

# Assessing Information Disclosure Practices For FOI Compliance

(AID-FOI TOOL)

# Contents

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Introduction.....	3
The AID-FOI Tool.....	4
Fundamental Basis.....	4
AID-FOI Questionnaire.....	5
Element 1: Leadership.....	5
<b>Indicator 1:</b> Level of commitment of agency leaders to institutionalize FOI within the agency.....	5
Element 2: Strategic and Policy Framework, Guidelines and Procedures.....	6
<b>Indicator 2:</b> Presence of whole-of-agency policy, strategy, guidelines and procedures regarding FOI implementation.....	6
Element 3: Structure, Systems, and Resources.....	16
<b>Indicator 3:</b> Presence and functioning of structures and systems to ensure effectiveness and efficiency of FOI implementation.....	16
Element 4: Monitoring.....	19
<b>Indicator 4:</b> Presence and functioning of monitoring systems for FOI implementation.....	19

# Introduction

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The Government of the Philippines operationalized people's access to information through Executive Order (EO) Number 2 signed by the President in July 2016. While covering only the executive branch of the government, it allowed different users, currently numbering 4,157 (as of December 17, 2018 statistics), access to key government information, managed through a program team housed under the Presidential Communications Operations Office (PCOO). The Freedom of Information (FOI) mandate was recently cascaded to local government units when the Department of Interior and Local Government (DILG), together with PCOO, issued a Joint Memorandum Circular in 2018, encouraging local government units to enact local FOI ordinances.

While significant efforts have been made by the FOI Project Management Office (FOI-PMO) to make citizens aware of the existence of the FOI EO and exact compliance of agencies, only very few has used the measure just yet to seek for information (as indicated in the above number of portal users), and very few of the agencies have been actively responding to information despite including FOI compliance a requirement for agencies to be eligible to received performance-based bonus. As of December 2018, only 34% of a total of 939 covered agencies submitted data inventories, 49% submitted FOI manuals indicating operationalization of the EO at the agency level, while 33% submitted FOI summary reports indicating the number of requests received and responded to. It must be noted, however, that the large bulk of non-compliance are local water districts constituting 55% of the total number of covered agencies.

Among national government agencies, 100% were able to comply with the preparation of FOI manuals, 75% were able to submit data inventories, and 72% have submitted FOI summary reports. The Philippine Statistics Authority topped as the agency with the greatest number of requests, followed by key service delivery agencies like the Department of Health (2<sup>nd</sup> place), the Department of Public Works and Highways (5<sup>th</sup> place), and the Department of Education (7<sup>th</sup> place). Others on the list are the Department of Transportation (3<sup>rd</sup> place), Department of Budget and Management (4<sup>th</sup> place), and the DILG (6<sup>th</sup> place). Interestingly enough legal documents, including contracts, top the list of most requested information in 2018. Statistics data/research data ranked second.

The Philippine government recognizes that the key to improvement in responsiveness of agencies to information requests through FOI mechanism is the proper functioning of data management systems of agencies, including the ability of its people, and quality of data leadership, and the different processes and systems that ensure data availability. Thus, this Assessing Information Disclosure practices for FOI (AID-FOI) Tool intends to determine the capacity and performance of agencies in complying with the FOI regulation and its ability to respond to information requests. The results of this tool can be used by the FOI-PMO and by relevant national agencies of the Philippine Government to formulate a capacity development strategy to improve capacity and performance of the NGA in information disclosure.

This document contains the first version of the AID-FOI Tool. This was developed by the Step Up Consulting as part of the "Increasing people's access to procurement information through the FOI program", a research project by Step Up Consulting funded by HIVOS.

# The AID-FOI Tool

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## Fundamental Basis

The AID-FOI Tool assesses whether the conditions within an agency are appropriate for FOI mechanisms to be effective. It assesses whether the agency possesses the critical elements that will enable it to perform proactive disclosure of open agency data. For purposes of the assessment AID-FOI Tool draws heavily from the work of the Carter Center's Rule of Law Program that specifies a set of indicators to assess FOI implementation. These indicators revolve around the following key essential components<sup>1</sup>:

### **i) Leadership**

Engagement of high-level leadership in the development and oversight of implementation is critical for its overall success. Motivated leaders committed to the implementation of the access to information legislation will assure that necessary policies and procedures are in place, systems developed, and resources applied.

### **ii) Rules**

Rules serve to ordain or lay out the way in which public officials will handle their various access to information regime functions. They may provide binding instructions, mandated actions, or standard operating procedures to advance implementation of the access to information law. Rules in themselves require a process of drafting and ordinance and imply both a negative and a positive concept: negative in the sense that it prevents failure or negligence from taking place, and a positive one, because it provides an orientation and clear guidance.

