GOVERNANCE
(ANTI-CORRUPTION)

# WORKING GROUP

# C20 Position Paper on Open Data

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C20

# C20 TURKEY POSITION PAPER ON OPEN DATA

## INTRODUCTION

Today, open governance is acknowledged as key concept that citizens have rights to access to information and participation, governments have in place the institutions and policies to advance promoting transparency, accountability and participation, and the appropriate tools and investments are made to enable these policies. Access to public information and availability of government data in open formats will also have preventive effect towards corruption. In recent years, open data is fast becoming an essential component and different set of principles have been put forward by several organisations, i.e. UN, EU, OECD, World Bank, OGP, G8 and G20.

Access to information is the threshold in open governance. The formats of the published documents and organisation of information on websites and in documents are crucial factors for easy access. Agreed international guidelines and initiatives emphasise that government and research data be (i) freely available at no cost, or at the marginal cost of distribution; (ii) easily discoverable and readily accessible; and (iii) open to unrestricted use and re-use on conditions that are readily discoverable and understandable. However, information published by public institutions may not always readily accessible and usable, sometimes they do not include clear definitions, metadata or explanatory notes.

We are witnessing major events one after the other in the last quarter of 2015: C20 Summit, OGP Global Summit and G20 Summit. Among other topics, all of these events bring up open data to the agenda.

Open data is identified as one of the major issues which merit particular attention by the G20 Anti-Corruption Working Group in 2015-2016 regarding **public sector transparency**; G20 has agreed on committing development of **G20 Open Data Principles**; and open data issue has been also brought to **the B20 agenda** at the B20 Conference on Digital Economy on 6 October 2015.

Meanwhile, UN General Assembly mandated the UN Summit to adopt the post 2015 development agenda which includes 17 **Sustainable Development Goals** (SDGs) on 25 September 2015; SDGs are

constituted as some of the key indicators for achieving **C20 priorities on inclusive growth and sustainability**; and according to the World Bank, **open data is key resource** for achieving SDGs by providing critical information on critical areas.

## 1. WHAT HAS C20 TURKEY DONE SO FAR AND HOW THE C20 TURKEY ADDRESSES THE ISSUE?

As the official engagement group of the G20 representing the civil society, C20's priorities for 2015 were decided through a participatory online consultation process that 1,169 people from 90 countries have been represented. "Anti-corruption" ranked amongst the top priority issue according to the results of the consultation process and C20 Turkey Governance (Anti-Corruption) Working Group has been established in connection with this. To that end;

C20 Turkey Anti-Corruption Working Group so far has:

- Determined open government tools (open data) as one of the four main policy areas and included to WG's policy paper;

- Organized two sessions directly targeting the issue and various sessions that touched upon the issue at the C20 Turkey Summit;

- Included concrete recommendations on open data and open government within the **C20 Turkey Final Communiqué**.

C20 Turkey Communiqué[1] is considered as the main outcome of the policy making process of the C20 which represents close to 500 civil society organizations and summarizes the C20 recommendations to the G20 Leaders in 2015.

According to the content analysis study carried out by Economic Development Foundation (IKV) which compares the content of the C20 Communiqués prepared in 2013, 2014 and 2015; collectively 'data' and 'information' are considered among the top 5 most frequent terms and phrases within the "Anti-Corruption" section of the 2015 Communiqué. Also as compared to other two communiqués, 'e-participation' has been included to the communiqué for the first time

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[1] C20 Turkey Communiqué,
http://c20turkey.org/uploads/C20%20Turkey%20Communique_FINAL_16.09.15.pdf.

in 2015. These outcomes could be considered as the sign of the importance given to "right to information" and "open data" by the C20 Turkey.

Beyond the signs, C20 Turkey's approach regarding open data has directly reflected to the recommendations took place within the C20 Turkey Communiqué. To this end, C20 called upon G20 leaders in 2015 to ensure the legal right to access public information and release all key data-sets crucial in tackling corruption in open data formats. This includes but is not limited to data for government budgets, government procurement, extractives payments, construction and infrastructure projects, regulatory impact assessments and all court decisions as granted, as well as allowing identification of individuals, companies and countries by name.

