



**Office in Yerevan**



**Civil Service Council  
of the Republic of Armenia**



**FREEDOM OF INFORMATION TRAINING  
NEEDS ASSESSMENT**  
**for Civil Servant Information Officers and Press Services of the  
Police, Military, and Security Agencies**

This Training Needs Assessment was conducted by the Freedom of Information Centre of Armenia and the Civil Service Council of the Republic of Armenia, with the support of the OSCE Office in Yerevan.

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**The views, findings, interpretations and conclusions expressed herein are those of the authors and do not necessarily reflect the views of the OSCE or the OSCE Office in Yerevan.**

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## **Introduction**

On 23 September 2003 Armenia adopted a comprehensive Freedom of Information (FOI) law. However, until now the implementation of FOI law continues to pose a significant challenge for national and local authorities, as well as for the Armenian society at large.

One of the main reasons for current situation is that information holders in government agencies do not provide information because they are not sufficiently aware of their duties under the law and do not possess the knowledge and skills to implement the law. To bridge this gap, training sessions on how to apply the FOI law are necessary for information officers working in government agencies. All fields of government policy need competent information officers, so training courses can serve a group of officers working in many different policy domains. However, it is believed that transparency is particularly difficult to achieve in the military, police and security agencies, yet these agencies do need to operate by the universal democratic principles of transparency, accountability and the rule of law.

Meanwhile, before conducting systematized training courses on FOI issues for public officials, there is a need to assess the needs and expectations of these officials from such courses. The objective of this Report is to assess the level of the knowledge of public officials, central and regional, on FOI legislation and the current situation in terms of its implementation practice, with a view of devising a unified access to information training curriculum for civil servants and information officers representing police, military and security agencies.

### ***Purpose and Methodology of the Research***

The primary purpose of this Needs Assessment is to determine the level of the knowledge of public officials on FOI legislation and their obligations under the FOI law, their expectations from FOI training and whether or not they see a need to increase their knowledge on FOI legislation and to improve its application mechanisms.

For this purpose, 104 officials representing 45 government agencies covering the central governmental level and all 10 regions of Armenia, as well as information officers from the police, military and security agencies have been interviewed. Based on in-depth face to face interviews with key actors, this Assessment Report was compiled to make recommendations on how the gaps in the information officers' FOI knowledge can be filled and implementation mechanisms can be improved. This will set the ground for the development of a unified training curriculum for civil servants and for information officers representing police, military and security agencies.

Before conducting the interview phase, the structures of the government agencies, as well as their charts, functions and management systems, have been studied for identifying target groups, i.e. those officials who are potentially responsible for providing information.

The research and interviews were conducted and the Needs Assessment Report was compiled by the Freedom of Information Center of Armenia (FOICA) and the Civil Service Council (CSC) of the Republic of Armenia.

### ***Profile of the Interviewed Officials***

In total 104 officials have been interviewed. The overall picture of the respondents is as follows:

- 66% represent Heads of Public Relations Departments from government agencies;
- 21% represent Press Secretaries;
- 10% Chiefs of Staff;
- 3% advisors, assistants.

The respondents represent 45 state bodies out of which 41 are covered by the CSC, and 4 represent the General Prosecutor's Office, the Police, National Security Service and the Ministry of Defense (*the complete list of agencies covered in this Report is presented in Appendix I*).

62 percent of the interviewed officials (or 64 persons) are female and 38 percent (or 40 persons) are male. Officials dealing with PR and information issues within departments are mostly women, while heads of institutions, who are the main decision makers, are mostly men.

It is noteworthy that both in Yerevan and in the region-based state agencies, the officials above the age of 40 constitute a majority (53 percent of the total, or 55 persons), 44 percent (46 persons) of the officials belong to the age group 25-40 and only 3 persons or 3 percent are from 18-24.

70 persons represent the central government, 22 persons come from the regional government and 12 persons represent various regulatory bodies and the Yerevan municipality.

Among the interviewed stakeholders, 71 officials, or 68 percent, have the duty to provide information, 17 percent (or 18 persons) mentioned they do not have such responsibility, and 15 persons, or 15 percent, are not sure, or simply do not know whether information provision is included in their duties or not.

## **Overview on FOI Legislation**

### ***INTERNATIONAL OBLIGATIONS***

As a member state of a number of international organizations, Armenia is a signatory to the key international human rights documents, and is, therefore, bound by the commitments to respect human rights, including the guarantee of freedom of expression and information.

As a Council of Europe member state Armenia has ratified in 2002 the European Convention on Human Rights, Article 10 of which protects freedom of expression and information. As a member state to the United Nations since 1992 it has also jointed the Universal Declaration on Human Rights, which declares in its Article 19 that: "Everyone has the right to freedom of opinion and expression; this right includes freedom to hold opinions without interference and to seek, receive and impart information and ideas through any media and regardless of frontiers". Armenia has ratified the International Covenant on Civil and Political Rights (ICCPR) (entered into force in 1993), which sets out "freedom to hold opinions" and freedom to "seek, receive and impart information and ideas through any media and regardless of frontiers" in its Article 19; and signed (in 1998) and ratified (in 2001) the Aarhus Convention.

As a participating State of the Organization for Security and Co-operation in Europe (OSCE) since 1992, Armenia undertook to respect the standards set forth in the Helsinki Final Act (1975) and further declarations of the OSCE.

### **Right of Access to Information**

#### *Constitutional Rights*

Amendments to the RA Constitution adopted in November 2005 declared access to information right as a constitutional right. Access to information was recognized as one of the fundamental human rights.

Articles 27 and 27.1 of the Constitution enshrine freedom of expression and right to access to information. Articles 23 and 33.2 provide additional guarantees for the right to access to state hold information.

**Article 27**

"Everyone shall have the right to freely express his/her opinion. No one shall be forced to recede or change his/her opinion.

Everyone shall have the right to freedom of expression including freedom to search for, receive and impart information and ideas by any means of information regardless of the state frontiers.

Freedom of mass media and other means of mass information shall be guaranteed.

The state shall guarantee the existence and activities of an independent and public radio and television service offering a variety of informational, cultural and entertaining programs".

**Article 27.1**

"Everyone shall have the right to submit letters and recommendations to the authorized public and local self-government bodies for the protection of his/her private and public interests and the right to receive appropriate answers to them in a reasonable time".

**Article 23** of the Constitution stipulates everybody's right to have access to the data concerning him/her available in the state and local self-government bodies.

**Article 33.2** of the Constitution declares access to environmental information:

"Everyone shall have the right to live in an environment favorable to his/her health and well-being and shall be obliged to protect and improve it in person or jointly with others.

The public officials shall be held responsible for hiding information on environmental issues and denying access to it".