### **iii) Systems**

Systems are the processes, both formal and informal, by which an agency functions. They are a crucial component when talking about improving access to information implementation because they determine the way the agency acts and reacts on every action or aspect related to ATI. Systems are the application of rules and procedures.

### **iv) Resources**

It is no secret to anyone that implementing access to information legislation requires considerable resources: human, financial and infrastructure. These resources are often found within government's pre-existing structure, but in some cases, they need to be acquired or specially allocated in order to ensure ATI implementation. Trained personnel, infrastructure, technology and responsible officers are some of the resources that an agency needs to fully and effectively implement access to information legislation.

### **v) Monitoring**

Monitoring the agency's access to information functions is a critical, but often overlooked, component of the access to information implementation plumbing. Monitoring allows agencies to identify advances and deficits and to make necessary modifications or corrections. Moreover, monitoring also provides leaders with the necessary information to make better decisions pertaining to the establishment of rules, the allocation of resources and the system adjustments required to improve the implementation of the access to information legislation.

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<sup>11</sup> The discussion of the key components are lifted in toto from Carter Center's methodological note in implementing the FOI Implementation Tool. For more discussion, please see <https://www.cartercenter.org/peace/ati/IAT/index.html>

# AID-FOI Questionnaire

## Element 1: Leadership

**Indicator 1: Level of commitment of agency leaders to institutionalize FOI within the agency.**

	Always	Sometimes	Rarely	Never	Not Applicable
1. Agency leaders (top or middle managers) provide guidance to the team implementing the FOI (e.g. attending meetings of the FOI team, responding to their questions, issuing directives to support FOI implementation within the agency)	✓				
2. Agency leaders (top or middle managers) provide resources for successful FOI implementation (e.g. annual financial budget, people to implement FOI, equipment necessary).	✓				
3. Agency leaders (top or middle managers) provide timely decisions on FOI matters (e.g. approval of requests, directives to personnel for compliance.)	✓				
4. Agency leaders (top or middle managers) provide motivation to the FOI implementation team in the agency to encourage successful FOI implementation (e.g. giving encouragement or recognizing FOI team's work).	✓				
5. Agency leaders (with authority regarding agency policy) actively participates in the crafting of the agency's FOI guidelines).	✓				
6. Agency leaders (with authority regarding agency policy) reviews compliance to FOI guidelines).	✓				
7. Agency leaders (with authority regarding agency policy) initiates review of agency policy when certain inefficiencies are observed.	✓				
<p><b>Comments:</b> The FOI issuances, regulations and other similar compliances are regularly discussed and monitored during various Top Management Committees meetings and approved by the Board Members upon issuance of BOD Resolution/s. Also, thru LBP's Centralized Compliance Management Framework all FOI compliances is monitored and addressed by submitting the Business Unit Compliance Action Plan (Proposal/Status) and confirmation thru submission of Status Update on Regulatory Issuance (SURI). Issuance of Special Order and/or Inter-office memorandum whenever applicable and necessary regarding FOI Matters.</p>					
<p><b>Means of Verification</b> (e.g. minutes of meetings, agency budget, interoffice communication, policy pronouncements)</p> <p>Minutes of Meeting, Board Resolutions, Special Order (S.O.), Inter-Office Memorandum</p>					

## Element 2: Strategic and Policy Framework, Guidelines and Procedures

### Indicator 2: Presence of whole-of-agency policy, strategy, guidelines and procedures regarding FOI implementation

	Yes	No	NA	Comments
1. The agency's strategic plan includes provisions related to FOI implementation (e.g. transparency, access to information).	✓			Under Transparency seal of LIBI's official website, all FOI agency info, inventory report and summary report and FOI manual are uploaded regularly
2. The agency has issued specific guidelines for FOI (e.g. FOI manual)	✓			LIBI have an updated FOI Manual duly approved and validated by its Board of Directors in accordance with the template provided by FOI Office.
3. The agency FOI guidelines are accessible to all in digital format and downloadable from the agency's website.	✓			Under Transparency seal of LIBI's official website, all FOI agency info, inventory report and summary report and FOI manual are uploaded regularly
4. The agency FOI guidelines are accessible to all in hardcopy and available to citizens.	✓			FOI agency info. Including FOI Manual, One-pager manual and FOI request Form is displayed upon entrance on agency's receiving area/lobby
5. The agency FOI guidelines have very specific provisions on	✓			
a. How FOI will be implemented	✓			Please see page_ of LIBI's FOI manual on the link provided  <a href="https://www.lbp-insurance.com/images/pdf/foi-manual.pdf">https://www.lbp-insurance.com/images/pdf/foi-manual.pdf</a>
b. Who is responsible for its implementation	✓			Please see page_ of LIBI's FOI manual on the link provided  <a href="https://www.lbp-insurance.com/images/pdf/foi-manual.pdf">https://www.lbp-insurance.com/images/pdf/foi-manual.pdf</a>
c. How citizens can request information	✓			Please see page_ of LIBI's FOI manual on the link provided  <a href="https://www.lbp-insurance.com/images/pdf/foi-manual.pdf">https://www.lbp-insurance.com/images/pdf/foi-manual.pdf</a>
d. How long requests can be processed	✓			Please see page_ of LIBI's FOI manual on the link provided  <a href="https://www.lbp-insurance.com/images/pdf/foi-manual.pdf">https://www.lbp-insurance.com/images/pdf/foi-manual.pdf</a>
e. How citizens can complain if their request is not responded to	✓			Please see page_ of LIBI's FOI manual on the link provided <a href="https://www.lbp-insurance.com/images/pdf/foi-manual.pdf">https://www.lbp-insurance.com/images/pdf/foi-manual.pdf</a>

