

**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 12th November, 2018.

Dear Shri R K Mathur,

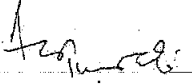
We have the honour to submit to you our report relating to the audit of online disclosures by Public Authorities through their websites. We sincerely thank you for this opportunity given to us to advise on and supervise the exercise of website audits in the light of section 4 of the RTI Act. This has 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.

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

'Democracy requires an informed citizenry and transparency of information which are vital to its functioning and also to contain corruption and to hold Governments and their instrumentalities accountable to the governed.'

(The Preamble of the RTI Act 2005)

I. Context:

The Right to Information Act, which allowed the citizen unprecedented access into information under the control of public authorities, has multiple dimensions. The most commonly known and, equally widely utilised, is the straightforward filing of requests by the information seekers and the subsequent process of first and second appeals. This is the demand side of the transparency law. The other dimension, which is the law's supply-side, is a scheme of voluntary disclosure of information by public authorities (PAs) through a variety of means, principal among which is the disclosure through websites.

Section 4 of the RTI Act provides the broad outline of the contents of the websites. Disclosures under this section are expected to: i) enable the citizen to access the information held by PAs without their having to take recourse to the provisions of RTI Act; and, b) promote transparency and accountability in the functioning of the government to promote participatory governance.

Most PAs have, quite creditably, also taken a host of transparency related initiatives that are independent of Section 4 of the RTI Act. Several other Acts and Rules as well as directions of the government provide for disclosure of certain classes of information for the benefit of citizens.

Section 4 of the RTI Act comprehensively deals with supply side of information held or under the control of Government and its instrumentalities. Aware that the Right to information cannot be made operational in letter and spirit without the government's

initiative to proactively disclose maximum information, the Department of Personnel and Training (DoPT) directed all the PAs, vide its order dated April 15, 2013, to ensure regular audit of mandatory disclosures by a third party. Specifically, the DoPT directed as under:

- 4.4 *Each ministry/public authority should have its proactive disclosure package audited by third-party every year. The audit should cover compliance with the proactive disclosure guidelines as well as adequacy of the items included in the package. The audit should examine whether there are any other types of information which could be proactively disclosed. Such audit should be done annually and should be communicated to the Central Information Commission annually through publication on their own websites. All public authorities should proactively disclose the names of the third-party auditors on their websites. For carrying out third-party audit through outside consultants also, ministries/public authorities should utilise their plan/non-plan funds.*
- 4.5 *The Central Information Commission shall examine third- party audit reports for each ministry/public authority and offer advice/recommendations to the concerned ministries/public authorities.*
- 4.6 *Central information commission should carry out sample audit of few of the ministries/public authorities each year with regard to adequacy of items included as well as compliance of the ministry/public authority with these guidelines.*
- 4.7 *Compliance with the proactive disclosure guidelines, it's audit by third-party and its communication to the Central information commission should be included as RFD target”.*

Subsequently, and in partial compliance with the above direction, a Report titled “Transparency Audit: Towards an Open and Accountable Government” 2015, was prepared under the auspices of the Central Information Commission (CIC), which outlined the framework of conducting disclosure audit to verify and authenticate disclosure of information. This Report has been in public domain. This report and the transparency audit – guidelines of the Ministry of personnel dealt with the audit of public authorities in order to evaluate their transparency – readiness. At another level, however, the disclosures made by public authorities through their websites also needed to be evaluated and graded. This

exercise may not be as comprehensive as the transparency audit recommended in the above-mentioned report, yet could be a significant pointer to the differential levels of *suo motu* disclosures by public authorities.

In the light of the above, CIC decided that it was now time to make a general assessment of Section 4 disclosures made through websites by various PAs and to take stock of its quality, strengths and weaknesses. Accordingly, an exercise was undertaken to evaluate the extent of mandatory disclosures on websites of the PAs.

