

INTRODUCTION

ICIC's Gender and Vulnerable Groups Working Group (GT) was established in 2022 as an initiative aimed at incorporating the specific needs of certain social groups regarding the Right to Access Public Information. It is mainly focused on social vulnerability, for which concrete actions are sought to promote the inclusion of Gender and Vulnerable Groups' perspectives within access to information (ATI) policies. Currently, the GT is coordinated by the Guarantor of Access to Public Information of the Autonomous City of Buenos Aires, Argentina (OGDAI) and the National Secretariat for Access to Information of the General Comptroller of Brazil. It is comprised of the following Members: National Information Commission of Nepal, Freedom of Information Project Management Office of the Philippines, Office of the People's Defender of Peru, Institute of Transparency, Access to Public Information, and Protection of Personal Data of the State of Mexico and Municipalities (INFOEM), National Institute of Transparency, Access to Information and Protection of Personal Data of Mexico (INAI), South African Information Regulator, U.S. Government Office of Information Services (OGIS), Administrative Justice Commission (Ombudsman's Office) of Kenya, Institute of Transparency, Access to Public Information, Protection of Personal Data, and Accountability of Mexico City (INFOCDMX) and Administrative Documents Access Commission of Portugal.

The GT understands groups in vulnerable situations as: "groups and communities that suffer discrimination and exclusion (social, political, and economic) due to unequal power relations in the economic, political, social, and cultural dimensions" (NARA, 2021); who "due to inherent aspects of their identity or condition, and due to state agency omission or action, are deprived of enjoying and exercising their fundamental rights and lack attention and satisfaction of their specific needs" (Ministry of Justice and Human Rights of Argentina, 2011, p.11). Consequently, they "require attention and the implementation of necessary or urgent actions, as well as measures and policies by the Obligated Subjects" (INFOEM, 2022).

METHODOLOGY

Based on the results obtained from the survey conducted by the Gender and Vulnerable Groups Working Group in 2023, whose findings were outlined in the

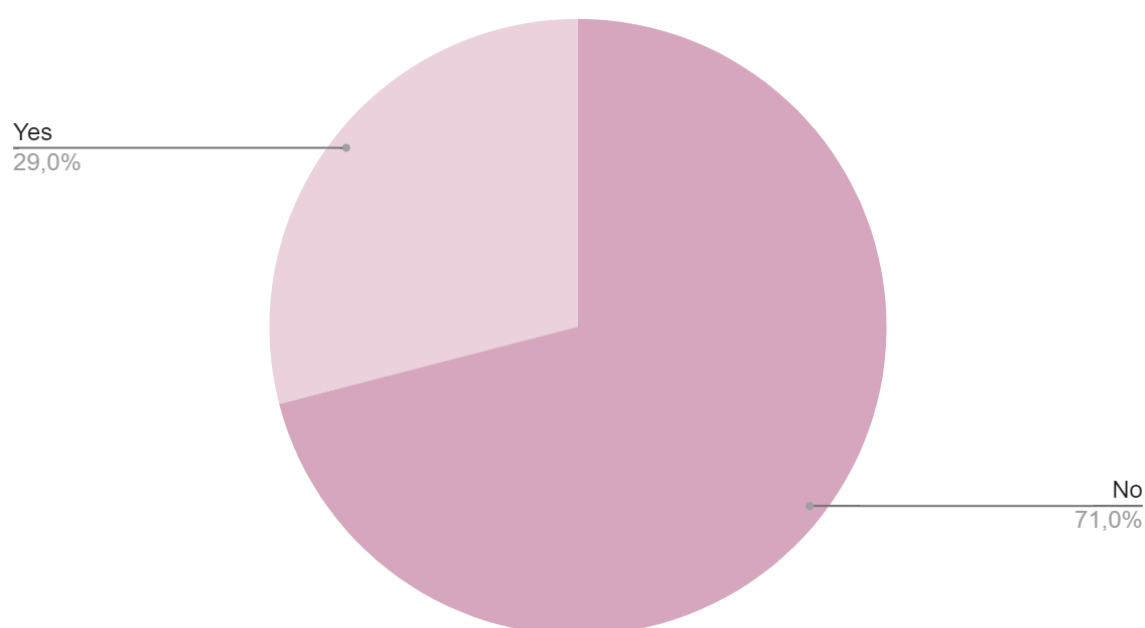
document "Diagnosis on promising practices and experiences of Access to Information for Vulnerable Groups," the difficulties that participating organizations encounter regarding the implementation of evaluation and monitoring processes as a constitutive part of project planning were highlighted. The need to gather more information on this topic to understand the real and precise situation regarding monitoring and evaluation practices became evident, leading to the distribution of a new survey among ICIC members complementing the previous one on this specific topic. Five questions were outlined to delve deeper into this aspect, which are detailed below:

