

	<p style="text-align: right;">Date : 11/06/2007</p> <p>Information management in Africa to undergo a change?</p> <p>Peter M. Sebina (PhD) University of Botswana Gaborone, Botswana</p>
<p>Meeting:</p>	<p>135 Access to Information Network - Africa (ATINA)</p>
<p>Simultaneous Interpretation:</p>	<p>No</p>
<p style="text-align: center;">WORLD LIBRARY AND INFORMATION CONGRESS: 73RD IFLA GENERAL CONFERENCE AND COUNCIL 19-23 August 2007, Durban, South Africa http://www.ifla.org/iv/ifla73/index.htm</p>	

Abstract

As Freedom of Information (FOI) legislation continues to be adopted in Africa, the presumption behind its adoption has been that good information infrastructures exists to guarantee access to information. Applying ideas of information economics, this paper argues that information management has all along undergone neglect in Africa. Using case studies of Botswana, Ireland, Malawi, South Africa and the United Kingdom the paper posits that the adoption of FOI legislation mandates African countries to reverse the neglect. Reversal of the neglect will be achieved by developing good information management infrastructure to cater for variable access to information demands.

Introduction

As Freedom of Information (FOI) legislation continues to be adopted in Africa, little or nothing is done to evaluate the efficacy of information management. The adoption of the laws appears to be based on the belief that good information management practices exist. The presumed existence of good information management practices is expected to ensure that information is created and can be made available to citizens for variable external access. A study carried out between 2003 and 2006 shows that the adoption of FOI laws in Africa is mostly founded on weak information management regimes which do not have the capacity to provide an assurance that citizens will gain direct access to information. This problem is further exacerbated by the failure by FOI laws in Africa to encourage and promote good information management practices. Focusing on records management, this paper argues that the current weaknesses ascribed to FOI laws in Africa stem from the above problems.

First the paper argues that the adoption of FOI laws in Africa has been initiated on a foundation of entrenched information asymmetries which promote secrecy of the governance process. These information asymmetries are a result of the neglect of information management practices particularly the absence of good records management. Next the paper highlights the ingredients necessary in creating a viable access to information regime under FOI legislation. It will however centre its discussions on records management rather than all the ingredients it identifies. The paper observes that the benefits resulting from these ingredients will suffer if the laws do not seek to encourage and promote good records management practices. The paper concludes by stressing that effective FOI regimes in Africa will only emerge when two things have been added. First, public servants should be made to sign a declaration for the commitment to good records management practices. Lastly, a clause similar to Section 46 of the UK Freedom of Information legislation of 2000 bearing on good records management practices should be introduced to FOI laws in Africa.

Adopting FOI legislation atop entrenched information asymmetries

By 2007 only Angola (2002), South Africa (2000), Uganda (2005) and Zimbabwe (2000) had legislated access to information through FOI laws. Countries such as Botswana,¹ Malawi,² Nigeria,³ Swaziland,⁴ Zambia⁵ and many others are at different levels of enacting similar laws. The adoption of these laws was meant to encourage much freer access to official information thereby reducing the high levels of information asymmetry between government on one hand and citizens on the other. The anticipated reduction of information asymmetries in the African countries which have already legislated FOI has not been realised partly because secrecy is still incumbent in the governance process. Although the failure to reverse the information asymmetries by FOI laws is normally attributable to difficulties in culture change towards more transparency, the overlooked problem is that of weak records management regimes which supported the uptake of secrecy in the first place.

Information asymmetry is a term associated with economics as a professional field. The term gained world recognition through the writings of Joseph Stiglitz, George Akerlof and Michael Spence who in 2001 received a Nobel Prize for their exploratory work on the topic.⁶ Information asymmetry refers to a state which arises in the governance process when those elected to govern have access to a whole body of information and knowledge while citizens have restricted access to it. The result of this imbalance is that secrecy is bred. Secrecy results from the fact that those in government create, hold and control access to information. They determine the information which citizens can gain access to, when they can do so, and the form of access appropriate at any such time disclosure of information is found appropriate. In most instances citizens will only gain direct access to files which are archival in nature. Many times they will gain access to information which government will have repackaged from the files it uses and holds. As Hubbard has observed, secrecy which results from the imbalance in access to information “creates an artificial scarcity of information; by its definition a secret is a piece of asymmetric information.”⁷ Secrecy, Stiglitz argued, gives those in government exclusive control over public knowledge.⁸