***Law on Freedom of Information (2003)***

The Armenian law "On Freedom of Information" was adopted by the National Assembly on September 23, 2003 and came into force on 15 November 2003. It covers not only state and self-government bodies but also some private organizations which conduct public functions or have monopoly or a leading role in the product market.

Although the law is in place, the government has not yet adopted the sub-legal acts which are required by the law and would facilitate its implementation.

The FOI law specifies a precise time frame of 5 days for answering information requests. If additional work is needed to provide the requested information, then the information is provided to the applicant within 30 days after the application is filed, about which a written notice should be provided within 5 days after the application submission, highlighting the reasons for delay and the final deadline when the information will be provided.

The FOI law also obliges state and local self-governing bodies to publish periodically, at least once a year, the list of information concerning its activities. This information includes, for example, activities and services, implemented for the public, budgets, staff-lists, names of official persons, their education, specialty, position, salary, work

phone number, e-mail address, list of available information and procedure of providing such information, impact of the respective body on the environment, etc.

The FOI law also clarifies the basis and procedure for refusing to provide information, requiring that all denials should be justified according to the grounds established in the law. These provisions should prevent officials from behaving arbitrarily.

Another advantage of the Armenian FOI Law is that it provides legal protection for whistleblowers. Article 8 states that three specific groups of information can not be classified as a secret and should be released immediately. For example, information that concerns urgent cases threatening public security and health, as well as natural disasters and their aftermaths, etc. Any public official releasing this kind of information even if it has been classified as a secret, is not liable to administrative or criminal liability (Article 14).

The FOI law requires that an official (or officials) be appointed to receive and process information requests in the state agencies.

Article 13 of the FOI law states:

1. The responsible for freedom of information official can be the official appointed by information holder or the supervisor of the information holder.

2. A person responsible for the freedom of information according to the law:

a) ensures that the responsibilities of the information holder in the field of FOI are exercised;

b) explains thoroughly the procedures, conditions and forms of providing information to the person seeking information;

c) elaborates the statistical and complete data of inquiries received.

The law declares that for illegal refusal to provide information, or for the incomplete information disposal, as well as for other infringements of access to information, the officials are held responsible according to the Code of Administrative Violations or the Criminal Code.

There are other rules relevant for the freedom of information in the Criminal and Civil Procedure Codes of the Republic of Armenia, which contain one article each on the public nature of the trial, although with restrictions to be specified by the law. Pursuant to Article 8 of the Civil Procedure Code of the Republic of Armenia, in-camera sessions are allowed in adoption cases and those involving the privacy or inviolability of family lives of individuals. Article 16 of the Criminal Procedure Code of the Republic of Armenia stipulates that in-camera sessions shall be held in cases provided by law, in the interests of public morality, national security, and privacy of an individual or the administration of justice.

#### *Law on the Dissemination of Mass Media (2003)*

This law, commonly known as the Mass Media law, provides for a general right of mass media and journalists who work for mass media organizations to operate without unreasonable restrictions. It reaffirms the constitutional right to seek, receive and disseminate information. It prohibits censorship, interfering with "the legitimate professional activities of a journalist", disclosure of sources without a court order for revealing serious crimes, and requires government bodies not to favor some journalists over others.

#### *Criminal and Administrative Codes*

According to the Amendments to the Code of Administrative Violations adopted on December 1, 2003 (Article 1, point 1) the official who illegally does not fulfill his/her obligation to provide information should be held responsible by paying a fine up to 10

to 50 times of the minimum salary (from 50 to 100 times in case the violation is replicated).

According to the Article 148 of the new Criminal Code an illegal refusal by an official to provide information or documents to a person immediately concerning his rights and legal interests and collected in accordance with established procedure, or provision of incomplete or willfully distorted information, if this damaged the person's rights and legal interests, is punished with a fine in the amount of 200 to 400 minimal salaries.

It is also a criminal offence under Article 282 to withhold information about environmental pollution. An official can be imprisoned or deprived of certain posts maximum for three years.

However, neither administrative nor criminal sanctions have been applied in practice since their adoption. In the court practice the plaintiffs claim only disclosure of information and compensation of state taxes and do not demand application of sanctions against the respondent party.

It should be noted that the Criminal Code also ensures special protection for journalists' right of access to information. Article 164 protects the journalists' legal professional activities which includes the right to have access to information: it is part of a journalist's professional legal activity.

Article 164 defines:

1. "Hindrance to the legal professional activities of a journalist, or forcing the journalist to disseminate information or not to disseminate information, is punished with a fine in the amount of 50-150 minimal salaries,
2. The same actions committed by an official abusing one's official position, is punished with a fine in the amount of 100-250 minimal salaries or imprisonment for the term of up to 3 years, by deprivation of the right to hold certain posts or practice certain activities for up to 3 years, or without that".

It is worth mentioning that this provision was applied for the first time on October 11, 2004. The Kotayk region first instance court found guilty the bodyguard who attacked journalists in Tsaghkadzor and didn't allow them to take photos. According to the court verdict, he was sentenced to 6 months imprisonment. This was the first case in the history of Armenia that anybody was sentenced to imprisonment for illegally interfering in the journalists' work and restricting their access to information rights.

#### *Environmental Legislation*

As mentioned above, Armenia signed the Aarhus Convention in 1998 and ratified it in 2001. The Convention provides for a right of individuals to be able to access environmental information. As an international treaty, this obligation of the treaty should be directly applicable for the government of Armenia.

The Law on Environmental Impact Assessment requires that bodies inform the mass media of environmental impact assessments and to hold public hearings.

#### *Law on Personal Data (2002)*

The Law on Personal Data provides for a right of citizens to obtain personal information about themselves for free. It also allows for them to correct, block or destroy personal information.

#### *Law on Administrative Basics and Administrative Procedure (2004)*



The Law on Administrative Basics and Administrative Procedure provides for the right of citizens to submit applications and appeals to the state bodies. The law defines that citizen's applications and appeals should be processed within a period of 1 month.

### ***Withholding Information***

Article 8 of the Law on Freedom of Information defines five categories of information that can be withheld. These are the cases when information:

- a. contains state, official, bank or trade secrets;
- b. infringes upon the privacy of a person and his family, including the privacy of correspondence, telephone conversations, post, telegraph and other transmissions;
- c. contains pre-investigation data not subject to publicity;
- d. discloses data that require accessibility limitation, conditioned by professional activity (medical, notary, attorney secrets).
- e. infringes upon copyright and associated rights.

The above are the FOI exemptions and are not subject to a requirement that harm to the public interest is shown or that the public interest must be satisfied before the information is withheld.

The harm test is not included in the law. However, point 3 of Article 8 defines several cases when information provision can not be declined even if it contains the above-mentioned categories protected by the law. Those cases are:

- a. if information concerns urgent cases threatening public security and health, including natural disasters and their aftermath;
- b. if information presents the overall economic situation of the Republic of Armenia, as well as the real situation in the spheres of nature and environment protection, health, education, agriculture, trade and culture;
- c. if declining the information request will have a negative influence on the implementation of state programs of the Republic of Armenia directed at socio-economic, scientific, spiritual and cultural development.

