

ACCESS TO INFORMATION AND PROACTIVE TRANSPARENCY POLICY OF THE INTER-AMERICAN COMMISSION ON HUMAN RIGHTS

CONSIDERING that the American Convention on Human Rights enshrines the right to freedom of expression as a fundamental right that "includes freedom to seek, receive and impart information and ideas of all kinds, regardless of frontiers, either orally, in writing or in print, in the form of art, or through any other media of one's choice"¹;

CONSIDERING that the Inter-American Democratic Charter recognizes as fundamental components of the exercise of democracy "transparency in government activities, probity, government accountability in public administration, respect for social rights, and freedom of expression and of the press."²;

CONSIDERING that the Declaration of Principles on Freedom of Expression of the Inter-American Commission on Human Rights (hereinafter, IACHR or the Commission) establishes that "all persons should have equal opportunity to receive, seek, and impart information through any media without discrimination"³ and that the right of access to information is a fundamental right that "admits only exceptional limitations that must be previously established by law in the case of a real and imminent danger that threatens national security in democratic societies"⁴;

CONSIDERING the Office of the Special Rapporteur for Freedom of Expression of the IACHR has highlighted the importance of exercising the right of access to information as an effective mechanism for citizen oversight of public administration, noting that "this right is a critical tool for democratic participation, control of the functioning of the State and of public administration, and control of corruption."⁵;

CONSIDERING that the General Assembly of the Organization of American States (OAS) recognizes that "the principle of maximum disclosure is inherent to access to public information"⁶ and that "privacy and the protection of personal data, the disclosure of which could affect the legitimate rights of its owner, constitutes one of the exceptions to access to public information"⁷; It has thus reaffirmed "the importance of protecting personal data and of respecting the right to privacy, according to which no one should be subjected to arbitrary or unlawful interference with his private life, family, home

¹ American Convention on Human Rights. Article 13. Signed at San José, Costa Rica. November 22, 1969.

² Inter-American Democratic Charter. Article 4. Signed in Lima, Peru. September 11, 2001.

³ IACHR Declaration of Principles on Freedom of Expression. Principle No. 2. Adopted by the IACHR at its 108th Regular Session. Washington, DC. October 2 to 20, 2000.

⁴ *Ibid.* Principle 4.

⁵ Office of the Special Rapporteur for Freedom of Expression of the IACHR. Annual Report 2008. OEA/Ser.L/V/II.134. February 25, 2009. Paragraphs 144 and 146.

See also: Office of the Special Rapporteur for Freedom of Expression of the IACHR. The Right of Access to Public Information in the Inter-American Legal Framework. OEA/Ser.L/V/II. CIDH/RELE/INF. 9/12. 2^{da}. Ed. 2012.

⁶ Organization of American States. General Assembly. Resolution AG/RES. 2811 (XLIII-O/13). Adopted at the 4th plenary meeting held on June 6, 2013.

⁷ *Ibid.*

or correspondence, as well as the right of every person to the protection of the law against such interference”⁸;

CONSIDERING the Commission understands that all those persons who have submitted petitions and cases and precautionary measures to date have done so under the conviction that the information they have provided will only be accessible to the parties involved in the case, with the exception of public decisions issued by the Executive Secretariat of the IACHR (hereinafter ES/IACHR or Executive Secretariat);

CONSIDERING that the IACHR's fundamental task is to protect the victims of human rights violations, it is necessary to maintain the confidentiality of the personal data and sensitive information of victims, complainants and/or witnesses, safeguarding their rights at all times and, in particular, their privacy, life and personal safety;

CONSIDERING the importance of the principle of institutional transparency and its relevance as a central element in the functioning of the IACHR;

CONSIDERING that in accordance with Article 40 of the American Convention on Human Rights, the secretariat services of the Commission are provided by the ES/IACHR, which is part of the OAS General Secretariat (hereinafter GS/OAS);

TAKING INTO ACCOUNT Resolution [No. 2/09](#) of the IACHR "Documents and Historical Archives of the Inter-American Commission on Human Rights", in which this body decides, among other matters, to develop a work plan on the opening of the historical archives, the design of a protocol that establishes clear processes in this regard and the adoption of measures aimed at protecting the personal safety, integrity and privacy of the victims and other users of the Inter-American Human Rights System, and;

