

Global Data Barometer

Thematic Module Draft

Political Integrity

Version 1.0 - December 2020

This document provides an overview of a proposed module for inclusion in the pilot edition of the Global Data Barometer: mapping data governance, capability, availability, and use for the public good.

The Global Data Barometer draws together secondary indicators and primary data from a multi-country expert survey to build a picture of data policies and practices across the world and across a wide range of sectors. It seeks to: add to understanding of the ongoing data transformation; provide a critical new comparative benchmark on data; contribute to in-depth quantitative and qualitative research on data; and to support sectoral efforts with actionable insights. It builds on the model of the [Open Data Barometer](#), adopting an updated structure (governance, capability, availability, use & impact) and incorporating many new indicators that explore key categories of data.

We welcome your review and feedback by 15th January 2021 in any of the following ways:

- Read the **module overview** to understand how we are addressing this theme, and how it fits into the overall Global Data Barometer.
- Review the **prospective indicators** to see the scope of our proposed data collection and measurement.
- Read the **literature review** to find the justifications for indicator selection and design, and to understand how we have covered relevant cross-cutting issues.
- Explore the **appendix** to go deeper into the prospective sub-questions for each indicator.
- Using the comment box feature, please **comment** directly on this document; when responding about a particular country- or region-based nuance, please let us know which country you're referring to. We're particularly keen to learn from you on a number of topics:
 - Is there something about an indicator or sub-question that doesn't fit well with your country's practices?

- Can you identify specific ways the data this module generates can be useful in your country or region?
- Can you identify specific harms that generating this data might prompt in your country or region that we should be aware of?
- Are there studies or standards that we should be referencing that aren't included yet?
- Have we made an error, or do you see that something critical is missing?

Note: This document convenes a community — we're excited to share with you what we've been working on and, with your help, make it even better! Thank you for sharing your expertise with us. When commenting, **please write from a position of mutual respect and generosity of spirit**. If necessary, we will moderate comments.

This module will be open to public review from 15 December 2020–15 January 2021. For questions about this module not covered here, please contact amy@globaldatabarometer.org. For more information about the Global Data Barometer, please visit <https://globaldatabarometer.org/>.

Module partners and acknowledgements



This module has been developed in partnership with the [Open Government Partnership](#) Research Team and [Transparency International](#). Positions taken in this document are solely those of the Global Data Barometer and do not represent specific policy positions of partner organizations.

The pilot edition of the Global Data Barometer receives core funding from Canada's International Development Research Center (IDRC.ca) under grant 109517-001 as part of the Data for Development (D4D.net) program of work. For more information about Global Data Barometer partners, please see www.globaldatabarometer.org

Lead author: Amy Johnson (amy@globaldatabarometer.org)

Contributors: Tim Davies (Global Data Barometer), Renzo Falla (Open Government Partnership), Joseph Foti (Open Government Partnership), Jorge Valladares (Transparency International), Jon Vrushi (Transparency International).

Acknowledgements: Valentina Mongui, Nadiia Babynska Virna, Abed Khooli, Hatem Ben Yacoub, Afzal Izzaz, Teona Turashvili, Erica Shein, Keitha Booth, Megan Donaldson, David Zamora, Tinatin Ninua, Helen Darbishire, Peck Sangiambut, Magnus Ohman, Elena Prohnitchi, Paul Zoubkov, Peter Wells, Graham Jones, Di Wu, Jack Lord



Contents

[Module overview](#)

[Political integrity data and the public good](#)

[Use cases shaping this module](#)

[Global relevance](#)

[Prospective indicators](#)

[Expert survey questions](#)

[Secondary data](#)

[Indicators from the Open Data Barometer](#)

[Literature & data review](#)

[Introduction](#)

[Issues](#)

[Campaign and party financing](#)

[Interest and asset declarations](#)

[Lobbying](#)

[Public consultation](#)

[Right to information](#)

[Setting standards](#)

[Campaign and party financing](#)

[Interest and asset declarations](#)

[Lobbying](#)

[Public consultation](#)

[Right to information](#)

[Global perspectives & cross-cutting themes](#)

[Global issues](#)

[Gender](#)

[Inclusion](#)

[Responsible AI](#)

[COVID-19](#)

[References](#)

[Appendix: Expert survey questions](#)

Module overview

The Political Integrity module is being co-developed with the Open Government Partnership research team and Transparency International. To capture a breadth of datasets relevant to political integrity, and to address key gaps in current data, it will address five specific themes:

- Data on political party finance
- Data on political interest declarations
- Lobbying registers
- Data on public consultation in rule-making
- Data on right-to-information regime performance

Political integrity data and the public good

Each indicator within the Global Data Barometer must contribute to an assessment of how far national policies and practices support governance, availability and use of data for the public good. This section sets out how a module on political integrity contributes to this.

The public good can best be served when there is an open, accountable, and equitable public sphere, in which money doesn't distort fair decision-making or access to political office.

Data can be a powerful tool to identify whose interests shape how governance decisions are made and implemented. Within democratic political systems, this involves transparency of political party finance, information on the interests of political decision makers, information on lobbyists' interventions, and information on public consultation processes in rule-making, as well as a robust access-to-information system that helps members of the public evaluate and hold to account those in power.

Our focus on political integrity data aligns with SDG 16: Peace, Justice, and Strong Institutions, particularly its targets around rule of law (16.3); transparent, accountable institutions (16.6); responsive, inclusive, participatory, and representative decision-making (16.7); and public access to information (16.10).

Use cases shaping this module

As well as contributing to the overall Global Data Barometer scores, rankings, and evidence, thematic indicators may be used by partners or other stakeholders to address identified problems. The design of the Barometer follows a 'publish with purpose' approach, where we seek to maximize the value from each data point we collect and share.

This module is being co-developed with the Open Government Partnership and Transparency International to address gaps in existing understanding of data-related political integrity practices, with a view to data informing the next OGP Global Report.

This module will support both policymakers and civil society organizations to diagnose data-specific weaknesses of a country's current practices of political integrity; to lay out specific goals for improved availability and use of data around party financing, interest declarations, lobbying, public consultation, and RTI performance; and to advocate for these changes persuasively, drawing on comprehensive contextual data and qualitative insights from around the world.

The data from this module will also be of great use to the numerous researchers across scholarly disciplines who study integrity, corruption, political partisanship, conflicts of interest, lobbying, public consultation, and RTI;¹ it will contribute to and extend the current wave of empirical research on these topics that has emerged in conjunction with more recently developed datasets such as those the module examines.

This module also supports members of the public in assessing and contextualizing the integrity of their government and public officials.

Further, this module will likely be of interest to specific populations corresponding to the module's themes—e.g., lobbyists seeking a balanced and diverse ecosystem of special interest groups; journalists investigating the financial backers of a particular campaign; researchers analyzing the conflicts of interest of a particular kind of public official, etc.

The data and evidence gathered here may also be taken up by global governance institutions—while this edition of GDB focuses primarily on country-level government, evidence from transparency research (e.g., Donaldson and Kingsbury 2013) suggests that practices of integrity can also have positive spillover effects on global governance institutions.

Global relevance

The Global Data Barometer will cover more than 100 countries, representing every continent and level of economic development. Indicators need to have a level of universality that allows them to be applied fairly across many different country settings.

