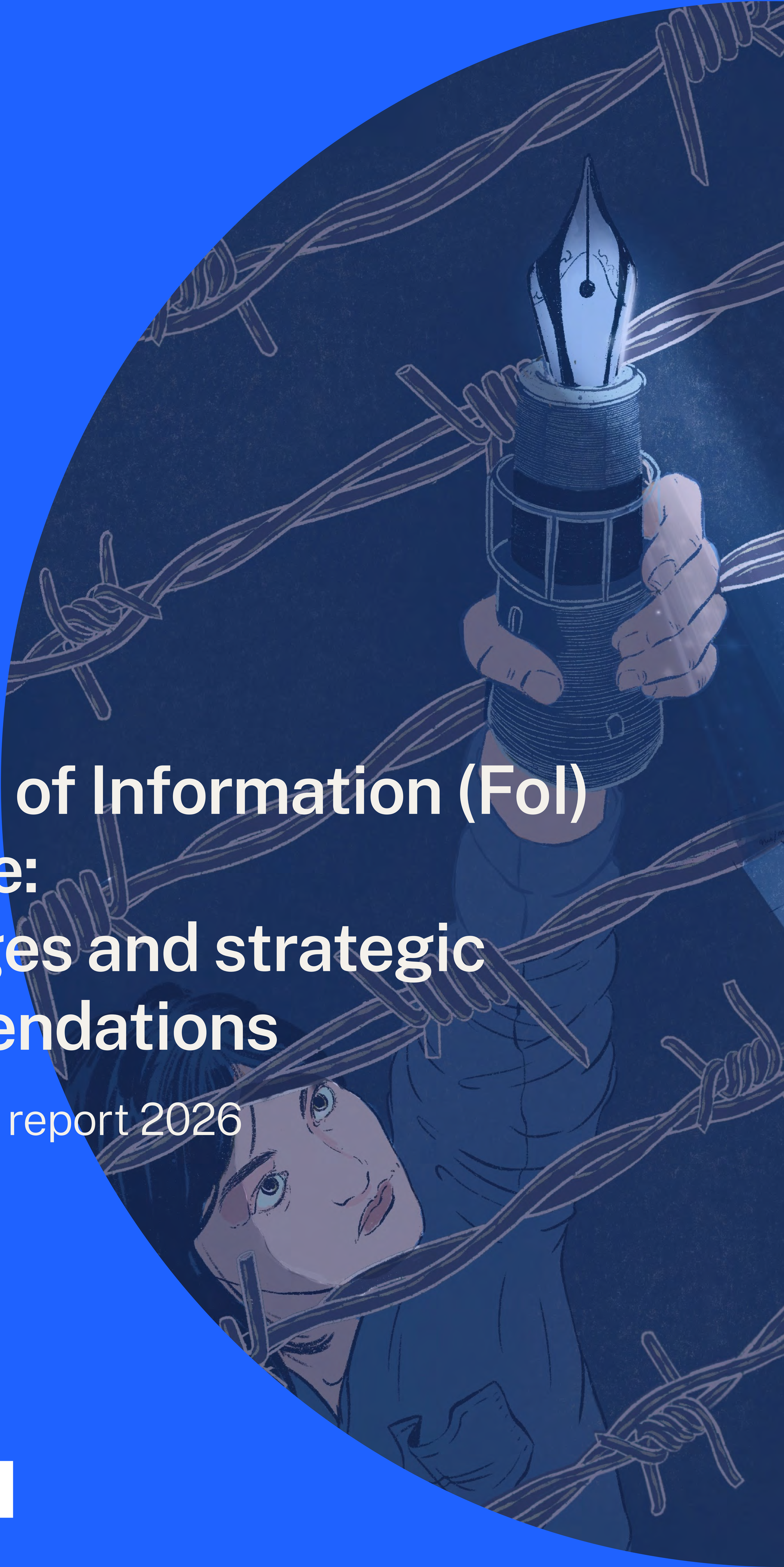
International Press Institute

TÜRKİYE



Freedom of Information (FoI) in Türkiye: Challenges and strategic recommendations

Third quarter report 2026

Funded by the European Union

Introduction

The International Press Institute (IPI) continues its efforts to improve the transparency and accountability of institutions by investigating how Freedom of Information (FoI) works in Türkiye, as part of a project launched in April 2024.

In September 2024, IPI surveyed more than 50 journalists, civil society organisations (CSOs), and lawyers on their habits of exercising the right to information, and published the results. In November 2024, IPI published a kick-off report based on one-on-one in-depth interviews with journalists and CSO representatives who had made FoI requests.