- Does your organization consider the development of evaluation/monitoring mechanisms for promoting the right to access information for vulnerable groups important and necessary?
- What are the difficulties your organization encounters in developing evaluation/monitoring mechanisms for promoting the right to access information for vulnerable groups?
- Of the practices promoting the right to access information directed at vulnerable groups that your jurisdiction has implemented, which ones have evaluation or monitoring mechanisms?
- What is the current situation of your organization regarding the development of evaluation or monitoring mechanisms for the results of practices promoting the right to access information?
- Even if your organization has not implemented evaluation or monitoring mechanisms for practices promoting the right to access information for vulnerable groups, can you suggest good evaluation or monitoring practices from other public policies in your jurisdiction that could be replicated?

Through the survey, information on the monitoring and evaluation practices implemented by ICIC members was collected, as well as an understanding of the current situation and the main obstacles faced when measuring and evaluating implemented policies.

The survey was conducted among all ICIC members and 31 members responded. Currently, ICIC consists of 86 members from 54 countries, meaning that the survey was answered by 36.04% of the total members. It is also evident that, out of the total responses, 29% (9 responses) correspond to members of the Gender and Vulnerable Groups Working Group (GT).

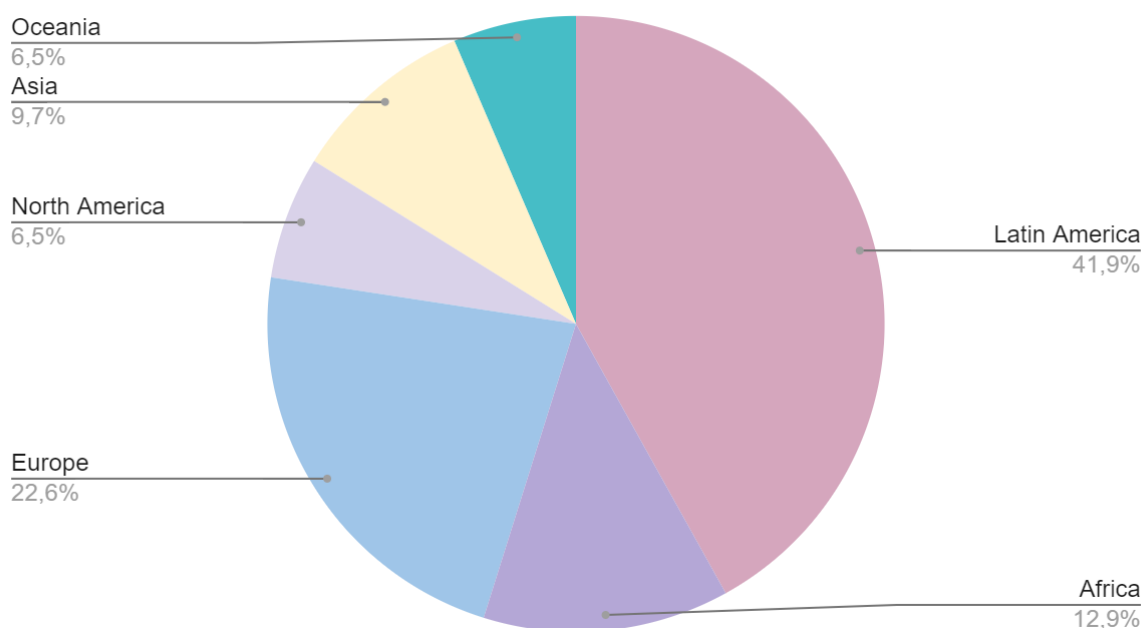
Members of the Working Group



Regarding the total number of members of the GT, the participation percentage was much higher, as 9 out of the total GT membership (12 members) participated, representing 75% of the group.