Integrity violations cause scandals around the world. Anti-corruption frameworks, which have tended to focus on specific integrity violations such as bribery and fraud, have been criticized as producing biased outcomes that favor developed countries and disfavor developing countries. Thus, for example, while Denmark has a long history of anti-corruption practices that helps it score highly on international and domestic surveys for its integrity practices, at the same time a Eurobarometer survey from 2017 found that 22% of Danes surveyed considered corruption to be widespread, with 40% concerned about corruption in local government and 41% concerned about corruption in national government (cited in Ardigó 2018:3). Huberts (2018), a leading scholar on integrity of governance, acknowledges that integrity frameworks may share a similar bias, but points to the broader range of integrity violations as offering a potentially less biased approach.

¹ See for example (Žuffová 2020) and (Jelenic 2019) who draw upon data from the predecessor Open Data Barometer to carry out detailed statistical comparative analysis of accountability and anti-corruption issues.

Because integrity frameworks tend to focus not only on identifying specific negative behaviors for monitoring and sanction, but also on building positive foundations and cultures to support integrity, we should expect significant regional variation.

In our indicator design, then, we want to make sure to ask about integrity violations broadly, to make sure that researchers are thinking beyond classic examples of corruption, and we want to provide open-ended space for country researchers to share observations on how the country approaches building a culture of integrity.

As with any complex cultural value, integrity entangles with other cultural values; further, the salience of different integrity violations will also vary. For example, research on integrity violations among government employees in Malaysia showed that employees focused on personal and family relationships in ways the organization deemed an integrity violation; the authors attribute this to broader cultural values around caring for others and the precedence of family over work (Zahari and Said 2019:136).

For indicator design, in addition to feedback from our regional partners, we'll also want to ask country researchers about other cultural values that may, explicitly or implicitly, shape the governance, capability, availability, and use/impact of the integrity data they are evaluating as part of this module. If there are conflicting values, we may further want to ask about how to resolve the question of what constitutes data for the public good in light of this conflict.

Prospective indicators

The following indicators are currently under consideration for inclusion in the Global Data Barometer's expert survey or secondary data collection. In this section, we list only the overall draft indicators. In the Appendix, each indicator is listed with all of its prospective sub-components. Every finalized indicator will also be accompanied by a detailed research handbook page that provides definitions and research guidance.

*Note: These indicators are **pre-pilot** and will be refined following initial piloting.*

Expert survey questions

We anticipate including up to 12 expert survey questions for this module. The following list contains the candidate questions that we will select from and refine. Details of each question can be found in Appendix 1.

1. To what extent is there a robust framework for collecting and publishing data on campaign and party finance?
2. To what extent is political finance information available as open data?
3. To what extent is there a robust framework for collecting and publishing data on the interests and assets of public officials?
4. To what extent is interest and asset declaration information available as open data?
5. To what extent is there a robust framework for collecting and publishing data on lobbying activities?
6. To what extent is lobby register information available as open data?
7. To what extent is there a robust framework for collecting and publishing data generated through and about public consultation on law- and rulemaking?
8. To what extent is public consultation information available as open data?
9. To what extent is there a robust framework for collecting and publishing data on the performance of Right to Information (RTI) / Freedom of Information (FOI) processes?
10. To what extent is detailed RTI performance information available as open data?
11. To what extent does political integrity data sync across different political integrity datasets?
12. To what extent do the agencies responsible for data on political integrity appear to have high levels of data capability?

13. To what extent are there dedicated capacity-building programs to improve data literacy among anti-corruption and accountability organizations, including media, civil society, government ethics offices, and independent institutions?
14. To what extent is there evidence of political integrity data being used to identify, expose, or highlight failures of government?
15. To what extent is there evidence of public data being used to support public engagement in rule-making processes?

Secondary data

Where we can identify that other studies have generated relevant data using rigorous methods and with appropriate country coverage, we use this data as the foundation for indicators in order to ease the burden on our country-level researchers and government survey respondents. There is no limit to how many indicators drawing from secondary data a module may contain. For this module, we currently anticipate including 2 such indicators.

16. To what extent is there a robust framework for public consultation on policy-making? *To be drawn from the [World Bank's Global Indicators on Regulatory Governance](#).*
17. To what extent is there a robust Right to Information (RTI) / Freedom of Information (FOI) framework? *To be drawn from the [Global RTI Rating](#).*

Indicators from the Open Data Barometer

This section outlines any relevant indicators included in our predecessor study, the Open Data Barometer, and considers how the Global Data Barometer may provide time-series continuity with these and where it may update or adapt them.

ODB.2013.C.RTI: To what extent does the country have a functioning Right to Information law (RTI) / Freedom of Information (Fol) law?

This question was asked in the 2016 peer-reviewed Open Data Barometer expert survey, with data covering the period to June 2016. This indicator addresses whether the Right to Information act disclosure requirements are “effective.” The basic requirements for them to be considered “effective” are whether information: is available to the public for free or at reasonable/minimal costs in a variety of venues (e.g., online, government agency offices); can be accessed by citizens within 30 days, and answers the specific request, with explanations for refusal to release information.

For GDB, our related indicators focus on the *performance* of RTI regimes. To maintain continuity with ODB, we will include a secondary indicator drawing on data provided by RTI Rating.

ODB.2013.D15: national election results

This dataset was assessed in the 2017 Open Data Barometer technical survey. The dataset sought was results by constituency/district for most or all national electoral contests over the last ten years.

At present, the GDB political integrity module focuses primarily on the integrity of political decision-making and exercise of power, rather than electoral integrity. It may make sense to include a sub-question about this dataset in the geodata module, in conjunction with assessments of data related to gerrymandering and malapportionment.

Literature & data review

This short review identifies the history of, and demand for, data governance, capability, availability, and use with respect to this theme, pointing to relevant frameworks, stakeholder groups, policy agendas, and scholarly work.

Introduction

In the 1990s, integrity arose as a key conceptual and practical framework in business administration and the public sector. Under the umbrella of integrity came practices for aligning individual action with organizational values; protocols for identifying when values were violated; mechanisms, such as whistleblowing procedures, for voicing concerns; and sanctions for violations.

More recently governments, civil society, and academia have applied integrity frameworks to examine the quality of governance. Here integrity focuses on the “*behavior, process, and procedure* (in a broad sense)” of those who participate in making governance decisions and implementing them (Huberts 2018: S20, italics in original). “Political integrity,” Transparency International explains, “means exercising political power consistently in the public interest, independent from private interests, and not using power to maintain the office holder’s own wealth and position” (n.d.) Schmidt and Wood (2019), approaching the same concerns from the angle of throughput legitimacy, identify four distinctive normative criteria: accountability, transparency, inclusiveness, and openness.

The driving force behind establishing particular integrity practices and integrity cultures in government has been a desire to preempt corruption. The OECD, for example, released in 2017 a recommendation on public integrity explicitly for this aim, later expanding upon it with a Public Integrity Handbook in 2020. While integrity violations include classic examples of corruption such as bribery, the integrity framework is broader. Reviewing literature on integrity, Huberts identified nine types of integrity violations: bribery, favoritism, conflict of interest, fraud and theft of resources, waste and abuse of resources, break rules/misuse power, misuse and manipulation of information, indecent treatment, private time misconduct (2018:S23).

Typically, integrity is understood as established through a complex system, variously understood through metaphors such as culture, ecosystem, and climate. Consequently, work toward integrity focuses not only on sanctions and monitoring, but also on the creation and maintenance of an integrity culture, ecosystem, or climate as a positive goal in and of itself.