	Yes	No	NA	Comments
6. The agency policy has been disseminated to all officials within the agency.	✓			During the conduct of ManCom. Meeting and thru issuance of Inter-office memorandum and Special Order (S.O.)
7. Agency employees handling data and information are all oriented with how the agency policy works.	✓			Handling of data and information are conducted during employee orientation.
8. The agency has disseminated the FOI policy to all its customers/constituents.	✓			Thru email blast and issuance of Inter-Office Memorandum we disseminate the FOI Policy for our constituents. For customers, Under Transparency seal of LIBI's official website, all FOI agency info, inventory report and summary report and FOI manual are uploaded regularly and FOI agency info. Including FOI Manual, One-pager manual and FOI request Form is displayed upon entrance of agency's receiving hall/area.
9. The agency has proactively informed all its customers/constituents about the policy.	✓			Thru email blast and issuance of Inter-Office Memorandum we disseminate the FOI Policy for our constituents. For customers, Under Transparency seal of LIBI's official website, all FOI agency info, inventory report and summary report and FOI manual are uploaded regularly and FOI agency info. Including FOI Manual, One-pager manual and FOI request Form is displayed upon entrance of agency's receiving hall/area.
10. The agency has written guidelines for receiving FOI requests, including	✓			
a. Determining what constitutes a request	✓			Please see page_ of LIBI's FOI manual on the link provided <a href="https://www.lbp-insurance.com/images/pdf/foi-manual.pdf">https://www.lbp-insurance.com/images/pdf/foi-manual.pdf</a>
b. Providing acknowledgment of receipt	✓			Please see page_ of LIBI's FOI manual on the link provided <a href="https://www.lbp-insurance.com/images/pdf/foi-manual.pdf">https://www.lbp-insurance.com/images/pdf/foi-manual.pdf</a>
c. Assisting the requester	✓			Please see page_ of LIBI's FOI manual on the link provided <a href="https://www.lbp-insurance.com/images/pdf/foi-manual.pdf">https://www.lbp-insurance.com/images/pdf/foi-manual.pdf</a>
11. The agency has written guidelines for processing requests, including	✓			
a. Coordination within the agency in responding to the request	✓			Please see page_ of LIBI's FOI manual on the link provided <a href="https://www.lbp-insurance.com/images/pdf/foi-manual.pdf">https://www.lbp-insurance.com/images/pdf/foi-manual.pdf</a>
b. Timeframes	✓			Please see page_ of LIBI's FOI manual on the link provided <a href="https://www.lbp-insurance.com/images/pdf/foi-manual.pdf">https://www.lbp-insurance.com/images/pdf/foi-manual.pdf</a>
c. Cost determination				

