

Freedom of Information (FoI) in Türkiye:

Challenges and strategic recommendations

November 2025 report



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IPI REPORT

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We extend our sincere appreciation to all journalists, civil society organization representatives, legal professionals, academics, and activists who contributed to this report through their utilization of the *IPI Fol Platform*.

For comprehensive information regarding the Fol request process, application considerations, and appeal procedures to the Board of Review of Access to Information (BEDK), please refer to the *informative guide* developed by Elif İnce for P24 in 2020.

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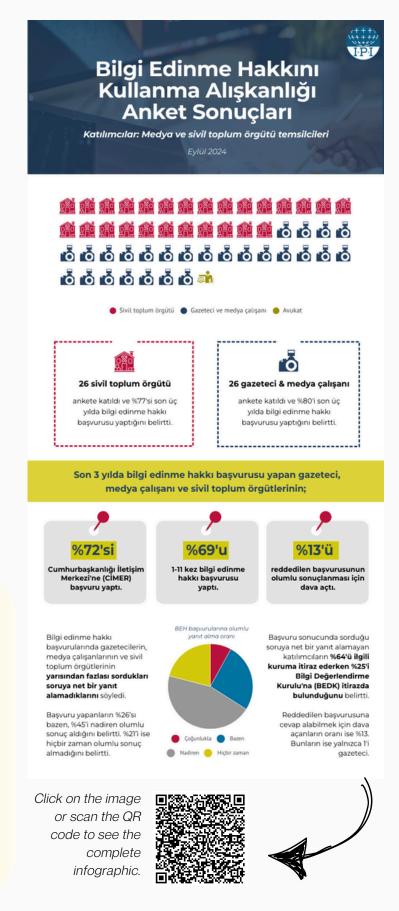
Freedom of Information (FoI) in Türkiye

Introduction

The International Press Institute (IPI) continues its efforts to improve the transparency and accountability of institutions by investigating how the freedom of information (FoI) is implemented in Türkiye, as part of its project ongoing since April 2024.

IPI first published the results of a survey titled "Habits of Exercising Information" the Riaht to conducted in September 2024 with the participation of over 50 journalists, civil organizations (CSOs). and lawyers. Subsequently, November 2024, we published a kick-off report based on one-onone in-depth interviews with journalists and NGO representatives who made Fol requests.

As of June 2025, IPI also initiated a training series titled "Freedom of Information: A Powerful Tool for Transparency," starting in Istanbul and continuing across different cities in Türkiye. These sessions equip journalists, CSOs, activists, and lawyers with practical strategies to exercise Fol effectively in their work. Training announcements can be followed on our website.

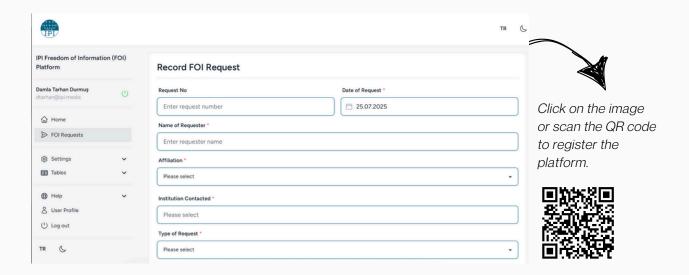




Freedom of Information (FoI) in Türkiye Introduction

Afterwards, the <u>IPI Fol Platform</u> was established to assess how institutions respond to Fol requests submitted by journalists, CSOs, lawyers, academics, and activists. Through this platform, IPI works toward a more transparent and accountable governance by collecting and analyzing data on the responsiveness of public institutions to such requests.

This report analyzes how Fol requests are responded to, using a sample derived from data submitted by users of the IPI Fol Platform. Additionally, feedback gathered through regular meetings with platform users helped further inform the findings. As a result, the report identifies key problems and proposes corresponding solutions.