Data can and does play an important role in this complex system, anchoring accountability and transparency efforts, helping officials maintain a high standard of integrity, and promoting participatory governance. At the same time, a Transparency International survey of key political integrity datasets of eight EU countries and institutions found considerable problems throughout with both data quality and data formats (Kergueno and Vrushni 2020).

Issues

In this module, to understand how private interests access power and influence its exercise, we examine data on party and campaign finance, public officials’ income and assets, and lobbying. To

consider how public interests access and shape the exercise of power, we review data on public consultation in policy-making, noting as we do, that public opinion is itself a target of grassroots lobbying by private interests, with growing attention in academia and civil society to problems like astroturfing. Finally, we examine data on the performance of RTI regimes to understand RTI's effective power as a tool for members of a public to assess how consistently public officials exercise political power for the common good and to hold public officials accountable when they do not.

Note: Gerrymandering, or the practice of redrawing an electoral district to favor a particular party, and malapportionment, or the inequitable distribution of voters across electoral districts, significantly affect the integrity of the political system. Here we focus on practices of making and implementing decisions other than through the electoral system. We will look for opportunities to explore data on electoral boundaries in a separate geodata module.

Campaign and party financing

While donating to a politician or political cause is widely considered a form of political participation, there is also widespread concern about the effects of money in politics, with particular questions regarding who donates to parties and campaigns, how much, and how that affects political outcomes. As Transparency International notes, understanding who has access to power is a key dimension to evaluating political integrity. This concern has yielded a variety of tools, including financial disclosure laws, spending caps, tax incentives, and public subsidies, as well as related requirements with regard to balanced news coverage and free media time.

In a review of scholarship on parties and partisanship, Muirhead and Rosenblum (2020) find that parties play important roles in democracy: parties are vehicles for representation and political pluralism, contributing to public reason and deliberation, and the party system serves as an institutionalized, managed form of rivalry and opposition. Transparency in campaign and party financing is thus critical for understanding whose interests shape parties and the decisions of specific public officials.

The increasing adoption of financial disclosure laws has supported a related growth in empirical research on the effects of money. At the same time, scholars like Scarrow (2007), upon reviewing comparative research on party financing, note that considerable differences remain even in terms of what categories are used to analyze funding (e.g., many use some variant of Von Beyme's (1985) internal, external, and state classification scheme, while others employ Nassmacher's (2001) plutocratic/grassroots framework). Standardized country-level data, Scarrow suggests, will help researchers understand the effects of disclosure laws and public subsidies, as well as to test hypotheses about funding, parties, and the larger political landscape.

Interest and asset declarations

Interest and asset declarations, sometimes referred to as wealth declarations or financial disclosures, have been used since at least 1960, when the Philippines passed its Anti-Graft and Corrupt Practices Act requiring public officials to declare under oath their assets and liabilities at the beginning and end of their terms in office (Apostol n.d.). In 2003, the adoption of the UN Convention Against Corruption, which includes strong declaration practices, sparked a renewed focus on the declaration as an accountability mechanism. A World Bank study published in 2016

found that 161 of 176 countries had some form of interest and asset declaration, though these showed significant variation (Rossi, Pop, and Berger 2016).

Perhaps the most important difference among systems for interest and asset declarations is whether they seek to prevent conflicts of interest or illicit enrichment—or, as is common, some combination of the two. As a report from the World Bank notes, this difference affects a system's approach, tools, and remedies (Burdescu et al. 2009). A focus on helping officials identify and avoid conflicts of interest may draw on practices like recusal, divestiture, blind trusts, and restructuring of responsibilities, while a focus on preventing illicit enrichment often takes a more adversarial approach.

Other major variations include whether declarations are collected and shared via electronic or paper systems; whether declarations are publicly accessible, allow only restricted access, or take hybrid form, with some components public and some private; whether declarations require both financial (i.e., interests, assets, and liabilities) and non-financial (e.g., employment and memberships) disclosures; whose interests and assets must be declared, both in terms of which public servants and for which of their family members and intimates interests and assets must be declared as well; the timeframes within which disclosures are required, which may include beginning/end of term, annual or biannual, within a short span upon a significant change, or some combination; to what degree an enforcement agency is empowered to access data held by other entities, governmental or otherwise, for verification and monitoring purposes; and whether or not enforcement agencies conduct lifestyle audits.

Lobbying

While there are considerable differences in how lobbying activities are defined for reporting purposes—a key impediment to studying lobbying comparatively—there's widespread consensus on the underlying concept of lobbying; here we use Transparency International EU's articulation: "Lobbying is any direct or indirect communication with public officials, political decision-makers or representatives for the purposes of influencing public decision-making, and carried out by or on behalf of a client or any organised group" (Berg and Freund 2015: 5). Research suggests lobbying is significant around the world (Figueiredo and Richter 2014:165), as are lobbying scandals.

In recent years lobbying has become an area of increasing regulation, with a priority placed on understanding *who* specifically lobbies. Thus, regulations typically require some form of lobbying register. Depending on how registers are construed, they may include not only identities of lobbyists but also transaction data regarding meetings, briefs, and gifts. Such registers ground a great deal of new empirical research (see, e.g., Bombardini and Trebbi 2020; de Figueiredo and Richter 2014) on lobbying. At the same time, they have gaps: different definitions of what requires reporting, sometimes within the same level of government (e.g., Mexico); more or less stringent sanction and cross-verification practices; differing capabilities for surfacing grassroots lobbying.

In broad strokes, corporate interests consistently account for the majority of lobbying across country contexts (Naoi & Krauss 2009, Sukiassyan & Nugent 2011, cited in de Figueiredo and Richter 2014), with lobbying a key component of corporate political activity (CPA). One notable exception surfaces in the use of *amicus curiae* or *intervener* briefs as a tool for influencing judicial decisions likely to shape public policy; a review of studies from the US, Canada, and the European Court found

that a consistently diverse collection of entities used such briefs as a lobbying tool (Collins 2018: 222).

Public consultation

Fundamental to democracy is the authority of the public and the involvement of the public in the act of governing, through voting as well as other forms of political participation. Increasingly, as the OECD's *2020 Innovative Citizen Participation and New Democratic Institutions: Catching the Deliberative Wave* details, such political participation includes public consultation in law- or rule-making processes. As with right-to-information frameworks, public consultation frameworks thus govern critical flows of information between members of a public and public officials, calling for thoughtful management of both textual and numerical data. Public consultation on law- or rule-making aligns with SDG 16.7, and is a component within Transparency International's decision-making dimension of political integrity.

In theory, public consultation offers an opportunity for the interests of a more diverse assortment of members of the public to access political power and shape its exercise. In practice it may not achieve its aims. For example, consultation is a key part of the current global model for state-Indigenous relations (see, e.g., the 2007 UN Declaration on the Rights of Indigenous Peoples) and employed particularly in conjunction with environmental and extractives issues. Scholars analyzing Mexico's Reducing Emissions from Deforestation and Forest Degradation (REDD+) Project found the consultation process with two Indigenous communities in the Yucatan Peninsula did not achieve governance legitimacy across an assortment of criteria (Špirić, Ramírez, and Skutsch 2019); a study of consultation approaches in the context of extractives industries in Bolivia and Peru found similarly unachieved goals (Flemmer and Schilling-Vacaflor 2016).

Public consultation is also an avenue that may be influenced by lobbying. For example, special interest groups may mobilize supporters to participate in consultations. More obliquely, public consultation is one of an array of forms of political participation that may be influenced by grassroots lobbying. At the same time, public consultation is also distinct, for it focuses not on the public official as mediator of law or regulation, but on a direct relationship between members of the public and law- and rule- making.