	Yes	No	NA	Comments
			✓	LIBI does not collect fees for its services
d. Fee collection (when applicable)			✓	LIBI does not collect fees for its services
e. Transfer of request from one office in the agency to another (when applicable)		✓		FRO solely processes the request that covers all the unit of LIBI
f. Transfer of request to another agency (when applicable)	✓			Please see page_ of LIBI's FOI manual on the link provided <a href="https://www.lbp-insurance.com/images/pdf/foi-manual.pdf">https://www.lbp-insurance.com/images/pdf/foi-manual.pdf</a>
12. The agency has written guidelines for responding to requests (e.g. granting or denying), including	✓			
a. Process for determining release of information	✓			Please see page_ of LIBI's FOI manual on the link provided <a href="https://www.lbp-insurance.com/images/pdf/foi-manual.pdf">https://www.lbp-insurance.com/images/pdf/foi-manual.pdf</a>
b. Means for providing the requested information	✓			Please see page_ of LIBI's FOI manual on the link provided <a href="https://www.lbp-insurance.com/images/pdf/foi-manual.pdf">https://www.lbp-insurance.com/images/pdf/foi-manual.pdf</a>
c. Means for providing notice of denial				Please see page_ of LIBI's FOI manual on the link provided <a href="https://www.lbp-insurance.com/images/pdf/foi-manual.pdf">https://www.lbp-insurance.com/images/pdf/foi-manual.pdf</a>
d. Reason for denial of information requested	✓			Please see page_ of LIBI's FOI manual on the link provided <a href="https://www.lbp-insurance.com/images/pdf/foi-manual.pdf">https://www.lbp-insurance.com/images/pdf/foi-manual.pdf</a>
13. The agency has written procedures for logging in and tracking requests and responses including	✓			
a. Updating the log/tracker to keep it current	✓			Please see page_ of LIBI's FOI manual on the link provided thru eFOI Portal <a href="https://foi.gov.ph/">https://foi.gov.ph/</a> <a href="https://www.lbp-insurance.com/images/pdf/foi-manual.pdf">https://www.lbp-insurance.com/images/pdf/foi-manual.pdf</a>
b. Tracking a request in one central recording system	✓			Please see page_ of LIBI's FOI manual on the link provided thru eFOI Portal <a href="https://foi.gov.ph/">https://foi.gov.ph/</a> <a href="https://www.lbp-insurance.com/images/pdf/foi-manual.pdf">https://www.lbp-insurance.com/images/pdf/foi-manual.pdf</a>
c. Detailing the request from submission to processing to resolution, including transfers and internal reviews	✓			Please see page_ of LIBI's FOI manual on the link provided and thru eFOI Portal <a href="https://foi.gov.ph/">https://foi.gov.ph/</a> <a href="https://www.lbp-insurance.com/images/pdf/foi-manual.pdf">https://www.lbp-insurance.com/images/pdf/foi-manual.pdf</a>
14. The agency has written guidelines for the internal review of FOI requests, including		✓		Under on-going development/For implementation
a. Receiving requests for review		✓		Under on-going development/For implementation
b. Reviewing agency's motives for initial decisions		✓		Under on-going development/For implementation

	Yes	No	NA	Comments
c. Issuing findings and decisions		✓		Under on-going development/For implementation
15. The agency has written procedures on processing requests, including	✓			
a. Identifying who in the agency holds the information		✓		Under on-going development/For implementation
b. Searching and finding information		✓		Under on-going development/For implementation
c. Determining release	✓			Please see page_ of LIBI's FOI manual on the link provided and thru eFOI Portal <a href="https://www.lbp-insurance.com/images/pdf/foi-manual.pdf">https://www.lbp-insurance.com/images/pdf/foi-manual.pdf</a>
d. Deciding on redactions	✓			Please see page_ of LIBI's FOI manual on the link provided and thru eFOI <a href="https://foi.gov.ph/">https://foi.gov.ph/</a> <a href="https://www.lbp-insurance.com/images/pdf/foi-manual.pdf">https://www.lbp-insurance.com/images/pdf/foi-manual.pdf</a>
e. Deciding on denials	✓			Please see page_ of LIBI's FOI manual on the link provided and thru eFOI Portal <a href="https://www.lbp-insurance.com/images/pdf/foi-manual.pdf">https://www.lbp-insurance.com/images/pdf/foi-manual.pdf</a>
16. The agency has written procedures in transferring requests to other agencies, including	✓			
a. Identifying the correct agency	✓			Please see page_ of LIBI's FOI manual on the link provided and thru eFOI Portal <a href="https://www.lbp-insurance.com/images/pdf/foi-manual.pdf">https://www.lbp-insurance.com/images/pdf/foi-manual.pdf</a>
b. Transferring the requests	✓			Please see page_ of LIBI's FOI manual on the link provided and thru eFOI Portal <a href="https://www.lbp-insurance.com/images/pdf/foi-manual.pdf">https://www.lbp-insurance.com/images/pdf/foi-manual.pdf</a>
c. Providing notice of transfer to the requester	✓			Please see page_ of LIBI's FOI manual on the link provided and thru eFOI Portal <a href="https://www.lbp-insurance.com/images/pdf/foi-manual.pdf">https://www.lbp-insurance.com/images/pdf/foi-manual.pdf</a>
17. The agency has written procedures for issuing and servicing responses, including	✓			
a. Provision of requested documents	✓			<a href="https://foi.gov.ph/">https://foi.gov.ph/</a> <a href="https://www.lbp-insurance.com/images/pdf/foi-manual.pdf">https://www.lbp-insurance.com/images/pdf/foi-manual.pdf</a>
b. Notice and collection of fees where applicable			✓	This is not applicable for LIBI
c. Sending notices of denial	✓			<a href="https://foi.gov.ph/">https://foi.gov.ph/</a> <a href="https://www.lbp-insurance.com/images/pdf/foi-manual.pdf">https://www.lbp-insurance.com/images/pdf/foi-manual.pdf</a>