TAKING INTO ACCOUNT the OAS General Assembly Resolution [AG/RES. 2607 \(XL-O/10\)](#), which approves the Inter-American Model Law on Access to Public Information; Resolution [AG/RES. 2885 \(XLVI-O/16\)](#), which approves the Inter-American Program on Access to Public Information; and [Executive Order No. 12-02](#) of 2012 of the OAS General Secretariat, which adopts the Access to Information Policy of the Organization of American States;

TAKING INTO ACCOUNT the objectives outlined by the IACHR in its [Strategic Plan 2017-2021](#), specifically in its Program No. 4, which reaffirms the Commission's commitment to advance in the design and implementation of a Policy on Access to Information and Proactive Transparency, and its continuity in the [Strategic Plan 2023-2027](#), specifically in its program No. 24 which, within its lines of action, contemplates the implementation of this policy and the strengthening of the culture of proactive transparency and access with respect to the information under the control of the IACHR, including information on petitions and cases, its criteria, procedures and its decisions;

RESOLVED:

FIRST: To adopt the following Policy on Access to Information and Proactive Transparency of the Inter-American Commission on Human Rights contained in the annex attached to this Resolution.

⁸ Organization of American States. General Assembly. Resolution AG/RES. 2842 (XLIV-O/14). Adopted at the 2nd plenary meeting held on June 4, 2014.

SECOND: To instruct the ES/IACHR to prepare a draft protocol for implementation of the Policy, as well as measures to strengthen the archiving system, for consideration and approval by the IACHR.

THIRD: This Resolution supersedes all provisions and practice contrary to this Policy.

FOURTH: Once this Policy has been approved by the IACHR, it will enter into force as of the date of approval of this Resolution.

Annex

ACCESS TO INFORMATION AND PROACTIVE TRANSPARENCY POLICY OF THE INTER-AMERICAN COMMISSION ON HUMAN RIGHTS

TITLE I. SCOPE AND DEFINITIONS

Article 1. Scope

The rules and provisions contained in this Policy apply to:

- a) Information in the possession of the IACHR, whether produced or received by it, related exclusively to its principal function as an autonomous and independent body of the OAS charged with promoting the observance and defense of human rights and serving as an advisory body to the OAS in this area, as provided for in Article 106 of the OAS Charter and in the American Convention on Human Rights; and
- b) Information in the possession of the ES/IACHR, whether produced or received by it, related to the secretariat services it provides to the Commission in the framework of the latter's main function, such as: reports, resolutions, studies and other work entrusted to it by the Commission or the Chair of the Commission, correspondence, communications addressed to the Commission, as well as the documents that make up the file of a case before the IACHR in accordance with its Rules of Procedure.

This Policy does not apply to administrative and financial information on the operations of the ES/IACHR as a dependency of the OAS General Secretariat, such as budgets, contracting, personnel, acquisitions, among others. Such information is subject to the provisions of the Access to Information Policy of the OAS General Secretariat, [Executive Order No. 12-02](#).

Article 2. Objective

The objective of this Policy is to ensure the widest possible application of the right of access to information referred in Article 1 paragraphs a) and b), by adopting principles, procedures, exceptions and obligations of proactive transparency for the ES/IACHR.

Article 3. Definitions

For the purposes of this Policy, the following definitions shall apply:

- a) **Historic Archive.** Repository of Information composed of documents with sufficient historical, evidentiary, or informative value to justify their preservation beyond the time in which they were needed to ensure their future consultation. For such purposes, these documents are kept in an external repository.
- b) **Open data.** Open access information that allows the use, reuse, and redistribution by any user. This implies that the data or information to be published will be in free and in unrestricted formats.
- c) **Personal data.** Information relating to an individual and through which he or she can be identified, directly or indirectly, in particular by means of a name, identification

number, location data, or any other information which, by itself or compiled with other data, can lead to his or her identification.