Right to information

Right-to-information practices are a key part of transparency and accountability initiatives that support members of a public in assessing whether and how consistently public officials use political power for the common good. The right to access the information that public authorities hold is recognized by the special mandates for the UN, OSCE, and OAS and connects directly with SDG 16.10.

Referred to alternately as right to information (RTI), access to information (ATI), and freedom of information (FOI), it's an area with considerable formal policy: Over the last thirty years, more and more countries have adopted right-to-information laws, with 119 in 2017 according to freedominfo.org. In part this is because transparency, as Kosack and Fung (2014) note, has evolved "from an end in itself to a tool for resolving increasingly practical concerns of governance and government performance." (65).

When RTI practices function well, they support oversight, reduce information asymmetries, and open a dialogue between members of the public and public officials (for more on transparency-as-dialogue see McCarthy and Fluck 2017). However, the quality, comprehensiveness, and attention to performance of these laws vary. Further, in practice, a host of obstacles may impede the RTI that legislation lays out, with regard to the timeliness of response, inappropriate use of exemptions, difficulties in contesting decisions—even lack of appropriate staffing and technical expertise among the relevant record officers can be a critical de facto impediment.

Setting standards

Campaign and party financing

In 2011, the OSCE Office for Democratic Institutions and Human Rights published [guidelines on political party regulation](#), which include a section on the funding of political parties, with guidelines for campaign and political finance, private funding, public funding, regulations of party and campaign finance, and a regulatory authority that can impose sanctions. IDEA's 2104 [Funding of Political Parties and Election Campaigns](#) includes a chapter on best practices. In 2016 the OECD published [Financing Democracy: Funding of Political Parties and Election Campaigns and the Risk of Policy Capture](#) which includes a framework. The [EuroPAM](#) database includes indicators on political financing.

Example: There are many steps, small and large, that governments can take to improve in this area. In 2014, Georgia shifted from publishing party finance declarations as .pdfs to publishing them instead as Excel and .csv files, which are machine readable. While this may seem a small development, this change made it easier for civil society organizations and others to monitor political donations and advocate for reform. Based on this data, in 2016 Transparency International Georgia launched a portal that helps users access and search this data, correlated with the business interests of donors.²

Interest and asset declarations

Transparency International's [2020 recommendations for OGP Action Plans](#) includes best practices and examples. Previously, Transparency International's [2015 Income and Asset Declaration Topic Guide](#) offered an overview of international and regional standards for income and asset declarations; these include: [United Nations Convention against Corruption \(UNCAC\), 2005](#); the [G20 high-level principles on asset disclosures by public officials](#) of 2012; the African Union ([Article 7](#), 2003), Union of Arab States ([Article 28](#)), Organization of American States ([Article 3](#)), and Council of Europe ([Article 14](#)) all have provisions urging member states to require some form of financial disclosure from public officials. Additionally, the OECD has [Guidelines for Managing Conflict of Interest in Public Service](#) and, as part of the Stolen Assets Recovery (StAR) Initiative, the World Bank and United Nations Office of Drugs and Crimes collaborated on a report that includes recommendations for asset declaration requirements ([1.3 Building an effective AD System: Summary of Findings](#)). The [EuroPAM database](#) includes indicators on income, assets, and conflicts of interest.

² This example draws from Georgia's 2014–2016 End of Term Open Government Partnership report: https://www.opengovpartnership.org/wp-content/uploads/2018/02/Georgia_EOTR_2014-2016_ENG.pdf.

Example: Although Georgia previously required public servants to publish declarations of their economic interests and assets, until the Conflict of Interest and Corruption in Public Service law, the country had no legal requirement to *monitor* declarations. Consequently, there was no official mechanism for verifying that the information that public servants provided was accurate — and there was reason to believe that often officials hid information about assets or provided wrong data. The new law required that, as of the beginning of 2017, declarations must be monitored, drawing on two mechanisms: an independent committee and randomly generated selection. In addition, by making monitoring a matter of law, the requirement opened a pathway for external stakeholders to prompt monitoring through reporting. Although the committee mechanism has never been implemented, in 2017 monitoring of declarations gathered through random selection (284) and external reports (3) found more than 75% had irregularities or missing information. The law has since been amended to expand the sanctions it includes to address not only late submissions and repeated failures to submit declarations, but also minor technical errors and providing incomplete or wrong data. There is still more to be done: in addition to finally establishing the independent committee, civil society organizations recommend that the government rule on who can submit classified declarations and how many declarations can be verified per agency.³

Lobbying

Lobbying standards include the OECD's 10 [Principles for Transparency and Integrity in Lobbying](#), originally proposed in 2010, with their implementation later assessed in 2014; the 2015 [International Standards for Lobbying Regulation](#) from Transparency International, Access Info Europe, Sunlight Foundation, and Open Knowledge; and the [Council of Europe's 2017 recommendations](#) that its member states implement/strengthen lobbying regulations, including definitions, freedom of expression, public registers, professional ethics, sanctions. In conjunction with the Open Government Partnership, a number of countries have made [lobbying commitments](#), with variable outcomes.

Example: Chile, after a decade of legislative effort, became the first country in Latin America to pass lobbying regulation in 2014. The law establishes legal definitions of lobbying and its active and passive subjects, creates public registers that require details of meetings and attendees, outlines sanctions and fines, and gives the Council for Transparency a mandate to consolidate and publish data on lobbying activities. Two years later, assessment showed that while an enormous amount of data had been made public, implementation was uneven across ministries and officials. Notable developments included the democratizing effect of lobbying formalization, making it easier for anyone to request a meeting with an official, with evidence of increasing diversity of interest groups meeting with officials; as well as the use of the InfoLobby platform as a tool for performance management by some agencies.⁴

³ The example draws from Georgia's Introduction of the Public Officials' Asset Declarations Monitoring System Open Government Partnership commitment:

<https://www.opengovpartnership.org/members/georgia/commitments/GE0050/>.

⁴ This example draws from Sahd and Valenzuela n.d.

Public consultation

The World Bank, as part of their Global Indicators of Regulatory Governance, have assessed [public consultation in rulemaking](#) around the world, including a number of questions related to how comments, responses, laws, and regulations are organized and published as datasets. The OECD outlined a three-stage framework for communication, consultation, and engagement in their [2017 recommendation](#) of the Council on Open Government that underscores the importance of data management and high quality open data to support public consultation processes. In its 2012 [Recommendation of the Council on Regulatory Policy and Governance](#), the OECD called for members to regularly make administrative data and information available to the public by publishing performance reports on policy and reform programs, calling for particular attention to how public consultation practices function in practice (4); the same recommendation also called for the establishment of basic data infrastructure, specifically a free, user-friendly, and up-to-date legislative and regulatory database available to members of the public online. In its [2020 Regulatory Governance in the Open Government Partnership](#) report, the OGP builds on existing member commitments to outline related maturity models that call for improved data infrastructure and data management practices such as unified regulatory portals, electronic comment platforms, digitized regulatory updates, and the ability to decentralize online consultation processes through the use of APIs to facilitate public engagement through third-party sites.