	Yes	No	NA	Comments
d. Sending notices of the requester's right to appeal	✓			<a href="https://foi.gov.ph/">https://foi.gov.ph/</a> <a href="https://www.lbp-insurance.com/images/pdf/foi-manual.pdf">https://www.lbp-insurance.com/images/pdf/foi-manual.pdf</a>
18. The agency has written procedures in capturing the following information	✓			
a. Number of requests	✓			<a href="https://foi.gov.ph/">https://foi.gov.ph/</a> <a href="https://www.lbp-insurance.com/images/pdf/foi-manual.pdf">https://www.lbp-insurance.com/images/pdf/foi-manual.pdf</a>
b. Number of transfers	✓			<a href="https://foi.gov.ph/">https://foi.gov.ph/</a> <a href="https://www.lbp-insurance.com/images/pdf/foi-manual.pdf">https://www.lbp-insurance.com/images/pdf/foi-manual.pdf</a>
c. Number of denials	✓			<a href="https://foi.gov.ph/">https://foi.gov.ph/</a> <a href="https://www.lbp-insurance.com/images/pdf/foi-manual.pdf">https://www.lbp-insurance.com/images/pdf/foi-manual.pdf</a>
d. Reasons for denial	✓			<a href="https://foi.gov.ph/">https://foi.gov.ph/</a> <a href="https://www.lbp-insurance.com/images/pdf/foi-manual.pdf">https://www.lbp-insurance.com/images/pdf/foi-manual.pdf</a>
e. Number of days to respond to requests	✓			<a href="https://foi.gov.ph/">https://foi.gov.ph/</a> <a href="https://www.lbp-insurance.com/images/pdf/foi-manual.pdf">https://www.lbp-insurance.com/images/pdf/foi-manual.pdf</a>
19. The agency has written procedures on proactive disclosure (i.e. not just responding to FOI requests but providing information to citizens on a regular basis) including	✓			
a. Identifying and listing documents that will be proactively disclosed	✓			LIBI implements and Follows the Guidelines on Classification of Handling, Access and Disclosure of Information Assets <a href="https://www.lbp-insurance.com/images/pdf/infosec.pdf">https://www.lbp-insurance.com/images/pdf/infosec.pdf</a>
b. How the documents will be disclosed (e.g. website, notice boards)	✓			LIBI implements and Follows the Guidelines on Classification of Handling, Access and Disclosure of Information Assets <a href="https://www.lbp-insurance.com/images/pdf/infosec.pdf">https://www.lbp-insurance.com/images/pdf/infosec.pdf</a>
c. Regularity in the disclosure of the documents	✓			LIBI implements and Follows the Guidelines on Classification of Handling, Access and Disclosure of Information Assets <a href="https://www.lbp-insurance.com/images/pdf/infosec.pdf">https://www.lbp-insurance.com/images/pdf/infosec.pdf</a>
d. Format of the document when disclosed (e.g. PDF, MS word, spreadsheet)	✓			LIBI implements and Follows the Guidelines on Classification of Handling, Access and Disclosure of Information Assets <a href="https://www.lbp-insurance.com/images/pdf/infosec.pdf">https://www.lbp-insurance.com/images/pdf/infosec.pdf</a>
e. People responsible in the disclosure process	✓			LIBI implements and Follows the Guidelines on Classification of Handling, Access and Disclosure of Information Assets <a href="https://www.lbp-insurance.com/images/pdf/infosec.pdf">https://www.lbp-insurance.com/images/pdf/infosec.pdf</a>  Also thru FOI Manual and One-pager Manual <a href="https://www.lbp-insurance.com/images/pdf/one-pager-manual.pdf">https://www.lbp-insurance.com/images/pdf/one-pager-manual.pdf</a>

	Yes	No	NA	Comments
f. Publishing information that is often requested through the FOI channel	✓			Thru FOI Reports uploaded in the agency's official website
20. The agency has record management policy in dealing with paper-based information.	✓			Thru Operations/Administrative Manual, Masterlist of Records and the Guidelines on Classification of Handling, Access and Disclosure of Information Assets <a href="https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf">https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf</a> and <a href="https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf">https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf</a>
21. The agency has record management policy in dealing with digital information.	✓			LIBI implements and Follows the Guidelines on Classification of Handling, Access and Disclosure of Information Assets <a href="https://www.lbp-insurance.com/images/pdf/infosec.pdf">https://www.lbp-insurance.com/images/pdf/infosec.pdf</a>
22. The agency has written guidelines in record management (regardless of format) including	✓			
a. Creating records	✓			Thru Operations/Administrative Manual, Masterlist of Records and the Guidelines on Classification of Handling, Access and Disclosure of Information Assets <a href="https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf">https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf</a> and <a href="https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf">https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf</a>
b. Organizing records	✓			Thru Operations/Administrative Manual, Masterlist of Records and the Guidelines on Classification of Handling, Access and Disclosure of Information Assets <a href="https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf">https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf</a> and <a href="https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf">https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf</a>
c. Storing records/preserving records	✓			Thru Operations/Administrative Manual, Masterlist of Records and the Guidelines on Classification of Handling, Access and Disclosure of Information Assets <a href="https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf">https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf</a> and <a href="https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf">https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf</a>
d. Retaining records	✓			Thru Operations/Administrative Manual, Masterlist of Records and the Guidelines on Classification of Handling, Access and Disclosure of Information Assets <a href="https://www.lbp-insurance.com/images/pdf/administrative-">https://www.lbp-insurance.com/images/pdf/administrative-</a>