IPI then established the IPI FoI Platform to assess how institutions respond to FoI requests submitted by journalists, CSOs, lawyers, academics, and activists. Through this platform, IPI works towards more transparent and accountable governance by collecting and analysing data on the responsiveness of public institutions.

Between June 2025 and November 2026, IPI organised 15 training sessions titled “Freedom of Information: A Powerful Tool for Transparency” across seven cities in Türkiye, reaching more than 120 participants, including journalists, civil society representatives, lawyers, activists, and academics. Through practical exercises and real-life case studies, the sessions equipped participants with strategies to submit effective FoI requests, challenge refusals through appeal mechanisms, explore alternative avenues for accessing public information, and make meaningful use of FoI in their reporting, investigations, and research.

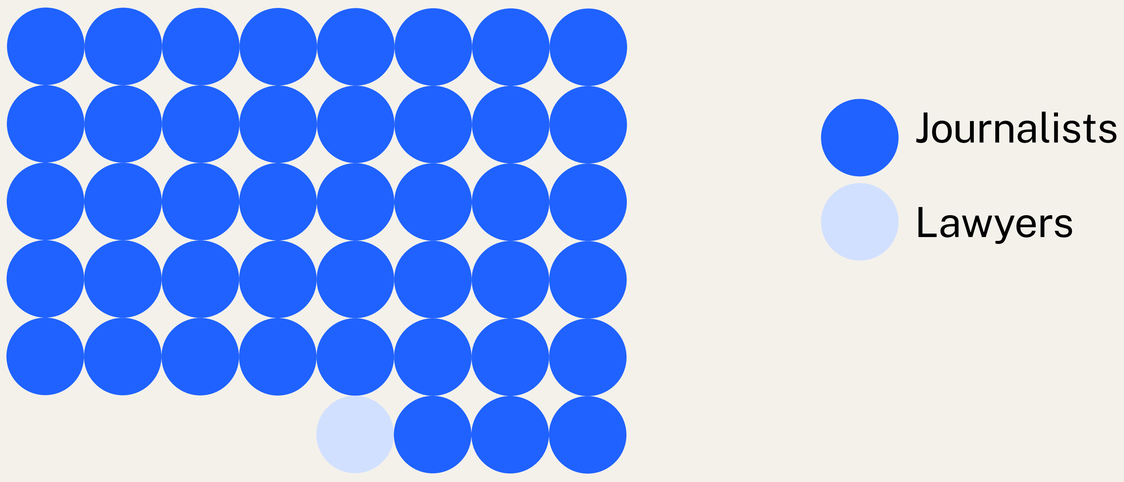
This report focuses on the third quarter of 2026, covering July, August, and September. It examines 44 FoI requests recorded during this period, bringing the total documented on the IPI FoI Platform to 733 between January 2015 and September 2026. Drawing on this broader dataset and one-on-one interviews with platform users, the report identifies recurring challenges in the implementation of FoI rights, assesses persistent barriers to accessing public information, and offers recommendations to strengthen transparency and accountability.

IPI's mentorship programme, launched in April 2026, also improved the quality of the data collected during this reporting period. As part of the programme, journalists, working closely with their mentors, submitted several FoI requests in support of ongoing reporting projects and recorded these requests on the IPI FoI Platform. As a result, the platform now includes requests concerning current public-interest issues that formed a direct part of investigative reporting processes.