The survey response universe consists of 13 members from Latin America (41.9%), 2 from North America (6.5%), 7 from Europe (22.6%), 4 from Africa (12.9%), 3 from Asia (9.7%), and 2 from Oceania (6.5%).

Origin of the respondents

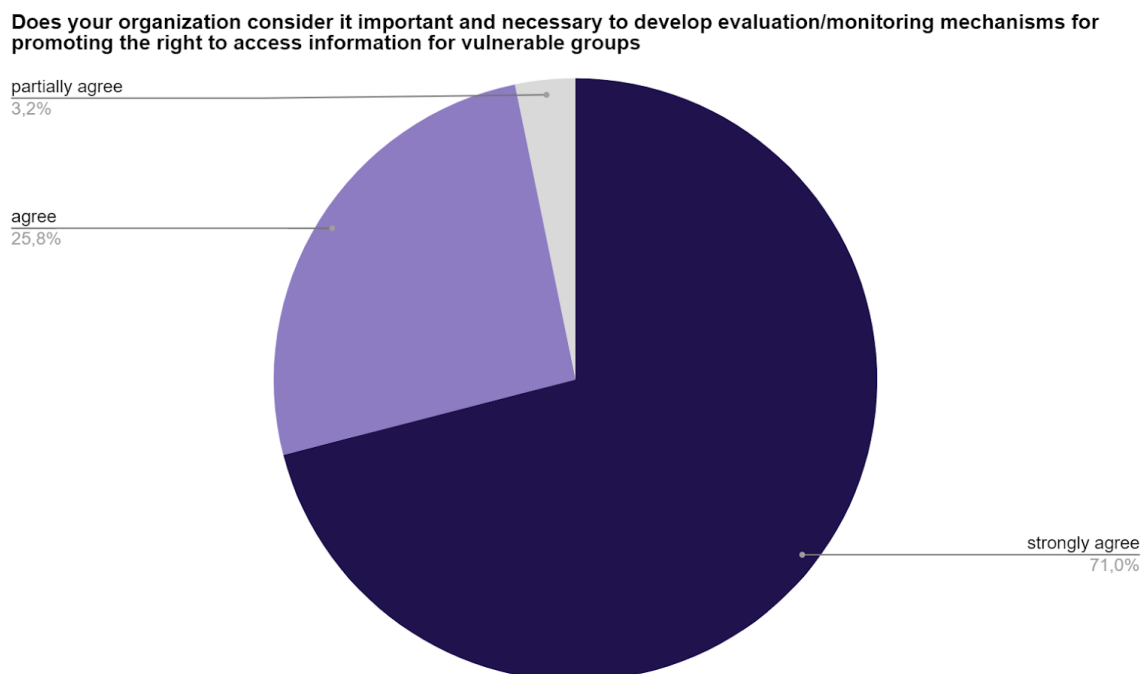


Once the responses were received, they were processed using graphs to systematize the information obtained according to different analysis variables, in order to ultimately highlight certain relevant practices that may meet specific selection criteria. In this way, the criteria chosen for defining promising evaluation and monitoring practices were: replicability or adaptability, sustainability, and participation.

- **Replicability/adaptability:** refers to the ability to reproduce, replicate, or transfer the action or policy in different contexts and situations, either wholly or partially. It relates to the capacity to adapt to changes in the circumstances of the environment in which it is implemented and to the needs, characteristics, and demands of the vulnerable group it targets.
- **Sustainability:** implies the continuity of the action or public policy over time, in the short, medium, and long terms.
- **Participation:** the jurisdiction has foreseen the involvement of the final recipients of a public policy in the formulation of said policy. In this case, it is a fundamental criterion, as it is imperative that the people who are part of a vulnerable groups are involved in the evaluation of the results as protagonists of public policies applied to them.