II. Major Objectives:

The main objective of this exercise is two-fold. One is to make a thorough assessment of voluntary disclosures and the other is to indicate the areas and directions for increasing transparency in PAs. Specifically, the major objectives of this exercise are as under:

- i) To take stock of, and to assess, quantitative and qualitative compliance by PAs of the mandated *suo motu* disclosures under Section 4 of the RTI Act;
- ii) To identify the areas for improvement in information disclosure by PAs; and,
- iii) To suggest measures for improving the content and quality of the disclosures as well as to identify the areas requiring special focus or impetus in terms of disclosures.

III. Approach and methodology:

The report on '*Transparency Audit: Towards an Open and Accountable Government*', apart from providing a conceptual framework and practical guide for ascertaining the level of transparency at different PAs, also contained a suggestion about the approach to evaluating the contents of the websites of the public authorities. That approach forms the basis of the current exercise.

Due credit has been given to the efforts made by the government to promote e-office and e-governance for improvement of institutional efficiency, and the resultant increase in online digital operations.

Similar credit has also been given to public authorities' efforts to familiarise public with its policies and programmes and to take the people into confidence before any legislative initiative.

The methodology of the present exercise was as follows:

Step-1:

A comprehensive format containing all the relevant indicators was designed and developed for evaluating disclosure by PAs. In doing so, care was taken to identify and capture all the relevant parameters that are mentioned in section 4 of the RTI Act as well as other information that has been prescribed by the CIC, the Courts, provisions under different Acts and the directions issued from time to time by the Department of Personnel and Training (DoPT). Broadly, information has been grouped under six categories as described below and the detailed format is attached as Annex-1.

1. Organisation and Function

- Are organisational details given?
- Have all the designated officers been appointed?
- Is the objective and purpose of the establishment given in clear and concise terms?
- Annual reports including information regarding number of RTI applications received and disposed of in that year.
- Are RTI application queries reflected in the FAQs on the PA website? (random check)
- Monthly reports of RTI applications received and disposed.

2. Budget and Programmes

- Are the budget details furnished on the website?
- Are the comprehensive end-to-end e-procurement details disclosed under Section 4?
- Information about fees, tolls, or other kinds of revenue that may be collected under authorization from the Government, information in respect of outputs and outcomes, process of selection of the private sector party may also be proactively disclosed.

- All discretionary /non-discretionary grants/ allocations to state governments/ NGOs/Other institutions by Ministry/Department should be placed on the website of the Ministry/Department concerned.
- Annual Accounts of all legal entities who are provided grants by Public Authorities should be made available through publication, directly or indirectly on the Public Authority's website.
- Are all the payments made under PPP projects disclosed in a periodic manner along with the purpose of making such payments?
- Is the PA proactively disclosing the CAG & PAC paras and the Action Taken Reports (ATRs) (After these have been laid on the floor of both the houses of Parliament)?
- Is the PA disclosing details of foreign and domestic official tours undertaken by the Minister(s) and officials of the rank of Joint Secretary to the Government of India and above and Heads of departments?
- Is the nature of official tours, places visited, number of people included in the official delegation and total cost of such travel undertaken disclosed?

3. **Publicity and Public Interface**

- It should be the endeavour of all public authorities that all entitlements to citizens and all transactions between the citizen and government are gradually made available through computer-based interface. The 'Electronic Delivery of Services Bill, 2012 under formulation in Government of India would provide the necessary impetus.
- Websites should contain detailed information from the point of origin to the point of delivery of entitlements/ services provided by the Public Authorities to citizens. Service delivery standards and performance indicators and penalties for non-compliance to standards of service delivery should be prominently published.
- Orders of the public authority should be uploaded on the website immediately after they have been issued.
- Information must be presented from a user's perspective, which may require re-arranging it, simplifying it, etc. However, original documents in original formats should continue to be made available because these are needed for community monitoring of government's functioning. Is this fact observed on the PA website?

