

## **Proceedings of the Annual Convention 2017**

The 12th Annual Convention of the Central Information Commission was inaugurated by the Vice President Hon'ble Shri Venkaiah Naidu on December 06, 2017.

While delivering the inaugural address, Shri M. Venkaiah Naidu stated that the information should be given in a language which is understandable to the applicant. He stated that the Right to Information has seen a massive increase in acceptance across the globe in the past twenty years. Right to Information enables greater Government accountability, facilitates citizens' participation and lends transparency to Government functioning.

The Vice President said that sharing of information and creation of a transparent governance structure accountable to the people is the cornerstone of democracy. It leads to a fundamental change in relations between the citizens and the Government, he added. It is well recognized that Government does not hold information for itself but on behalf of the general public. We need to convert Swarajya in to Surajya and the fruits of the development should reach everyone, he added.

Shri M. Venkaiah Naidu said that what is important is 'information with confirmation' which can be trusted to be complete and correct. Enhanced access to credible information makes our democracy more progressive, participatory and meaningful. According to Kautilya, good governance is aimed at fulfilling the welfare of the people; 'In the happiness of the king's subjects lies his happiness, in their welfare, his welfare', he added.

Shri M. Venkaiah Naidu said that early disposal by the Information Commissions will help citizens get their grievances redressed quickly and encouraged all the Commissions to make a concerted, sincere effort towards speeding up disposal of cases registered with them.

In his address, the Union Minister of State (Independent Charge) Development of North-Eastern Region (DoNER), MoS PMO, Personnel, Public Grievances & Pensions, Atomic Energy and Space, Dr Jitendra Singh said that the focus of the Government, under the leadership of Prime Minister Shri Narendra Modi, has been on 'minimum government, maximum governance'. He emphasized upon transparency, accountability and in-time delivery in the Government. He said that the Government has adopted two-pronged strategy viz zero-tolerance towards corruption and providing adequate protection to those who are performing their task with integrity and excellence.

Dr Jitendra Singh said that last year for the first time, all vacancies of Information Commissioners had been filled by the Government. He assured all support to the functioning of the Commission. He said that RTI online portal has been launched through which RTI can be filed from anywhere in the world. From 96 registered Public Authorities for the online RTI facility in 2014, there are 1,893 Public Authorities registered at present and by the end of 2017-18, this figure would go beyond 2000. He said that number of RTI requests online has increased from about 87,830 in the year 2014 to 2,68,920 in the year 2016-17 and the number of grievances lodged by people has increased 5 fold in the recent years, from 1.5-2 lakh grievances in the year 2014 to 11 lakh grievances now. He said that this increase is due to the quick response given by the Government to the grievances. He said that Government has been more responsive, more prompt and citizen-centric. He also said that the pendency of the cases has also been reduced by the Commission in the recent years.

The Minister said that a mechanism should be devised to reduce the pendency in all Commissions. Most of the information is now available in the public domain, he added. He said that the Government is open to strengthen various legislations. He further said that the focus of the Government is on zero tolerance to corruption and performance, maximum transparency, citizen-centricity and benefitting the last man in the queue.

Speaking on the occasion, the Chief Information Commissioner, Shri R. K. Mathur said that the annual convention is an occasion to do a stocktaking of what has been done in the previous year and what needs to be done. He said that the Commission had about 26,000 cases pending as on 31.03.2017 as compared to about 35,000 pending cases as on April 01, 2016. He said that the Commission has converted to a paperless system. He also spoke on other initiatives of the CIC i.e. video-conferencing and facilitation desk among others. He said that more than 3,500 queries have been answered by CIC through facilitation desk. In the year 2016-17, the CIC conducted about 15,000 video conferences, he added. He informed that this convention has followed two earlier seminars held in May and July of 2017, to discuss 'Implementation of the Right to Information Act 2005' and 'Land Records and RTI Act' respectively.

At the end of inaugural function, Smt Manjula Prasher, Hon'ble Information Commissioner proposed the vote of thanks.

After the inauguration of the Convention, seminars were organised on three subjects namely 'Suo-motu disclosures', 'Record keeping' and 'Emerging issues in implementation of RTI Act' .