Example: Latvia has a long-term project to establish a single portal that will allow members of the public and civil servants to follow – and comment on – legislation through the draft revision process, tracking changes and providing feedback all the way through to the stages of adoption and enforcement. The country already has a robust system for providing reasoned responses to comments generated during public consultation processes, with ministries required to consolidate feedback from the public and explain what has been agreed upon and why.⁵ While there is disagreement between the government and civil society about whether Latvia's related OGP commitment entails tracking the progress of drafts through Parliament as well, the State Chancellery has enumerated a variety of other data points in broader legislative trajectories that the portal could also link together.⁶

Right to information

The [joint declaration](#) published by the three special mandates on freedom of expression at the UN, OSCE, and OAS in 2004 that recognized the right to access information held by public authorities as a fundamental human right also enjoined governments to ensure effective implementation of RTI legislation. Increasingly, such implementation has been understood to include the publication of administrative data on RTI processes themselves. The African Commission on Human and Peoples' Rights' [Model Law on Access to Information for Africa](#) of 2013, also referenced as a source for further guidance in the Commission's [2019](#) update to the Declaration of Principles on Freedom of

⁵ This example draws from: Open Government Partnership and World Bank. 2020. Regulatory Governance in the Open Government Partnership: Democracy Beyond the Ballot Box.

<https://www.opengovpartnership.org/wp-content/uploads/2020/08/Regulatory-Governance-in-OGP-.pdf>, accessed 10 September 2020.

⁶ See the IRM reports of Latvia's Portal Drafting Legislature and Development of Planning Documents (LV0019) OGP commitment: <https://www.opengovpartnership.org/members/costa-rica/commitments/lv0019/> accessed 9 December 2020.

Expression in Africa, requires public bodies and relevant private bodies to submit extensive statistical reports on RTI performance annually to the relevant oversight mechanism, which is in turn directed to review and publish these reports. The [EuroPAM](#) database's set of RTI indicators includes a question regarding whether frameworks require the release of data on requests and appeals to the public.

Example: In the United States federal agencies report FOIA administrative data quarterly and annually; following the OPEN Government Act of 2007 and the FOIA Improvement Act of 2016 updates to the Freedom of Information Act, the data reported was significantly broadened and required to be made available to the public as raw data downloadable in bulk. Reports now include data on number of requests, exemptions, processing times, fees, backlogs, and proactive disclosures, among others. Reports are available through the National Archives and, more recently, both reports and raw data are available on FOIA.gov, the central portal for requesters required by the FOIA Improvement Act of 2016. FOIA.gov hosts a database interface that allows users to compare FOIA performance across years and agencies, both broadly and at a more granular level; users can also export results as CSV files.

Global perspectives & cross-cutting themes

Global issues

As a practical and conceptual framework, an integrity approach seeks to establish cultures and practices that can preempt corruption. Such frameworks, however, exist within larger networks of power relations, with integrity frameworks promoted by global governance initiatives, often with financial assistance contingent to more or less degree on their adoption. At times these specific ideas of integrity and integrity violations clash with other cultural values (e.g., around helping family). Thus, there may be specific forms of mismatch between policy and implementation.

Further, while data on political integrity is being measured here at the country-level, money and interests cross political borders. Thus, for example, multinational corporations actively lobby authorities around the world, but even countries with strong lobbying regulations typically lack frameworks that allow members of a public to trace a corporation's global imprint. This is a module, then, where it's important to assess global standards and interoperability, as these can be expected to greatly amplify the value of the data shared.

Gender

Laws and norms that nominally don't reference gender often show gender inequities in the data they choose not to generate. As part of our cross-cutting module on gender and inclusion, we ask a sub-question about gender-differentiation in datasets as part of our standard set of availability elements.

Additionally, the data such processes generate and publish may be used differently in conjunction with a politician's or public servant's gender. This is particularly relevant where sanctions and shaming play a role. Thus, for example, where public officials are required by law to declare the assets of family members, a male public official's family declarations may receive less scrutiny than those of a public official who isn't male. As another example, journalists may use data about

campaign financing to focus disproportionately on contributions to women who run for election, as part of a larger structural opposition to gender equity. One way to address such concerns in this module is through our elements checklist for relevant use & impact indicators. For example, as part of a sub-question asking about the use of political integrity data for accountability purposes, if a researcher indicates that yes, the media in that country often uses such data to hold government accountable, a follow-up question might be:

Is there evidence that this data has been invoked disproportionately with regard to gender or membership in a marginalized population?

Similarly, training and literacy programs that don't take into account gender-based inequities will likely further entrench inequities. Consequently, in some countries, education campaigns have included specific commitments to focus on women, e.g., around right to information and public consultation processes, as part of a larger endeavor to address gender inequities in governance. IDEA's [Funding of Political Parties and Election Campaigns](#) includes a special section on gender as well as regional breakdowns. One way to address this concern is through our elements checklist for relevant capability indicators.

Inclusion

Concerns about how the implementation of sanctions and shaming may favor/disfavor certain groups disproportionately, and whether training and literacy efforts take into account existing inequities, apply not only with regard to gender, but across a country's marginalized populations. One way to address such concerns is through our elements checklist for relevant governance, capability, and use & impact indicators.

In addition, data systems have specific inclusion-related dimensions: The languages and formats in which data is available will favor particular language and ability groups and disfavor others. These concerns apply not only to the languages and formats of the collection and publication of data, but also to processes such as public consultation or requesting and receiving FOI information. For example, having to translate instructions for reporting lobbying activities will yield additional costs, but only for specific groups, as well as making mistakes — and consequently sanctions — more likely. One way to assess this is to ask about laws that govern the language and accessibility coverage of government communications (including data). Recognizing that even if such laws exist, they may not be implemented consistently, another way we assess coverage is through recurring sub-questions on our elements checklist for relevant availability indicators. For example:

*Data is available in all the country's official or national languages. If the country has no official or national languages, data is available in the major languages of the country.
(no/partially/yes)*

Responsible AI

A recurring concern for political integrity — particularly with regard to campaign and party financing disclosure, interest and asset declarations, and lobbying registers — is the monitoring and verification of large amounts of data. Methods for addressing this challenge have included special focus on high-risk officials (high-risk, e.g., due to seniority or access to public resources), review by

independent committee, parallel registers for corroboration, and random selection by an automated system. It seems likely that in some countries this is an area where machine-learning systems will be deployed in the future. Algorithmic risk assessment tools used in criminal justice systems may offer us a preview of what this will look like. Such predictive tools have been shown to be highly problematic, reproducing racial bias, lacking auditability, and requiring higher data literacy levels than their end users typically possess.

Innovative research by Kang (2016), who used NLP to compare the texts of statutes from the US House of Representatives that addressed energy issues with energy lobbyists' proposals, suggests a view of how responsible machine-learning could figure into integrity data in the future.

COVID-19

In some countries, the COVID-19 pandemic has affected the reporting and sharing of political integrity data, particularly those that relied on paper-based systems. For example, Ghana suspended the collection of its Assets and Liabilities Declaration Forms (Ghana Audit Service 2020, cited in Ngumbi and Owiny 2020). One way to address this concern is to add a checklist item regarding the nature of the data collection and circulation systems and whether they are electronic, and if not, whether they were affected by COVID-19.