4. E-Governance / Digitisation

- Website should contain all the relevant Acts, Rules, forms and other documents which are normally accessed by citizens.
- While adhering to the standards of government guidelines as laid down by Department of Information Technology and Department of Administrative Reforms & Public Grievances the following principles additionally should also be kept in view to ensure that websites' disclosures are complete, easily accessible, technology and platform neutral and in a form, which conveys the desired information in an effective and user-friendly manner.
- Maintain reliability of information and its real time updation, information generation in a digital form should be automatically updated on the basis of key work outputs, like a muster roll and salary slip (NREGA in Andhra Pradesh) or formalization of a government order (Andhra Pradesh). Such an approach will lead to automation of proactive disclosure.
- The 'National Data Sharing and Accessibility Policy' by the Department of Science and Technology is based on the principle that all publicly funded information should be readily available. The policy has been notified in March 2012 and the schedule should be strictly adhered to.
- Information and data should be presented in open data formats whereby it can be pulled by different Application Protocol Interfaces to be used in different fashions more appropriate to specific contexts and needs. Information/ data can, for instance, be presented in powerful visual ways using visualisation techniques. Such visual representation of information/ data can give insights that may remain largely hidden in a textual or tabular presentation of data. In some contexts, pictures and audio/videos recordings etc may be more useful. There have been moves in some parts of the country to video record Gram Sabha meetings. A picture of a NREGA worksite, for instance, may tell much more than words can. All such different media and forms should be used for proactive disclosure.
- Every webpage displaying information or data proactively disclosed under the RTI Act should, on the top right corner, display the mandatory field 'Date last updated (DD/MM/YY)'.
- The data about digitized record may include the name of the record and any categorization or indexing used; the subject matter and any other information that is

required to be compiled in relation to a file as prescribed by Manual of Office Procedure (and to be prescribed by MOP for electronic records that is under finalization by DARPG), the division/ section/ unit/ office where the record is normally held; the person, with designation, responsible for maintaining the record; and the life span of the record, as prescribed in the relevant record retention schedule.

- The government has issued directions to all the Ministries/ Departments to include a chapter on RTI Act in the Annual Reports submitted to parliament. Details about compliance with proactive disclosure guidelines should be mandatorily be included in the relevant chapter in Annual Reports of Ministries / departments. Is the Annual Report regularly prepared and uploaded on the website?

5. Information as prescribed

- Each Central Ministry/Public Authority should appoint a senior officer not below the rank of a Joint Secretary and not below rank of Additional HOD in case of attached offices for ensuring compliance with the proactive disclosure guidelines. The Nodal Officer would work under the supervision of the Secretary of the Ministry/Department or the HOD of the attached office, as the case may be. Nodal Officers of Ministry/ Department and HOD separately should also ensure that the formations below the Ministry/Department/Attached Office also disclose the information as per the proactive disclosure guidelines. Is this fact mentioned anywhere on the website?

6. Information disclosed on own initiative

- Maximum weightage would be given to the items/ information disclosed with a purpose that public may have minimum resort to use of RTI Act to obtain information.

(Based on above description, the format for evaluation of websites of PAs is attached at Annex-1)

Step-2:

Transparency audit pro-forma was sent to 2092 PAs, which figure in the records of CIC. The first request letter was emailed by the office of CIC on July 12, 2018 asking the PAs to make self-assessment and return the pro-forma within a month. Due to inadequate response, reminders were subsequently sent on August 2, 14, 30 and September 27, 2018. In all, only 838 PAs (40%) have responded till October 31, 2018.

The response from the top 100 PAs that have been receiving large number of RTI application has been rather low. Disclosure by such PAs is separately analysed to ascertain if there is any connection between the level of website disclosure and the number of RTI applications received by them.

The feedback received from the PAs has been carefully examined and vetted by the CIC's Team of evaluators in order to ascertain the accuracy in reporting. Based upon this, as well as other inputs, an as-is-where-is evaluation of the websites has been made.

As a preliminary step the information obtained by the evaluators was grouped into two categories, namely, "Meets the requirement," and "Partially meets the requirement."

"Meets the requirement" comprises websites which disclosed either all; or most, of the information as mandated by the section 4 of RTI Act in a section by section analysis.

"Partially meets the requirement" reflects the incomplete disclosure of the mandated information.