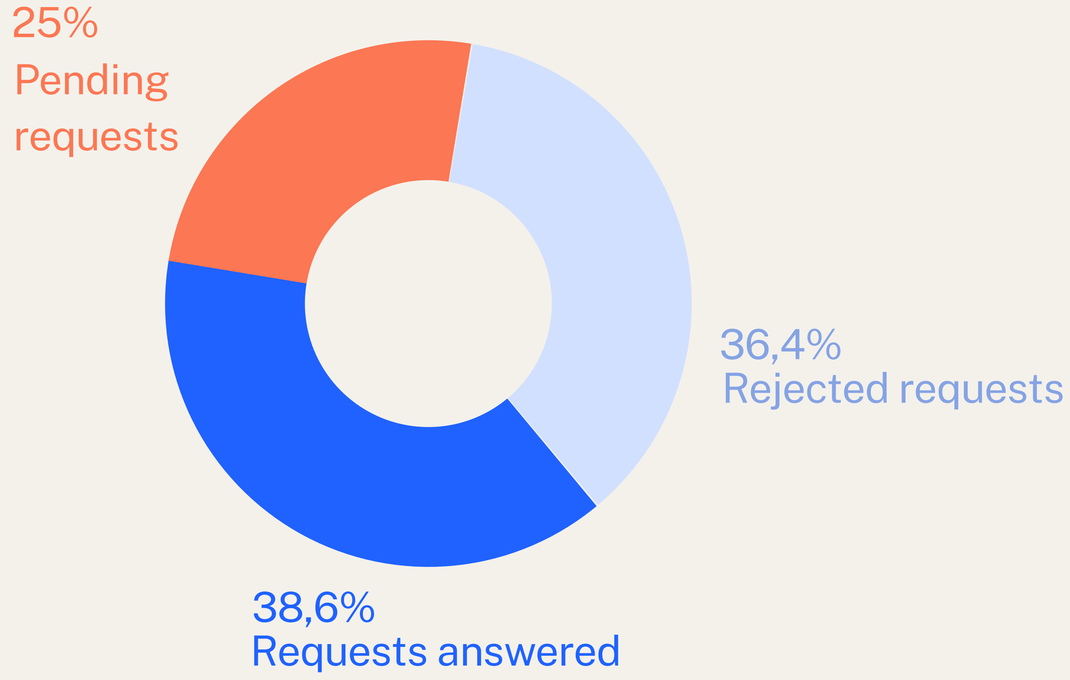
The IPI Legal Advisory Board began its work in April 2026. Composed of lawyers Gökhan Tekşen and Selin Nakıpoğlu, the board provided legal guidance to journalists on issues arising throughout the FoI process. It gave particular support to participants in the mentorship programme regarding the preparation of FoI requests, the management of appeal procedures, and the assessment of legal issues encountered during the application process. This support contributed both to the more effective use of FoI mechanisms and to the more systematic documentation of implementation challenges.

Data collected through the IPI FoI Platform

During the three-month period covering July, August, and September 2026, a total of 44 FoI requests were recorded on the IPI FoI Platform by journalists and lawyers, with 43 requests coming from journalists and one from a lawyer.



Of the recorded requests, 17 received full or partial responses, 16 were rejected, and 11 remain pending. The institutions responding most frequently were the Ministry of Health and the Turkish Employment Agency (İŞKUR).



The most common topics of the requests were human rights, accountability and transparency, and children's rights.

The most frequently cited ground for rejection was that requests fell “outside the institution's area of responsibility”, accounting for 7 of the 16 rejected requests, using (Article 7(1)). This was followed by requests “requiring separate or special work” and requests concerning “published or publicly disclosed information and documents”, each accounting for 5 requests under (Articles 7(2) and 8, respectively).

Users also evaluated the quality of the responses they received. While 17 of the 44 requests (38.6%) were formally classified as "responded", receiving a response did not necessarily mean obtaining the information requested. Of these 17 responses, 13 provided less than half of the requested information or none at all, two supplied approximately half, and two were comprehensive, containing most or all of the requested information.

Current issues in the implementation of FoI rights

During the third quarter of 2026, cases documented through the IPI FoI Platform continued to reveal significant discrepancies between the legal recognition of the right to information and how public authorities in Türkiye apply it.

Beyond outright refusals and unanswered requests, several cases demonstrated how procedural requirements, broadly interpreted exemptions, and inadequate administrative review can obstruct access to information that should ordinarily be available to the public.

The cases examined during this reporting period raise particular concerns about the use of procedural grounds to dismiss requests without examining their substance, the continued reliance on the additional-work exemption, and shortcomings in the appeals process.

Restrictive interpretations of procedural requirements:

A platform user received a response from the Ministry of Interior through the Presidential Communication Centre (CİMER), stating the ministry would not process their request because an earlier application concerning the same subject had already been submitted. The authority cited Article 5(2)(f) of the CİMER Regulation as the basis for its decision.

While administrative mechanisms may legitimately seek to prevent the repeated submission of identical requests, this particular case did not involve a repetition of the same questions. Rather, the applicant sought different information relating to the same broader subject. Authorities must therefore distinguish between genuinely duplicate applications and separate requests addressing different aspects of a common issue.

The existence of an earlier application should not, in itself, be sufficient grounds for dismissing a subsequent request without assessing whether it seeks additional or substantively different information.

Continued misuse of the additional-work exemption:

The use of the additional-work exemption remained a recurring obstacle during the third quarter.
Authorities rejected several requests seeking relatively straightforward statistical information on the grounds that providing the data would require additional or separate work.

However, the information sought in these cases concerned basic administrative statistics that public institutions could reasonably be expected to maintain as part of their ordinary responsibilities.