References

- Apostol, Pelagio S. n.d. The Experience of Asset Declaration in the Philippines.
<http://search.oecd.org/site/adboecdanti-corruptioninitiative/39367966.pdf>, accessed 10 September 2020.
- Berg, Janina and Daniel Freund. 2015. EU legislative footprint: What's the real influence of lobbying? *Transparency International EU*
<https://transparency.eu/wp-content/uploads/2016/09/Transparency-05-small-text-web-1.pdf>
- Bombardini, Matilde and Francesco Trebbi. 2020. Empirical models of lobbying. *Annual Review of Economics* 12.10.1–10.23.
- Burdescu, Ruxandra, Gary J. Reid, Stuart Gilman, and Stephanie Trapnell. 2009. *Income and Asset Declarations: Tools and Trade-offs*. World Bank Publications.
<http://documents1.worldbank.org/curated/en/126741468151478453/pdf/550040WP0AD0in10Box349432B01PUBLIC1.pdf>, accessed 10 September 2020.
- Collins, Paul M., Jr. 2018. The use of amicus briefs. *Annual Review of Law and Social Science* 14:219–237.
- de Figueiredo, John M. and Brian Kelleher Richter. 2014. Advancing the empirical research on lobbying. *Annual Review of Political Science* 17:163–185.
- Donaldson, Megan and Benedict Kingsbury. 2013. The adoption of transparency policies in global governance institutions: Justifications, effects, and implications. *Annual Review of Law and Social Science* 9:119–147.

Flemmer, Riccarda and Almut Schilling-Vacaflor. 2016. Unfulfilled promises of the consultation approach: the limitations to effective indigenous participation in Bolivia's and Peru's extractive industries. *Third World Quarterly* 37(1):172–188.

Huberts, L. W. J. C. 2018. Integrity: What it is and why it is important. *Public Integrity* 20:S18–S32.

Kang, K. 2016. Policy influence and private returns from lobbying in the energy sector. *Rev. Econ. Stud.* 83:269–305.

Kergueno, Raphaël and Jon Vrush. 2020. *Debugging Democracy: Open Data for Political Integrity in Europe*. Transparency International.

Kosack, Stephen and Archon Fung. 2014. Does transparency improve governance? *Annual Review of Political Science* 17:65–87.

McCarthy, Daniel R. and Matthew Fluck. 2017. The concept of transparency in international relations: Towards a critical approach. *European Journal of International Relations* 23(2):416–440.

Muirhead, Russell and Nancy L. Rosenblum. 2020. The political theory of parties and partisanship: Catching up. *Annual Review of Political Science* 23:95–110.

Open Government Partnership and World Bank. 2020. Regulatory Governance in the Open Government Partnership: Democracy Beyond the Ballot Box.

<https://www.opengovpartnership.org/wp-content/uploads/2020/08/Regulatory-Governance-in-OGP-.pdf>, accessed 10 September 2020.

Rossi, Ivana M, Laura Pop, and Tammar Berger. 2016. *Getting the Full Picture on Public Officials: A How-to Guide for Effective Financial Disclosure*. World Bank Publications.

<https://star.worldbank.org/sites/star/files/getting-the-full-picture-on-public-officials-how-to-guide.pdf>, accessed 10 September 2020.

Sahd, Jorge and Cristian Valzuela. N.d. Lobby law in Chile: Democratizing access to public authorities, Open Government Partnership case study.

https://www.opengovpartnership.org/wp-content/uploads/2001/01/case-study_Chile_Lobby-Law.pdf

Scarrow, Susan E. 2007. Political finance in comparative perspective. *Annual Review of Political Science* 10:193–210.

Schmidt, Vivien and Matthew Wood. 2019. Conceptualizing throughput legitimacy: Procedural mechanisms of accountability, transparency, inclusiveness, and openness in EU governance. *Public Administration* 97:727–740.

Špirić, J., M. I. Ramírez, and M. Skutsch. 2019. The legitimacy of environmental governance based on consultation with indigenous people: insights from Mexico's REDD+ readiness process in the Yucatan Peninsula. *International Forestry Review* 21(2): 238–253.



Transparency International. N.d. Political integrity: Holding the powerful to account for the common good. <https://www.transparency.org/en/our-priorities/political-integrity>, accessed 10 September 2020.

Zahari, Afzal I., Jamaliah Said, and Roshayani Arshad. 2019. Integrity climate of the Malaysian public sector. *Proceedings of RSU Research Conference* 1036–1044.

Appendix: Expert survey questions

This section shows the working draft of each expert survey indicator. Each indicator is made up of weighted sub-questions, to produce a score out of 10 as well as a set of detailed justifications. Indicators are supported by research handbook pages, which are not currently displayed.

At both the level of the indicator and the level of the sub-question, this current draft shows a 'long list'; final selections of both indicators and sub-questions may be shorter, based on piloting.

*Note: The following display format shows potential sub-questions, but does **not** show the supplemental justification questions that particular responses prompt.*

To what extent is there a robust framework for collecting and publishing data on campaign and party finance?

Existence

What is the nature of the framework?

- No framework exists
- A framework exists but lacks full force of law
- A framework exists and has the force of law

Elements

- ***The framework requires collecting specific information on income, spending, assets, and debts, including in kind and non-financial support.***
- ***The framework contains unambiguous definitions of campaigning activities of parties, candidates, and third parties.***
- ***The framework requires data to be regularly updated.***
- ***The framework requires updates in conjunction with campaigns and defined campaign schedules.***
- ***The framework requires a verification process.***
- ***The framework empowers an agency or official to ensure the accurate and timely collection and publication of required data.***
- ***The framework authorizes remedies for noncompliance.***
- ***The framework supports collection of structured data***
- ***The framework requires donors' identities be made public.***
- ***The framework supports publication of open data.***

Extent

How comprehensive, in terms of jurisdiction, is the coverage of the framework assessed for this question?

- The framework assessed covers one or more localities, but there are many other localities without such frameworks, or with frameworks of a lesser quality.
- The framework assessed covers one or more localities and is a representative example of the kind of framework that can be found for all, or most, localities.
- The framework assessed provides national coverage.

To what extent is political finance information available as open data?

Existence

Is this data available online in any form?

- Data is not available online
- Data is available, but not as a result of government action
- Data is available from government, or because of government actions

Elements

- *The dataset contains details of the income, spending, assets, and debts of each party or campaign.*
- *The dataset contains details of donations, public funding, and membership dues.*
- *The dataset contains details of the timing and amounts of donations linked to donors.*
- *The dataset contains clear identifying information for each donor.*
- *Data is timely and updated.*
- *The dataset includes details of individuals' sex or gender.*
- *Dataset is available free of charge.*
- *Data is openly licensed.*
- *Data is available in all the country's official or national languages. If the country has no official or national languages, data is available in the major languages of the country.*
- *The collection and publishing of this data is accessible through screen readers, call relays, or similar mechanisms.*
- *Data is provided in machine-readable, reusable formats.*
- *The machine-readable and reusable dataset is available as a whole.*
- *This dataset is missing data required by the relevant governing framework.*
- *The availability of this data has been affected by government response to COVID-19.*

Extent

How comprehensive is the coverage of data assessed for this question?

- The data assessed covers one or more localities, but there are many other localities without available data, or with data of a lesser quality.
- The data assessed covers one or more localities, and is a representative example of the kind of data that can be found for all, or most, localities.
- The data assessed provides national coverage.

To what extent is there a robust framework for collecting and publishing data on the interests and assets of public officials?

Existence

What is the nature of the framework?

