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Strengthening Access to Information and Public Participation in Government Decisionmaking in Latvia:

An Assessment of Current Institutional Processes and A Suggested Program to Implement the Laws on Administrative Procedure and Information Access

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Strengthening Access to Information and Public Participation in Government Decisionmaking in Latvia:

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Malcolm L. Russell-Einhorn, Jeffrey Lubbers, and Vedat Milor

Executive Summary

Latvia is in the midst of a major reconstruction of its system of public administration. Among other reform efforts, the country has sought to promote transparency and public participation in executive branch decisionmaking through the adoption of several mutually reinforcing institutions – government-civil society councils or other consultative mechanisms, a law affording the public access to government information, processes facilitating public input into the rulemaking process, and a new administrative procedure law strengthening citizens’ ability to challenge bureaucratic decisions within agencies or in the courts.

By limiting bureaucratic discretion, such institutions have the potential simultaneously to increase the predictability and fairness of regulatory processes. In theory, information asymmetries can be reduced and regulatory transaction costs lowered, strengthening the kind of supportive roles for civil society – emphasizing ‘voice’ and partnerships – that are emblematic of so-called Second Wave public sector reform.

This report represents an effort to assess the steps that the Latvian Government has taken to strengthen these public accountability mechanisms. It also presents specific recommendations on how to implement two laws – the existing Law on Information Access (LIA) and the soon-to-be enacted Administrative Procedure Law (APL) – in a manner in that will maximize their potential benefits to citizens, businesses, and the government. The recommendations include a suggested government program and action plan that would guide

the implementation process for the two laws over an 18-month period beginning around October 1, 2001 and extending through March 31, 2003.

The Broader Context of Administrative Law Reform in Latvia and Other Transition Countries

The ability of individual citizens and businesses to obtain information about Government operations generally and the impact of particular government programs, policies, and decisions represents a fundamental element of accountable governance. So too is the ability of the public to challenge administrative actions, and to have a say in the development of policies, laws, and regulations. These rights are especially important in engendering trust between the state and civil society and in legitimizing a country's various regulatory systems. This is where the state's fidelity to the Rule of Law or lack thereof is most likely to be experienced by the average citizen or business.

Many of these topics can be subsumed under the rubric of administrative law and procedure. The defining objective of administrative law and procedure in Western democracies is controlling administrative discretion. The mechanisms under consideration seek to curb such discretion through direct civil society oversight (so-called 'vertical' accountability) rather than through the checks and balances of other state institutions (so-called 'horizontal' accountability). This accountability challenge looms even larger in the former communist countries where the state's share of the economy was often all-encompassing, the bureaucracy dominated the lives of individual citizens, and civil society was extraordinarily and purposefully enfeebled.

Steeped in civil law traditions and having largely adopted parliamentary or quasi-parliamentary systems, most transition countries have tended to embrace a formal framework for bureaucratic control that favors legislative oversight supplemented by judicial review in

individual cases. Among the Central and East European countries seeking EU membership, these general preferences have been bolstered by various EU directives and general guidance from EU administrative law experts.

Even in the case of a transition country willing to rely more heavily on vertical accountability mechanisms, however, there exist a number of background impediments to this kind of reform – some conceptual, some bureaucratic, some political. In many ways, the most entrenched obstacles are conceptual in nature: despite its importance in establishing certain rules of the game in state-civil society interactions, administrative law and procedure are often viewed as mundane, fragmented, and highly idiosyncratic subjects that even public administration specialists routinely ignore in favor of more heavily-publicized topics such as the New Public Sector Management.¹

Despite these potential obstacles, administrative law reform may actually represent a relatively cost-effective legal reform investment for those transition countries that have demonstrated significant progress toward democratization. Many processes that fall under the rubric of administrative law may simply consolidate and formalize institutional patterns or rules of the game that have already emerged on a voluntary, quasi-self enforcing basis (e.g., various consultative processes). Moreover, because administrative law and procedure can be implemented on a sectoral or agency-by-agency basis (even after a national framework law is passed), favorable political economies can produce individual ‘islands of reform’ that can have important local or demonstration effects. Finally, administrative law reform can advance