The emergence of information asymmetries in the governance process in Africa is attributable to high levels of secrecy. When most, if not all, African countries who

were former dependencies of the United Kingdom (UK) attained independence, they adopted independence constitutions which encouraged secrecy of the governance process. This was achieved through implying access to information through guarantees on freedom of expression. These constitutional guarantees encouraged secrecy in the sense that access to information was only associated with free expression and the process was not considered a right in itself. African governments were empowered by these constitutions to determine the appropriate time to inform citizens and to select the information which they felt citizens needed to access as well as choose mode of communication necessary to relay the information. These constitutions did not provide citizens with recourse to corroborate the information which governments provided to them. The option available to citizens was for them to wait until some selected government files became archives where they could possibly gain direct access to them. Alternatively they could seek court intervention to force governments into providing direct access to records they wish to access.

This shortcoming has led to some African countries adopting revised constitutions to address the defect. For example, Malawi in 1994 adopted a new constitution which replaced the one adopted when the country attained independence in 1961. South Africa also adopted a new constitution in 1996 which put an end to apartheid. Both these constitutions retained the link between access to information and freedom of expression in those they were replacing. However, they also introduced clauses which sought to promote access to information as an independent right.

It should be understood that when constitutions mention that access is guaranteed to state information it is not clear which state information the public can gain access to. Is it information which members of the public can seek or information which governments can provide without citizens requesting it? Even if it is information which members of the public can seek access to, what would be the types provided? Is it access to documents, verbal response or any other means? Further still, how will access to information be provided? When will it be provided? How is the guarantee going to be enforced? What are the penalties for the infringement of the guarantee? Are there any fees to be paid for wanting to gain access? If the fees are there, how are they determined? While the 1996 South African constitution guarantees access to information as an independent right, it also prescribed the promulgation of a law to turn the guarantee on access into practice.⁹ The constitution further provides a timeframe in which this was to be done, another indication of the fundamental nature of access.

The adoption of FOI laws in Africa is meant to contain and reduce growing levels of state secrecy. As some UK respondents to the 2003-2006 study mentioned argued: "FOI creates a move away from the culture of all this information is secret to all this information is open,"¹⁰ "FOI inculcates an openness mentality. Government starts to think about openness and seeks to develop and mould its business base on openness."¹¹ Realistically, the move towards more openness and better transparency is arrived at through enabling citizens to gain insight into the activities of government. Through this process, citizens are to develop thorough knowledge of how a government transacts each one of its activities. FOI legislation also makes governments capable of proclaiming "we have to be accountable; we have to demonstrate good practice; we have to be able to show why we did things the way we did, we have to be able to explain how public funds have been expended."¹² Clearly,

the adoption of FOI legislation can lead to better transparency but transparency can only be proven to function if information exists and citizens can gain direct access to it.

Although the adoption of FOI laws in Africa is a credible step towards promoting good and honest governance, it should be remembered that state secrecy exists and is growing by the day in African countries. This partly has to do with FOI laws in Africa being founded on poor records management regimes which are incapable of fully supporting and documenting the governance process as well as incapable of providing citizens with direct access to official information. Records management is an area which has faced neglect in Africa. Case study research conducted by the International Records Management Trust (IRMT) in Africa has revealed serious decay of record keeping systems.¹³ The case studies have underscored that weak records management systems not only impede the ability of governments in being accountable but are sources of growing levels of white collar corruption in Africa.

When the set of African countries which currently have FOI laws enacted them, they did so with the intention of reversing corruption and enhancing democratic governance. However, the information asymmetries which the laws were meant to reverse and counteract are still in existence. In other words, FOI laws in Africa have failed to overturn secrecy of the governance process. The secrecy can be attributable to exemption clauses contained in the FOI laws. Clearly, the exemption clauses have not been crafted to encourage state secrecy but their purpose is to balance free access to information with the need to restrict access to certain categories of information.

The real problem is that African governments who have enacted FOI legislation did this on records management regimes which are weak. Weak records management does not provide an assurance that records created and held by government will capture sufficient information on each process and activity it is engaged in. It also does not guarantee that the records or the information they capture will be available to address variable information needs of individuals which FOI laws promote. Poor or weak records management systems are the real causes of continued state secrecy, information asymmetries and corruption even after FOI legislation has been enacted. A respondent in Malawi for the study already mentioned has opined that: “FOI is a good development for Malawi but our current approach to records management may not make information available when needed for compliance to the legislation.”¹⁴ This observation is an indication that any FOI law should seek to promote and encourage good records management practices.