- No framework exists
- A framework exists but lacks full force of law
- A framework exists and has the force of law

Elements

- *The framework requires disclosure of both financial (e.g., assets and liabilities) and non-financial (e.g., employment and memberships) interests.*
- *The framework requires disclosure of income and assets held by a public official's spouse, family members, or other intimates.*
- *The framework requires conflict of interest training for officials.*
- *The framework requires data to be regularly updated.*
- *The framework requires a verification process.*
- *The framework empowers an agency or official to ensure the accurate and timely collection and publication of required data.*
- *The framework authorizes remedies for noncompliance.*
- *The framework supports collection of structured data.*
- *The framework requires the publication of income and asset declarations.*
- *The framework supports publication of open data.*

Extent

How comprehensive, in terms of jurisdiction, is the coverage of the framework assessed for this question?

- The framework assessed covers one or more localities, but there are many other localities without such frameworks, or with frameworks of a lesser quality.

- The framework assessed covers one or more localities and is a representative example of the kind of framework that can be found for all, or most, localities.
- The framework assessed provides national coverage.

To what extent is interest and asset declaration information available as open data?

Existence

Is this data available online in any form?

- Data is not available online
- Data is available, but not as a result of government action
- Data is available from government, or because of government actions

Elements

- *The dataset contains details of the income and assets held by each public official.*
- *The dataset contains unique identifiers for each public official and any family members or intimates for whom disclosure is required.*
- *The dataset contains clear identifying information for each interest and asset.*
- *The dataset contains details of the income and assets held by each family member for whom disclosure is required.*
- *Data is timely and updated.*
- *The dataset includes details of individuals' sex or gender.*
- *Dataset is available free of charge.*
- *Data is openly licensed.*
- *Data is available in all the country's official or national languages. If the country has no official or national languages, data is available in the major languages of the country.*
- *The collection and publishing of this data is accessible through screen readers, call relays, or similar mechanisms.*
- *Data is provided in machine-readable, reusable formats.*
- *The machine-readable and reusable dataset is available as a whole.*
- *This dataset is missing data required by the relevant governing framework.*
- *The availability of this data has been affected by government response to COVID-19.*

Extent

How comprehensive is the coverage of data assessed for this question?

- The data assessed covers one or more localities, but there are many other localities without available data, or with data of a lesser quality.
- The data assessed covers one or more localities, and is a representative example of the kind of data that can be found for all, or most, localities.
- The data assessed provides national coverage.

To what extent is there a robust framework for collecting and publishing data on lobbying activities?

Existence

What is the nature of the framework?

- No framework exists
- A framework exists but lacks full force of law
- A framework exists and has the force of law

Elements

- *The framework contains unambiguous definitions of lobbyists, lobbying clients, lobbying activities, and public officials.*
- *The framework requires the collection and publication of the identities of lobbyists, lobbyist clients, and public officials who engage with lobbyists.*



- *The framework requires structured data on lobbyists, lobbying clients, lobbying activities, and public officials.*
- *The framework supports collection of structured data.*
- *The framework requires data to be regularly updated.*
- *The framework requires a verification process.*
- *The framework empowers an agency or official to ensure the accurate and timely collection and publication of required data.*
- *The framework authorizes remedies for noncompliance.*
- *The framework supports publication of open data.*
- *The framework requires the collection and publication of information on participants, topics, and timing of lobbying activities.*

Extent

How comprehensive, in terms of jurisdiction, is the lobbying framework assessed for this question?

- The framework assessed covers only some selected parts of national or local government.
- The framework assessed covers the national government, but may have some exceptions or may not apply to other levels of government.
- The framework covers the entire public sector.

To what extent is lobby register information available as open data?

Existence

Is this data available online in any form?

- Data is not available online
- Data is available, but not as a result of government action
- Data is available from government, or because of government actions

Elements

- *The dataset contains unique identifiers for each lobbyist and public official.*
- *The dataset contains clear identifying information for each lobbying client.*
- *The dataset contains participant, topic, and time details for each interaction between a lobbyist and a public official.*
- *Data is timely and updated.*
- *The dataset includes details of individuals' sex or gender.*
- *Dataset is available free of charge.*
- *Data is openly licensed.*
- *Data is available in all the country's official or national languages. If the country has no official or national languages, data is available in the major languages of the country.*
- *The collection and publishing of this data is accessible through screen readers, call relays, or similar mechanisms.*
- *Data is provided in machine-readable, reusable formats.*
- *The machine-readable and reusable dataset is available as a whole.*
- *This dataset is missing data required by the relevant governing framework.*
- *The availability of this data has been affected by government response to COVID-19.*

Extent

How comprehensive is the coverage of data assessed for this question?

- The data assessed covers one or more localities, but there are many other localities without available data, or with data of a lesser quality.
- The data assessed covers one or more localities, and is a representative example of the kind of data that can be found for all, or most, localities.
- The data assessed provides national coverage.

To what extent is there a robust framework for collecting and publishing data generated through and about public consultation on law- and rule-making?

Existence

What is the nature of the framework?

- No framework exists
- A framework exists but lacks full force of law
- A framework exists and has the force of law

Elements

- ***The framework requires the timely publication of a full set of public comments generated through public consultation processes.***
- ***The framework requires that relevant documents — e.g., notice of intent, justification, proposed law or regulation, supporting documents, final law or regulation — are published and maintained as a docket or collection in conjunction with the specific law or regulation.***
- ***The framework requires reasoned responses to be published alongside comments.***
- ***The framework requires the publication of challenges to laws and regulations that have undergone public consultation processes, as well as their results.***
- ***The framework requires data to be regularly updated.***
- ***The framework supports collection of structured data.***
- ***The framework supports publication of open data.***

Extent

How comprehensive, in terms of jurisdiction, is the coverage of the framework assessed for this question?

- The framework assessed covers one or more localities, but there are many other localities without such frameworks, or with frameworks of a lesser quality.
- The framework assessed covers one or more localities and is a representative example of the kind of framework that can be found for all, or most, localities.
- The framework assessed provides national coverage.

To what extent is public consultation information available as open data?

Existence

Is this data available online in any form?

- Data is not available online
- Data is available, but not as a result of government action
- Data is available from government, or because of government actions

Elements

- ***The dataset includes a full set of public comments generated through public consultation processes.***
- ***Relevant notice and policy documents — e.g., notice of intent, justification, proposed law or regulation, supporting documents, final law or regulation — are available as a docket or collection in conjunction with the specific law or regulation.***
- ***The dataset includes details about the provision of reasoned responses to public comments.***
- ***The dataset includes details of challenges to laws or regulations that have passed through public consultation processes, as well as the results of these challenges.***
- ***Data is timely and updated.***
- ***The dataset includes details of individuals' sex or gender.***
- ***Dataset is available free of charge.***
- ***Data is openly licensed.***
- ***Data is available in all the country's official or national languages. If the country has no official or national languages, data is available in the major languages of the country.***
- ***The collection and publishing of this data is accessible through screen readers, call relays, or similar mechanisms.***
- ***Data is provided in machine-readable, reusable formats.***
- ***The machine-readable and reusable dataset is available as a whole.***
- ***This dataset is missing data required by the relevant governing framework.***
- ***The availability of this data has been affected by government response to COVID-19.***

Extent

How comprehensive is the coverage of data assessed for this question?

- The data assessed covers one or more localities, but there are many other localities without available data, or with data of a lesser quality.
- The data assessed covers one or more localities, and is a representative example of the kind of data that can be found for all, or most, localities.
- The data assessed provides national coverage.

To what extent is there a robust framework for collecting and publishing data on the performance of Right to Information (RTI) / Freedom of Information (FOI) processes?

Existence

What is the nature of the framework?