#### **Session I: Suo-motu disclosures.**

The session started with the opening remarks by Shri Bimal Julka, the Hon'ble Information Commissioner who chaired the session. There were seven speakers in the session, namely Shri Devesh Chaturvedi, Joint Secretary, DoPT, Shri Lal Duhthlana Ralte, State Chief Information Commissioner, Mizoram, Shri Nikhil Dey, Member Mazdoor Kisan Shakti Sangathan (MKSS), Shri K.Govindarajulu Joint Director (BT), Institute of Secretariat Training and Management, Shri Venkatesh Nayak, Member Commonwealth Human Rights Initiative, Shri R.K. Jain, President Customs & Excise Bar Association and Ms. Amrita Johri, Member, NCPRI.

Shri Bimal Julka, Hon'ble Information Commissioner in his opening remarks mentioned that with increasing need of good governance, anti- corruption initiatives and participation of the public, there is a need of an awareness drive to sensitize the citizens and public authorities about the use and proper implementation of *Suo Motu* Disclosure under the RTI Act, 2005. He stated that about 10-14% appeals that come before him involve information that should have been disclosed suo-motu.

**Devesh Chaturvedi, IAS, Jt. Secy. DoP&T**, the first speaker, gave a power point presentation summarizing Section 4 as the heart and soul of the RTI Act. He stated that if Section 4 was implemented, the burden of RTI applications could come down. Information on the website must be user friendly. Every Public Authority must conduct third party audit to see how effective its compliance is. After his presentation queries and suggestions were put forth by the audience like RTI replies not being properly uploaded on the website, Section 4(1)(a) not being complied with by most public authorities which was the basic requirement for proper implementation of RTI, etc.

**Mr. Lalduhthlana Ralte, SCIC (Mizoram)**, the second speaker of the session, gave a presentation which included issues like whether Noting portion of a file should also be included under the Act, and other such information should be disclosed or not under RTI Act, 2005 etc. He said that much of our public is unaware of the fact that there is an RTI Act and its purpose. Many use it for personal reasons. However, in Mizoram, some activists and others have used it mainly to get information on projects and programmes. In Mizoram, a pilot audit on compliance of Section 4 was undertaken wherein it was discovered that many public authorities had not even put in place basic requirements such as public declaration of officers dealing with RTI issues. At the completion of his presentation a suggestion was made that all Information Commissions must ensure compliance of Section 4(1) (a) of the RTI Act, 2005.

**Mr. Nikhil Dey**, the third presenter, discussed issues like nature of Information, modes of disclosure of such information, role of Information Commission and current challenges to be addressed. He gave examples of Government of Kerala, Rajasthan and Meghalaya for their proactive disclosure, digital dialogues and social audit law, Information and Facilitation Centers, Government of Bihar, MGNREGA Sahayta Kendras, Jharkhand and Common Service Centers, Rajasthan etc. Suggestions were provided to link RTI to public service delivery acts and framing the accountability of Public Authorities for non-implementation of Section 4. He emphasized the need for 'Janta Information System' to meet public needs. He stated that Aadhaar is the opposite of RTI where Government gets information. He suggested that Commissions showed private pressure on Government to implement RTI Act in letter and spirit.

**Mr. K Govindarajulu**, the fourth presenter, elaborated on conclusions drawn from the third party audit of Section 4 disclosures of various Public Authorities undertaken by ISTM. The conclusions mainly pointed towards lack of digitization of records, need for better Record Management and obligation of Public Authority to publish such records/manuals on a regular basis. Some initiatives by ISTM were also elaborated which included RTI input in all training programmes, training of its staff in RTI matters, conducting specialised programme on Records Management and Process Re-engineering, etc. Queries were raised from the audience whether ISTM training curricula included training on giving of reasoned orders by PIOs and FAAs.

**Mr. Venkatesh Nayak**, the fifth presenter raised issues which revolved around the DoP&T guidelines and CIC directions not being complied. Examples of Ashokan inscriptions were given to show that there was proper and regular dissemination of information for the public in the rock edicts even more than 2000 years ago. He also gave examples of positive efforts from Government showing transparency in fiscal matters wherein details of sanction and expenditure and much more details are made available by the Government of UP on its website 'Koshvani' as well as by Central Government. He also gave

examples of transparency in matters of police arrests in Kerala and Government records/files and list of such information which are made available in public domain.

**Mr. R.K Jain**, the sixth presenter, gave presentation which elaborated on the free flow of information encapsulated in Digitalisation & Electronic Dissemination of Information, Cost Effectiveness, Use of Local Language, Easy & Fast Access by Public, etc. The presentation also highlighted the expanding horizon of Section 4 in the form of additional items published by DoPT under Section 4(b)(xvii) of RTI Act, CIC Directions Under Section 19 & 25 of the RTI Act to avoid repeated RTI applications and Court's directions for proactive disclosures. The speaker also focussed on the role of the CIC in enforcing Suo-motu disclosures and the remedy against non-Compliance of Section 4.