Data collected through the IPI Fol Platform

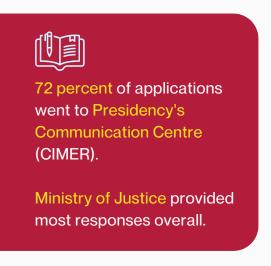
Since its launch in January 2025, the IPI Fol Platform has recorded a total of 290 Fol requests submitted by 20 users, including journalists, CSOs, lawyers, activists and academics. The requests were filed between January 2021 and October 2025. Journalists accounted for 71 percent of submissions, CSOs for 26 percent, and lawyers/activists for 3 percent.

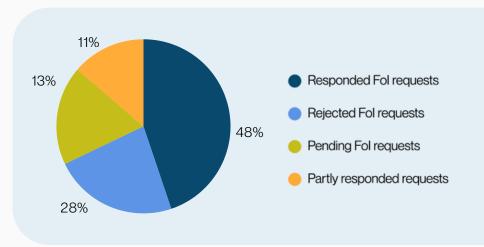


Of the recorded requests, 166 received full or partial responses, 69 were rejected, and 55 are still pending. The institutions that most frequently responded were the Ministry of Justice, Istanbul Metropolitan Municipality, Ministry of Health, and Ministry of Environment and Urbanization.

The most common topics were accountability/transparency (100), human rights (70), and transportation (26).

The most frequently cited grounds for rejection were "published or publicly disclosed information and documents" (Article 8), "requests requiring separate or special work" (Article 7), and "practices not concerning the public" (Article 25).

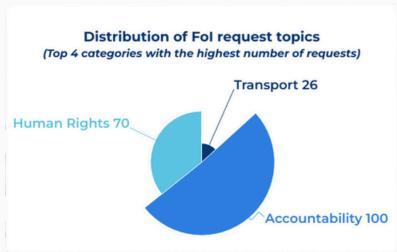


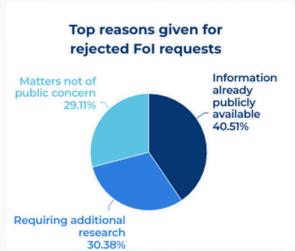


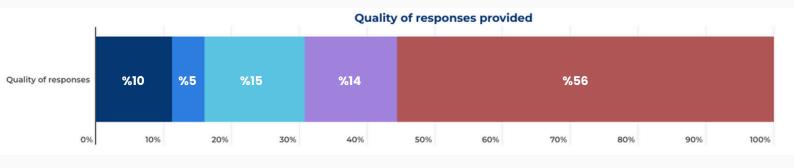


Data collected through the IPI Fol Platform

Users also evaluated the content quality of responses received. Although 56 percent of responses were technically classified as "answers" (i.e., not formal rejections), they nonetheless failed to address the question posed. A further 15 percent provided only partial information. Comprehensive responses that provided all requested information amounted to just 11 percent.











Current issues in the implementation of Fol rights

Common problems identified through interviews with platform users and during IPI training sessions reveal systematic shortcomings in the exercise of Fol. Users supported these findings with concrete, experience-based examples:

Substituting written replies with oral/informal guidance

Some users reported being called by institutional staff after filing a request and told the information could be conveyed by phone or in person, but not in writing. Bypassing written responses prevents statements that could create administrative liability from being placed on record, weakens transparency and accountability, and deprives applicants of an evidentiary basis needed for appeal and judicial review.

Retaliatory surveillance and threats

Some applicants reported that, following their requests, officials closely monitored their socialmedia accounts—at times liking and then withdrawing interactions—and in some cases phoned them with threats. This undermines the safe exercise of Fol and exerts a chilling effect on freedom of expression. As a result, applicants may refrain from pursuing legitimate requests, weakening public oversight.



Current issues in the implementation of Fol rights

Al-generated responses

A platform user reported receiving a response evidently generated by a general-purpose AI system to a question about existing legislation. Phrases such as "I prepared this summary especially for you," warnings to "check up-to-date legal texts," dead links, and even emojis appeared in the reply. Offloading institutional responsibility for legal interpretation to AI jeopardizes legal certainty. Given AI's propensity for errors or fabrications, such texts fail to meet the standard of reasoned and reviewable administrative responses.