- No framework exists
- A framework exists but lacks full force of law
- A framework exists and has the force of law

Elements

- ***The framework requires the collection and publication of data regarding the number of requests submitted and processed.***
- ***The framework requires the collection and publication of data regarding how long it took the relevant government agency or agencies to fill requests.***
- ***The framework requires the collection and publication of data regarding material withheld and the reasons for withholding it.***
- ***The framework requires the collection and publication of data regarding appeals to RTI determinations and their results.***
- ***The framework requires that information is linked to the relevant agency, department, or other governmental entity.***
- ***The framework requires a verification process.***
- ***The framework authorizes remedies for noncompliance.***
- ***The framework requires data to be regularly updated.***
- ***The framework supports collection of structured data.***
- ***The framework supports publication of open data.***
- ***The framework empowers an agency or official to ensure the accurate and timely collection and publication of required data.***

Extent

How comprehensive, in terms of jurisdiction, is the framework assessed for this question?

- The framework assessed covers only some selected parts of national or local government.
- The framework assessed covers the national government, but some positions, agencies, or branches may be exempt or the framework may not apply to other levels of government.
- The framework covers the entire public sector.

To what extent is detailed RTI performance information available as open data?

Existence

Is this data available online in any form?

- Data is not available online
- Data is available, but not as a result of government action
- Data is available from government, or because of government actions

Elements

- ***The dataset includes details on the number of requests submitted and processed.***



- *The dataset includes details on how long it took the relevant government agency or agencies to fill requests.*
- *The dataset includes details about material withheld and the reasons for withholding it.*
- *The dataset includes details about appeals to RTI determinations and their results.*
- *Data is linked to the relevant agency, department, or other governmental entity.*
- *Data is timely and updated.*
- *The dataset includes details of individuals' sex or gender.*
- *Dataset is available free of charge.*
- *Data is openly licensed.*
- *Data is available in all the country's official or national languages. If the country has no official or national languages, data is available in the major languages of the country.*
- *The collection and publishing of this data is accessible through screen readers, call relays, or similar mechanisms.*
- *Data is provided in machine-readable, reusable formats.*
- *The machine-readable and reusable dataset is available as a whole.*
- *This dataset is missing data required by the relevant governing framework.*
- *The availability of this data has been affected by government response to COVID-19.*

Extent

How comprehensive is the coverage of data assessed for this question?

- The data assessed covers one or more localities, but there are many other localities without available data, or with data of a lesser quality.
- The data assessed covers one or more localities, and is a representative example of the kind of data that can be found for all, or most, localities.
- The data assessed provides national coverage.

To what extent does political integrity data sync across different political integrity datasets?

Existence

There is evidence that data syncs across two or more of the theme's datasets.

- No
- Partially
- Yes

Elements

- *Public officials are identified using unique identifiers in the same identification system across the different political integrity datasets.*
- *Lobbyist clients and party and campaign donors are identified using unique identifiers in the same identification system.*
- *Proposed and finalized rules and legislation are identified using unique identifiers in the same identification system across the lobbying register and public consultation dataset.*
- *Interests, assets, and liabilities are identified using unique identifiers in the same identification system across asset declarations and political finance disclosures.*
- *Companies associated with donations, interests, assets, liabilities, and lobbying activities are identified using unique identifiers in the same identification system across the different political integrity datasets.*
- *The key datasets for this theme share common identifiers that facilitate mapping flows across the data ecosystem.*
- *There is evidence of systems in place to validate data and make sure it matches across key datasets in this theme.*

Extent

To what degree do the datasets associated with this theme use consistent identifiers and identification systems for elements that appear in more than one dataset?

- There is no consistency of identifiers or identification systems.
- There is minimal consistency; at least one category of identifiers is consistent across two datasets.

- There is partial consistency; several categories of identifiers are consistent across multiple datasets or whole identification systems are consistent across at least two datasets.
- There is strong consistency; all of almost all of the element categories that appear in more than one dataset use consistent identifiers and identification systems.

To what extent do the agencies responsible for data on political integrity appear to have high levels of data capability?

Existence

There is evidence that these actors or entities have technical skills.

- No
- Partially
- Yes

Elements

- *There is evidence that these agencies or entities either include dedicated positions that require data expertise and/or positions with responsibilities that require data expertise.*
- *There is evidence that these agencies or entities use database platforms for managing information.*
- *There is evidence that these agencies or entities use advanced tools for data analysis.*

Extent

How extensive are the actor or entity's data skills?

- Evidence shows that data skills exist but skills appear to be minimal.
- Skills are moderate; they are more than minimal but also show some weaknesses.
- Skills are strong, with few obvious weaknesses.

To what extent are there dedicated capacity-building programs to improve data literacy among anti-corruption and accountability organizations, including media, civil society, government ethics offices, and independent institutions?

Existence

There is evidence of dedicated programs or other forms of training to improve the literacy and capacity to use this kind of thematic data.

- No
- Partially
- Yes

Elements

- *There is evidence of programs or other forms of training to improve the literacy and capacity of public officials to use this kind of thematic data.*
- *There is evidence of programs or other forms of training to improve the literacy and capacity of members of civil society organizations to use this kind of thematic data.*
- *There is evidence of programs or other forms of training to improve the literacy and capacity of members of the media to use this kind of thematic data.*
- *There is evidence of programs or other forms of training to improve the literacy and capacity of youth to use this kind of thematic data.*
- *There is evidence of programs or other forms of training to improve the literacy and capacity of researchers, academic and other, to use this kind of thematic data.*
- *There is evidence of programs or other forms of training to improve the literacy and capacity of members of the public to use this kind of thematic data.*

Extent

**How comprehensive or representative is the training assessed for this question?**

- The training assessed is available to one or more communities, but there are many other communities without such training.
- The training assessed is available to one or more communities and is representative of the kind of training that can be found for all, or most, communities.

To what extent is there evidence of political integrity data being used to identify, expose, or highlight failures of government?

Existence

Is there evidence of this data being used for accountability purposes?

- No evidence of actors or entities using this data for accountability purposes.
- There are isolated cases of actors or entities using this kind of data for accountability purposes, though the source may not be open data.
- There are a number of cases of actors or entities using this kind of open data for accountability purposes.
- There are widespread and regular cases of actors or entities using this kind of open data for accountability purposes.

Elements

- **The media regularly uses this data for accountability purposes.**
- **Civil society organizations regularly use this data for accountability purposes.**
- **Scholars or academic institutions regularly use this data for accountability purposes.**
- **The private sector regularly uses this data for accountability purposes.**

Extent

There is evidence that these uses are having meaningful positive impacts.

- No
- Partially
- Yes

To what extent is there evidence of public data being used to support public engagement in rule-making processes?

Existence

Is there evidence of public data being used to support public participation in rule-making?

- There is no evidence of civil society and/or academia using public data to participate in rule-making.
- There is evidence that civil society, academia, or individual members of the public occasionally use and/or analyze public data to support their participation in rule-making.
- There is evidence that civil society or academia regularly use and/or analyze public data to support their participation in rule-making.
- There is evidence that civil society or academia use and/or analyze public data to support their participation in rule-making whenever this may be relevant.

Elements

- **There are cases where public data has been used by academia or civil society to promote greater inclusion, or to address the needs of marginalized groups in rule-making.**
- **There are cases where public data has been used by academia or civil society to address rule-making regarding COVID response and recovery.**



- *There are cases where public data has been used by academia or civil society to address rule-making related to AI or machine learning.*

Extent

There is evidence that these uses are having meaningful positive impacts.

- No
- Partially
- Yes