## ENSURE THE LEGAL RIGHT TO ACCESS PUBLICINFORMATION AND RELEASE ALL KEY DATA SETS IN OPEN DATA FORMATS

Besides, C20 Turkey has also addressed open data and open government issues together with other main policy areas of the C20 Turkey Governance (Anti-Corruption) Working Group: beneficial ownership and public procurement. Regarding public procurement, C20 Turkey called G20 to also ensure independent monitoring by non-governmental actors of all stages of the procurement cycle including e-participation. In addition to this, in regard to the relation between beneficial ownership and right to information; the C20 asked the G20 to make the Beneficial Ownership registry system public and extend it to all jurisdictions worldwide, ensuring access at least by all authorities to this information by the establishment of a central (unified) registry.

After presentation of the C20 Communiqué including recommendations regarding open data to representatives of the 2015 G20 Presidency, C20 reaffirms and emphasizes the importance attached to open data once again and calls the decision-makers to step into action through this position paper.

## 2. PRACTICES AND INITIATIVES AMONG THE G20

Today, more than 50 governments have been working on establishing efficient open data portals and initiatives. To this end, 2013 Open Data Barometer which ranked the open data potentials of 77 different countries draws a particular attention. According to the outcomes of the Barometer, more than 55% of the evaluated countries including the G20 countries carry out open data policies. Within this context, in 2015, the Barometer has been expended and covered 86 countries. Rankings of the G20 countries draw an interesting picture in 2015 as it does not seem possible to come up with a specific pattern, in terms of their rankings:[2]

| G20 Country | Barometer Rank |
|---|---|
| UK* | 1 |
| US | 2 |
| France* | 4 |
| Canada | 7 |
| Australia | 10 |
| Germany* | 10 |
| Korea | 17 |
| Japan | 19 |
| Brazil | 21 |
| Italy* | 22 |
| Mexico | 24 |
| Russia | 26 |
| Indonesia | 36 |
| Argentina | 36 |
| India | 39 |
| Turkey** | 41 |
| South Africa | 41 |
| China | 46 |
| Saudi Arabia | 59 |

(*) EU Member State
(**) G20 Presidency

Nonetheless, according to the well-known research conducted by Omidyar Network, open data initiatives would boost almost 55% of the

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[2] Open Data Barometer Global Rankings 2015,
http://barometer.opendataresearch.org/report/analysis/rankings.html

G20's 2% growth target over five years. Therefore it is not possible to undermine the growth potential of the open data within the G20 framework. On the other hand, as it possible to be seen from the special emphasis G20 Anti-Corruption Working Group put; open data also considered as a key instrument in terms of transparency, accountability and fight against corruption by the G20.

## OPEN DATA INITIATIVES WOULD BOOST ALMOST 55% OF THE G20'S 2% GROWTH TARGET OVER FIVE YEARS.

Interestingly 6 EU Member States has ranked among leading 10 countries of the Barometer concerning open data; United Kingdom, Sweden, France, Holland, Denmark and Germany. Therefore as an integration and association project consists of 28 different countries with different political and economic circumstances, the EU's collective open data policies and initiatives would be taken into consideration by the G20 for the future prospect regarding open data cooperation among themselves.

### 2.1. "GROWTH" BASED OPEN DATA STRATEGY OF THE EU[3]

The idea of opening up government data and data of the EU institutions is a major part of the EU's 2020 Strategy. Within this framework, the EU's digital agenda promotes e-government as the core of a smart, sustainable and inclusive economy model. In other words, "growth" is at the center of the EU's interest regarding open data and open government approaches as well as the G20. As expressed within the EU Open Data Strategy published in 2011, opening up all public sector data for use and re-use in machine readable format would boost the EU economy up to 40 billion euro.[4] In addition to this, public participation through e-portals also would ensure important gains for the EU.