- d) **Drafts.** Documents that have not yet reached the status of official or definitive, because they are still in the drafting stage or have not yet completed the approval or deliberation process.
- e) **Documents produced.** Records of information that are within the scope of this Policy and that were produced by the team that makes up the ES/IACHR or the Commissioners in the exercise of their functions, through any media, format, *software* or communication platforms that have been approved by the ES/IACHR and/or the Commission; whether they are physically on paper, in another storage format or in an electronic repository, including databases.
- f) **Documents received.** Records of information within the scope of this Policy produced by third parties and delivered by any means to the ES/IACHR or the Commissioners in the framework of their functional activities, whether physically on paper, in any other storage format or in an electronic repository, including databases.
- g) **Information.** Any type of data within the scope of this Policy that is received, generated or controlled by the IACHR and/or ES/IACHR through different media, *software* or communication platforms, whether as a result of the activities of its Commissioners -acting in Plenary, Thematic Rapporteurships and/or Working Groups-, Special Rapporteurships, Executive Secretariat or the team that is part of it.
- h) **Party.** Person (natural or legal) who, with a direct interest, intervenes in the resolution of a proceeding before the IACHR, and may be referred to as: petitioners, alleged victims, proposed beneficiaries (precautionary measures), and the State concerned.
- i) **Publish.** Spread, disseminate, or make available to the public information or documents, whether using print, electronic or any other media or communication platform.
- j) **Public version of a document.** Document that the ES/IACHR publishes on its institutional website or sends in response to a request for access to information, and whose content has been edited, in order to cover the parts where there is information subject to any of the exceptions contained in this Policy.

TITLE II. PRINCIPLES

Article 4. Principles

This Policy is based on the following principles:

- a) **Accessibility.** The right of access to information is a human right, of which every person, without any discrimination whatsoever, is a holder. It follows that the ES/IACHR will not demand requirements that may constitute obstacles to the presentation of requests for access to information, will facilitate the presentation of these requests in any of the official languages recognized by the OAS, will assist

persons belonging to groups in situations of special vulnerability or with difficulties of access to technology, and will not require applicants to prove a direct interest or personal involvement in order to process their request.

- b) **Good faith.** The ES/IACHR shall interpret the rules set forth in this Policy in such a way that they serve to fulfill the purposes pursued by the right of access to information, provide the necessary assistance to applicants, promote a culture of institutional transparency, and act with diligence and professionalism.
- c) **Quality of information.** The information published or disseminated by the IACHR shall, to the extent possible, be in the official languages of the OAS and in accessible formats that facilitate the reuse of information and the generation of knowledge. It shall also ensure that the information produced and disseminated is up-to-date, complete, objective, and truthful.
- d) **Divisibility.** If a document or file contains information that may be public and non-public information, access shall be given to the information that may be public.
- e) **Gratuity.** The request for access to information is free of charge. The IACHR will not require prior registration, special subscription, or payment to access the form to request access to information or the information that the IACHR has available through its website.
- f) **Equality.** All requests for access to information will be processed equally without any distinction, predilection, or favoritism. Requests will be processed according to a chronological criterion of presentation.
- g) **Maximum disclosure.** This principle assumes that transparency and access to information within the scope of this Policy are the general rule, except for the regime of exceptions indicated in the Rules of Procedure of the IACHR and in this Policy, as well as those established to respect the exercise of the rights of third parties, particularly when necessary to safeguard victims of human rights violations in their privacy or in situations of risk to their life, integrity, or personal safety. Under this principle, the ES/IACHR must justify any denial of access to information and, when in doubt or when there is a regulatory vacuum, it will give priority to access to information.
- h) **Timeliness.** Information should be published as quickly as possible since higher levels of timeliness imply an added value and greater usefulness with respect to such information.
- i) **Proactivity.** The IACHR recognizes that the right of access to information also requires a proactive approach that implies the responsibility to publish and disseminate information in a timely and periodic manner and without external request.
- j) **Motivation of the decision.** The ES/IACHR shall record and express the reasons for denying a request for access to information in order to allow the person who submitted the request to exercise his or her right of review in accordance with the provisions of this Policy.

- k) **Progressivity and non-regression.** The IACHR will make every effort to improve the conditions that guarantee the exercise and enjoyment of the right of access to information by users. Likewise, the actions and decisions of the IACHR shall be aimed at avoiding the diminution, impairment, or annulment of the content of this Policy and other instruments derived from it.
- l) **Reuse.** The IACHR will promote the use of formats that allow for the reuse of the information available on its different platforms.

TITLE III. PROACTIVE TRANSPARENCY

Article 5. Public information of the IACHR through proactive transparency

The IACHR promotes a proactive approach to transparency in order to facilitate and promote access to relevant institutional information related to the exercise of its mandate and functions. The IACHR also seeks to contribute to the generation of public knowledge, dissemination, and reuse of the information it generates.