The official publication of this kind of secrets can not carry a legal responsibility. Point 2, article 14 stipulates that in the cases foreseen by the 3rd clause of Article 8 of the FOI law, the disclosure of information can not cause administrative or criminal responsibility.

When refusing to provide information, the public body should justify the refusal by making reference to the exemptions defined by the law.

### *Law on State and Official Secrets (1996)*

The Law on State and Official Secrets sets up a comprehensive system of classifying information.

Information can be protected if it relates to military affairs, including strategies and operations plans, mobilization of troops, programs of the military industrial complex, organization structure and location of the armed forces; external affairs and foreign economic activity; economics, science and technology relating to defense programs and arms production, precious metals and stones, reserves, government finances and budget policy, and intelligence including counterintelligence, informants, encryption and protection of state and official secrets.

There are limits similar to the restrictions in the Law on Freedom of Information on information that cannot be withheld. Information cannot be classified as a state or official secret if related to accidents which threaten the health and safety of the citizens, the general economic consideration or the real situation on the environment,

health, culture, education, agriculture and trade, violations of law or rights, or would limit government programs relating to socio-economic, scientific, spiritual or cultural development.

Information is divided into three categories: "Of Special Importance", "Top Secret" and "Secret". The first two categories are for State Secrets and can be classified for thirty years. Documents in the "secret category" are considered "Official Secrets" and can be classified for ten years. It must be reviewed every five years. A decision to classify information can be appealed. Declassified information must be sent to Public Archive within three months.

#### *Law on the Dissemination of Mass Media (2003)*

Article 7 of the Law on Mass Media provides limits for publishing certain information, including secret information, or information advocating criminally punishable acts, as well as information violating the right to privacy of personal or family life; and information obtained by video and audio recording conducted without notifying the person of the fact or recording, except "if it is necessary for the protection of public interest".

#### *Criminal Code*

There are numerous provisions in the Criminal Code relating to restrictions on publishing information including personal or family life (Article 144), medical secrets (145), secrecy of communications (146), espionage (302), revealing state secrets (306), breach of rules for handling state secrets (307), revealing the data of an inquiry or investigation (342).

#### *Law on Personal Data (2002)*

The Law on Personal Data provides limits on the collecting and use of personal information. Its definition of personal information is broad and does not explicitly exempt information about government employees or officials acting in their official capacity which could result in government documents being withheld as personal information. It does specifically provide for access to databases that contain anonymous personal data relating to state activities and access to library and archive documents.

## **International Practice on FOI**

Within the framework of this Needs Assessment, a study was conducted on the international practices in the field of FOI in six countries - Bulgaria, Spain, Great Britain, Cyprus, France and Canada. The study revealed the following:

i) Almost all state institutions have separate PR and information departments (or special FOI officers). The first is responsible for information flow from the institution to the public to promote (advertise) the functions and activities of the respective institution. The second is responsible for processing FOI requests and publishing legally obligatory information under FOI acts.

ii) In all of the countries above, a special FOI Ombudsperson or an FOI Commissioner functions, who helps citizens to get access to state held information on the one hand, and public officials on the other, by providing the latter with consultation whenever they have any uncertainty in information provision decision making process. This politically and financially independent body plays a role of a liaison between state bodies (FOI officers) and public, trying to effectively solve problems without time and money waste.

The Ministry of Central Government and Administrative Reforms of the Republic of Bulgaria, along with other reforms implemented in the government system, is dealing with the issues of freedom of information. Particularly, special departments for collecting, providing and analyzing information in all state institutions are established. The main mission of these departments is providing necessary information to the citizens, analyzing suggestions and complaints of citizens, providing feedback communication. Moreover, they use the experience of posting information on the responsibilities of each official and the citizens' rights on an information billboard placed in a conspicuous place near the official's office. The responsibility of giving information and the right to get the information is emphasized on the billboard.

An outstanding Bulgarian NGO, Access to Information Programme, frequently conducts training sessions and seminars on the implementation of freedom of information legislation in Bulgaria and Southeastern Europe. These trainings are attended by representatives of the local and national government administrations, journalists, NGOs, and citizens, and are presented with the assistance of several Bulgarian and international partners. A number of training materials are posted at their website, [www.aip-bg.org](http://www.aip-bg.org).

In the government system of the Republic of Cyprus, the public relations functions, as well as the activity of corresponding departments and services (collecting, providing and analyzing information) play a central role. A special emphasis is put on the electronic system of systematizing, preserving and providing information. The electronic information system helps citizens to get information more easily. Through the "One Window" advanced electronic system, citizens may have access to government held information/documents without wasting time and money. According to statistics, 89.9% of the citizens' requests to provide information is being satisfied within 10 minutes.

It is a common practice in Bulgaria, Cyprus and France to widely distribute printed booklets, brochures, guidebooks on any government department structure, activity, charters and policy outcomes. This experience could also be applied in Armenia to make the information about the activities of government bodies widely accessible for citizens.

In the UK, FOI trainings are under the responsibility of the Department of Constitutional Affairs (DCA) which regularly conducts a number of training courses for officials. It has prepared a comprehensive set of materials providing FOI guidance for practitioners across the public sector. The DCA also organizes postgraduate information rights qualification, which allows decision-makers to be properly educated in the complexities of the legislation and in evolving case law. The qualification helps building up a cadre of experienced and expert officials within the public sector. An official training course has been designed to deliver a comprehensive and a consistent understanding of information rights within the context of government and the public sector. The training course was developed by the DCA and the University of Northumbria and is delivered predominantly through web-based distance learning. More information on the training course can be obtained from Northumbria University web site [www.northumbria.ac.uk](http://www.northumbria.ac.uk).

### ***Freedom of Information Commissioners***

Studies show that one of the best and most effective systems for protecting the right to access to official documents is the institution of FOI commissioners or commissions which function, for instance, in France or in Canada. It is worth mentioning that in the above mentioned countries the responsibility to educate officials and the public is mainly under the power of the FOI commissioner's office.

The FOI commissioner's office is a public body that is completely independent from the Government in the performance of its functions. It reports directly to Parliament in the majority of states and has an international role as well as a national one.

The study of the international practice of FOI commissioners indicates that the purpose of creating such an institution was/is to oversee the administration and enforce the provisions of the Freedom of Information Act, thereby ensuring access to the records of public agencies for individuals seeking information. Among other objectives of this institution is to protect personal information and to rationalize the exemption provisions, so that information will be withheld only where this is in the public interest.