	Yes	No	NA	Comments
				manual.pdf and <a href="https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf">https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf</a>
e. Securing records	✓			Thru Operations/Administrative Manual, Masterlist of Records and the Guidelines on Classification of Handling, Access and Disclosure of Information Assets <a href="https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf">https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf</a> and <a href="https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf">https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf</a>
f. Retrieving records	✓			Thru Operations/Administrative Manual, Masterlist of Records and the Guidelines on Classification of Handling, Access and Disclosure of Information Assets <a href="https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf">https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf</a> and <a href="https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf">https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf</a>
g. Accessing records	✓			Thru Operations/Administrative Manual, Masterlist of Records and the Guidelines on Classification of Handling, Access and Disclosure of Information Assets <a href="https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf">https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf</a> and <a href="https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf">https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf</a>
23. The agency has written guidelines in records security, including				
a. Determining classification	✓			Thru Operations/Administrative Manual, Masterlist of Records and the Guidelines on Classification of Handling, Access and Disclosure of Information Assets <a href="https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf">https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf</a> and <a href="https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf">https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf</a>
b. Internal access to classified documents	✓			Thru Operations/Administrative Manual, Masterlist of Records and the Guidelines on Classification of Handling, Access and Disclosure of Information Assets <a href="https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf">https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf</a> and <a href="https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf">https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf</a>
c. Transmission of classified documents	✓			Thru Operations/Administrative Manual, Masterlist of Records and the Guidelines on Classification of Handling, Access and Disclosure of Information Assets

	Yes	No	NA	Comments
				<a href="https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf">https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf</a> and <a href="https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf">https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf</a>
d. Creation of index or other forms of identifying classified documents	✓			Thru Operations/Administrative Manual, Masterlist of Records and the Guidelines on Classification of Handling, Access and Disclosure of Information Assets <a href="https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf">https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf</a> and <a href="https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf">https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf</a>
24. The agency has written guidelines and procedures in managing paper records, including	✓			
a. Creation	✓			Thru Operations/Administrative Manual, Masterlist of Records and the Guidelines on Classification of Handling, Access and Disclosure of Information Assets <a href="https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf">https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf</a> and <a href="https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf">https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf</a>
b. Records organization	✓			Thru Operations/Administrative Manual, Masterlist of Records and the Guidelines on Classification of Handling, Access and Disclosure of Information Assets <a href="https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf">https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf</a> and <a href="https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf">https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf</a>
c. Inventory	✓			Thru Operations/Administrative Manual, Masterlist of Records and the Guidelines on Classification of Handling, Access and Disclosure of Information Assets <a href="https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf">https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf</a> and <a href="https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf">https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf</a>
d. Indexing and logging	✓			Thru Operations/Administrative Manual, Masterlist of Records and the Guidelines on Classification of Handling, Access and Disclosure of Information Assets <a href="https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf">https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf</a> and <a href="https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf">https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf</a>
e. Access permission				Thru Operations/Administrative Manual, Masterlist of Records and the Guidelines on

	Yes	No	NA	Comments
	✓			Classification of Handling, Access and Disclosure of Information Assets <a href="https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf">https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf</a> and <a href="https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf">https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf</a>
f. Retention and disposal	✓			Thru Operations/Administrative Manual, Masterlist of Records and the Guidelines on Classification of Handling, Access and Disclosure of Information Assets <a href="https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf">https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf</a> and <a href="https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf">https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf</a>
25. The agency has written guidelines and procedures in managing digital records, including				
a. Creation	✓			Thru Operations/Administrative Manual, Masterlist of Records and the Guidelines on Classification of Handling, Access and Disclosure of Information Assets <a href="https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf">https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf</a> and <a href="https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf">https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf</a>
b. Records organization	✓			Thru Operations/Administrative Manual, Masterlist of Records and the Guidelines on Classification of Handling, Access and Disclosure of Information Assets <a href="https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf">https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf</a> and <a href="https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf">https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf</a>
c. Inventory	✓			Thru Operations/Administrative Manual, Masterlist of Records and the Guidelines on Classification of Handling, Access and Disclosure of Information Assets <a href="https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf">https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf</a> and <a href="https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf">https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf</a>
d. Indexing and logging	✓			Thru Operations/Administrative Manual, Masterlist of Records and the Guidelines on Classification of Handling, Access and Disclosure of Information Assets <a href="https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf">https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf</a> and <a href="https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf">https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf</a>