Where a certain Section (or sub-section) of Section 4 is 'not applicable' to a Public Authority, the same has to be mentioned as such on the website. This is deemed to be meeting the requirement. If it is not mentioned clearly, it is taken as "Partially meeting the requirement".

Where systematic (Section and sub-section-wise) mandated disclosure is not made on the website, the information is deemed to be 'Not Disclosed and non-compliant' with RTI Act.

Step-3:

Finally, based on the level of disclosures, PAs have been marked and graded, for which the following procedure was followed.

First, it is admitted that there are no objective criteria for assigning appropriate numerical value to different parameters, which are largely qualitative. The evaluation of disclosures has to be made by the peer group on the basis of domain knowledge and experience of working with the PAs. All the qualitative indicators need to be converted into measurable quantitative values, on the scale of 1 to 100. Accordingly, numerical value to each parameter was assigned for marking and grading PAs, as explained below.

Second, in view of relative significance of each of the identified parameter, the following weightages were assigned:

Parameter	Weight %
1. Organisation and Functions	10%
2. Budget and Programme	30%
3. Publicity and Public Interface	25%
4. E-Governance	20%
5. Information as may be Prescribed	10%
6. Information disclosed on own initiative	5%
Total:	100%

These weights are further distributed across the sub-parameters in the respective categories, as illustrated below:

The weight of, say 10%, under the category of 'organisation and function' is divided by the number of sub-indicators, 13 in this case, to equalize the marks of the sub-indicators, which comes to 7.7, which is further divided by the number of indicators, 6, under the sub-indicator within the category of sub-indicator, which comes to 1.28

This procedure has been followed throughout this exercise. It is important to note that:

- i) A Public Authority scores full marks, as worked out above, when it 'meets the disclosure requirement';
- ii) If a PA 'meets partial requirement', it gets fifty percent marks under the relevant parameter;
- iii) 'zero' mark is given when required information is not disclosed; and,
- iv) if the identified information is 'not applicable', PA is not marked. The appropriate weight is 'reduced' from both the numerator as well as the denominator to ensure that a PA is neither rewarded nor penalised on account of information that is not applicable to a PA.

The final score may be grouped as under:

Score (% age)	Grade
90-100	A
80-89	B
70-79	C
60-69	D
Below 60	E

The PAs that score less than 60% score of marks are grouped under E, which indicate PAs in this group do not meet the minimum disclosure requirements.

Finally, PAs may be graded as A, B, C, D and E on the basis of the score of marks obtained as indicated above. Based on our assessment, all the indicators and sub-indicators are assigned appropriate values, within the maximum marks indicated against each parameters and sub-parameters.

On the basis of total scores, the PAs scoring 90 to 100 marks, are graded 'A', and score of 80 to 89 as 'B', 70 to 79 as 'C', 60 to 69 as 'D' and 'E' for score lower than 60.

It is important to note that no attempt is made to make direct comparisons of one public authority with some others as they may not be comparable in terms of their mandatory activities and public interface.

Limitations:

This exercise is confined to the evaluation of websites of the public authorities relating to disclosures u/s 4 of the RTI Act. No attempt was made to establish direct contact with the public authorities for physical inspection of record of disclosure. PAs were contacted only through E-mail for obtaining their comments and observations on the preliminary evaluation made by the evaluators.

A greater reliance is made on the feedback obtained from the PAs.

It is readily admitted that there can be no optimal solution regarding the best scheme of marking the websites for their quality and content. A certain amount of subjectivity is inescapable. However, an attempt has been made to link the numerical evaluation to the website disclosures as rationally as possible, free from bias. The experience and the domain knowledge of the experts and practitioners has been used for this purpose. With time, better systems of numerical evaluation are sure to come about and usefully employed.

IV. Analysis of Data and Interpretation of Results:

All the total 2092 PAs, as per CIC's record, were directly approached between July to October 2018, for obtaining feedback and comments of PAs on the basis of proforma supplied to them, as Annex-1.