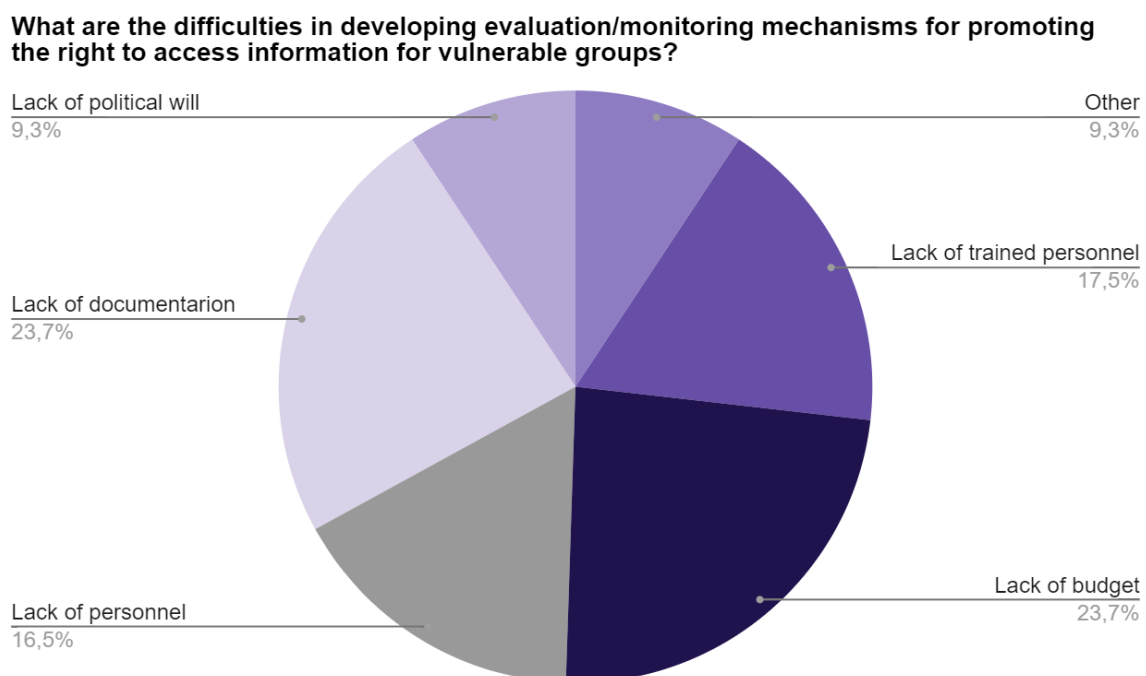
The first question, "Does your organization consider it important and necessary to develop evaluation/monitoring mechanisms for promoting the right to access information for vulnerable groups?", seeks to delve into the importance of evaluation and monitoring mechanisms for promoting the right to access information for vulnerable groups by ICIC members.

Of the 31 responses obtained, 71% "strongly agree" with the development of evaluation and monitoring mechanisms, while 25.8% "agree" with this statement. Finally, only 3.2% (1 response) "partially agree". It would be advisable to delve into the reasons underlying this stance.



The next question in the survey was: "What are the difficulties in developing evaluation/monitoring mechanisms for promoting the right to access information for vulnerable groups?" This query aimed to gain insight into the reasons that prevent or hinder the development of evaluation and monitoring mechanisms for promoting the right to access information. This question had the following possible responses: "lack of political will," "lack of personnel," "lack of trained personnel," "lack of documentation," "lack of budget," "other."

"Lack of budget" and "lack of documentation" were the most commonly chosen responses, each with 23.7%. Next were "lack of trained personnel" (17.5%) and "lack of personnel" in general (16.5%). Finally, "lack of political will" and the option "other" were at 9.3%. Within the latter, it is worth mentioning that several respondents mentioned "methodological difficulties," such as "accessibility to reliable data" and "lack of clear indicators," as well as "lack of technology and low levels of access to platforms or technological tools" to conduct evaluations. The "need for a diagnosis of the needs of vulnerable groups to address the complexity of this collective" also stood out.