Without the need for a request and in an open data format, the ES/IACHR shall publish and periodically update the following information on the IACHR website:

- a) Description of the mandates and functions of the IACHR.
- b) Rules, regulations, resolutions, policies, manuals, guides, or other documents containing information, precedents, or practical interpretations of how the IACHR works or how to access its mechanisms.
- c) Description of the composition of the Commission, accompanied by a brief summary of the background of each Commissioner and the ES/IACHR staff.
- d) The list of Rapporteurships of the Commission, by country, by theme and Special Rapporteurships, accompanied by a brief summary of the background of each Rapporteur.
- e) Annual reports, country reports, and thematic reports.
- f) Information regarding deadlines and internal management of the different mechanisms of the IACHR, mainly those related to cases, petitions, friendly settlements, and precautionary measures.
- g) General information regarding case, petition, friendly settlements, and precautionary measures management. As well as other data of interest and the main statistics related to highlights of these decisions.
- h) The reports of special follow-up mechanisms and working tables.
- i) The annual agenda of the IACHR sessions and the calendar of public hearings scheduled for each session.

- j) Information on the activities of the Commission and the Executive Secretary, the issues being addressed and prioritized, as well as the persons or organizations with whom they have exchanges.
- k) The updated list of hearings held, by topic, by country where applicable, and by session. Also, indication of the procedure for grants and ex officio calls, follow-ups, trends, and any other related action.
- l) List of requests for information addressed to the States, pursuant to Article 41.D of the American Convention on Human Rights, Article 18.D of the Statute of the IACHR and Article XIV of the Inter-American Convention on Forced Disappearance of Persons, once the response has been received from the requested State and after the publication of the annual report of the IACHR corresponding to the calendar year of the respective consultation.
- m) Decisions on precautionary measures and the main statistics of the mechanism in general.
- n) Reports on admissibility, inadmissibility, merits, approval of friendly settlement agreements, and archive decisions.
- o) The notes of referral of cases to the Inter-American Court of Human Rights.
- p) Press releases.
- q) Report on requests for access to information received by the IACHR.
- r) All information that, due to the recurrence of its request, and based on the principles of maximum disclosure and good faith, the IACHR establishes as information subject to proactive transparency.

The above list is not exhaustive, so the ES/IACHR will periodically review the requests for information in order to identify the most recurrent topics, and thus expand the categories of information subject to proactive transparency.

The disclosure and updating of information on the organizational structure (organizational charts), budget, rules and procedures, copies of bilateral agreements, institutional budget, budget execution, and the like, is governed by the provisions of the GS/OAS Access to Information Policy. The foregoing is without prejudice to the fact that said information may be available on the IACHR's website.

TITLE IV. PROCEDURE FOR ACCESS TO IACHR INFORMATION

Article 6. Request for access to information from the IACHR

The submission of the request for access to information will be free of charge for the applicant. Similarly, those requests whose delivery of documents can be managed electronically or when the documents requested in paper format do not exceed twenty pages will be free of charge. For all other cases, the ES/IACHR will determine the route to follow according to the particularities of each request.

The ES/IACHR will not require the applicant to state a reason or justify an interest or direct impact that would enable him or her to request the information. The request for access to information must be submitted in writing, using the form available in the "Access to Information" section of the IACHR website. However, the IACHR will progressively provide alternative formats for the submission of applications.

The form must identify in detail the information and/or documents requested and indicate an e-mail account to receive information on the request. Requests for generic or indeterminate information will not be processed. Requests must be sufficiently specific to be processed. Likewise, the ES/IACHR will not be obliged to process requests for access to information that, due to their large volume, affect the fulfillment of its functions and mandates or that exceed its technical and human resource capacity. The ES/IACHR will communicate this to the applicant requesting the delimitation or identification of the information required as a priority.

Persons who, for any reason or circumstance, are unable to send their request electronically, may send it by mail to the Executive Secretariat of the Commission, detailing the information and/or documents they are requesting, indicating an address or electronic or postal address to which the ES/IACHR can send its response and additional information to be contacted or notified.

Requests submitted by the parties involved in a case before the IACHR, whose objective is to obtain general information related to the processing of the case, will not be classified as a request for access to information under the terms of this policy, therefore, this type of request will be processed within the file of the corresponding petition, case, or precautionary measure.

Article 7. Deadline for responding to requests for access to information from the IACHR

The ES/IACHR will respond to the applicant within thirty (30) calendar days from the date of receipt of the request or from the date of delivery of the document or file by the Central Archive, in the case of historical archives. The aforementioned deadline may be extended for an additional thirty (30) calendar days or a longer period to be determined by ES/IACHR, depending on the complexity of the request, the volume of the documents, the medium on which the information is stored, or whether it is historical archives. Any extension of the deadline will be notified to the applicant.