**Functions of the FOI Commissioner** should include:

- Auditing the agencies' FOI performance;
- Preparing an annual report on FOI;
- Collecting statistics on FOI requests and decisions;
- Publicizing the Act in the community;
- Issuing guidelines on how to administer the Act;
- Providing training to agencies;
- Providing information, advice and assistance in respect to FOI requests (influencing function)
  - at any stage of the FOI request;
  - at the request of the applicant, the agency or a third party;
- Providing legislative policy advice on the FOI Act;
- Protect personal information;
- Providing access to official information unless there are good reasons for non-disclosure (for instance public security);
- Reviewing (on application) decisions of public bodies in relation to FOI requests and, where necessary, making binding, new decisions;
- Enforcement (legal sanctions against those who ignore or refuse to accept their obligations);
- Educational function (conducts educational workshops and speaking engagements for public agencies throughout the country);

**Responsibilities:**

- Ensuring that agencies are aware of their responsibilities under the FOI Act;
- Ensuring that members of the public are aware of the FOI Act and their rights;
- Providing assistance to members of the public and agencies on matters relevant to the FOI Act;
- Recommending to Parliament legislative or administrative changes that could be made to help the objectives of the FOI Act be achieved.

### **Services:**

- Publish guidance and information to encourage organizations to achieve good practice and help individuals to understand their rights;
- Resolve eligible complaints from people;
- Maintain the public register of data controllers;
- Approve publication schemes adopted by public authorities under the FOI Act;
- Prosecute those who commit offences under the legislation;
- Speak to groups to raise awareness of the law and how it works;
- Influence thinking on privacy and access issues.

### **What is covered:**

- Personal information, promoting access to official information;
- Data protection;
- Privacy & electronic communications;
- Freedom of information;
- Provide tools & resources.

### **Powers:**

If the Commissioner considers a decision to be inadequate, s/he may require that a new one be issued. S/he may also require any person who s/he considers has information relevant to a case or investigation to provide it to him/her. Furthermore, s/he may require the person to attend before him/her to present the information. S/he can enter any premises occupied by a public body and require any person found on the premises to provide him/her with records (documents) which s/he may copy and retain for a reasonable period. *S/he* may carry out an investigation at any time into the **practices and procedures** adopted by public bodies.

Anyone who hinders the Commissioner in the performance of his/her review or investigative functions is guilty of an offence and may have a fine imposed or be imprisoned *or both*. Delays beyond a prescribed period for the production of documents are considered by the Commissioner as a refusal. Poor Records Management would be regarded as an inadequate reason for refusal.

### **Ways of operation:**

- Hearings;
- Education;
- Litigation (The FOI Commission's legal staff is authorized to represent the Commission in all matters affecting the Commission and to defend Commission decisions that are appealed, in the superior and appellate courts).

### **Who can address the FOI Commissioner?**

Any person (legal and/or natural) denied the right to inspect, or to get a copy of a public information, record, documents or denied access to a meeting of a public

agency, may address and file a complaint against the public agency within limited time, that differ from state to state (usually 20-30 days).

In Armenia the Office of the Ombudsman functions as an independent appeals system. However, the protection of the right to access to information is included in the general framework of the Ombudsman, which makes the implementation of FOI law and protection of this right less effective. It is highly recommended that the Ombudsman has a special representative or staff for handling information access appeals. Experiences of FOI commissioners of several foreign countries presented above prove to be useful.

## Public Officials' Awareness on the FOI Legal Framework

95 percent (or 99 persons) of the interviewed officials said they were aware of the existence of the Armenian FOI law, and only 5 persons, or 5 percent have responded "I am not aware of it". This is excellent data in comparison with the previous years' outcomes according to which fewer officials were aware of the FOI law and its requirements (in 2004 this percentage was 75). Although the existence of the law is known to 95 percent of the respondents, only 88.4 percent is familiar with the provisions of the FOI law (in 2004 it was 50 percent). 12 persons (or 11.5 percent) confessed that they have never read the law. However, the high percentage of officials aware of the law provisions does not prove that all of them properly implement the law in their practice. This statement is based on the fact that very few officials could quote concrete examples on how he/she implemented the FOI law in his/her everyday practice. Not many of them, or only 54 percent could present any precise provision of the FOI Law. Nevertheless, the vast majority of officials was well aware that it is their obligation to inform and provide the public with information and that it is the constitutional right of everyone to be informed.

Knowledge of the officials on FOI international standards and practice is relatively limited. 46 persons or 44 percent are aware on FOI international standards/documents. 48 percent or 50 persons confessed that they are not familiar with FOI international standards. 54 persons refused to answer this question. Here again, the percentage of officials who answered positively does not reflect the real picture. For example, while stating that he knew FOI international standards, one of the officials could not provide any concrete title of an international document on FOI. Instead, he mentioned the draft FOI law of the Russian Federation.

Only 17.5 percent of interview participants were familiar with Article 10 of the European Convention, 4 persons mentioned the Aarhus Convention, two of them being the representatives of the Ministry of Environment (who have provided official information in compliance with the Aarhus Convention).

To our question whether the law on Freedom of Information will change the situation to the better, we received positive responses from 94 persons or 90.3 percent. The respondents believe that the FOI law has already made substantial positive changes. Only 4 persons disagree with this statement and think that no positive move can be anticipated. Two persons felt it difficult to give an unambiguous response. One of the officials from the Ministry of Health, who knew about the law, mentioned that although he is well informed about it, he thinks that the law has not brought changes in the citizen-journalist-public official relationships. The main concern expressed both by officials who provided positive answers and those who gave a negative answer is the insufficient implementation of the FOI law. They mention that in order for the law to be implemented effectively it must be extensively used by people and should be applied by officials in their everyday work. For the purpose of ensuring complete accessibility of official information in Armenia, they think the law can be sufficient, if both the officials, who apply the law, and journalists and the citizens, who use the law in their everyday work and life, know its provisions.

A regional governor's office representative made an observation that the FOI legislation will be fully applied and its effectiveness will be increased only after making some amendments to it. In the opinion of one of the regional officials, who was suspicious about the effectiveness of the law on FOI, the law to some extent restricts the rights of journalists, since if before the officials responded to the journalists' requests immediately or within possible short terms, now they can provide a response within five days. In another official's opinion the law on FOI, to some extent, contradicts other laws defining secrets.