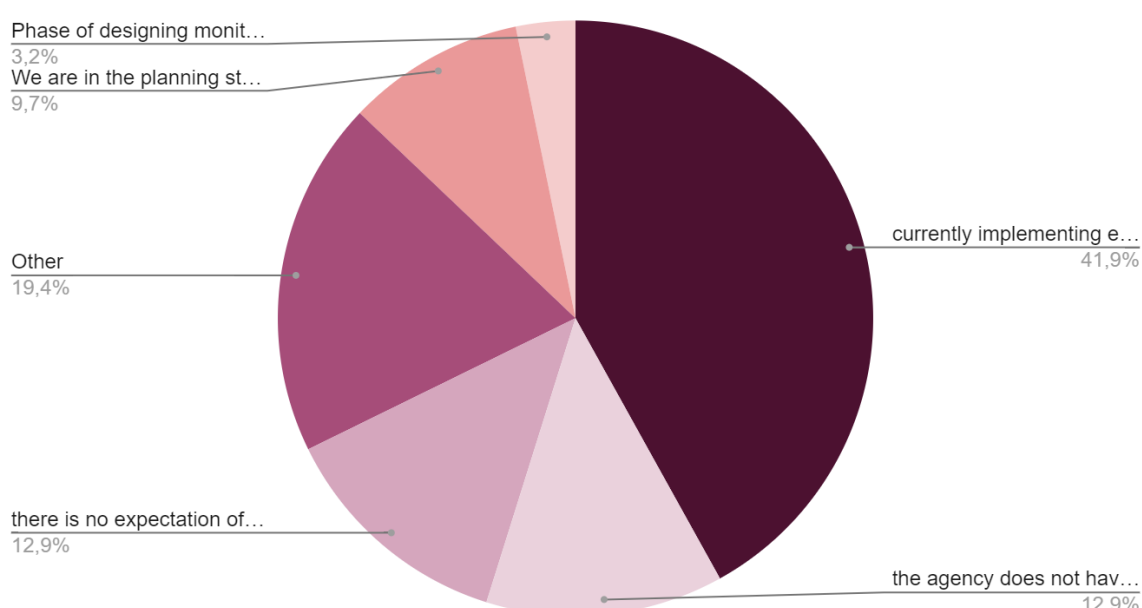


Regarding the question "What is the current situation of your organization regarding the development of evaluation or monitoring mechanisms for the results of practices promoting the right to access information?", 41.9% of respondents stated that they are currently implementing evaluation/monitoring mechanisms. Next in line, with 12.9% (4 responses), are the answers "there is no expectation of implementing evaluation/monitoring mechanisms for now" and "the agency does not have the competence or capacity to implement evaluation/monitoring mechanisms." A total of

three responses, representing 9.7%, refer to "we are in the planning stage of evaluation/monitoring mechanisms."

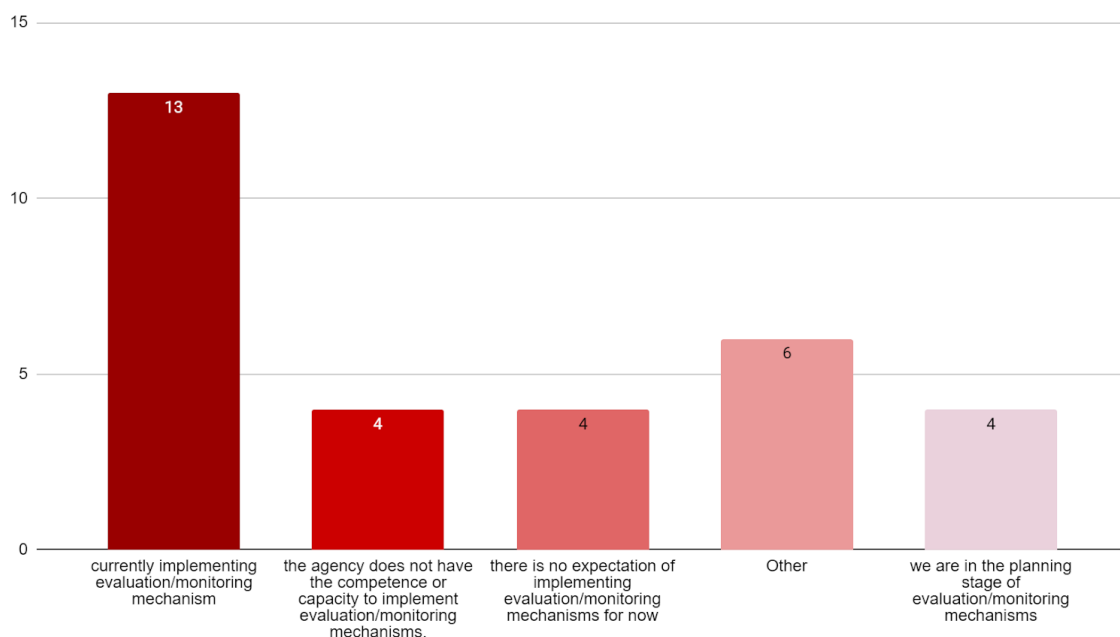
A single response indicating that "they are in the phase of designing monitoring/evaluation mechanisms" represented 3.2%, and 19.4% responded "other." Within the "other" option, some respondents mentioned the lack of personnel to implement evaluation and monitoring mechanisms, while others highlighted the importance of these practices in implemented projects but emphasized that they have not yet progressed in monitoring their projects.