**Ms. Amrita Johri**, the last presenter for the session raised concerns highlighting the significance of proactive disclosures in improving social welfare programs and gave examples from a audit of Suo-motu disclosures by PDS shops undertaken to check compliance with transparency. Compliance with Section 4 requirements was very poor in 65% of the Ration shop premises inspected. The speaker suggested that remedies were available with ICs like awarding compensation to appellants who are forced to ask for information which should have been disclosed suo-motu, besides issuing notices to PAs for non-compliance with proactive disclosure obligations and to penalise CPIOs/Head of Department for continued non-compliance.

## **Session II- RECORD KEEPING**

The session started with the opening remarks by **Shri Sudhir Bhargava**, Hon'ble Information Commissioner chairing the session on "Record Keeping". Shri Bhargava laid emphasis on section 4 (1) (a) of RTI Act which mandates maintenance of records duly annexed and catalogued by public authorities. He set the tone for discussion by emphasising on importance of record keeping, in

light of the Public Records Act, 1993, 14<sup>th</sup> Edition of Official Manual Procedure, DoPT Office Memorandums on Record Keeping etc.

**Mrs. Smita Kumar, Joint Secretary DARPG**, the first speaker, gave a power point presentation on classification of documents for record keeping and the importance of Record Retention Schedule 2012. She emphasised on maintaining records in compliance with Central Secretariat Office Manual Procedure and emphasized on following laid down procedures before weeding out. At the end of the presentation, questions were raised about the documents marked as 'top-classified', information regarding Prime Minister's Office on the website of DoPT and scope of its disclosure, etc.

**Mr. Basudeb Banerjee, Hon'ble State Chief Information Commissioner**, West Bengal Information Commission gave a presentation on the digitisation of records and its significance in classification, disposal and retrieval of records. He stated that Rules 4(1) (a), 4 (1) (b) (v) and 19 (8) were relevant in this record. He urged the Information Commissioners to exercise their powers under RTI Act to make recommendations for policy changes within public authorities' rules for record management. He further discussed the importance of accountability being fixed on the Records custodian with respect to missing files. As per the Public Records Act, 1993, "Record Retention Schedule in respect of Records Common to All Ministries/Departments", is available on Department of Administrative Reforms and Public Grievances" website [www.darpg.nic.in](http://www.darpg.nic.in). As per rules 53 and 54 of Manual 2015, the public authorities have to maintain the records if documents are weeded out. Any recorded file or archival records can only be sent under a requisition in the form prescribed under Public Records Act, 1993. This Manual mandates not only maintenance of records but also easy retrieval. He emphasised the need for record keeping by NGoS. All states should have 'Public Record Act'. He stated that record maintenance by itself should be full time with uniformity in practices or Central and State Governments.

**Mr. Syed Farid Ahmad, Assistant Director, National Archives of India**, gave a presentation on the integration of Public Records Act, 1993 and RTI Act, 2005. As per section 7 (1) of Public Records Act, 1993, the officers at the creation level are expected to maintain File Registers & File movement Registers for the purpose of identification of records, keeping track of the information and timely compilation. The managers at maintenance level i.e. dealing with semi-current & non-current information should follow timely closing of files, annual reviewing, maintaining entries in file register (recorded & reviewed category). The officer maintaining the non-current recorded files is the main information supplier who must be a DRO (the legal entity in-charge). He explained the functioning of record-keeping section of National Archives of India stating that the Records Division receives 8-10 applications weekly focussing on the fact that more than 90% RTI applications received in Records Division, NAI are without proper reference to the documents/files required under RTI Act 2005.