Other African countries which are yet to legislate FOI have to be mindful of the fact that FOI legislation is about access to recorded information. The laws consequently promote and encourage citizens gaining direct access to records which governments hold. It is from these very records that governments extract information which they use to account to citizens and the records themselves are thus important for citizens to individually access when they develop a need to do so. However, African countries considering enacting FOI legislation, even those that already have the law in place, should learn from the experiences of the Northern Territory in Australia which has enacted an Information law which enforces FOI, privacy and management of archives and records all in a single piece of legislation.¹⁵ The basis for having done so emanates

from the fact that FOI, privacy and archives all emanate from good records management practices.

African countries should also learn from the FOI law of the UK of 2007. Through section 46 this law acknowledged the importance of good records management for enabling effective access to information.¹⁶ It achieved this by mandating the creation and implementation of a non-statutory records management code of practice. The code is “an explicit recognition of how good records management underpins rights of access.”¹⁷ Even though the UK FOI legislation does not compel organisations to create records, it encourages them to adhere to the requirements of the code, one of which is the duty to create records.¹⁸

The only shortcoming of the UK records management code is its lack of statutory force. The code is non-statutory and because of this it has limited enforcement powers. However, the Information Commissioner’s office in its endeavour to enforce compliance to the code, can invoke section 48 of the FOI Act to issue a practice recommendation if the records management environment of an organisation does not conform to the code. The Information Commissioner can also issue an information notice derived from section 51 of the Act to enforce the compliance. Although sections 48 and 51 were an attempt to add legal leverage to the code, UK public service organisations are not in breach of the law if they do not conform to the code, hence they cannot be penalised. Another way of enforcing conformity to the code lies in the option to name and shame public organisations in the reports the Information Commissioner makes to Parliament.

African countries should seek to adopt FOI legislation which has requirements for a records management code of practice. These should unlike the UK make it statutory. A statutory code of practice will not depend on the goodwill of public organisations to comply with it but it will make compliance a legal obligation. A statutory code will not leave good records management as an optional extra but will make it a core component of the law. In addition, the recommendation made by John Reid, the Canadian Information Commissioner, to the Gomery Commission set up in 2004 to investigate allegations of corruption in the government of Canada, holds true for African countries. Reid had recommended that records management should be mandatory for all public servants and penalties should be imposed where there is a need in respect of FOI.¹⁹ African countries should also opt to adopt this recommendation as it will ensure that all public servants become committed to good records management which in turn will provide assurances of the availability of information for access purposes among others.

Recipe for an effective FOI regime for African countries

An effective FOI regime results from a combination of many logistical concerns. When combined with democracy, accountability, trust, good records management, and being balanced with personal privacy, FOI legislation has the potential of creating an effective access to information regime. Democracy as a system of governance

attains its legitimacy from the informed consent of citizens and gains guidance from a constitution to provide a propitious environment for the functionality of FOI legislation. This is further given impetus by the obligation of government to be accountable to itself, parliament and to citizens. Where trust also exists between citizens and government, the effective functionality of FOI legislation is likely to be accomplished. Although FOI is not a records law it mandates legal access to recorded information of which records are a constituent part. When integrated with a practical records management programme, FOI legislation will have the capacity to become effective in the provision of access to information. The collective consequence of all these ingredients is an adequate recipe for an effective FOI regime. This paper will only focus on good records management as an ingredient of an effective FOI regime.

Good records management: an ingredient of an effective FOI regime

Although existing FOI laws do not usually express requirements for records management, through suggesting that records have to be created, managed and disposed, this is nonetheless implied. The Irish and Canadian Information Commissioners have linked records management to access to information in several of their reports. Further links between these two processes have been revealed through some of the investigations that the Information Commissioners would have carried out in their jurisdictions.²⁰ The reports and the investigations have revealed that the ability of government to provide access to information through FOI legislation rests on its capacity to manage records. In support, Mendel contended that an:

effective access to information system depends on good records management; if public bodies cannot find the information being sought for, or have to spend excessive amounts of time locating it, the system will fail to deliver the desired results. Records management also has implications for costs, whether they are borne by the requester or the public body in question, as time spent searching has to be paid for.²¹

An efficient records management system provides additional incentives for an effective FOI regime. It ensures that information needed for purposes of access through the legislation is available when needed and that it is arranged so as to make easy its identification and retrieval.