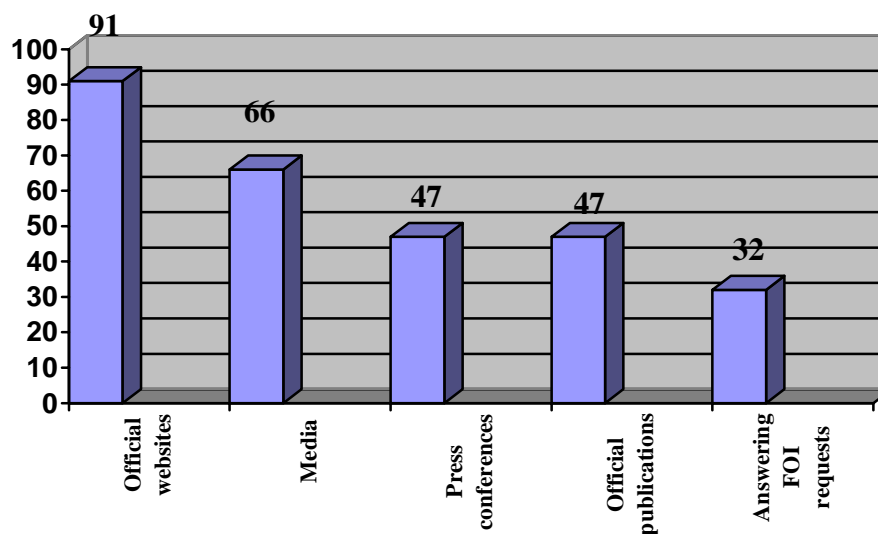
Several officials stated that for a full-fledged implementation of the FOI law, a government decree on the procedure of information provision should be adopted, to make the provision process unified, more effective and better arranged.

## Practice of Releasing Official Information

87.5 percent (91 persons) of the interviewed officials considers official websites as one of the speediest and most effective ways for releasing official information (to inform, according to the polls by the FOICA conducted in 2004, 77.5 percent of officials considered the media to be the speediest way for releasing information, while 32.5 percent responded negatively on the effectiveness of the official websites in terms of releasing information). This shows that in due course, officials understood the importance of official websites for making their activities open to the public. The press secretary of the General Prosecutor's Office, however, mentioned that very few Armenians have wide access to internet, and that is why people use the media or other means to be informed rather than visiting official websites. 66 persons or 63 percent believes the media is the most efficient way, particularly mentioning TV as the most influential and effective media. Press conferences follow the media with 45 percent (47 persons) (the same, as FOICA registered in 2004). The least priority was given to the practice of responding to information requests (32 persons or 31 percent), as they think that it is unfeasible to provide complete information in written form.

A summary of the responses is presented in Chart 1 below.

Chart 1. Releasing Official Information



**Official websites:** Since the vast majority of interviewed officials (87.5 percent or 91 persons) see internet as one of the speediest and most effective ways for information provision, the monitoring working group checked how often the official websites are being updated and whether they contain public oriented information. It turned out that almost all targeted agencies, both in the central government in Yerevan and in the regions, have official websites. However, most of these websites contain information aimed at promoting (advertising) their agency and not at publishing information of public importance. Furthermore, the websites of the government agencies are not regularly updated, consequently they do not serve their main goal.

The requirement to publish obligatory information as defined by law on FOI (article 7) is not fulfilled by publishing it on the websites and/or by other means. The interviews indicate that out of 104 officials 97 know about the obligation to regularly publish some categories of information. However, practice shows just the opposite. The



decisions of the ministers and local governors are not published on the official websites. For example, on the website of the Ministry of Territorial Administration there is no decision of the minister. On the official website of the Aragatsotn regional administration, the last decision by the governor was published in October 2006, and on the website of the Armavir regional administration, no decision of the governor is posted. Several official websites of public agencies do not function at all. The e-mail addresses indicated on the websites by which people should be able to send their applications and get information quickly and efficiently are not used either. For instance, an application was sent through the official site of the Government [www.gov.am](http://www.gov.am) to find out whether the promise indicated on the website that every request will be answered is fulfilled or not. No answer was received, the request was not even denied.

Nevertheless there are good examples as well. For instance, the websites of the RA Commission for the Protection of Economic Competition and of the General Prosecutor's Office are being updated on regular basis and the information is mostly public oriented. The most significant obstacle still remains the low level of public use of the Internet. The number of Internet users is very limited, especially in the regions.

Among 16 Ministries, 15 have official websites. Only the Ministry of Construction does not have one. The website of the Ministry of Territorial Administration does not open and does not function properly.

Out of 15 websites of the Ministries, the section "Decisions" (where the decisions of the government and ministers should be placed) exists only in 6 (the sites of the Ministry of Health Care, Ministry of Justice, Ministry of Environmental Protection, Ministry of Education and Science, Ministry of Sport and Youth Affairs, Ministry of Labor and Social Affairs). However, some of the placed decisions are dated from 2006 (for example, in the website of the Ministry of Justice there is only one decision of July 7, 2006). In the website of the Ministry of Sport and Youth Affairs the section "Decisions" does not function. The website of the Ministry of Education and Science contains 30 decisions and the last decision was published on June 14, 2007. It can be said that comparatively it is the freshest decision among others.

The FOICA surveyed in detail the official websites of the General Prosecutor's Office, Police, Ministry of Defense and National Security Service. Below is the overall picture.

In the official website of the General Prosecutor's Office ([www.genproc.am](http://www.genproc.am)) the legal normative acts and statistical reports are published. There is also information about the functions and structure of the Prosecutor's Office and the order of receiving citizens. One can find some data about the amount of money allocated to the General Prosecutor's Office from the state budget of 2007. In the site you can also find the staff list and the General Prosecutor's Order to open vacancies. According to its press secretary, the General Prosecutor's Office receives from 1-3 information requests by e-mail daily.

Several categories of information that is obligatory to publish are posted on the official web site of the Ministry of Defense ([www.mil.am](http://www.mil.am)). It is the only official site researched by us where there are data about the sum from the state budget allocated to the Ministry in the last 3 years. The staff list of the Ministry of Defense, the names and surnames, positions and office phone numbers also exist. Here one may find information about the terms of getting a position in the ministry. People send applications to the ministry's e-mail address ([press@mail.ru](mailto:press@mail.ru)) more often. The chief of information and public affairs department says that they receive from 3-5 letters by e-mail daily in the result of which the number of written applications to the ministry has reduced by half.

Although the website of the Police ([www.police.am](http://www.police.am)) publishes some information of compulsory publicity (the terms of getting a position, the order, days and hours of

receiving citizens), there is a number of other important information of public interest that is not published. Particularly, the sum of money allocated to the Police from the state budget of 2007 is not published. The section "Subdivisions" of the site shows "The structure section is under construction" since 2006.

On the website of the National Security Service ([www.sns.am](http://www.sns.am)) the information of compulsory publicity (the terms of getting a position, the order, days and hours of the citizens' reception, the estimated sum of money allocated to the National Security Service from the budget of 2007) does not exist at all. In fact, this is a website which contains the least public oriented information. Instead, there is information about the structure of NSS, the biography of the chief, the history and symbols of NSS. In the section "Legislation" there are 4 laws concerning national security bodies and frontier troops. In the section "Press center" there are press releases released by the NSS. No categories of information stipulated by the FOI law as obligatory for publishing is placed here.