## THE EU'S DIGITAL AGENDA PROMOTES E-GOVERNMENT AS THE CORE OF A SMART, SUSTAINABLE AND INCLUSIVE ECONOMY

According to the data published by the European Commission, public entities that already have implemented e-procurement has been

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[3] This section has been written by Ahmet Ceran, Economic Development Foundation (IKV) and edited by Büşra Çatır, Economic Development Foundation (IKV).

[4] Open data :An engine for innovation, growth and transparent governance, European Commission, http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52011DC0882.

gaining savings between 5% and 20% of their procurement expenditure.[5] Considering the G20's emphasis on public procurement for years, this dimension of the issue should be considered broadly as well. In other respect, taking into account this fact; entire infrastructures, means and methods connected to open data and e-government depend on efficient legal and political framework pursuing transparency, accountability and participation.

**What the EU law says about open data?**

The very first legislative framework concerning the issue in the EU was based on the 2003/98/EC PSI Directive which entered into force in 31 December 2003. The Directive ensures the use and reuse of the data stored by the national, local, ministerial, municipal and other public sector entities. Subsequently with the major effects of the increasing importance of the EU's Digital Agenda; developments in the field of information technologies and emerging governance strategies; The EU shared the new EU Open Data Strategy with all stakeholders.

The EU Open Data Strategy consists of three main baselines: constitution of national and international primary/secondary law resources and political measures concerning re-use of the public sector data; establishment of financial instruments supporting infrastructure and R&D works; ensuring the share of best examples among all EU Member States. The EU's collective "example sharing efforts" would be considered as an important point for the G20 Countries as well. During 2013, PSI Directive has been carried over a wider scoop with the related amendments; by doing so, museums, libraries and archives has been included within the Directive's framework.

**Main outcome of the EU's open data policies: EU Open Data Portal**

At this stage, the EU's biggest reform step towards getting over the barriers on use and re-use of the public sector data has been the launch of the EU Open Data Portal on December 2012. With the EU Open Data Portal, till now, more than 7,800 data-sets of the European Commission and other EU institutions have been public, open to use and re-use.

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[5] Delivering savings for Europe: moving to full e-procurement for all public purchases by 2016, European Commission, Press Release, http://europa.eu/rapid/press-release_IP-12-389_en.htm.

After the launch of EU Open Data Portal; it has been possible to reach the data from various bodies such as; European Investment Bank, Eurostat, European Aviation Safety Agency through an "one-stop mechanism". According to the rankings published on the Portal; official translations of the EU *acquis*, elevation map of Europe and EU research projects under Horizon 2020 appear to be the most viewed three data sets. On the other hand, with 6,071 different data sets, Eurostat, statistics agency of the EU is the leading open data publisher among all EU agencies as lastly updated data on 6 November 2015.

Even though the EU has been able to open up various public data to use and re-use through EU Open Data Portal since 2012, main strategy of the EU is to establish an infrastructure of a Pan-European Data Portal which would ensure multi-lingual access to data published by public administrations at all levels in the EU countries by all EU citizens. Once the Pan-European Data Portal is established, all EU citizens would be able to access all data published by the public administrations of the EU countries and EU institutions through a single portal.[6]

**EU open data initiatives as a good example for the G20**

Besides the economic gains and its positive effect to the growth potential, C20 Turkey has been considering the open government tools as major instruments enhancing good governance, transparency, participation and accountability. Therefore as an integration project consists of 28 countries, the EU's open data initiatives promoting those values would set some intriguing examples to other regional and international structures such as the G20.

## C20 TURKEY CONSIDERS THE OPEN GOVERNMENT TOOLS AS THE MAJOR INSTRUMENT ENHANCING TRANSPARENCY

*EU Aid Explorer*

As also emphasized within the C20 2015 Communiqué, mismanaging needed development and humanitarian aid affects millions of people all around the world and this issue appears as a significant governance failure radically hindering inclusive and sustainable development. EU countries and institutions collectively are considered as the biggest

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[6] EU Open Data Portals, http://ec.europa.eu/digital-agenda/en/open-data-portals.

donor in the world providing over 50 billion euro a year. To be able to ensure the efficiency and to be accountable to the EU citizens who are the main resources of the funds through their taxes; the EU has established a one-stop mechanism called EU Aid Explorer.