Failure to respond and content-free answers

Recently, some requests have either received no reply within statutory time limits or have been met with generic, template-like texts that do not address the substance of the question. In some cases, institutions provide information unrelated to the request topic, allowing the case to be marked "answered" in the system. This obstructs the creation of reviewable administrative records and, in practice, weakens appeal/oversight pathways.

Conflicting responses to similar requests

There are notable inconsistencies between institutions—and even among different units within the same institution—when responding to similar requests. One administration may refuse to share a piece of information while another releases the same data upon request. Such lack of coordination and standards undermines predictability and equal treatment.



Strategic Recommendations for Strengthening Fol Rights

In light of the problems identified in the implementation of freedom of information rights, IPI has developed the following recommendations. These suggestions encompass improvements that can be made both at the institutional level and within the legal framework.

Establish internal standards and consistency mechanisms

Divergent responses to similar requests undermine equal treatment. Institutions should adopt binding response standards, create a "single source of truth" answer repository, and implement interunit coordination protocols. This will promote institutional coherence and reduce uncertainty arising from contradictory decisions.

Reinforce the obligation to provide written, reasoned replies

Phone or in-person guidance does not produce reviewable records. All procedures should be conducted on time, in writing, and with reasons; oral communications must not substitute for written replies. This strengthens accountability and enables effective use of appeals and judicial remedies.

Define guardrails for Al use; keep final responsibility with the administration

Texts generated by general-purpose Al carry risks of error and source opacity. If used at all, Al should be limited to internal drafting with clear rules and audit trails; final replies must be reviewed, sourced (with article citations), and signed by qualified staff. This preserves institutional authority and legal certainty.



Strategic Recommendations for Strengthening Fol Rights

Guarantee applicant safety

Monitoring, intimidation, and threats suppress the exercise of rights. Internal disciplinary procedures and judicial avenues should be clarified, with swift sanctions for violations. Assessment must be based on public interest—not on who the requester is—ensuring equal and safe access.

Adopt proactive disclosure and open-data practices

Failure to publish frequently requested, non-personal datasets creates unnecessary request volume. Frequently requested information should be proactively published on websites and opendata portals. This shortens processing times and naturally narrows the scope for exceptions.

Strengthen independent monitoring and enforcement

Lack of external oversight sustains chronic problems. Independent monitoring, periodic quality reviews, and corrective/preventive action plans for repeated violations should be mandated to ensure that improvements are measurable and not merely on paper.



Freedom of Information (FoI) in Türkiye Conclusion

IPI Fol Platform will continue to collect and analyze data to promote the effective use of the freedom of information in Türkiye and to increase the transparency of institutions. This long-term monitoring effort aims to systematically document issues in the Fol processes and support the development of concrete solutions.

The platform will maintain regular updates to its statistical data and enrich its findings through qualitative insights gathered from user interviews. These data are intended to be valuable resources both for informing the public and influencing policy makers.

The success of this initiative depends on the active use of the platform. Therefore, we invite all journalists, CSOs, lawyers, activists, and academics to make Fol requests and record these requests on <u>our platform</u>. Even when requests receive no response, this absence itself generates valuable data and plays a critical role in documenting systematic problems in the implementation of the right to information.

The long-term goal of the platform is to contribute to strengthening the freedom of information in Türkiye and to facilitate citizens' access to information about public institutions. For this purpose, regular reports will be published and shared with the public in line with the data obtained.

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In parallel, IPI's in-person training encourages journalists, CSOs, lawyers, and activists to file more effective requests, appeal unanswered or rejected applications, and integrate these requests into their reporting and research.

Freedom of information is one of the cornerstones of a democratic society. The effective use of this right is essential for establishing accountability and transparency in governance. IPI remains committed with determination to strengthen this fundamental right.