It is typical that in all the above mentioned official websites there is neither a form of a written information request nor an instruction about them which is foreseen by the law on Freedom of Information. Staff responsible for the website's updating say that citizens decide the form of application and write these applications themselves. This results in a number of incorrect requests, which do not contain the necessary requirements prescribed by the FOI law. This allows officials not to process those requests and to leave them unanswered.

**Processing Information Requests:** 83% or 86 officials responded that their agencies register (file) the received FOI requests. 14 answered that it is not included in their duties, 2 did not know, 2 confirmed that FOI requests are not being registered. The interviewed officials mention while working with journalists they prefer verbal communication to make real live contacts possible. Oral requests are being responded to immediately or within possible shortest terms. State bodies register only the written requests, consequently it is not possible to register the real number of requests made by citizens and/or journalists. The number of the received written requests varies from agency to agency, from 3 to 30,000 requests received during the third quarter of 2007 (the smallest number was registered in Lori regional governor's office and the biggest number was registered in the Ministry of Defense – 30,000 requests). In general, ministries receive the highest number of written information requests, and regional governor's offices receive the smallest. This proves that the regional population is less aware on their rights to apply in the written form and receive information as stipulated by the law. This also indicates that the regional population prefer the informal way of receiving information from the regional agencies. Almost all officials mention that the number of verbal requests is immense but they are not being officially registered in the logs.

Written requests are being registered in the general log and are not being separated as specific information requests, which need to be responded within other terms, established by the FOI law. By the way, some state institutions still follow the former 15-day term, whereas the law on Freedom of Information defines a 5-day time frame for responding to information requests.

Although the right to access to information equally belongs to everyone in the society and the FOI law does not envisage special privileges for journalists versus common citizens, in practice some officials are more willing to provide information to journalists rather than to citizens.

In these polls, 16 officials (15.3%) still think that journalists should have privileges in receiving information as mediators between the government and the society. 81 percent or 84 of the respondents did not make any differentiation between a citizen and a journalist in terms of providing information. They believe that the right to

access to information is equal to everyone in society. 4 people answered that they did not know.

On the question whether the respective institution/department/section has procedures (public hours, rules and guidelines, information officer, etc.) and mechanisms (forms, archives allowing for search, etc.) for providing information, 83 percent or 86 persons gave a positive answer. In many ministries there are special internal procedures for providing information. For example, information centers function in the Ministries of Health and Environment Protection, where journalists and citizens are allowed to receive the information they need, using technical means and resources. The Lori, Gegharquniq and Tavush regional governor's offices also have good conditions, special information rooms for accepting information requests and receiving information. The Gegharquniq and Tavush regional governor's offices have published special guides for citizens, explaining where to go for information and other services, how to apply, how to make a request and other necessary information.

The RA Government has recently formed a group, including public relations officials from the security and defense agencies, who currently are working out a concept paper on how to communicate information to the public. The working group unites PR officers from the President's Office, the National Assembly, the Government, the Ministry of Foreign Affairs, the Ministry of Defense, and the Police. First, a unified concept paper on communicating information to the public will be adopted, which will be followed by individual concept papers of each agency to be based on the main paper. However, no final document has been drafted by the time this assessment was conducted. The only state body which at this stage already has drafted its internal strategy for releasing information to the public is the Ministry of Defense as per the information provided by the MoD Head of Public Relations Department.

## **What are the Main Obstacles for FOI?**

This chapter clarifies what the main obstacles are for freedom of information according to the officials. As is shown in Chart II, responding to the question "why citizens face difficulties in getting information", 77 of the interviewed officials mention that people are unaware of their rights, 39 of them mention that the reason is the mentality of the authorities to work in a secret way. 24 of the respondents found that another obstacle is that the officials do not fulfill their legal responsibilities. 32 respondents mentioned that the existing legislation is sufficient. However regulations/procedures have not been developed. This is an important statement, bearing in mind the fact that since the adoption of the FOI Law in 2003, the Government has not drafted and adopted two necessary sub legal acts defined by the FOI law which should clarify the procedure of providing information, as well as the procedure of collecting, maintaining and filing information within institutions. This statement was mostly brought up by regional officials (such as officials from the Kotayq, Gegharquniq and Ararat regions, as well as officials from the Civil Service Council and the State Tax Service).

12 persons thought the biggest problem causing obstacles is that the process of appointment of FOI responsible persons in the state agencies goes extremely slowly. According to the FOI law, an official responsible for FOI should be appointed in every state agency.

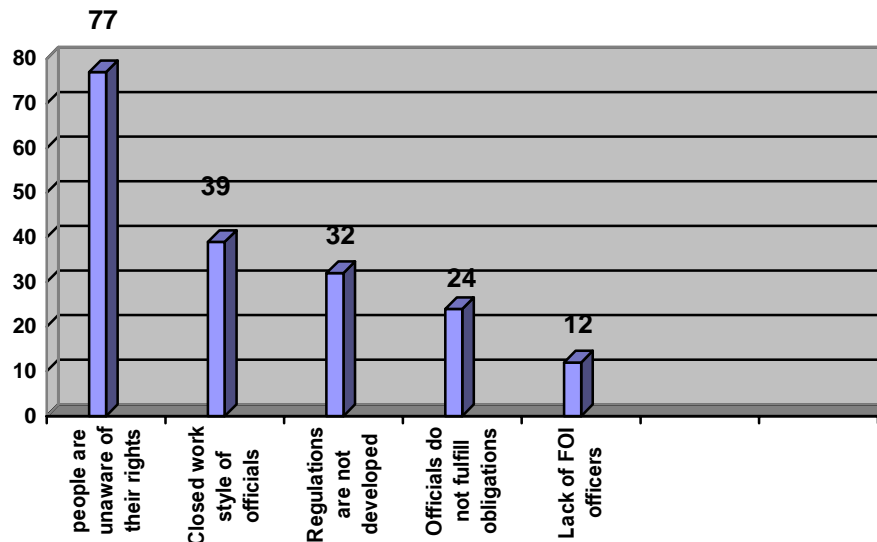
The survey shows that in the government no unified system of providing information exists. In several bodies this function is under the responsibility of various departments, administrations and specialists. This decreases the efficiency of the information flow from the government to society. At present, in the regional Governor's Offices, public affairs departments exist only in Gegharkunik and Tavush. In other places that responsibility is carried out by the departments of sport and culture, department of education or by press spokespersons who work mainly with media representatives. Recently a positive change has been noticed when the

government passed Decree N1083 on September 20, 2007, according to which a new information and PR department should be established in each of the regional government offices.

Another view was pushed forward by an official: he sees the biggest problem being the lack of trust of people towards the government system.

Summary of the responses in Chart 2.