¹ This blind spot extends to the bureaucratic politics that drive the design and implementation of reform programs. Among government reformers and donor agencies alike, administrative law does not fit neatly into democracy and governance or economic development stovepipes. Insofar as administrative law and procedure embody cross-cutting procedural principles, they also lack natural, concentrated constituencies among a country’s regulators and/or regulated subjects. Finally, each ministry or agency has special procedural norms and its own way of conducting regulatory business that tend to obscure the massive collective impact that such processes have on the daily lives of millions of citizens. Harmonizing or eliminating dozens or hundreds of such special norms to bring them into conformity with common democratic principles involves considerable legal and bureaucratic spade work.

sectoral regulatory reform efforts that are broadly popular (e.g., telecommunications, energy, or agricultural reform) and therefore carry significant support. Many of these factors are at work in Latvia.

Assessment of Mechanisms Facilitating Access to Information and Public Participation in Executive Branch Decisionmaking

This assessment concentrates on five discrete types of vertical accountability mechanisms: (1) advisory councils and other consultative mechanisms; (2) affirmative ('active') provision of information; (3) public participation in ministerial rulemaking and legislative drafting; (4) responsive ('passive') provision of information upon request; and (5) administrative procedure. The foregoing sequence represents an ascending order that roughly reflects the increasing time, resources, and legal formality (sophistication) that may be necessary to institutionalize their effective use.²

Consultative Mechanisms. In the interest of improving the technical quality of policy and rulemaking and adding some stakeholder participation, government officials often turn to formal or semi-formal consultative mechanisms (CMs) to gather information and elicit opinions from knowledgeable and interested individuals or organizations. Because they can, at their very simplest, involve a handful of individuals functioning as an advisory body with little institutional infrastructure or budget, CMs may be one of the least costly accountability investments that a government (or individual ministry) can make as it seeks to obtain additional expertise. On the other hand, empowering CMs to serve as more truly representative forums for diverse sectoral or social interests can involve a much greater expenditure of time and resources, not to mention political risk.

² For example, consultative processes can function quite effectively in the absence of formal procedures or abundant funding. By contrast, even a modestly functional responsive information access system or administrative procedure regime requires large outlays of money, large numbers of trained individuals, and a significant level of legal sophistication.

CMs describe a very broad range of public-private bodies. They extend from formal councils established by statute to address specific policies and draft legislation at regularly scheduled meetings, to informally chartered groups that are convened from time to time to discuss general topics like the climate of government-business relations. The potential benefits of such consultation include improved information for public and private decisionmaking; greater consensus about the ownership and credibility of policy reforms; and reduced costs of business-government transactions through habitual interaction and the generation of social capital.

Risks also attend such bodies, however, including possible reinforcement of the power of existing elites and insiders; their use as vehicles for rent-seeking; and their circumvention of broader and possibly more transparent forums for policy dialogue. CMs around the world have been organized on a national basis (e.g., South Africa's National Economic Development and Labor Council (NEDLAC)), sectoral basis (e.g., Ghana's Private Sector Roundtable), or industry or functional basis (Latvia's Road Traffic Safety Council).

Successful CMs seem to share five important characteristics:

- They have a specific and well-defined set of objectives
- They have transparent internal procedures and strong public participation
- They have an effective secretariat that streamlines the organization's work
- Membership is drawn from broad sectoral or functional constituencies rather than industries whose narrow interests may skew the work of such bodies
- They feature follow-up and monitoring procedures that enable CM participants to know what happens following any formal or informal agreements produced during CM discussions.

Latvia has a wide range of CMs, from those with well-defined objectives and significant policymaking duties (e.g., the Tripartite Coordinating Commission that takes up most matters of social policy and legislation) to those whose agendas are looser and

government commitment possibly weaker (e.g, the National Economic Council). Among the most important ways to strengthen CMs in Latvia may be the following:

- Create greater public awareness of the work of CMs generally, as well as pressure for greater accountability
- Develop a greater appreciation by NGOs and the business community of the need for greater technical expertise and professionalism in working with CMs
- Encourage the government to adopt a concerted CM improvement strategy
- Encourage greater CM reliance on working groups and subcommittees
- Adopt uniform basic guidelines for CMs.

