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**Transparency Audit of Disclosures  
u/s 4 of the Right to Information Act  
by the Public Authorities**

By

A N Tiwari & M M Ansari

A Report Submitted to

**Central Information Commission**

New Delhi

November 2018

Dated the 12<sup>th</sup> November, 2018.

Dear Shri R K Mathur,

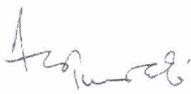
We have the honour to submit to you our report relating to the audit of online disclosures by Public Authorities through their websites. We sincerely thank you for this opportunity given to us to advise on and supervise the exercise of website audits in the light of section 4 of the RTI Act. This has been a highly rewarding experience for us and equally creative. It is our belief that this exercise will set the ground rules for the methodology and approaches to evaluating online disclosure standards.

Thanking you once again.

With kind regards.

We remain

Yours Sincerely

  
A N TIWARI

  
M M ANSARI

Shri R K Mathur  
Chief Central Information Commissioner  
New Delhi

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## PREFACE

The celebrated RTI Act is an acknowledged charter of people's right to information and, at the same time, it is an invocation to the Indian state to embrace transparency as central to its functioning. The last Administrative Reforms Commission (ARC) in its report has radically altered the governance landscape. ARC recommended that the Official Secrets Act of the government of India should be revised in the light of the provisions of the RTI Act. That however remains a distant dream given the national state bureaucracies' natural inclination toward secrecy. Yet, due largely to the RTI Act, state institutions are now under positive pressure to make their functions progressively more transparent.

The RTI Act is predominantly about the demand side of information dissemination, i.e., demand for information disclosure by the citizen and the processes that go with it. But, there is also a supply-side to this Act, which relates to voluntary disclosure of information held by Public Authorities. The mandate for *suo motu* disclosure is contained in Section 4 of the Act. This section has now emerged as the focal point at which most disclosure related efforts of the Public Authorities converge. The audit exercise, which the undersigned were mandated by the CIC to supervise, relates to online disclosure of information by public authorities through their respective websites in terms of section 4 of the RTI Act.

This section 4 sets out in some detail, the parameters for information disclosure, on one hand, and on other, it defines the transparency horizon to be aimed for by the state instrumentalities. We observed that this latter aspect of the section 4 – the proverbial “woods” – is often lost sight of in “counting of trees”, i.e., a routine adherence to the subject list of the section. Yet, it must be readily conceded that even the “counting of trees” exercise has the potential to significantly expand the horizons of transparency in government, if done with methodological rigour. Thus, we ensured that methodology was central to the present exercise which has resulted in this report.

During our study of the various facets of online disclosure audit- verification and authentication of disclosures, we found that several government agencies had done quite serious work specially in regard to introduction of advanced transparency – promoting technologies, use of social media and improving and standardizing website designs, among

several other similar initiatives. We have attempted to capture all these developments in the format for section 4 related disclosures. Our study of these initiatives outside the remit of the RTI Act lent credence to the point that transparency is a much broader and deeper concept and multidimensional too, which cannot be limited by any straitjacket. But, this is a subject for a later and much more elaborate study. For the present our approach is limited to RTI section 4.

The CIC rightly reckoned that section 4 of the RTI Act, with all its structural limitations, can still become an ideal window for the citizen to peek into the twilight world of state bureaucracies and, even to shine a light onto it. At another level, when Public Authorities compete with each other for brownie points for better information disclosure on their websites and its superior quality, transparency is the gainer, so is the citizen.

If the present audit exercise achieves this objective even in a limited measure, it shall be highly satisfying to us as Advisers.

We received copious support from the officers and the staff of CIC in our engagement with the audit exercise. Their experience of the internal functioning of the government was a valuable asset, so was their hard work to accomplice the given task. Our grateful thanks to them.

The Chief Central Information Commissioner Shri R K Mathur was the conceptualiser, the motivator and the implementer of this idea. His boundless enthusiasm, determination and experience made our task easier than it really was. He acted purposefully to remove hurdles – and there were many – to guide the exercise to fruition. We cannot thank him enough.

We have also had enlightened discussions with the Members of the Commission. At various stages of our work, Shri A.K. Gehlot, Joint Secretary, Shri Y K Singhal, Joint Secretary, Shri Piyush Agrawal, Registrar, Umesh K. Joshi, Dy Registrar, Shri Gajinder Singh Kataria, DEO and Shri Vaibhav Kumar of IIPA provided us help and support for finalization of the Report.