What is the current situation of your organization regarding the development of evaluation or monitoring mechanisms for the results of practices promoting the right to access information



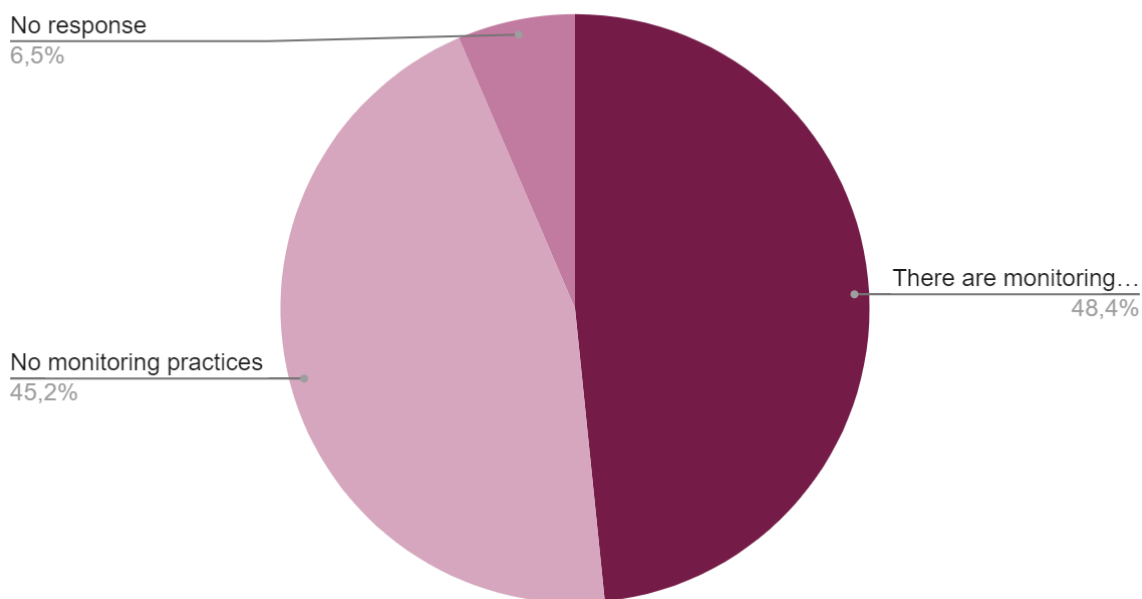
Based on the responses received, it can be determined that 13 ICIC members are currently implementing evaluation and monitoring mechanisms. Additionally, there are 4 members who do not have the competence to implement these mechanisms, and 4 are in the planning stage. Another 4 members responded that they have no expectations of implementation for now, while 6 responded "Other." Those within this category mentioned various issues, such as being in diagnostic stages or implementation difficulties due to lack of personnel, among others. The chart below illustrates this point.

Status of agencies in the development of evaluation and monitoring mechanisms



The chart below shows that, out of the total responses received, 45.2% of the practices promoting ATI rights do not have evaluation or monitoring mechanisms, while 6.5% did not respond to this point. This adds up to 51.7%, revealing that only 48.4% are conducting monitoring or evaluation practices for their projects.

Practices to promote the right of access to information aimed at GSV: Which have evaluation or monitoring mechanisms?