An important consideration in improving the functioning of CMs is the need to avoid usurping the powers and legitimacy of official decisionmaking organs. CMs should complement, not substitute for, formal policy- and decisionmaking organs.

Affirmative ('Active') Provision of Information. Government accountability depends critically on access to information. Indeed, general information about executive branch organization, processes, and substantive policies represents the basic currency of government accountability. Such transparency enhances control of administration, helps create more efficient public sector program delivery, and contributes to more vibrant and informed political life. The absence of such information may increase opportunities for abuse of authority, corruption, and poorly-informed decisionmaking.

Access to government information may be largely informal, haphazard, and dependent on the preferences of current officeholders – as it is in most countries around the world – or it can be formalized in law and institutionalized in practice. In discussions about democracy and individual rights, the responsive, or ‘passive’ provision of information upon request invariably garners the most attention. Yet establishment and maintenance of such a system of information access requires considerable time and resources, as well as legal expertise. By contrast, the affirmative, or ‘active,’ provision of information by the government can be

prioritized and routinized along more predictable budget and human resource parameters by making available certain classes of official information regarded as the most vital to the economy and political discourse.

Several countries have laws on access to information that include affirmative provision requirements, including the United States, Ireland, Australia, Canada, Hungary, and the Netherlands. These laws mandate that information about government agencies, including policies, decisions, interpretations, and staff manuals and instructions be made public. Other countries may have a custom of making such information accessible.

Latvia's Law on Information Access (LIA) does not have an affirmative information access requirement, although several individual laws (e.g., Law on State Statistics) require specific kinds of disclosure. The only significant nationwide affirmative publication requirement comes from the Cabinet of Ministers Instruction on the Procedure for Preparing Annual Public Statements. It mandates that national agencies annually disclose information about their mission, activities, budgets, and key accomplishments. Other disclosure occurs through the initiative of individual agencies, e.g., the State Enterprise Registry, which has published many brochures about its work, and which maintains a listserv by which it disseminates commercial law information.

As the phenomenon of voluntary information disclosure expands, the Latvian government should consider adoption of more expansive and uniform principles for affirmative information provision, including a more encompassing list of the types of documents that must be provided in hard copy and electronically; minimum requirements for agency web sites, and general policies on the commercial re-use of public sector data.

Public Participation in Government Rulemaking and Law Drafting. In most countries around the world, the drafting of rules and legislation represents a relatively closed affair carried out by a small working group composed of agency personnel and a few outside experts. In many cases, however, their work product may contain impractical provisions, conflict with other normative acts, and fail to address the actual needs of intended beneficiaries. To remedy these problems, some countries have sought to open up their regulatory and legislative drafting processes at the agency level by permitting some degree of public comment. Among the transition countries, only Hungary has a comprehensive law requiring such public input; other countries in Central and Eastern Europe have informal arrangements for inviting knowledgeable and interested NGOs to participate in consultations or provide comments on draft regulations and/or legislation.

Latvia has generally treated the issue of public participation in ministry rulemaking and legislative drafting on an *ad hoc*, ministry-by-ministry basis. In the past year, however, the government has moved to adopt two related formal mechanisms that seek to elicit public comments on all regulations and legislation passing through the Cabinet of Ministers. One requires ministries proposing new rules or legislation to document the extent to which they have consulted with NGOs or foreign experts on their proposals. The other requires proposed rules and legislation to be posted on the Cabinet of Ministers web site for comment shortly before the Cabinet takes action on them.

Despite their potential to promote greater public participation in lawmaking and rulemaking, both mechanisms fall short of their promise. The annotation process not only provides little guidance as to how the consultations are to be conducted (posing the danger that the process will be treated as a mere formality) but does not even by its terms require that

consultations be held (although they are obviously expected). The website posting requirement, though laudable, is hostage to the country's low Internet connectivity and occurs at a relatively late stage in the drafting process.