At the initial stages of the work, Shri K. Govindrajulu, Joint Director and Shri Govind H of ISTM provided intellectual inputs for developing and designing proforma for evaluating websites of public authorities.

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None of the above mentioned, we need hardly add, can be held responsible for the errors and omissions that might have still remained in this Report.

We have great pleasure and feel honoured to submit this report to the Chief Central Information Commissioner.

A. N. Tiwari and M. M. Ansari

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## Mandatory Disclosure Audit of Respondent Public Authorities

S. No.	Name of Public Authority	%	Grade
1	Agricultural Technology Application Research Institute, Zone-II, JODHPUR	100%	A
2	Allahabad Museum	99%	A
3	Assistant High Commission of India(ACHI), KANDY	94%	A
4	Atomic Energy Regulatory Board(AERB)	93%	A
5	Babasaheb Bhimrao Ambedkar University, Lucknow	91%	A
6	Bank of India	93%	A
7	Bhakra Beas Management Board (BBMB), Chandigarh	96%	A
8	Bharat Electronical Ltd	92%	A
9	Broadcast Engineering Constulatants India Ltd	90%	A
10	Cabinet Secretariat	96%	A
11	CCBF Suratgarh	100%	A
12	CCBF, Andeshnagar	98%	A
13	Central Administrative Tribunal, Ahmedabad Bench	100%	A
14	Central Board of Film Certification	92%	A
15	Central Cattle Breeding Farm	93%	A
16	Central Council for Homoeopathy	91%	A
17	CENTRAL DRUGS TESTING LABORATORY, chennai	95%	A
18	Central Frozen Semen Production & Training Institute (CFSP & TI)Hessarghatta	91%	A
19	Central Industrial Security Force	97%	A

20	Central Information Commission	94%	A
21	Central Institute for Cotton Research	95%	A
22	Central Institute of Brackishwater Aquaculture	93%	A
23	Central Plantation Crops Research Institute (CPCRI)	97%	A
24	Central Soil & Materials Research Station	100%	A
25	Centre for Nano and Soft Matter Sciences	92%	A
26	CGST & Central Excise Delhi Zone	97%	A
27	CHANDIGARH SCHEDULED CASTES, BACKWARD GLASSES & MINORITIES, FINANCIAL & DEVELOPMENT CORPORATION LTD	100%	A
28	CHIEF COMMISSIONER OF CUSTOMS (DZ)	98%	A
29	CHRS, Ongole	100%	A
30	Consulate General of India Edinburgh	90%	A
31	Consulate General of India in Jeddah	100%	A
32	Consulate General of India, Hamburg	100%	A
33	Consulate General of India, Jaffna	100%	A
34	Consulate General of India, sydney	98%	A
35	Consulate General of India, Osaka-Kobe	100%	A
36	Consulate of India, Bandar Abbas, Iran	100%	A
37	DCPW-MHA (Department of Coordination (Police Wireless))	100%	A
38	Deendayal Port Trust	93%	A
39	Delhi Co Operative Housing Finance Corporation Limited (DCHFC Ltd)	93%	A
40	Delhi Metro Rail Corporation	93%	A
41	DIRECTORATE GENERAL OF COMMERCIAL INTELLIGENCE & STATISTICS	96%	A
42	Directorate of Jute Development	90%	A

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43	Directorate of Prosecution, Delhi govt.	92%	A
44	<b>DIRECTORATE OF PULSES DEVELOPMENT</b>	<b>97%</b>	<b>A</b>
45	Directorate of Prohibition, GNCTD	99%	A
46	Dr. Hedgewar Arogya Sansthan	99%	A
47	DRT 2 Chandigarh	94%	A
48	DRT I Chandigarh	98%	A
49	Dte. of Economics and Statistics, Govt. of NCT of Delhi	100%	A
50	Economics and statistics UT of Pondicherry	97%	A
51	Embassy of india Havana	96%	A
52	Embassy of India, Algiers	96%	A
53	Embassy of India, Astana	97%	A
54	Embassy of India, Hanoi	97%	A
55	Embassy of India, Lisbon	95%	A
56	Embassy of India, Minsk	95%	A
57	Embassy of India, Moscow	94%	A
58	Embassy of India, Paramaribo	100%	A
59	Embassy of India, Seoul	100%	A
60	Embassy of India, Vientiane	90%	A
61	Embassy of India, Zagreb	95%	A
62	ERNET India	91%	A
63	Fishery Survey of India, Kochi	93%	A
64	Fishery Survey of India, Mormugao	90%	A
65	Food Corporation Of India	94%	A