EU Aid Explorer provides access to complete and accurate information regarding development and humanitarian aid carried out in more than 60 countries. In this way it is possible for the EU citizens and whole international community to observe and supervise various information including but not limited to the main resources, projects, tools and time schedules of the aid that continues and has been carried out which has global effects to the international system. This system grants a "watchdog role" to the civil society, media and individual citizens. The accessible open data used in the tool is taken from multiple sources including OECD, EDRIS, IATI.[7]

### *EU Transparency Portal – Transparency Register*

Considering the fact that the different level of decision making process within the EU affects lives of millions of EU citizens directly, open data would play an essential role concerning the participation of EU citizens to these decision making mechanisms and transparency of the process. EU Transparency Portal and EU Transparency Register are considered as main tools to this end.

Through the EU Transparency Portal, it is possible to access information such as draft and final versions of the EU legislation, information concerning the individuals who have been involved in the preparation of these documents, who has received funding from EU institutions as well as information on public consultations regarding decision making process of the EU institutions. In terms of access to open data, main problem is the complexity of the EU's publishing methods rather than the number of the data published. It is possible to access a big amount of open government data through different web pages of the EU institutions. Transparency Portal eases the direct access of citizens on a single menu to the data that published on various different and complex resources.

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[7] EU Aid Explorer, https://euaidexplorer.ec.europa.eu/AboutAction.do.

EU Transparency Register is an online system that the organizations interacting with the European Commission and European Parliament consisting of consultancy/law firms, lobby firms, CSOs, think tanks, religious institutions and local administrative bodies register an disclose on a voluntary basis. In this way, the EU institutions claim to assert their policy of openness. Throughout the Transparency Register, open data and information related to the advocacy efforts regarding over 8,000 different organizations became accessible. Even though registration is on voluntary basis, the European Commission and the European Parliament has provided various incentives to the registered organizations including meetings with the Members of the European Commission, Cabinet members and Directors-Generals; allowing special access to European Parliament's premises.

Besides all these recent developments, civil society still remains concerned regarding the transparency of the EU institutions and citizen participation to the decision making process. Civil society's criticism centers upon the opaque nature of the negotiations in the course of the EU decision making process; complex and unorganized framework of the open data publication mechanisms and not requiring mandatory register to the Transparency Register. Civil society has been calling for mandatory register to the database for some time.[8] It is essential that even large numbers of open data is being published through various different channels; these data should be presented in more understandable, accessible and systematic ways. Most importantly civil society calls the EU officials to publish all documents related to the policy making process at all levels not only the related legislative framework but also minutes of the proceedings and negotiation documents. European Parliament's and European civil society's raised voice about their transparency concerns regarding the TTIP negotiations and its reflections to the European Ombudsman draws a good example for this call.

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[8] Lobby meetings with EU policy-makers dominated by corporate interests, Transparency International EUOffice, http://www.transparency.org/news/pressrelease/lobby_meetings_with_eu_policy_makers_dominated_by_corporate_interests.

**Case Study: The European Ombudsman's Decision on Transparency in TTIP Negotiations**

Since the beginning of the Transatlantic Trade and Investment Partnership (TTIP) negotiations between the EU and the USA, which is a mega trade agreement that is predicted to change the international trade system fundamentally, European Parliament's Civil Liberties Committee has been calling the European Commission for more transparency and accountability in the TTIP negotiations throughout the entire process. Also European civil society has been expressing the necessity of agreement upon full respect for EU fundamental rights and data protection standards as a part of the TTIP. However both the European Parliament and European civil society criticized the opaque environment of the negotiations and lack of fulfillment of the right to information till now. These concerns raised by the European Parliament and European civil society regarding key TTIP documents not being disclosed triggered an own-initiative investigation by the European Ombudsman on June 2014.