In moving toward a more participatory drafting regime, the government should consider reforms that would encourage or require ministries and administrative bodies to devote substantial time to public consultation and solicitation of comments closer to the beginning of the legislative or regulatory drafting process. This could involve more precise guidance as to the time and manner by which consultations or public comments will be invited (e.g., website posting, email or mail distribution to interested parties, etc.).

Responsive ('Passive') Provision of Government Information. In recent years, a number of transition countries have enacted access to information laws, including Hungary, Lithuania, Slovakia, Bulgaria, and Georgia. Latvia's LIA became effective in 1999, but it suffers from several textual and conceptual deficiencies, including these:

- The law may not apply to all state administrative bodies
- Many definitions are unclear
- The law does not clearly take precedence over other laws concerning the disposition of government information and its access by the public
- There is no clear right of public access qualified only by a limited number of legislatively-defined exemptions
- There is no public interest or other balancing test governing disclosure of otherwise restricted information
- The right to appeal to court a refusal of access may be artificially limited.

Many of these impediments have been documented in a study conducted in 1999-2000 by the nongovernmental organization *Delna*. The study depicted government officials as poorly informed about citizens' rights under the law and hostile to information requests.

The law's shortcomings on paper and in practice necessitate not only amendments to the LIA but the designation of a state organization to serve as a central source of expertise

and enforcement authority on the law. Presently no such organization exists. Plans are now underway, however, to grant such powers to the State Data Protection Inspectorate. The new Inspectorate could have the following kinds of duties:

- Commenting on draft legislation and regulations affecting access to information across the government
- Serving as a source of expertise on interpretation and application of the law through formal guidance to executive branch agencies
- Serving as a central coordinator for public information and education on access to information, as well as training of government officials
- Investigating public complaints about information access
- Serving as a first- or second-instance informal decisionmaker able to issue non-binding yet authoritative appealable decisions on disputed access matters

Decisions about these functions must be made in the coming months and translated into legislation and subsequent internal government guidance by the Inspectorate.

. ***Administrative Procedure and Judicial Review of Agency Decisions.*** All non-totalitarian societies need a mechanism to resolve disputes that arise between the government and its citizens. Common law countries, with less faith in bureaucrats' technocratic expertise and capacity for fairness, have tended to ensure that appeals of agency decisions within the bureaucracy are bolstered by formal adjudicative procedures and presided over by independent, often quasi-judicial, hearing officers. Civil law systems, less steeped in adversarial procedure and more deferential to administrative authority, have neither the legal tradition nor the political inclination to judicialize agency appeals procedures. Moreover, most civil law systems (with key exceptions like Germany and Austria) feature appeals processes that may vary widely from agency to agency.

Latvia's draft Administrative Procedure Law (APL) has determined to pattern its new system of administrative procedure on a relatively unified German model. Like the *Verwaltungsverfahrensgesetz*, the German Administrative Procedure Act of 1976, the Latvian

law is designed to provide a uniform framework of general principles and guidelines by which agency decisionmaking must be conducted. Under this German approach, judicial review tends to focus less on whether the correct procedures were followed, and more on the appropriateness of substantive outcomes.

The draft APL effects the following key changes over current practice:

- The principles of law to be applied by administrative bodies and the courts are enumerated (e.g., equality, proportionality, legality, etc.)(Arts.1-17).
- There is an explicit requirement that the petitioner have an opportunity to be heard at the agency level (Art. 60)
- The form and elements of an administrative decision are explained in detail (Art. 65), along with the right to demand a decision in this form (Art. 67).
- The principle of allowing damages for harms suffered as a result of an administrative act, omission, or decision is clarified (Arts. 90-93)
- The state's burden of proof under judicial review is made explicit (Art. 140)

Despite these impressive changes, the draft law has a few ambiguities that may require modification, including its relationship to other legal norms, the precise nature of the 'hearing' to be afforded citizens at the agency level, and the grounds for waiving the formal elements of an administrative decision. At the same time, implementation of the APL will require a comprehensive education strategy combining the efforts of the government, the legal community, the judiciary, and nongovernmental organizations.