**Chart 2. Major Obstacles**



The respondents presented several ideas on how to overcome the above mentioned obstacles. Below are some of their suggestions:

- To inform and educate the public on their rights; to encourage people to address more questions to the government bodies, to submit more and better designed requests making references to the FOI legislation in the written requests (97 officials);
- To train and inform officials (in particular, high level decision makers) on how to apply FOI legislation in practice, to improve the legal knowledge of officials (67 officials);
- To adopt, in very short time frames, a unified system for providing information within state agencies, to establish special departments of information and public relations in each of the state agencies (34 officials);
- To strengthen human and technical resources of PR and information departments/centers in respective institutions;
- To widely advertise the law in mass media;
- To improve and harmonize relevant legislation;
- To criticize those officials who violate the people's right to know and create a negative public opinion about them and their agencies;
- To take measures for changing the psychology and mentality of officials; to pass the message that state institutions work for society and not the opposite;
- The government should closely cooperate with the NGO sector to explain to society what information can be obtained from which body, where to go and how to exercise their access to information right;
- To develop internet facilities countrywide and to educate people on how to use internet,
- To appoint FOI officers in government agencies;
- To establish a "one window" electronic system in every agency; to develop systems of electronic circulation of documents within institutions;

- To strengthen mechanisms of restoring violated FOI rights. Violators of the law should carry responsibility, both administrative and criminal. Judicial control should be activated;
- To adopt regulations on information provision mechanisms to clearly define how to provide information to the public.

## **Officials about State Agencies**

37 officials could not bring any concrete example of an open/transparent agency and 35 mentioned that they find it difficult to define the most non-transparent agency.

Among open structures, the officials first indicated their agencies, then others. For instance, it turned out that all 3 officials giving their preference to the Ministry of Urban Construction were representatives of the same ministry. This, of course, could not be considered as an impartial approach. The most frequently mentioned open institutions were the Ministry of Labour and Social Security and the Ministry of Education (10 each). Then follows the staff of the Government (10). However, here 2 of the officials represent the same agency. Six officials mentioned the Civil Service Council and 3 the Presidential Administration. 3 officials answered that all agencies in Armenia are open, and 3 officials stated that there are no open agencies at all.

Among non-transparent institutions, the respondents mentioned the National Security Service (the biggest number of responses – 22), then the Police follows (12), law enforcement bodies in general (11), the General Prosecutor's Office and prosecutor's offices in general (10), the Ministry of Defense (7), the Tax and Customs services (5). Four persons asserted that there is no close public agency in the RA.

## **FOI Training**

63 of the interviewed officials or 61% have never taken part in any training on FOI, 35 persons or 34% have taken part, 2 did not answer. 22 officials stated that they did not need the training to improve their work experience. 58 persons or 56 percent see it as necessary to take part in training courses, 24 did not answer.

Some of the interviewed officials commented on the format and efficiency of the previous trainings they participated in. They do not see any need for a plain presentation of legal provisions, because most officials are already well aware of them. The most efficient way for delivering FOI knowledge to the audience is to pay more attention to application mechanisms of the law and real practice. Based on the previous trainings, one of the officials informed that their agency designed and currently actively uses FOI sample requests (Vayots Dzor).

The National Security Service representative observed that training sessions are mostly organized by US or European organizations and experts, while their mentality strongly differs from that of the local population. That is why their efficiency is very low, in his opinion.

The respondents also mentioned that it is very important to conduct training sessions on a regular, and not just one time, basis. Below are some more ideas:

- The training should target to change the mentality of officials and their work culture;
- Since the information sphere is developing quickly, this demands trainers to follow new developments and shift training methodologies accordingly;
- Training sessions should promote implementation of work responsibilities in the right way;

- It is also useful to explore the experience of other countries, especially those with best practices;
- The training should inform the participants about international standards on FOI.

One of the interviewed officials argued that training is useless, another respondent explained his negative approach by saying that sometimes, even when an official finds the information to be provided, his/her chief instructs not to release it. In such cases no training or seminars could be a solution. This means that, first of all, the training should target higher level decision makers.

## Summary of Findings

Access to official information remains a major problem area in Armenia. Although public officials accepted that they have a duty to release information, the practice shows that the accessibility of official information is still unsatisfactory.

Among major obstacles, the respondents mentioned:

- lack of appropriate unified mechanisms and procedures for classification, maintenance and provision of information based on the freedom of information laws;
- over-bureaucratic attitudes and old way of thinking of the officials;
- lack of awareness of their legal rights among media professionals and citizens; and
- lack of appointed FOI officers and special information departments in the state agencies;
- lack of a unified policy in the field of Public Relations and FOI in the state bodies;
- there is no unified system in terms of the structures of the respective Press and Public Relations departments. In some cases, a special PR department functions. In other cases, the press secretary is responsible for FOI or the Chief of Staff is dealing with providing information, and so forth;
- FOI and PR functions are not defined in the charters of the state bodies;
- Current training programs designed for civil servants do not cover FOI knowledge and skills.

The efficiency of information provision also depends on the personal diligence of the government employees and their experience and knowledge on FOI issues. The practice shows that in cases when an information officer works professionally, the requests are responded to properly and timely. Unfortunately, our observations showed that information officers have gained their work experience and knowledge mainly due to long work experience, but not due to any training. Their knowledge of freedom of information is very limited and is based more on the traditions and on instructions from their supervisors.

The lack of procedures and mechanisms, or lack of appropriate sub-legislation, leaves an enormous amount of discretion to officials, allowing for arbitrary refusals, manipulation of information, and, in extreme cases, even release of false information.

Regardless of the general understanding that the right to information belongs to everyone, in practice it proves to be easier to obtain official information in the capacity of a media professional rather than by an ordinary individual.

E-governance is underdeveloped in the government; official websites are either absent or are poorly maintained, that is, are not regularly updated and/or contain insufficient basic information.

Soviet traditions of secrecy dominate public bodies, and are threatening to undermine the emerging democratic values in the society.

The National Security Service, the Police, alongside the General Prosecutor's Office and the Ministry of Defense, prove to be the least accessible to the public. Information on military and security issues is the most difficult to obtain.

The overwhelming majority of officials feel that it is necessary for them to take part in regular training courses on FOI. The training, in their opinion, should be conducted periodically and be focused on new tendencies of FOI, including e-FOI governance techniques and mechanisms. Training courses should include the study of both national and international legal norms and best implementation practices all over the world.