FOI legislation typically requires the publishing of manuals that identify record classes, or series, a particular organisation holds. One of the purposes of the manual is to enable citizens to know which records they are likely to access from respective organisations. Another provision of the legislation obliges organisations to inform requestors for access if the information they seek is held or not. FOI laws also expect organisations to develop the capacity of providing access to information sought within a stipulated timeframe e.g. 20 or 30 days. Where the access has been denied or is contested, the law allows for a review process. The law may also direct organisations to undertake proactive disclosures even where requests for access have not been made. All these processes underpinning FOI legislation imply the ability to provide access to records by organisations, thus making records management one of the ingredients needed to make FOI effective.

- **FOI manuals**

By providing guidance to the records held through grouping them into classes, series or categories, FOI manuals²² are making reference to records management. In order for them to group records into classes and/or series, organisations have to know and understand the content, context and structure of the records they hold. For them to know the records they hold and carry out the ensuing task of grouping them into classes or series, organisations have to utilise records management. Through records management, organisations are able to evaluate the various business processes they transact; identify records which result from each of their activities; and bring the records together into classes to depict each transaction. When citizens shape their requests for access to information they usually relate them to a transaction of an organisation. Through the manuals, citizens are able to identify the records class in which the information they would like to access may be contained.

In proclaiming the need for the development of manuals, FOI legislation neither makes reference to records management nor suggests that records management has to be relied on to help identify the record classes, series or categories. For instance, section 14 (1) of the South African FOI law stated that within:

six months after the commencement of this section or the coming into existence of a public body, the information officer of the public body concerned must compile in at least three official languages a manual containing:

(d) sufficient detail to facilitate a request for access to a record of the body, a description of the subjects on which the body holds records and the categories of records held on each subject.²³

Section 15 (1) of the Irish law decreed that:

A public body shall cause to be prepared and published and to be made available in accordance with subsection (7) a reference book containing-

(b) a general description of the classes of records held by it, giving such particulars as are reasonably necessary to facilitate the exercise of the right of access.²⁴

In these examples, there exists an implicit awareness that the potential of an organisation in grouping its information into classes is derived from records management. In other words, records management has the capacity to enable organisations to know the types of information they hold. Records management also has the ability to assist the organisations in grouping the information into classes for ease of identification and reference. It is from the respective classes that organisations become adept at identifying the appropriate records requested for access or for selecting information for proactive disclosures. Building FOI legislation on practicable records management has the incentive of producing comprehensive and informative manuals.

- **Obligation to inform requestors if the information sought is held or not**

FOI laws have inbuilt obligations which mandate an organisation which receives requests for access, to inform the requestors if they hold the information being sought. This implies that the organisations are expected to know the information which their records capture so as to undertake this obligation. For instance one UK respondent observed that:

The role of records management is to capture all that information and keep it for an appropriate period of time. It is very difficult to prejudge what is going to be important and what is not going to be important for access. That is why you need a systematic regime that makes sure you capture everything you should keep and you keep it for an appropriate amount of time. I think this is where things will fall apart if you do not have good records management.²⁵

Unless good records management is in place, this may hinder the capacity of organisations to know if they hold the information to which access is being requested. Where organisations, through records management, are able to ascertain without much trouble the information they hold, this is proof that once enacted, FOI legislation has the potential of being effective.

- **Responding to requests within prescribed timeframes**

Another obligation which FOI legislation bestows on organisations is to facilitate access to the information sought within a specific timeframe, in some laws it is 20 working days, in others 30. Organisations are expected to have located and made the information available within the set timeframe. However, unless “information is organised and maintained in a logical and consistent manner, agencies are likely to assert that they are unable to locate responsive material when a request is received.”²⁶ Ineffective records management will therefore lead to considerable time being wasted searching for the information needed for access and this may well exceed the prescribed timeframe. The ease of identifying records and their subsequent retrieval is made possible by good records management. One UK respondent observed that:

Good records management is essential if you want to comply with the legislation and it is really about finding your stuff. If you can't find it, you can't release it. If basic records management practices are not followed in respect to FOI i.e. keeping things in chronological order, not keeping duplicates and drafts on file, filing all the key documents and the like, making sure they are readable...all the very basic rules of record keeping, [it] can make it difficult to deal with requests if they are not in place.²⁷