In the case of requests for information that is not available or has not been generated, the ES/IACHR shall indicate the tentative deadline within which it would consider sending the requested information, which shall be calculated from the date on which the documents are received or generated by ES/IACHR. In any case, failure by the ES/IACHR to respond within the indicated deadline shall be understood as a decision denying access to the requested information.

The requested information will be provided to the applicant in the language in which it is available. The IACHR will not incur in any translation costs.

Article 8. Exceptions to the IACHR's Access to Information

The IACHR, acting through its Executive Secretariat, may deny (in whole or in part) requests for access to information based on at least one of the following grounds:

- a) The information requested is outside the scope of this Policy.
- b) The inappropriateness of the information requested because it is not information that, in accordance with its mission or mandate, the ES/IACHR generates.

- c) The non-existence of the requested information.
- d) The information requested is of a reserved or confidential nature, in accordance with the regulations governing the OAS and the IACHR.
- e) The information requested is part of the file of a case being processed in the system of petitions, cases, precautionary measures, or before the Inter-American Court of Human Rights. This information is only accessible to the parties involved in the case.
- f) The files, the identity of the petitioners, alleged victims and proposed beneficiaries relating to petitions not opened for processing or precautionary measures for which the Commission decided not to request information from the State concerned, shall be reserved and accessible only to the aforementioned parties or their representatives. With the exception of statistical data, such as country, year of filing and decision, violation of the human right in question or its link to thematic rapporteurships.
- g) The information requested is part of the process of an amicable settlement process subject to the principle of confidentiality that governs mediation and alternative dispute resolution mechanisms, regardless of whether the process was successful or not.
- h) The information or document requested is preliminary and not definitive, that is, it is information under construction or drafts.
- i) Publicity, communication, or knowledge of the requested information places at risk the life, integrity and/or personal safety of alleged victims, applicants and proposed beneficiaries of precautionary measures, petitioners, witnesses of human rights violations, staff of the ES/IACHR and their families, or the national security of an OAS Member State.
- j) Publicity, communication, or knowledge of the requested information affects the right to privacy of the staff of the ES/IACHR, consultants, scholarship holders or interns, insofar as it refers to personal data whose publicity has not been consented to or is sensitive information.
- k) Publicity, communication, or knowledge of the requested information affects the right to privacy of the alleged victims, proposed beneficiaries, petitioners and/or witnesses of human rights violations, inasmuch as it refers to personal data whose publicity has not been consented to or is sensitive information.
- l) Publicity, communication, or knowledge of the requested information affects the deliberative process or the independence of the Commission or any of its activities.
- m) Information subject to professional secrecy, including communications made and received by the staff of the ES/IACHR, consultants, fellows, or interns.
- n) The information requested is protected by intellectual property rights or is commercial and/or financial information whose disclosure could, directly or indirectly, harm the interests of the General Secretariat of the Organization of American States.

- o) Information that could compromise the security and/or international and intergovernmental relations of Member States or Permanent Observers.
- p) Any information whose sensitivity could be equated with the exceptions described above, provided that the potential harm to the interests protected by the exceptions outweighs the potential benefits of disclosure.

Article 9. Proof of Damage

When invoking the existence of a ground of confidentiality in a request for information, the ES/IACHR must apply the harm test by which, in writing, it must establish that the disclosure of the requested information could generate real, demonstrable, and identifiable harm.

Article 10. Public interest test

When invoking the existence of grounds for confidentiality in a request for information, the ES/IACHR must apply the public interest test. When conducting the public interest test, the ES/IACHR must incorporate the elements of appropriateness, necessity, and proportionality into its analysis.

Article 11. Maximum reservation period

For information in the possession of the IACHR prior to the entry into force of this Policy, the ES/IACHR shall maintain the confidentiality of the information for a period of thirty (30) years from the date on which the ES/IACHR has adopted its final decision. The maximum period of confidentiality for information received or generated by the IACHR after the adoption of this Policy shall be ten (10) years from the date on which the IACHR adopted a final decision.