The European Ombudsman conducted a public consultation process on September 2014. During this public consultation process, the Ombudsman has received 315 responses and 6,000 e-mails expressing the need for a more transparent negotiation process. On January 2015, the Ombudsman reached a decision and submitted a list of recommendations to the European Commission. Reaffirming access to public documents is a fundamental right of the European citizens, the Ombudsman requested the Commission to provide the comprehensive list of TTIP documents and make these accessible, regularly updated and in all official EU languages. In addition to the documents, the Ombudsman also recommended that the information regarding the negotiators and the stakeholders they meet should be disclosed. Also as the Ombudsman called, the negotiators should only be meeting the entities that have been registered to the Transparency Register.

**Considering the evaluations above, some practices and initiatives carried out by the EU constitutes some solid baselines for possible collective G20 actions regarding open data, open government and right to information;**

•        The G20 could establish a G20 Open Data Portal which would publish entire data related to the policy and decision making process carried out by the G20 and all engagement groups.
•        The G20 could take the EU Transparency Register as example and establish a similar registration database for all stakeholders that would like to be part of the G20 policy and decision making process.

## 2.2. CURRENT SITUATION IN TURKEY AND THE ROLE OF THE CIVIL SOCIETY[9]

Open governance is more than *e-government*. When referred to open governance, it is meant to the access to information, technology and participation. Access to information lies at the heart of open governance but not just that. It should be supported by technology and participation. To this end, **open data** emerges as a key actor that can make linkages and serve as bridges between the open governance's three pillars.

As a founding member of United Nations and Council of Europe, member of Organisation for Economic Co-operation and Development (OECD) and G20, a candidate state for European Union membership, and participating country to Open Government Partnership (OGP) Turkey has assumed duties and responsibilities, undertaken commitments on open governance. While the global trend in enhancing governance is pointing out to open governance principles, Turkey has achieved limited progress.

*From words…*

Turkey signed up to OGP in April 2012 and in the first action plan declared that the government aims to share public-sector-produced information as much as possible by utilizing contemporary technological possibilities and mass media, will increase the level of public participation in policy making and implementation processes through an online platform dedicated to publish information during the preparation of laws and other regulatory processes and will increase public awareness through workshops, seminars and conferences.

To put these into action Turkey also committed set of concrete activities. However, Turkey's participation in OGP has been taken under review after the country was found to be acting contrary to the OGP

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[9] By taking the opportunity of Turkey's G20 Presidency, Transparency International (TI) Turkey commenced a baseline comparative research on open data legal framework and implementation in Turkey with the support of TI Secretariat and Omidyar Network, and in cooperation with TI Mexico. This section bases on the said research –namely, ***Open Governance Scorecard Turkey***. The assessment has been carried out by Özlem Zıngıl, TI Turkey. The TI Turkey owes special thanks to Pelin Erdoğan, Deniz Can Akkaya, Irmak Ekin Karel and Tolga Öztürk for their input during research period.

process for two consecutive action plan cycles by complete inactivity.[10]

Relevant indices at the international level also demonstrate that the state of play in Turkey is disappointing. In the Open Government Index 2014 by World Justice Project, Turkey scored 0.45 having ranked in 82nd place out of 102 countries.[11] In the 2015 Open Data Barometer, Turkey ranked 41th among 86 countries remaining behind all EU countries.[12]

## IN THE 2015 OPEN DATA BAROMETER, TURKEY RANKED 41TH AMONG 86 COUNTRIES REMAINING BEHIND ALL

### *… to action*

Civil society organizations (CSOs) are crucial in monitoring public services, expenditures and policy-making processes. For evidence-based advocacy they need to monitor targeted areas to uncover inefficiencies, delays, misuse in spending, effectiveness of public services and integrity in policy making. To make significant progress in the field of open governance a process of learning, experiencing, dialogue and evaluation is needed.