The proforma was also put on the website of CIC for information and use of all the PAs. In all, 838/2092, 40%, replied by October 31, 2018. This analysis is therefore based on these responses.

Table-1, presents summary results on categorisation of PAs under different grades on the basis of overall scores on all the parameters. Based on the total respondents of 838, a significant majority of PAs 292 (35%) fall under grade E whereas merely 19 % score the highest-grade A. The rest of PAs fall in between B, C and D grades, in the range of 13 to 19 %, as may be seen in Table-1.

Table - 1: Number of Public Authorities with Different Levels of Transparency

Grade/ Score of Marks	Number of Public Authorities	% age of Public Authorities
A (90-100) %	158	19%
B (80-89) %	157	19%
C (70-79) %	118	14%
D (60-69) %	113	13%
E (Below 60%)	292	35%
Total PAs	838	100%

Table - 2, presents the parameter-wise and grade-wise disclosure status of PAs. Over 85% of PAs do not disclose information relating to: budget and programme, publicity and public interface and E-governance. On the key parameters, such as these, PAs have been reluctant to ensure mandatory disclosures, as evident from the results shown below.

Table 2: Number of Public Authorities by Grades under different Parameters

S. No.	Grade / Parameter	A	B	C	D	E	Total
1	Organisation and Functions	288	160	130	78	182	838
	(Percentage)	(34)	(19)	(15)	(9)	(22)	(100)
2	Budget and Programme	228	88	70	57	395	838
	(Percentage)	(27)	(11)	(8)	(7)	(47)	(100)
3	Publicity and Public Interface	374	111	71	64	218	838
	(Percentage)	(45)	(13)	(8)	(8)	(26)	(100)
4	E-Governance	286	123	92	79	258	838
	(Percentage)	(34)	(15)	(11)	(9)	(31)	(100)
5	Information as may be Prescribed	198	38	30	70	502	838
	(Percentage)	(24)	(5)	(4)	(8)	(60)	(100)
6	Information disclosed on own initiative	217	5	91	10	515	838
	(Percentage)	(26)	(1)	(11)	(1)	(61)	(100)

The disclosure status as briefly pointed out in Table 1 and 2, may be seen in Annexure-2, which presents the detailed results with respect to each respondent PA.

V. Major Findings and Observations:

An assessment of disclosure by PAs reveals that certain vital information is not fully displayed on the official websites of the different government departments. The missing information largely falls in the following categories:

- Decision-making process, the delegation of powers, duties, and responsibilities of officials and the system of compensation paid to them;
- Information relating to consultation with public on the proposed major policy decisions, as required, are not available;
- Minutes of meetings of various committees and boards, details of the relevant Acts, rules, instruments, manuals, office orders, custodians of various categories of documents held by the organization;

- Policy on transfer and posting of senior officers deployed at important and sensitive places;
- RTI applications and appeals received and their responses, details of Public Information Officers, Appellate Authority, Nodal Officer and other facilities available to citizens for obtaining information;
- Details of domestic and foreign visits undertaken by the senior officials;
- Details of the mechanism to redress grievances of affected persons, mainly employees, clients, and customers;
- Discretionary and Non-discretionary Grants and details of the beneficiaries of subsidy;
- Criteria/ guidelines for allocation and utilization of CSR funds by the Public Sector Enterprises;
- Sources and methods of funding political parties or identification of donors; and,
- Details about Public-Private Partnerships and outcomes of such ventures.

VI. Recommendations:

That a full-fledged transparency audit of the instrumentalities of the government alone can determine the transparency preparedness of these instrumentalities is now considered a given. However, since the audit of that scale and content needs huge preparation, trained auditors, an institution for audit oversight and definitive arrangements for implementation of the audit recommendations, it is a considerable task. While such an exercise waits to be undertaken, as a first step, evaluation of the websites of the public authorities to determine their compliance with the mandated provisions of section 4 of the Right to information law can be extremely useful. Comprehensive information disclosures on websites of PAs, which are carefully designed and regularly updated will doubtless make a significant difference in terms of the Public authority – public interface. The increase in the trust quotient between the public and the Public authority brings in huge benefits in terms of improvement in delivery efficiency and other rewards.

