTI for Investigating Foreign Bribery

Richard Baker and Nick McKenzie of The Age (Melbourne) have produced more than 60 exclusive reports on Australia's leading case of foreign bribery, a story they originally broke in May 2009 when they revealed that a subsidiary of the Reserve Bank of Australia had paid million-dollar commissions to win global banknote contracts. Their stories have forced a parliamentary inquiry. Baker and McKenzie's investigation involved RTI requests and led to the uncovering of a complex money trail which spans Asia, Europe and Africa. The reports sparked raids, arrests and the creation of an Australian-British taskforce to investigate alleged bribery in three continents. In July 2011, the Australian Federal Police publicly acknowledged the Baker and McKenzie investigation.

Find more global cases at www.Right2Info.org which lists short descriptions of interesting stories and case studies organized by countries, where Freedom of Information helped individuals as well as organizations to achieve their goals. See some of the main case studies in the 2007 [report](#) by Commonwealth Human Rights Initiative.

RESOURCES

Key websites

Global RTI Rating: <https://www.rti-rating.org/>

2020 World Press Freedom Index: <https://rsf.org/en/2020-rsf-index-europes-journalists-face-growing-dangers>

Access Info Europe: <https://www.access-info.org/>

UNESCO: <https://en.unesco.org/themes/access-information>

World Bank: <https://www.worldbank.org/en/access-to-information>

Council of Europe <https://www.coe.int/en/web/conventions/full-list/-/conventions/treaty/205>

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