A particularity of this analysis is that out of all European members who participated in the survey (7), none have monitoring and control mechanisms. In the case of Africa, 2 out of 4 countries do not have mechanisms, while Latin America is the region with the highest monitoring, with a total of 9 countries out of the 13 Latin American countries surveyed.

The last question refers to the replicability of good practices in evaluating or monitoring public policies. Out of all the responses received, 22 respondents mentioned their good practices, while 9 (29.03%) did not provide a response on this matter.

Among the most recurrent practices are, in general terms, the creation of indicators, conducting training sessions, and conducting surveys and interviews.

Below, we highlight some noteworthy practices based on the responses obtained in the survey, considering adaptability, replicability, sustainability, and participation criteria:

- **INFOCDMX:** The Women's Secretariat of Mexico City created the Gender Indicators System of Mexico City (SINGE), which allows "key indicators about the condition and position of women in Mexico City and progress in closing gender gaps to be known and used for substantive equality." It would be interesting to delve into the process of operating the SINGE.

Regarding evaluation methodology, the agency proposes a quantitative and qualitative evaluation through two approaches: formative (quarterly) and summative (annually). Formative evaluation focuses on processes, aiming to improve them and allows for immediate action. Summative assessment applies to finished products, aiming to determine the extent to which the goals were achieved and to assess the evaluated product, enabling medium- and long-term actions to be taken. Each quarterly evaluation is accompanied by a progress traffic light, with four stages representing the degree of progress measured by a percentage of achievement relative to the goal. This percentage is represented by a colour.

Comment: It would be interesting to observe this evaluation methodology applied to a specific example for better appreciation.

- **Guarantor of the Right of Access to Information of the Government of the Autonomous City of Buenos Aires (OGDAI):** OGDAI worked on promoting the right of access to information through the development and distribution of handbooks or “guides” aimed at different vulnerable groups. An evaluative instance of the practice was carried out through satisfaction surveys accompanying the guide at the time of its distribution. Additionally, feedback was requested from trainers who used and distributed the guide in the field. Furthermore, a consultant will be engaged to evaluate results and issue recommendations.
- **Transparency Council of Chile:** Specific satisfaction surveys were conducted for Vulnerable Social Groups (GSVs). It is proposed to carry out learning evaluations through pre- and post-testing for specific groups, as well as to conduct assessments of the perception of the usefulness/efficiency of access to information to solve social or community problems.

Comment: It would be interesting to delve into the possible scope of this practice. Understanding the specific case and defining its replicability for the GSV universe would be valuable.

- **National Authority for Transparency and Access to Information of Panama (ANTAI):** ANTAI implements the use of accessibility solutions on websites for all Public Institutions of the Republic of Panama. This practice will be monitored and evaluated through the transparency monitoring platform, where compliant institutions must indicate whether their websites meet the required solutions. Additionally, the Authority has initiated the ANTAI Offer project, which seeks to provide training to vulnerable collective groups in hard-to-reach areas and indigenous groups, enabling them to guarantee their right of access to information and other rights. The monitoring and evaluation of this practice are conducted through surveys of participants on what they learned during the training.

Comment: Regarding the transparency monitoring platform, it would be desirable to have more information on this platform and its operation: how does it work? How is monitoring conducted? How are surveys conducted? What is measured through them?

- **INFOEM:** The organization evaluates and monitors obligated subjects annually through a procedure called Official Virtual Verification, which is carried out on a sample and random basis for all obligated subjects, aiming to review and verify compliance with transparency obligations.
- **National Secretary of Access to Information - General Comptroller of the Union - Brazil:** The Fala.BR system (unique system for receiving ATI requests in the Federal Government) established "race/colour" and "gender" fields as mandatory in the registration of new applicants. With this data, the Government can assess how Fala.BR is being used by certain vulnerable groups, such as indigenous peoples and women, who would otherwise remain invisible.

Comment: It is interesting to raise for discussion or debate how, although requirements are incorporated that are not foreseen by the regulatory framework, and even contradict it, they can still provide useful and sometimes necessary information to outline and implement public policies aligned with the needs expressed by these communities.