A Suggested Implementation Program for the Laws on Administrative Procedure and Access to Information

The Latvian Government seeks to take an active approach to implementing the LIA and the APL. Few laws are so modest in their apparent import, yet have the potential to play such an important role in the lives of ordinary citizens and in the development of a favorable business environment. Due to low public and government consciousness about the two laws, however, a special government-wide commitment to implementation is required, something that can only come from the Cabinet of Ministers. *Accordingly, we recommend that an 18-*

month implementation program (from October, 2001 to March, 2003) be designated as a formal program of the Government. A useful model is the current program on Improvement of the Business Environment in Latvia.

Program Organization and Management. Under this implementation framework, we envision overall program coordination residing with the Ministry of Justice (MoJ). Significant other responsibilities would be carried out by the Secretariat of the Special Ministry for Public Sector Reforms (guidance and training for civil servants by the Secretariat, the State Civil Service Administration, and the School of Public Administration), the Special Ministry for Local Government Affairs and the Union of Municipalities (guidance and training for local government officials), the Legal Department of the State Chancellery (oversight over harmonization of other relevant laws, regulations, and other normative acts with the APL and LIA), the Ministry of Finance (creation of a feasible compensation scheme), and the Supreme Court and Latvian Judicial Training Center (guidance and training for judges). *Representatives of these institutions should sit on a program-wide central task force structure (or 'Steering Committee') to be created at the outset of the initiative.*

The Committee would function as a kind of board of directors of the program, providing high-level guidance to an executive group at the Ministry of Justice comprising the Program Implementation Unit (PIU). The PIU would in turn be led by the Deputy State Secretary for Legislative Matters and would include a representative of the Ministry's Division on Legislation and Regulations, the Director of the State Data Inspectorate, a person responsible for public affairs at the Ministry, and a consultant charged with day-to-day management of the program. The PIU would guide the program across the government while serving a central monitoring body (*see Fig. 1*).