In both cases, the ES/IACHR may, with the approval of the IACHR Board of Directors⁹, extend the confidentiality for up to ten (10) additional years from the date on which the information is classified. For such purposes, the ES/IACHR shall submit a duly grounded and reasoned request to the Board, applying the harm and/or public interest test, and indicating the new term for the reserve. The Board shall have 15 calendar days to issue a decision. Until the board renders a decision on the request for an extension of the restriction, the information shall continue reserved.

Article 12. Partial disclosure

In accordance with the principle of divisibility, if a document contains information to which one of the exceptions indicated in Article 8 applies and information that is not exempt from publication, the ES/IACHR will generate a public version of the document and will provide it to the applicant. The ES/IACHR shall state in the document the reasons for the deletion of certain information.

Article 13. Disclosure of personal data and the right of opposition

If the information requested is contained in a document or series of documents containing personal data of alleged victims, proposed beneficiaries, petitioners, complainants and/or witnesses, the

⁹ The IACHR's Board of Directors is composed of its President, First Vice-Chair, and Second Vice-Chair, in accordance with the provisions of Chapter III of the Rules of Procedure and Article 14 of the Statute, both of the IACHR.

ES/IACHR shall inform these persons of their right to object to the disclosure of such information.

This communication will be sent by the ES/IACHR within twenty (15) calendar days from the date on which the ES/IACHR received the information that is the subject of the request. If the communication is sent by e-mail, the holder of the personal data shall have fifteen (15) calendar days from the date on which he/she was informed by the ES/IACHR to exercise his/her right to object. If the communication was sent by mail, the term shall be thirty (30) calendar days, taking into account the distance and postal procedures.

If the ES/IACHR does not have updated information that allows it to notify the persons concerned of their right to object to the disclosure of their personal data, or if they fail to respond, the Commission shall continue the procedure for access to information while maintaining the confidentiality of the corresponding personal data. To that end, the ES/IACHR shall prepare a public version of the documents and shall adopt the measures indicated in Article 17 of this Policy.

Article 14. On the decision rejecting the application access to and review of IACHR information

If the ES/IACHR denies access to information from the IACHR or does not respond within the time period established in Article 7, the applicant may challenge this decision before the IACHR Board of Directors. The request for review must be submitted within thirty (30) calendar days from the date on which the ES/IACHR communicates its response to the request for access to information, or from when the deadline for the response has passed, as established in Article 7, and must be addressed to the President of the Commission, indicating the background of the request for review and the specific request that is submitted for his or her knowledge and resolution.

Article 15. On the hearing and disposition of a request for review

Requests for review shall be heard and resolved by the IACHR Board of Directors. The ES/IACHR shall forward to the Commission's Board of Directors a copy of the request for access to information and of the decision adopted, together with a summary of the background of the case.

The IACHR Board shall adopt a decision on the request for review within forty-five (45) calendar days from the date of its submission.

TITLE V. PROTECTION OF PERSONAL DATA

Article 16. Reserve of identity or personal data

With respect to any information received by the IACHR or its Executive Secretariat, the provider or sender may request the confidentiality of personal data.

The personal data of those who provide background information or testimony to the Commission as a result of its monitoring activities, such as *on-site* visits or working visits, shall be reserved, unless the person concerned expressly authorizes its disclosure. Upon a request for reserve of identity or personal data, the IACHR will not include them in the drafting of public reports, nor will it provide access to these documents as long as the ES/IACHR notes that the reason for the reserve persists.

In the final reports of the case and petition system, the personal data of those submitting the petitions, alleged victims, witnesses, family members, and any person mentioned in the petitions will

be made public, unless, prior to the adoption of the reports, a request for reserve has been made in accordance with the Rules of Procedure of the IACHR. The personal data of children, adolescents, or people in situations of special vulnerability will not be published.

Article 17. Measures for the protection of personal data

The IACHR will adopt the necessary measures for the processing of personal data and sensitive information of alleged victims, proposed beneficiaries, petitioners, complainants and/or witnesses that appear in documents that it must publish in compliance with its standards of active transparency, or that it is empowered to provide to those who have requested information in accordance with the provisions of this Policy.

Among these measures, the Commission may replace the names of individuals with initials or fictitious names and shall not publish personal data or sensitive information from which they can be identified. The measures adopted by the Commission shall always balance the public interest of the information with the protection of the personal data and sensitive information of individuals.

TÍTULO VI. TRANSPARENCY CULTURE

Article 18. Promoting transparency and access to information

The SE/IACHR will provide ongoing training and updates on the right of access to information, both to its Commission and to all members of the SE/IACHR.