**Mr. Surinder Kumar, Senior Technical Director, National Informatics Centre** presented a paper on “Digital Preservation of electronic records”. The presentation highlighted the need for preserving e-records, its legal requirements and the characteristics of preservable e-records. The speaker also focussed on the selection criteria for capturing the e-records as fixed objects. The presentation also covered the guidelines for e-records storage and the periodic auditing of digital storage media. The speaker stated that the Ministry of Electronics and Information Technology (DeitY) has taken early steps towards envisaging a National Digital Preservation Program which includes National Study Report on Digital Preservation Requirements of India and the project on “Centre of Excellence for Digital Preservation” and setting up e-Governance standard division. The speaker further stated that the Centre for Excellence in Digital Preservation has developed e-Records Management and Archival System named as Digitalaya in order to meet Electronic records management, Long term archival and preservation, Digital repository

development and Controlled access to digital resources. HCDC group is also developing an E-Records Extraction Tool for automatic extraction of preservation metadata in compliance with E-Governance standard for Preservation Information Documentation (eGOV-PID) standard and for capturing the electronic records stored in the database of e-governance system. He emphasised that the digitised records should be stored in PDF/A (Archival) format, while images should be in JPEG format. He referred to the need to follow ISO standards for record management.

**Mr. Shishir Chand, PBT India,** presented a case study involving the importance of record keeping in the medical field. In the presentation, the speaker highlighted the importance of Records management with respect to Right to Information Act. He discussed the benefits of efficient record management including protection of rights of agency and its employees, quicker retrieval of information, reduction of subsequent appeals to public authorities and unwarranted litigation. He shared his personal experience of medical negligence in his deceased brother's case where the failure of diagnosis of symptoms from the ECG report by the doctor of Corporate Hospital in Jamshedpur, resulted in his brother's demise. The failure of record management in institutions such as Corporate Hospitals, Medical Council of India, Directorate General of Health Services is an alarming situation that calls for strict compliance of both Public Records Act and RTI Act.

**Dr. Kalyna Bhattacharjee, First Appellate Authority, IIT,** presented a case study on the record keeping of IIT. He mentioned that there has been a substantial growth in the number of RTI Applications from 2010 to 2016 from 4,37,744 to 9,76,679. The disposal rate of RTI applications has resulted in encouraging the RTI applicants to inquire about the functioning of the University. However, the record keeping mechanism followed by IIT has significantly brought down the number of internal queries filed mostly by the students or employees of the institution. The RTI queries for the year 2013-2016 submitted to IITD were analyzed and it has been observed that a large

number of queries were internal (around 45%). This mechanism facilitates transparency in fields of admission of students, selection of Professors, competitions organized, election of Deans and Heads of Departments, minutes of meetings of important events, infrastructure, Government grants.

**Dr. Amaresh Jha, Assistant Professor and Dr. Aman Vats, Associate Professor, Amity University,** Uttar Pradesh presented a paper on “Using Open-Government Data for Integrated Environment Notification System: Meta Analysis of Initiatives in India”. The speaker highlighted the discovery of open data apps which are crucial for issues such as Environment policies for smart use by the public. The speaker further discussed the Use and Gratification Theory (UGT) which is a study based on the conceptual framework where people often reach out to media to satisfy specific needs. In the presentation, the speaker stated that the architecture of open environmental data platforms and apps has also been studied for proposing the open green data notification system for Smartphone users and that the notification system is a mechanism for wireless multimedia sensor networks using information fusion. At the end of the presentation, the speaker stated that the market already has some open data based apps and they really help the public by informing them the right information at required times.

### **INTERACTIVE SESSION**

Mr. Venkatesh Nayak raised the issue of non-transfer and non-disclosure of the documents. He asked Mr. Syed Ahmad, Assistant Director of National Archives whether the Ministry of Home Affairs was in possession of the said documents and reasons for their non-transfer to the Archives. Similarly, instruments of accession of Kashmir and Mountbatten letters were understood to be in the possession of Ministry of Home Affairs which were published on the website earlier but were taken off after the enactment of RTI Act.

Mr. Syed Ahmad, Assistant Director of National Archives, responded that the Archives shall take up necessary measures and DRO Training Programmes to

effectively operate the Department record rooms under the supervision of Record Officers.

Some queries related to the disclosure of details of appointment of Election Commissioners were raised in the session and the representative of DoPT responded that the DoPT is working to timely updating of the details related to all Commissioners.

### **SESSION – III- EMERGING ISSUES IN IMPLEMENTATION OF RTI ACT.**

The session started after the opening remarks by Shri Amitava Bhattacharyya, the Hon'ble Information Commissioner who had chaired the session. There were eight speakers in the session, namely Shri Vinson M Paul, IPS (Rtd.), Chief Information Commissioner, Kerala; Shri Khursheed Ahmed Ganai, Chief Information Commissioner of Jammu & Kashmir; Sh. Suresh Chaudhary, Chief Information Commissioner, Rajasthan; Sh. Shyamlal Yadav, Senior Editor, The Indian Express; Ms. Purandhya Vij, Research Associate, Transparency International India; Sh. Sanjeev Narula, Advocate; Sh. Shiv Om Prakash, Former CE (MES) and Sh. Kush Kalra, Advocate.