Another UK respondent added:

A public authority is encouraged to assist people in making requests for information and they have to efficiently process requests for information...deal with them within statutory timescales as soon as possible. And that links to good records management. Having good records management provision, having cleared information which is no longer relevant, having clear records management policies,

disposal schedules enables information to be found and made available within the timescales.²⁸

Good records management can therefore enable organisations to ensure that they create and retain records in their normal course of business. As made clear in the above quotation, good records management will help organisations in their bid to comply with FOI legislation by ensuring that records are created, properly classified for retrieval and can be found when required for access.

- **Reviews for denied access**

Although FOI laws facilitate access to information, there are times when the access can be denied on various grounds following prescriptions of relevant exemptions. For instance the UK FOI law lists 23 exemptions which can be used to withhold access to information. These include but are not limited to: withholding information whose disclosure is not in the interest of the public e.g. information on the defence, economy of the UK or the country's relations with others; personal information; information which would prejudice conduct of public affairs; and information provided in confidence.²⁹ A UK respondent highlighted that when organisations withhold information, "they start from the premise of wanting to grant access to information and then withholding the information if there is a clear reason for doing so within the terms of exemptions."³⁰

The denial of access is however is not cast in stone and can be contested. A requestor for access can appeal against the denial, and an organisation can also contest against decisions mandating it to make available access to certain information. In order to sustain the denial or overturn it, there is a need for access to the contentious information and to the recorded decisions which forbade the access. Through records management, the decisions relating to the denial will be accessible including the records whose access is contested. The incentive to record and maintain the decisions of the denials, and the ability to identify and retrieve the contested records for adjudication, shows that FOI legislation built on good records management is likely to be more effective.

Good records management is an invaluable ingredient for an effective FOI regime. Apart from supporting organisational compliance with the legislation, good records management depicts the ability and the commitment of an organisation in implementing a legal right of access. Without effective records management, FOI legislation is likely to suffer from information which cannot be found or is found outside the prescribed time limits. Further, the manuals which will have been published may not be helpful in enabling citizens to identify the records they may wish to access.

Conclusion

The effective functionality of records management should not be assumed to exist when FOI legislation is being planned for or when the law is being reviewed. Rather, there is a need to establish the efficiency of records management in creating records, making them available in support of business and as corporate memory, and in

meeting any additional demands that may be brought about by external access. Records management is not built around FOI legislation. However, the legislation expects records management to be able to assure that records will provide the necessary information when requested to do so. FOI legislation should not be considered just as legislation which creates a viable access environment. It should be thought of broadly as an information policy which relies on good records management to facilitate the creation, maintenance, and making available for access, of information. One UK respondent has advised that:

You can only have access to information if the right information is being created in the first place. That is one area that FOI does not dwell on too much but I think it will increasingly need to be defined because the fact that, are the right records being created by the right people? Is it obvious that records are being created? It is a case in which every function within the organisation producing a documentary output can then be the subject of an inquiry.³¹

Even though records management exists to help organisations execute their functions, it also enables them to process access requests and to make proactive disclosures. The records result from and support the functions of organisations. Hence, when citizens express interest in gaining knowledge about a particular function of government, records will be expected to provide the information.

As Botswana, Malawi, Ghana, Nigeria and many others plan for the adoption of FOI legislation in Africa they should consider records management as an important tool of governance and as crucial for the successful implementation of the legislation. The countries have to understand that even though records will already be in existence, FOI legislation will present challenges to them to make assurances that records will always be available and will also provide the needed information. These governments have to understand that assurances concerning the availability of records or their capacity to provide the required information cannot be made when records management is weak. African countries should also consider adopting FOI legislation which has requirements for a statutory records management code of practice. In addition, public servants should be made to adhere to good records management practices through being compelled to sign declarations to this end as part of their annual service contracts.

Endnotes

¹ Botswana has committed itself for the enactment of FOI legislation as part of suite of ideals expected to be realisable in 2016.

² Malawi released an FOI draft Bill for consultation in 2004, by 2007 the Bill is yet to become law.

³ In 2007 Parliament in Nigeria adopted an FOI Bill which at the time of compiling this paper was awaiting Presidential assent for it to become law. More information is available at Open Society Justice Initiative 'Freedom of Information Bill advances in Nigeria.' Available at http://www.justiceinitiative.org/db/resource2?res_id=103632. Accessed 20/05/07.