While CSOs can have a big impact on driving policy change, this impact is much greater when they work with other actors. Therefore, it is important to be aware of the roles of these various actors at the different levels. Members of the public are directly affected by government policies and decisions. Thus CSOs can facilitate greater and more effective public participation through efforts to raise public awareness of the connections between open governance and people's daily lives and increase the public's understanding on open governance eventually mobilizing public support to action.

Nevertheless the commitments of Turkey, to date no thorough assessment on open governance in Turkey have been carried out. However, CSOs engagement and know-how on open governance

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[10]Letter by Open Government Partnership http://www.opengovpartnership.org/blog/open-government-partnership/2014/08/15/ogp-publishes-letters-11-countries

[11] Open Government Index 2015, World Justice Project http://worldjusticeproject.org/open-government-index

[12] Open Data Barometer 2015, Open Data Institute and World Wide Web Foundation, http://barometer.opendataresearch.org/report/analysis/rankings.html

should be provided to increase the demand for greater accountability from those in political power.

Transparency International (TI), following debates, developed a framework *Open Governance Scorecard* to provide a quick reference guide to the conditions required for open governance and a tool to assess whether basic legal and institutional conditions are met. The Governance Data Scorecard is a dashboard that assesses the *basic conditions* of a set of commonly agreed open governance standards are met and bases on three dimensions: *Transparency*, *Participation* and *Oversight*.

TI Turkey's Open Governance Scorecard Turkey -an application of *Open Governance Scorecard* framework insofar on a limited scope- provides us a snapshot of Turkey's current state in terms of legal framework and insight to in-practice issues. The research provides pointers as to where the emphasis should be placed on improving the system and what factors are required for open governance more effectively. This will serve as the starting point for identifying areas requiring priority action. Also, hereafter the research results will be used as a benchmarking tool to measure progress over time, to compare performance across institutions, and to identify good as well as bad practices.

The assessment finds that although there is a legal baseline for acknowledgement of right to know, it is a light-touch framework being not ideal. Participation and oversight are Turkey's weakest dimensions where accepted standards are not enshrined. Turkey performs poor on transparency and participation dimension in terms of in-practice indicators where no assessment can be made for oversight.

| Dimension | Status of Legal Framework (Fully/Partially/Weak) | In-practice (Good/Moderate/Poor) |
|---|---|---|
| Transparency | Partially | Poor |
| Participation | Weak | Poor |
| Oversight[13] | Weak | N/A |

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[13] Supreme audit institution –Court of Auditors- in Turkey, mainly performs oversight function and significant oversight indicators such as transparency in lobbying and political financing, whistleblower are not in place. The Court of Auditor is assessed by means of in-practice within transparency pillar. Therefore, the overall assessment on oversight pillar is limited to the legal framework.

The Open Governance Scorecard Turkey indicates that there are many gaps in open governance regime which need to be addressed by updating existing legislation, enacting new ones and creating the necessary tools and institutions to ensure to achieve the commitments.

**Transparency**

*Transparency* in open governance is determined by the two types of tests, acknowledgment of the right of access to information and whether government agencies, parliament, the judiciary and the executive proactively publish documents in accessible format for citizens.

The right to know is recognized in the Constitution and the Right to Information Law (Law No.4982) provides the legal framework. However, the Law No.4982 is not in line with the standards such as not covering all national and subnational bodies as well as not referring to a harm test for exceptions.

The right to access to information is overseen by a Council –Council of Right to Information- but does not have broad mandate. The Council cannot undertake ex-officio investigations and does not have power to promote the right to information. The appeal should be only submitted in means of post, other means of communication like electronic submission is not recognized which causes adverse effect on applicants.

There is legal framework requiring most of the public authorities to publish annual activity reports as well as strategic reports. There reports are accessible online. However, online published documents are not in line with technical open data standards. In means of judiciary, the judgments are not published online. There is an ICT Agency -the Information and Communication Technologies Authority- however mainly engaging in communications technology not information technology.