Shri Amitava Bhattacharyya, Hon'ble Information Commissioner in his opening remarks mentioned about various emerging issues while implementing the RTI Act. The first and foremost issue is the suo-moto disclosure under Section 4(1)(b) of the RTI Act, 2005 has not been done by various public authorities. The CPIOs are not adequately trained and consequently the quality of the replies given to the applicants is affected. The CPIOs are not motivated as they have fear of punishment but no incentives. The other emerging issue which was discussed was regarding the non-compliance of Commission's orders. There is inadequate monitoring system to check whether the Commission's orders have been complied. Hon'ble IC referred to the need to develop such mechanism for timely compliance of Commission's orders.

**Shri Vinson M Paul, IPS (Rtd.), Chief Information Commissioner, Kerala,** the first speaker gave a power point presentation summarizing Section 7(8) of the RTI Act which mandates furnishing of particulars of the Appellate Authority where a request for information is rejected. The speaker stated that 'should it not be made compulsory as the information could be incomplete, vague, misleading, wrong, etc.?' The speaker suggested that organisation which has nothing to do with intelligence and security have been notified u/s. 24(4) of the RTI Act. He further suggested that RTI Act should be incorporated as part of academic syllabus at Higher Secondary level and necessary amendment made in the Act to make FAAs accountable. The speaker concluded his presentation by stating that there should be public awareness campaigns for the RTI Act.

**Shri Khursheed Ahmed Ganai, Chief Information Commissioner of Jammu & Kashmir,** the second speaker gave a brief introduction of Jammu & Kashmir Right to Information Act, 2009. The speaker highlighted that the J&K RTI Act, 2009 is very similar to the Central Act but is better at least at two places- First improvement is specification of time limits for disposal of Second appeals which is 60-120 days and the second is referral of a case of an errant PIO by FAA to the SIC for consideration of penalty proceedings. The speaker stated that there should be time limit for disposing off the second appeals/complaints and further suggested that the First Appellate Authority should have the power to take action against PIO, in case, he has not discharged his duty properly. The speaker stated that it is observed that Commission's orders are not being complied by the public authorities. The speaker suggested that there should be a provision vide which the penalty could be imposed on the head of the public authority for non-compliance of Commission's orders. The speaker concluded his presentation by suggesting that the 'recommendations' given under Section 25(5) of the RTI Act should be in the form of 'directions' so that it can be brought under the ambit of penalty clause for non-compliance.

**Sh. Suresh Chaudhary, Chief Information Commissioner, Rajasthan,** at the outset, stated that there are serious emerging issues in implementation of the

RTI Act. He pointed out that inadequate steps have not been taken by various public authorities for Section 4(1)(b) implementation during initial preparatory phase, suo-moto disclosures still lack in quality and many public authorities remain lukewarm towards requirement of constant updation of websites. The speaker, stated that there is faulty records management, poor infrastructure, poor manpower and poor quality of information provided. The speaker suggested that there should be public awareness campaigns through existing govt. machinery and inclusion of reputed NGOs to increase RTI use by weaker and under-privileged sections. Digitisation of records should be done. The speaker concluded his presentation by stating that allocation of hearing opportunity to appellants/complainants is based on first come first served basis in general.

**Sh. Shyamlal Yadav, Senior Editor, The Indian Express,** stated that RTI is a tool for agenda for free journalism. In over 110 countries with RTI law, it is the new way on investigative reporting for media in 'post-fact' era. But Indian media has failed to utilise this tool adequately. The speaker, discussed the success stories of RTI Act viz. foreign travel details made by the Ministers, Bureaucrats which are available on the websites. Further, every Minister had declared their assets and liabilities on time on the website. The speaker stated that information such as (dormant) insurance policies, details related to PM's Jan Dhan scheme, etc, can also be disclosed under the RTI Act which information could be used to bring out wrong doings and resulted in improvement of systems for public herewith. The speaker concludes his presentation by quoting the Hon'ble Prime Minister Sh. Narendra Modi's quote that "if we limit just to reply to questions, there will be no changes in governance. We have to analyse the RTI questions and ponder whether there is need to make changes in policy matter".