⁴ MISA reports that in 2006 Themba Msibi, the Minister for Public Service and Information announced that the Swazi Government had engaged consultants to draft an FOI Bill for the country. See Media Institute of Southern Africa 'Government soon to draft long-overdue Freedom of Information Act, says minister' Available at

http://www.humanrightsinitiative.org/programs/ai/rti/international/laws_papers/swaziland/govt_to_draft_foi_bill_may06_swaziland.pdf. Accessed 20/05/07.

⁵ An FOI draft Bill was withdrawn from Parliament in 2003, the Bill is yet to be brought back to it.

⁶ See for instance: J Stiglitz 'Transparency in government' in *The right to tell-the role of the mass media in economic development* (Washington, DC: The World Bank, 2002): 27-29.

⁷ P Hubbard 'Freedom of information and security intelligence: an economic analysis in an Australian context' *Open Government: a journal on Freedom of Information* 1:3 (2005):4-21. Available at <http://www.opengovjournal.org/>. Accessed 08/02/06.

⁸ J Stiglitz 'Transparency in government.' 34-35.

⁹ South Africa Government *Constitution of South Africa* (1996). Available at <http://www.info.gov.za/documents/constitution/1996/a108-96.pdf>. Accessed 13/03/03.

¹⁰ Personal interview with UK/14, 21/05/04.

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- ¹¹ Personal interview with UK/17, 06/01/05.
- ¹² Personal interview with UK/11, 30/04/04.
- ¹³ See case study material at <http://www.irmt.org>
- ¹⁴ Personal interview with MAL/2, 09/08/04.
- ¹⁵ See Northern Territory Government, Australia *Information Act*. Available at <http://www.austlii.edu.au/au/legis/nt/consol_act/ia144/>. Accessed 21/08/06.
- ¹⁶ United Kingdom Government, *Freedom of Information Act* (London: Her Majesty's Stationery Office, 2000). Available at <<http://www.opsi.gov/acts/acts2000/20000036.htm>>. Accessed 21/08/06.
- ¹⁷ Personal interview with UK/4, 30/01/04.
- ¹⁸ United Kingdom Government, Lord Chancellor's code of practice on the management of records: 11-12.
- ¹⁹ Canada Government, J H Gomery *Commission of inquiry into the sponsorship program and advertising activities: restoring accountability-recommendations* (Ottawa, Ont: Publishing and Depository Services, 2006): 177-178. Available at <http://epe.lac-bac.gc.ca/100/206/301/pco-bcp/commissions/sponsorship-ef/06-03-06/www.gomery.ca/en/phase2report/recommendations/cispaa_report_full.pdf>. Accessed 12/06/06.
- ²⁰ For instance see Ireland Government, Office of the Information Commissioner *Freedom of information act-compliance by public bodies* (Dublin: Office of the Information Commissioner, 2001).
- ²¹ T Mendel 'Parliament and access to information: working for transparent governance.' (Washington, DC: The World Bank, 2005): 35. Available at <http://siteresources.worldbank.org/WBI/Resources/Parliament_and_Access_to_Information_with_cover.pdf>. Accessed 17/02/06.
- ²² In the UK these are known as publication schemes.
- ²³ South Africa Government *Promotion of Access to Information Act* (Cape Town: 2000). Available at <<http://www.info.gov.za/gazette/acts/2000/a2-00.pdf>>. Accessed 21/08/06
- ²⁴ Ireland Government *Freedom of Information Act* (Dublin, 1997). Available at <<http://www.irishstatutebook.ie/ZZA13Y1997.html>>. Accessed 21/08/06.
- ²⁵ Personal interview with UK/9, 07/04/04.
- ²⁶ The Federal Institute for Access to Information in Mexico and a Culture of Transparency, a report for the William and Flora Hewlett Foundation, 2006. Available at <http://www.pgcs.asc.upenn.edu/docs/mex_report_fiai06_english.pdf>. Accessed 24/02/06.
- ²⁷ Personal interview with UK/1, 20/11/03.
- ²⁸ Personal interview with UK/12, 18/05/04.
- ²⁹ See Part II of the UK FOI legislation.
- ³⁰ Personal interview with UK/12, 18/05/04.
- ³¹ Personal interview with UK/11, 30/04/04.