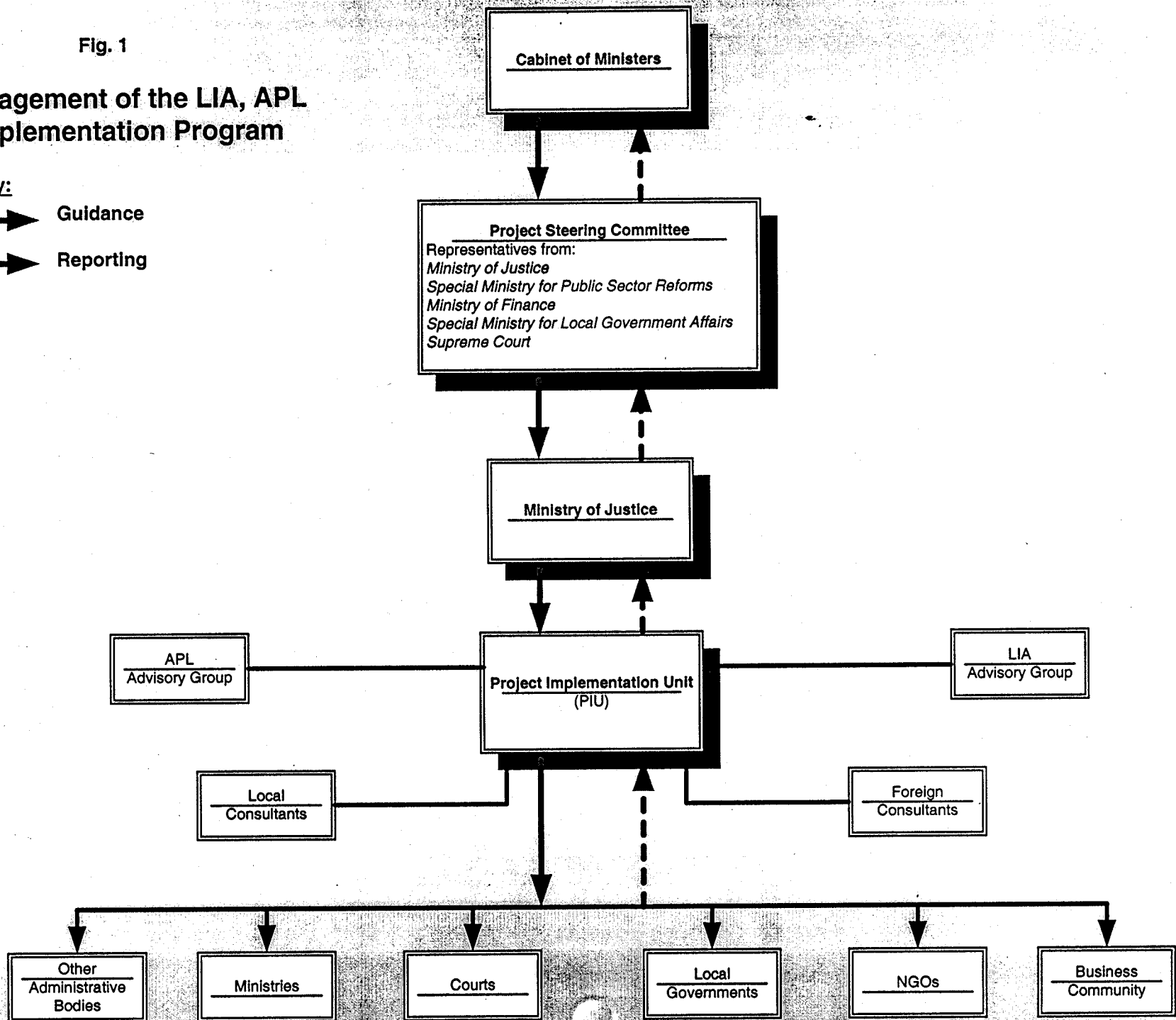
Fig. 1

Management of the LIA, APL Implementation Program

Key:

—→ Guidance

- -→ Reporting



Key Conceptual/Strategic Considerations. A number of key strategic considerations must be weighed in the course of discussing and approving the program:

The different implementation contexts of the two laws. Because the State Data Protection Inspectorate must be given new powers in order to enforce the LIA in a more vigorous manner, implementation activities for the LIA will end up on a slower timetable than those for the APL. Amendments to the LIA, in turn, will be developed by the newly-empowered Inspectorate based on empirical evidence.

Treatment of municipalities under the program. Because municipalities are among the agencies least attuned to procedural regularity in their decisionmaking, they will require special attention from the program, subject to legal and resource constraints. We recommend that the program integrate municipalities wherever possible into common training and other tasks or create parallel implementation activities that can be overseen by the Union of Municipalities and the Special Ministry for Local Government Affairs.

Basic approach to training activities. The basic approach to training relies on a core group of experienced trainers steeped in the nuances of the APL and/or LIA who can help develop a broader cadre of instructors through a training-of-trainers mechanism. Decentralized training can then occur more flexibly in disparate venues such as agencies, the courts, and the legal community.

Coverage of proposed training and education activities. The program will feature separate training and education modules aimed at agency lawyers and managers, municipal officials, judges, practicing lawyers, law students, procurators, businesses, the media, and NGOs. While supply-side training and education has its limitations, some level of pump-priming in this regard is an absolute necessity. Over time, it is to be hoped that citizen activism

and decentralized agency/municipality initiatives will lead to greater demand for the two laws and more compliance with their letter and spirit.

Suggested Implementation Program Agenda

The implementation program described in the report does not constitute a blueprint, but rather an ambitious and somewhat idealized agenda that is purposely designed to provoke discussion and debate. Its components have been broken down into detailed tasks in the accompanying Gantt chart in Appendix B in order to provide a logical sequence of implementation tasks that can be modified or eliminated after careful consideration. The program consists of three major parts: (1) common program organization and management tasks; (2) implementation tasks for the APL; and (3) implementation tasks for the LIA.

Common Program Organization and Management Tasks. The major tasks here relate to formation of the PIU and Advisory Groups on the LIA and APL. Under the plan as envisioned, the PIU would submit the program to the Cabinet for consideration by early October 2001 based on input from the Steering Committee. A final program would be approved by November. A workshop on the program would also be held for Deputy State Secretaries and the Union of Municipalities in November. Responsible managers and legal staff in each ministry, as well as responsible officials in each municipality, would be designated by December. These individuals would be introduced to the major implementation tasks under the two laws in workshops conducted in January 2002.