**Ms. Purandhya Vij, Research Associate, Transparency International India,** The speaker referred to the figures/data (as collected by them from annual report/information given by State Information Commissions regarding the total

number of RTI applications received (state-wise) from the year 2005-2016. The speaker also referred to the data regarding the number of second appeals and complaints received by Central Information Commission and State Information Commissions. She stated that the CIC, Maharashtra, Bihar, Karnataka and Gujarat are the top recipients of second appeals and complaints. The speaker discussed the challenges faced by different stakeholders. She stated that the information seekers have low awareness level, particularly those from marginalized section. Unsupportive attitude of PIOs is leading to unsatisfactory and poor quality replies by PIOs, ineffective record management system, inadequate training to PIO & FAAs, absence of infrastructure and inadequate human resources in various Commissions, high level of pendency, etc. The speaker recommended that innovative technology should be used; training should be given to the PIOs; and suo-moto disclosures should be done under Section 4(1)(b) of the RTI Act.

**Sh. Sanjeev Narula, Advocate,** the speaker at the outset gave a brief introduction regarding non-compliance of Commission's orders and stated that non-compliance of the order would be an obstruction in the delivery of information. The speaker referred to various orders of Hon'ble High Courts in the matter of Sri G Basavaraju vs. Smt. Arundathi & Anr.; Kadiyam Shekhar Babu vs. The Chairman, A.P. Public Service Commission, Hyderabad & Anr. In view of the interpretation given by the High Courts relating to Section 20 of the Act, it can be inferred that the Commission can entertain non-compliance complaints, adjudicate the grievances and decide the matters brought before it, in terms of the provisions contained in the Act. The speaker, after that, stated that there is no foolproof mechanism to ensure that the information seeker will definitely get his information after the hearing of his non-compliance application. The speaker concluded his presentation by stating that one must be mindful of the fact that the Information Commissions are set up under the Act and they have to perform their functions and duties within the precincts

marked out by the legislature lest they travel beyond their boundaries of power and transgress the provisions of the very Act which created them.

**Sh. Shiv Om Prakash, Former CE (MES),** gave a brief introduction of Section 4 of the RTI Act regarding suo-moto disclosures and its obligatory requirement as brought out vide DoP&T circular dated 17.09.2007 and 20.01.2010 and DoP&T guidelines issued in November, 2013. The speaker stated that that there are various deficiencies in the websites of the public authorities viz. website links are confusing and inadequate, in-accessibility of information, vague subjects and uploading under incorrect link, search facility does not exist for tracing out any specific record from website, details of CPIOs/FAAs and details of senior officers are not available, etc. The speaker concluded his presentation by suggesting that compliance of Commission's orders by public authority should be done within a period of maximum 3 months and there should be monitoring mechanism at the Commission to know if its decisions have been actually implemented by CPIOs/Public Authorities and insisted on imposition of penalty/compensation against the CPIO/PAs in each case of established delay/denial.

**Sh. Kush Kalra, Advocate, Delhi High Court,** discussed the issues that have emerged during implementation of the RTI Act, 2005. This includes low levels of awareness; non-availability of user guides for RTI implementation for information seekers; standard forms for RTI application and inconvenient payment channels for submission of application fees etc. The speaker concluded his presentation by stating that by enacting the RTI Act, India has moved from an opaque and arbitrary system of government to the beginning of an era where there will be greater transparency and to a system where the citizen will be empowered and be the true centre of power.

The session concluded with vote of thanks from Shri Amitava Bhattacharyya, Hon'ble Information Commissioner.

The deliberations and take-aways from the Convention are summarised below:

1) Suo-motu disclosures are the heart and soul of the RTI Act. It is a primary measure adopted in the Act for promoting transparency and accountability in the working of Public Authorities. In the interest of good governance and elimination of corruption, it was recommended that the DoPT may further reiterate its directions to all Public authorities for making maximum suo-motu disclosures as required under Section 4 of the Act. Transparency audits may be taken up regularly by all Public Authorities themselves or through third party audits as well as by the Commissions.

2) The poor maintenance of records and difficulties in retrieval was highlighted in all three sessions of the Convention despite clear directions for record keeping are in Section 4(1)(a) of the RTI Act. It was, therefore, strongly recommended that the DARPG and other authorities involved in this subject at Central and State level should take up implementation of the requirements of Section 4(1)(a) in a mission mode with specific time-lines given to all Public Authorities and also make adequate budget provisions for the work.

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