## Recommendations

- **Training of Public Officials:** It is recommended that FOI training courses are offered to all information officers working in government agencies. These should cover both legal aspects of access to information and technical/practical skills for information management. FOI training courses should include the study of FOI international practice and international documents on FOI. It is quite possible to use local human resources along with international expert assistance to conduct such training sessions. NGO experts in the FOI field can be called upon to contribute to these trainings.
- **Ongoing Training:** It is recommended to include FOI training courses in the curricula of the State Administration Academy and the Civil Service Council qualification training programs. It is also recommended to include a course on FOI national and international legislation in the curricula of the universities, particularly in the Journalism and Law Departments. A certain amount of essential knowledge should also be delivered in schools.
- **Internal Guidelines:** It is recommended that manuals and guidelines already produced by civil society (FOICA, in particular) for public servants and for law enforcement bodies are used for organizing training sessions for administration staff on how to apply the FOI legislation.
- **Exchange of Experiences:** It is recommended that mechanisms are developed for the exchange of experience in FOI implementation practices between different branches and levels of the government in Armenia, and to the greatest extent possible, between civil servants in Armenia and those in other countries with greater experience of implementing FOI laws.
- **Training of the law-enforcement bodies:** Special training courses are needed for the law-enforcement bodies (in addition to the general FOI training) on how to ensure media's unimpeded access to information during demonstrations. This recommendation was also stated in the special report of the OSCE Representative on Freedom of the Media on "Handling of the Media during Political Demonstrations", issued on June 21, 2007. The report recommends: "The role, function, responsibilities and rights of the media should be integral to the training curriculum for law-enforcers whose duties include crowd management". Law-enforcers should be "adequately trained about the role and function of journalists and particularly their role during a demonstration. In the event of an over-reaction from the police, the issue of police behavior vis-a-vis journalists should be dealt with separately, regardless of whether the demonstration was sanctioned or not."

*Besides, the following recommendations will ensure FOI practice improvement:*

- **Public Awareness Raising:** It is recommended that both the government and civil society groups take steps to inform the general public about their rights to access information and the mechanisms for exercising these rights. Government web portals should include information on how to request information. The publication of FOI guides for citizens would contribute this purpose and can be widely disseminated and made available in all government bodies. The idea of FOI should be widely advertised and its use should be demonstrated.
- **Internal Systems:** It was found that in most ministries and regional governor's offices there is no unified system for processing FOI requests. Different departments within a government body have their own administrative procedures. It is necessary to promote standardized information management procedures for all state institutions. It is also important that applications and



FOI requests of citizens are registered and processed separately within the different time frames stated by the FOI Law. The FOI request templates should be placed in the general departments of the public agencies to assist citizens submitting properly composed FOI requests.

- **Information registers:** Every government agency should publish an information register which contains detailed information on how a citizen may write a written request, what type of information the particular agency holds, what is the internal procedure for answering requests, what are FOI exemptions, what is the appeal mechanism, etc.
- **Technical capacity:** To strengthen the technical capacities of all state institutions and to ensure that the information officers/public relations departments of these institutions have sufficient computing resources to carry out their work.
- **FOI Officers:** The process of assignment of FOI officers goes extremely slowly particularly at the regional government level. Although PR officers were nominated in almost all central government bodies, they may not fulfill the duties of an FOI officer, and replace them. The FOI Law states that in each state agency FOI officers responsible for information provision should be appointed (FOI Law, Article 13). State bodies are called upon to ensure that they are complying with the provisions of the FOI law, including speeding up the process of assignments of FOI officers.
- **Publication of Information:** State institutions do not publish obligatory information in their possession at least once a year, posting this information in an accessible place in their premises as required by the law to ease and speed up access to official information. Even those agencies that maintain websites do not fulfill this legal obligation.
- **Use of Internet:** All institutions are encouraged to post information they possess on their websites to ease the procedure for access to government-held documents. Those agencies who have not constructed their websites yet, are encouraged to create them and make the information available on-line. Resources should be allocated to do this. The government agencies' official websites should be regularly updated and should contain public oriented information, in particular, the information prescribed by Article 7 of the FOI Law. In the PR and Information departments a special person should be responsible for updating websites. The official websites should become an important source of information for the general public. Official e-mails sent to addresses indicated on their websites should be checked every day and all electronic requests should be processed properly and timely. At the same time, having information on the Internet should not preclude for answers to written or oral requests to be received in oral or written form as appropriate.
- **Strengthening e-FOI mechanisms:** To establish a "one window" electronic system in every agency and to develop systems of electronic circulation of documents within institutions. State and local government bodies should speed up efforts to establish internal electronic mechanisms to provide access and openness of their activities as stated by the FOI Law. Each central and regional government department must have a records keeping system in place. This will preferably be an electronic system, though paper records management systems will be acceptable where this is not possible.
- **Implementing Regulation:** By-laws should be drafted and adopted by the Government to facilitate the procedures of documentation, filing and maintenance of information. In particular the following by-laws should be drafted and adopted:

- Order for payments for information release,
  - Order for documentation and filing,
  - Order for classification and maintenance of information. On the basis of this order, information holders prescribed by law have to elaborate their own procedures for the release, classification and documentation of information.
- ***Independent Appeals System:*** The Office of the Ombudsman should be more active in examining violations and taking proper measures to protect the people's right of access to information. The officials should carry liability for illegal actions. It is highly recommended that the Ombudsmen has a special assistant or staff for handling information access appeals.

Summarizing the FOI implementation practice in the Armenian government bodies, it should be noted that Freedom of Information is not a magic stick to improve the government overnight. It is a part of a process that will change the culture of the government and public services and, over time, improve the quality of decision-making.

## APPENDIX 1

<i>List of agencies covered in the Needs Assessment Report</i>
1. Office of the President of the RA
2. Office of the Prime Minister of the RA
3. RA Ministry of Health
4. RA Ministry of Trade and Economic Development
5. RA Ministry of Labour and Social issues
6. RA Ministry of Justice
7. RA Ministry of Environmental Protection
8. RA Ministry of Agriculture
9. RA Ministry of Energy
10. RA Ministry of Education and Science
11. RA Ministry of Culture
12. RA Ministry of Territorial Administration
13. RA Ministry of Transport and Communication
14. RA Ministry of Urban Construction
15. RA Ministry of Finance and Economy
16. RA Ministry of Sport and Youth issues
17. RA State Committee of Real Estate
18. RA State Committee of Water Supply Management
19. RA State Tax Service
20. RA State Customs Committee
21. RA State Department of Civil Aviation
22. RA State Department of State Property Governance
23. RA Rescue Service
24. RA Civil Service Council
25. RA Committee on Public Service Regulation
26. RA National Statistics Service
27. RA Committee for Stocks
28. RA Commission for the Protection of Economic Competition
29. National Commission on Television and Radio
30. RA Central Electoral Commission
31. Yerevan Municipality
32. Governor's Office, Aragatsotn region
33. Governor's Office, Ararat region
34. Governor's Office, Armavir region
35. Governor's Office, Gegharquniq region
36. Governor's Office, Lori region
37. Governor's Office, Kotayq region

38. Governor's Office, Shirak region
39. Governor's Office, Syunik region
40. Governor's Office, Vayots Dzor region
41. Governor's Office, Tavush region
42. RA National Security Service
43. RA Police
44. RA Ministry of Defense
45. RA Prosecutor General's Office