- **Institute of Transparency, Access to Information and Personal Data Protection of Mexico (INAI):** The Sensitization Program for Rights of Access to Information and Personal Data Protection (PROSEDE) stands out, which is an initiative of INAI aimed at civil society organizations that act as strategic allies to disseminate, promote, and disseminate the rights protected by the institute with a focus on social utility in sectors of the population in vulnerable situations. Regarding the program, INAI monitors and evaluates the implementation of the winning projects of the PROSEDE INAI program directed at vulnerable population groups. Final reports are requested from each of the organizations implementing the project to know in detail the results and impacts obtained. In

order to promote greater impartiality and objectivity in the evaluations, the organization prefers that this development be carried out by third parties (whether specific governmental entities, international organizations, civil society organizations, or individuals with extensive experience in the field).

Comment: When the ATI institution or agency does not have adequate resources, outsourcing the evaluation and monitoring process to civil society organizations can be an interesting alternative.

PROTAI is interesting; having examples would be valuable.

- **Office of the Victorian Information Commissioner (OVIC) of Australia:** OVIC has developed a self-assessment tool that agencies can use to assess their compliance with professional standards. As described, it is voluntary for agencies to use the self-assessment tool, and they do not need to report the results of their assessment. However, the tool allows agencies to assess their progress in meeting expectations regarding how agencies should facilitate access to information.
- **Commission d'Accès à l'Information d'intérêt public et aux Documents Publics (CAIDP) of Ivory Coast:** Monitoring is mainly based on the websites of entities subject to the RTI. Before visiting these websites, criteria based on a typology of published information and documents were announced. Vulnerable groups should access all that information and documents.

Comment: It would be interesting to delve into the criteria based on the typology of published information and documents.

- **Information Commission Bangladesh:** The Bangladesh Information Commission has three committees named Divisional Supervision and Monitoring Committee, District Supervision and Monitoring Committee, and Upazila (Sub-district) Implementation and Monitoring Committees. They are also working on grassroots-level field management to promote access to information for all sectors of the population, including vulnerable groups.

Comment: It would be interesting to have more information about how these committees are formed (academia, public sector, civil society), what criteria they follow, and how they conduct monitoring (what methodology they use).

- **National Transparency and Access to Information Authority (ANTAIP):**
From the National Strategic Planning Center of the Government of Peru, a guide for monitoring and evaluation of national policies was created. The guide provides for different types of evaluations: design, implementation, and results. It can be consulted at: <https://bit.ly/3RqgqRW>

RECOMMENDATIONS

Monitoring is a continuous process of collecting information on the implementation and results of a widespread public policy or plan to verify its progress. It involves periodic data collection and systematic recording, as well as identifying alerts and deviations to take corrective measures during the implementation of the policy or plan. One aspect to highlight from the results analysis is that many countries do not define evaluation and monitoring practices when implementing their public policies, or if they do, it is not a prioritized instance in the planning and design process of the measure or project. In this regard, the first recommendation would focus on generating training and awareness-raising activities on the importance of the evaluation and monitoring phase in the design of any public policy to establish its true scope and effectiveness. To achieve better performance of public policies, especially those directed at vulnerable sectors, many factors must be considered. Among them, increased access to evidence or knowledge and a better application of these in the decision-making process stand out. One of the main sources of evidence and knowledge about public policies is the practice of monitoring and evaluation exercises.

Monitoring and evaluating programs and public policies provide feedback for policy design, improve levels of transparency and accountability of officials, and achieve greater effectiveness and accountability. They allow for strategic and quality information for decision-making.

Consequently, they play a fundamental role in ensuring that the government is effective, efficient, transparent, and accountable to the citizenry, ensuring that policies effectively address the needs and concerns of society.

Therefore, it is necessary to assert that, when planning public policies, consideration should be given to how monitoring of these policies will be carried out. Not only to measure the outcome but also to have additional information that can serve as a starting point for designing effective and efficient public policies.

The design of public policies aimed at vulnerable groups must take into account the specific needs and the real and concrete situation of that particular group. Determining preliminary baseline data and situation diagnoses to understand the starting point of the collective to which a practice is intended is necessary and crucial for effectively evaluating and monitoring the impact of the activity in guaranteeing access to information for the target group. It is essential to have information that allows understanding the status of vulnerable groups regarding access to information to measure their evolution and progressive exercise over time.