The following points need careful attention:

1. Regularity of website audit – the audit of public authorities' websites should not be sporadic but regular. CIC will need to play a key role in ensuring this. These audits should become a firm basis for progressive and incremental changes in the design and the content of the websites indicating the public authority's seriousness about mandatory disclosures.
2. CIC and DoPT may consider setting up a web-based mechanism to: (a) note all update dates of the websites, (b) send out advance reminders to PAs' website managers, or nodal officers, regarding the approaching update dates, and (c) pursue defaulting PAs to effect updates and demand compliance from their nodal officers.
3. CIC/DoPT may consider setting up a separate dedicated unit for website monitoring and auditing.
4. Audit oversight – caution should be exercised to ensure that website audits are done only under the supervision of a central authority such as the CIC and not by any organisation which wants two minutes of fame under the RTI sun.
5. Methodology – the website audit should be done through a predetermined methodology approved by the central authority such as the CIC either directly or through a peer group created for this purpose.
6. Choice of auditors – in order to ensure that the audits are not slipshod or non-serious, the choice of auditors must be made carefully by the central authority/CIC.
7. Utilising the services of the Nodal Officers – the services of the Nodal Officers can be usefully requisitioned for monitoring the websites in order to ensure the quality and the quantity of online disclosures as well as to keep the websites updated.
8. The role of the Nodal Officer will go a long way in achieving the goals set out in section 4 of the RTI act relating to disclosures of information by public authorities. It is strongly urged that this institution is extensively used to achieve the stated objectives of supply-side disclosures set out in RTIA.
9. Incentives – a scheme of incentives should be put in place to encourage PAs take interest in the design and the content of the websites. The Nodal Officers should be similarly incentivised for exceptional work and dedication.

VII. Conclusion

We have been at pains to point out in our report that while the audit of the websites of the Public Authorities is a necessary step in the direction of ushering in greater transparency in the functioning of the state instrumentalities, the ultimate objective still remains the embrace of transparency by them as central to governance. This task can be performed only by the government who control all supply side of information. It is our hope that the initiative taken by the Central Information Commission to evaluate disclosure standards on websites of public authorities shall usher in the change which the RTI Act enjoins. We repeat that institutional transparency is the final frontier of the Right to information movement.

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 & T)Hessarghatta	91%	A
19	Central Industrial Security Force	97%	A

365	GST Commissionerate, Ludhiana ,Office of Chief Commissioner of GST, Chandigarh Zone	76%	C
366	High Commission of India, Canberra	77%	C
367	High Commission of India, Dhaka	79%	C
368	High Commission of India, Lilongwe	77%	C
369	Hindustan Copper Ltd.	76%	C
370	Hindustan Prefab Ltd.	76%	C
371	IIM Kashipur	73%	C
372	ICAR - Indian Institute of Vegetable Research, Varanasi.	74%	C
373	IHM , Chennai	75%	C
374	IHM GURDASPUR	75%	C
375	India Trade Promotion Organisation	74%	C
376	Indian Air Force	70%	C
377	Indian Institute of Management Rohtak	74%	C
378	Indian Institute of Science Education & Research (IISER), Pune	72%	C
379	Indian Institute of Technology Goa	78%	C
380	Indian Institute of Technology Kharagpur	77%	C
381	Indian National Academy of Engg. (INAE)	78%	C
382	Indira Gandhi Delhi Technical University for Women(IGDTUW), Govt. of Delhi	72%	C
383	Institute of Actuaries of India(IAI)	79%	C
384	INSTITUTE OF HOTEL MANAGEMENT AND CATERING TECHNOLOGY, Kovalam (IHM Thiruvananthapuram)	73%	C
385	Institute of Human Behaviour and Allied Sciences (IHBAS)	71%	C
386	Kendriya Vidyalaya Sangathan (HQ), New Delhi	79%	C
387	Lakshmi Bai National Institute of Physical Education	80%	C

Neelam
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