	Yes	No	NA	Comments
				insurance.com/images/pdf/administrative-manual.pdf
e. Access permission	✓			Thru Operations/Administrative Manual, Masterlist of Records and the Guidelines on Classification of Handling, Access and Disclosure of Information Assets https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf and https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf
f. Retention and disposal	✓			Thru Operations/Administrative Manual, Masterlist of Records and the Guidelines on Classification of Handling, Access and Disclosure of Information Assets https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf and https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf
26. Our data management system is decentralized.	✓			Thru Operations/Administrative Manual, Masterlist of Records and the Guidelines on Classification of Handling, Access and Disclosure of Information Assets https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf and https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf
27. Access to the data of the agency is available for everyone working in the organization.	✓			Thru Operations/Administrative Manual, Masterlist of Records and the Guidelines on Classification of Handling, Access and Disclosure of Information Assets https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf and https://www.lbp-insurance.com/images/pdf/administrative-manual.pdf
<b>Means of Verification</b>				
<b>LIBI implements and follows records managements policy thru the following:</b>				
<ol style="list-style-type: none"> <li>1. Issuances from the National Archives of the Philippines</li> <li>2. Information Security Manual</li> <li>3. Operations Manual on Records Management</li> <li>4. ISO-QMS Manual</li> <li>5. COA Regulation on Records Management</li> <li>6. AMLA Manual</li> <li>7. Document Management System (DMS)</li> <li>8. Masterlist of Records and Masterlist of Controlled Documents</li> </ol>				
<b>Note:</b> (In the comments column, indicate how this policy, procedure or guideline, has been implemented, the reasons for your answer, or a further explanation).				

### Element 3: Structure, Systems, and Resources

#### Indicator 3: Presence and functioning of structures and systems to ensure effectiveness and efficiency of FOI implementation.

	Yes	No	NA	Comments
1. One or more agency official has been appointed to handle FOI implementation.	✓			There are three (3) officials appointed to handle FOI Implementation, which are : FRO, FDM and FDM's Authorized Representative, see FOI Manual on the link below:  <a href="https://www.lbp-insurance.com/images/pdf/foi-manual.pdf">https://www.lbp-insurance.com/images/pdf/foi-manual.pdf</a>
2. One or more agency official has been informally tasked to handle FOI implementation.	✓			Yes, the OIC-Admin. Head is appointed as the Authorized Representative of the FDM see FOI Manual on the link below  <a href="https://www.lbp-insurance.com/images/pdf/foi-manual.pdf">https://www.lbp-insurance.com/images/pdf/foi-manual.pdf</a>
3. The agency officials handling FOI implementation are also doing other functions besides ensuring the effectiveness and efficiency of FOI implementation.	✓			Yes, the FOI Official composes of the following:  FDM – Acting President & CEO  FRO – Administrative Analyst  Authorized Representative – OIC-Admin. Head
4. The agency officials handling FOI implementation have the authority and mandate to perform their functions.	✓			Yes, thru BOD Resolutions
5. The names of agency officials tasked to handle FOI implementation are made known to the public.	✓			Yes, the FOI Manual is uploaded on the agency's official website as well as the One-Page Manual which includes the full name of the FRO and its contact details, see the link below for the FOI One-pager Manual:  <a href="https://www.lbp-insurance.com/images/pdf/one-pager-manual.pdf">https://www.lbp-insurance.com/images/pdf/one-pager-manual.pdf</a>
6. The agency official/s tasked to handle FOI implementation has/have				
a. The time required to fulfill his/her function	✓			
b. The staff needed to fulfill his/her function		✓		Only the three (3) officials are appointed to perform FOI duties
c. The financial resources needed to fulfill his/her function	✓			Yes, budget for operations are reflected in the Annual Budget/Appropriation see below link