Implementation of the APL. Education and training lie at the heart of the implementation program, although significant press attention, as well as business and NGO activism, should spur changes in administrative and judicial practice. The following clusters of tasks comprise the major objectives of the APL implementation program:

- *Creation and/or Harmonization of Legal Frameworks.* After passage of the APL, all special agency norms must be inventoried and then harmonized to conform to the new law's procedural requirements.
- *Development of a Compensation Mechanism.* The Ministries of Justice and Finance must develop a workable compensation mechanism to fund appropriate monetary awards under the APL.
- *Training of Agency Managers and Lawyers.* Focusing on a training-of-trainers methodology, the program should ensure that a knowledgeable core group of trainers instructs a wider group of potential trainers from the ranks of agency lawyers and managers in the practical impact of the APL. This larger cadre of trainers will then carry out decentralized training of rank-and-file agency personnel toward the end of the 18-month program period. A parallel process will be carried out with municipalities. The core group of trainers will receive special training at the German Judicial Training Academy toward the beginning of the program.
- *Implementation of New/Modified Administrative Appeals Procedures.* Through problem-solving workshops, internal instructions, and special manuals, agencies will oversee and report back to the Cabinet of Ministers on implementation of new and modified administrative appeals procedures consistent with the new law. Municipalities will be asked to go through a similar process.
- *Training of Judges.* New and existing judges assigned to administrative cases will be given differentiated training in the APL. Using the training-of-trainers approach, certain members of the core group of trainers noted above will train at least 3 or 4 dedicated judicial trainers in the intricacies of the APL. These trainers will go on to anchor rank-and-file judicial training at the Latvian Judicial Training Academy.
- *Training of Municipal Officials.* Parallel training for municipal officials similar to that given to national government lawyers and managers will be carried out by the Union of Municipalities, using trainers instructed by the core training group noted above.
- *Education and Training for Lawyers and Procurators.* Lawyers' associations, law faculties, and the Procurator General will be encouraged to provide educational materials and training to their respective audiences (practicing lawyers, law students, procurators). Procurators should know how to provide citizens with proper guidance or referrals to other organizations when consulted about administrative appeals.
- *Public Education.* Public education (of individual citizens and businesses) should occur through a combination of targeted press coverage, public education campaigns (with leaflets and brochures), special research, test litigation, and government publication of official brochures and wall posters that will be posted in government offices according to official instructions.

Implementation of the LIA. Implementation of the LIA centers around proper development of an access to information competency within the State Data Protection Inspectorate, followed by empirically-grounded legal revisions to the law, technical assistance and training to government bodies, and a public education program.

- *Empowerment of the State Data Protection Inspectorate.* A new Access to Information Division will be created in the Inspectorate that will have certain advisory and enforcement responsibilities and possibly a non-binding decisional authority on disputed access matters. Appropriate Inspectorate staff will participate in a study tour to Hungary's Ombudsman for Data Protection and Freedom of Information to learn more about achieving a balance between data protection and dissemination in a modern transition country government.
- *Research on Compliance and Development of Legal Reform Proposals.* The Ministry of Justice will commission and/or encourage research on LIA compliance as a basis for developing reform proposals to eliminate ambiguities and loopholes in the law.
- *Provision of Technical Assistance and Training to Agencies.* Relying on a network of designated information access officers at every national-level government agency (which group will also be linked through an email network), the Inspectorate will launch a technical assistance and training program aimed at nurturing a knowledgeable group of information professionals able to manage and opine on government records classification, registration, and dissemination. A parallel network will be developed among the larger municipalities.
- *Public Education.* This work comprises several tasks, including establishment of a central government web site on access to information (with links to every individual agency's web site and respective information access officer); development of official brochures and informational posters, citizens' leaflets and guidebooks; development of press and broadcast campaigns; and the holding of several workshops for NGOs and the business community.