Law No.4982 generally includes provisions rendering limitation rather than freedoms. On the other hand, it is reported that in-practice the Law does not applied consistently[14].

**Participation**

*Participation* in open governance is determined by the two types of tests, acknowledgment of the right to participate and whether the right to participate in decision-making includes national and local level consultation with citizens and stakeholders.

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[14] "Freedom to access information in Turkey" research conducted by İstanbul Bilgi University Faculty of Communication. http://www.bilgiedinmeozgurlugu.com/#

The right to participate in national decision-making processes is not recognized in the Constitution and relevant laws. The right to participate is only acknowledged in local level.

The major setback for participation in Turkey is that the lack of national-level consultation with government. Open governance is achieved through citizens' and CSOs' access to public information and by their participation in government. Without *participation*, a major factor in open governance is blotted out. Lacking platforms to involve citizens in decision-making at national level, become more of an issue in terms of budgetary decisions. The budget is a government's plan for how it is going to use the public's resources to meet the public's needs. Therefore, a transparent and inclusive budget process is essential to holding government accountable for managing public resources. However, this process is undermined in Turkey.

**Oversight**

*Oversight* in open governance is determined by a test on variety of measures designed to ensure public sector integrity.

The Supreme Audit Institution - namely, the Court of Accounts- has power and functions of effective oversight. However, its powers are limited to institutional oversight. There are major problems for individual oversight i.e, public officials, MPs. Major deficiencies remain for asset declarations, conflict of interest, disclosures. There areas are behind the accepted systems. Also, there is no legal framework for lobbying and political financing in Turkey.

A key plank of citizen oversight is whistleblower. There is no legal framework for whistleblower channels and mechanisms to promote and protect persons to reveal wrongdoing within governance frameworks.

The Public Procurement Law is enacted within EU accession process however now there are several step backs. In practice, the Public Procurement Authority does not function well. There are several hardships being encountered while accessing its decisions online or searching bid announcements.

Overall, oversight in Turkey is limited to freestanding legislation indicating weak regime.

**Full List of C20 Turkey's Recommendations to the G20 regarding "Open Data"**

**The G20 should:**

• Take concrete steps to ensure the increased availability of high quality, timely and open government data, as well as mandate that private sector data that has consequences for the public interest, such as beneficial ownership information and regulatory impact assessments, are made publicly available.

• Release key data-sets that are crucial in tackling corruption including but not limited to data for extractives payments, government procurement, construction and infrastructure projects in open data format.

• Establish independent national supervisory institutions which strongly collaborate with private sector and civil society.

• Implement the Los Cabos High Level Principles on Asset Disclosure by Public Officials. In particular, governments must require disclosure of assets by officials; especially of the officials who hold decision-making positions in government and are involved in procurement processes. Make national income and asset disclosure (IAD) registries publicly available and harmonized across G20 countries.

• Ensure, all court decisions at all levels are published as granted in official web-pages of the courts at all levels/ministry of justices.

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[15] Anti-Corruption Policy Paper, C20 Turkey, http://c20turkey.org/uploads/(ENG)C20-AntiCorruption%20WG.pdf.

**Organizations Participated in the Policy Development Process of C20 Turkey Governance (Anti-Corruption) Working Group**

Governance (Anti-Corruption) Working Group is chaired by Oya Özarslan, Chair of Transparency International Turkey (*Uluslararası Şeffaflık Derneği Türkiye*) and following organizations contributed to the policy development process of the Working Group:

- Transparency International Turkey
- Economic Development Foundation (IKV)
- Arguden Governance Academy
- TESEV
- TUYID
- TKYD
- TEID
- KALDER
- Ernst&Young
- TIDE
- Transparency International USA
- GOPAC
- INTERACTION
- Transparency International Secretariat
- Transparency International Germany
- Article 19
- Transparency International Mexico
- Financial Transparency Coalition
- European Network on Debt and Development
- Publish What You Pay