	Yes	No	NA	Comments
				of agency's audited Financial Statement  <a href="https://www.lbp-insurance.com/images/pdf/fs-2020.pdf">https://www.lbp-insurance.com/images/pdf/fs-2020.pdf</a>
7. The official/s tasked to handle FOI implementation received a specialized training on FOI and access to information in order to effectively do his/her job.	✓			Yes, the officials attended the orientations on FOI conducted by FOI Philippines
8. All agency employees are oriented about the FOI policy and their roles in its implementation.		✓		Under on-going development as part of Reorganization
9. All agency employees receive regular information about the progress of FOI implementation within the agency.		✓		Under on-going development as part of Reorganization
10. The agency has training materials related to the agency's FOI guidelines, procedures and processes and these are made available to all employees.		✓		Under on-going development as part of Reorganization
11. Agency official/s tasked to handle FOI implementation has/have regular access to:				
a. Computers	✓			
b. Stable internet connection	✓			
c. Scanners	✓			
d. Photocopiers	✓			
12. The agency has created a physical space where citizens can make written FOI requests.	✓			
13. The agency has created an online space where citizens can make online FOI requests.	✓			Thru official website via FOI Portal and thru standard email request.  <a href="https://foi.gov.ph/">https://foi.gov.ph/</a>  <a href="https://www.lbp-insurance.com/images/pdf/one-pager-manual.pdf">https://www.lbp-insurance.com/images/pdf/one-pager-manual.pdf</a>
14. One or more agency official has been appointed to handle proactive disclosure of information.	✓			The Authorized Representative of the FDM is also the Compliance Officer
15. One or more agency official has been informally tasked to handle proactive disclosure of information.	✓			The IT Team are appointed to handle proactive disclosure of information and supervision of the disclosure to the agency's official website
16. The agency officials handling proactive disclosure functions are also doing other functions besides ensuring the effectiveness and efficiency of proactive disclosure mechanisms.	✓			Yes, these are composed of IT Officers

	Yes	No	NA	Comments
17. The agency officials handling proactive disclosure functions have the authority and mandate to perform their functions.	✓			
18. The agency official/s tasked to handle proactive disclosure functions has/have				
a. The time required to fulfill his/her function	✓			
b. The staff needed to fulfill his/her function		✓		
c. The financial resources needed to fulfill his/her function	✓			Yes, thru Annual Budget
19. The official/s tasked to handle proactive disclosure functions received a specialized training on open data and proactive disclosure principles to do his/her job.	✓			Yes, thru orientation from FOI Philippines and LandBank -ERMO on orientation on Information Security
20. Agency official/s tasked to handle proactive disclosure functions has/have regular access to:				
a. Computers	✓			
b. Stable internet connection	✓			
c. Scanners	✓			
d. Photocopiers	✓			
21. The agency has an appointed official/s handling records management.	✓			
22. The agency official/s tasked to handle records management has/have				
a. The time required to fulfill his/her function	✓			
b. The staff needed to fulfill his/her function		✓		
c. The financial resources needed to fulfill his/her function	✓			
23. Agency official/s tasked to handle records management has/have regular access to:				
a. Computers	✓			
b. Stable internet connection	✓			
c. Scanners	✓			
d. Photocopiers	✓			
24. The official/s tasked to handle records management received a specialized training on records management to do his/her job.	✓			The Records Custodian has trained by National Archives of the Philippines and ISO-QMS
25. The agency has created/maintained a physical space and facilities for storing paper records.	✓			The agency has the centralized Records Section

	Yes	No	NA	Comments
26. The agency has created/maintained space and facilities for storing digital records.	✓			Yes, thru Document Management System, Google Drive and iCloud system
<b>Means of Verification</b>				
LIBI has its Integrated Insurance Brokerage System (IIBS) as its official system for operations, it also provides internet connections for employees under onsite and offsite working arrangement. Further, it also implements Document Management System for records managements and iCloud backup to incorporate its system thru online basis.				
<b>Note:</b> (In the comments column, indicate how this policy, procedure or guideline, has been implemented, the reasons for your answer, or a further explanation).				

## Element 4: Monitoring

### Indicator 4: Presence and functioning of monitoring systems for FOI implementation

	Always	Sometimes	Rarely	Never	Not Applicable
1. The agency monitors its FOI functions and duties.	✓				
2. The agency issues FOI implementation reports on a regular basis.	✓				
3. The agency's internal audit department includes FOI functioning as part of its auditable areas.		✓			
4. The agency reviews the performance of the personnel assigned to handle FOI implementation to determine how they perform their tasks and functions.	✓				
5. The agency captures statistics on FOI implementation and discloses this to the public.	✓				
6. The agency captures statistics on proactive disclosure implementation and discloses this to the public.	✓				
7. The agency monitors its proactive disclosure practices.	✓				
8. The agency monitors its records management functions and practices.	✓				
9. The agency has designated an official/s who will oversee and monitor FOI implementation.	✓				
<b>Comments</b>					
The monitoring system of the implementation of FOI is thru the FOI Portal handled by the LIBI's FRO. Also, thru LandBank's Centralized Compliance Management Framework, the Compliance Management Group can monitor the FOI standard practices.					

**Means of Verification** (e.g. minutes of meetings, agency budget, interoffice communication, policy pronouncements)

Through BOD Resolution, Business Unit Compliance Action Plan (BUCAP), Status on Update of Regulatory Issuances (SURI)

**Note:** *(In the comments column, indicate how this policy, procedure or guideline, has been implemented, the reasons for your answer, or a further explanation).*