Article 7 of Türkiye's Right to Information Law No. 4982 provides a legal basis for addressing requests that would require public institutions to undertake separate or special research, examination, analysis, or compilation. Nevertheless, the application of this provision raises concerns when authorities invoke it without explaining why the requested information cannot be retrieved from existing records.

Authorities must distinguish between creating new information and extracting or compiling information already held by a public institution. The fact that responding to a request requires administrative effort does not necessarily mean that it falls outside the scope of the right to information.

Consolidated appeals and the effectiveness of administrative oversight:

A further case documented during the reporting period raised concerns about the effectiveness of the administrative appeals mechanism.

A journalist conducting an investigation submitted more than 10 FoI requests to the Turkish Employment Agency (İŞKUR). After receiving responses that failed to provide the requested information adequately, the journalist pursued appeals before the Review Board of Access to Information (BEDK).

According to the documents shared with IPI, the board consolidated appeals concerning 10 separate FoI requests into a single decision, rejecting them without substantively addressing the merits of each request. The decision provided only vague and insufficient explanation for the rejections, leaving the applicant without a clear understanding of the grounds on which it had dismissed them.

The consolidation of related appeals may be administratively justified in certain circumstances. However, procedural efficiency should not come at the expense of examining the distinct facts, information sought, and grounds for refusal associated with each application. Moreover, decisions that lack clear and specific reasoning undermine transparency and make it difficult for applicants to assess whether their appeals have received meaningful consideration.

The significance of the case extends beyond the initial refusals. An appeals mechanism that does not provide sufficiently individualised and reasoned decisions risks reinforcing restrictive administrative practices rather than correcting them.

Strategic recommendations for strengthening FoI rights

To address the persistent shortcomings identified through the IPI FoI Platform during the third quarter of 2026, IPI recommends the following measures:

Ensure individual assessment of potentially duplicate requests:

Public institutions should assess the content of each FoI request before classifying it as a duplicate. Institutions should dismiss requests on these grounds only when they seek the same information as an earlier application, rather than different information concerning the same subject. Any decision to dismiss a request as a duplicate should clearly identify the previous application and provide a specific justification for treating the two requests as identical.

Prevent the arbitrary application of the additional-work exemption:

Authorities should distinguish between requests requiring the creation of new information and those seeking the retrieval or reasonable compilation of existing administrative records. Refusals based on Article 7 of Law No. 4982 should include specific explanations of the work allegedly required and why the request falls within the statutory exception.

Strengthen requirements for written and reasoned responses:

Public institutions should provide formal, written responses that clearly identify whether they hold the requested information, whether access is granted or refused, and the legal grounds for any restrictions. Informal telephone communications should not replace documented decisions or undermine applicants' ability to seek administrative review.

Improve the effectiveness and independence of the appeals mechanism:

The Review Board of Access to Information (BEDK) should ensure that appeals receive substantive and individualised consideration. Where it consolidates related cases, decisions should still address the distinct information requests and grounds for refusal. The board should provide clear reasoning to enable applicants to understand and, where appropriate, challenge its decisions.

Strengthen institutional record-keeping and proactive disclosure:

Public authorities should maintain accessible, regularly updated administrative statistics and publish information of significant public interest proactively. Improved record-management practices would reduce the administrative burden associated with responding to FoI requests while supporting public oversight.

Provide targeted training for public officials responsible for FoI requests:

Public officials should receive practical training on the Right to Information Law, the narrow interpretation of exemptions, the obligation to provide reasoned responses, and the public-interest function of information disclosure. Such training should emphasise that facilitating access to information is a legal responsibility rather than a discretionary administrative service.

Conclusion

IPI FoI Platform will continue to collect and analyse data to promote the effective use of freedom of information in Türkiye and to increase the transparency of institutions. This long-term monitoring effort aims to systematically document issues in FoI 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 to inform the public and to influence policymakers.

The success of this initiative depends on the active use of the platform. IPI therefore invites all journalists, CSOs, lawyers, activists, and academics to make FoI requests and record them on the platform. Even when requests receive no response, this absence itself generates valuable data and plays a critical role in documenting systemic problems in the implementation of the right to information.

The long-term goal of the platform is to contribute to strengthening freedom of information in the country and to facilitate citizens' access to information about public institutions. IPI will publish regular reports and share them publicly in line with the data obtained.

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 to strengthening this fundamental right.

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Funded by the European Union

This report was produced as part of IPI's project "Strengthening Capacity for Freedom of Information (FoI) and Data Activism in Türkiye's Civil Society," with the financial support of the European Union. Its contents are the sole responsibility of the International Press Institute and do not necessarily reflect the views of the European Union.

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