

Mr. Toby McIntosh
Editor
Eye on Global Transparency

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**Sector for Administration and Management
Assistant Director-General**

Ref: ADM/EO/2026/DPO/02

Dear Mr McIntosh,

Thank you for your request which was received by our office on 12 February 2026 and acknowledged on 17 February 2026.

Your request concerned information about: 1) The Panel's decision document for the 2023 appeal request (*Request for access to WHC – ICOMOS November 2020 Technical Review document*); and, 2) The original 2023 appeal request submitted by the appellant.

As the independent UNESCO panel mandated to consider your appeal, we have unanimously made the following final determination in terms of UNESCO's Access to Information Policy. The Panel affirms the previous decision to deny access to the original and the new information you have requested (the Panel's decision document).

1. Para. 3.2(a)(vi) exempts internal deliberations and communications from disclosure to protect the integrity of the Panel's deliberative process and confidentiality where required. In this case, the Panel's deliberations were not formally distinguished from the final decision, and no separate, public-facing decision document was prepared. A summary of the appeal request and the Panel's grant/deny decision was published in the 2023 Annual Report, while the detailed deliberations of the Panel remain confidential.
2. Denial under para. 3.2(a)(ii) is justified, as disclosure of the requested original documents could reveal the 2023 appellant's identity, either directly or indirectly. The current Policy does not provide for redaction or anonymization of appeals documents, nor does it address public disclosure of appellant identities. It thus does not provide for informing requesters that their requests (e.g., inquiries) could be publicly disclosed. As such, retroactive disclosure would be inappropriate and constitute an unauthorized diversion for a specific instance. This is the reasoning for the denial based on para. 3.2(a)(iv).

Moving forward, however, the Panel will undertake a review of current UN-system practices and, where appropriate, make recommendations to the UNESCO Director-General on how to improve the implementation of the Policy, including possibly:

1. Confidentiality and Consent: The Panel may recommend updating the Policy to include a consent mechanism for requesters to opt into public disclosure of their identities.
2. Publication of Decisions and Summaries: The Panel may recommend the proactive disclosure of its decisions and reasoning, and the publication of summaries of appeal requests, with due regard to confidentiality considerations. This may entail publishing information in anonymized or redacted form in order to protect personal and other confidential information.
3. Guidelines for Anonymization/Redaction: The Panel may recommend establishing standards and procedures for such appropriate anonymization and/or redaction for appeals documents where the applicant consents to public disclosure.

Any updates to the Policy may require consultation with the UNESCO Member States. Such updates would apply prospectively and would not change the confidentiality of a past appeal as per that submitted by you on 12 February 2026. Any such updates will be publicly announced.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Jennifer Linkins', with a stylized flourish at the end.

Jennifer Linkins