



# Commonwealth Human Rights Initiative

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## The Right to Information Act, 2005

### Implementation in the Union Government and Union Territories

*Based on the Central Information Commission's Annual Reports*

**2024-25 & 2023-24<sup>1</sup>**

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#### **Introduction**

The Annual Report of the Central Information Commission (CIC) for the year 2024-25 was released mid-February this year. Some trends with regard to the disposal of RTI applications particularly, rejections, were reported by some segments of the media. But there is much more in these statistical reports which deserve our attention with regard to the manner of implementation of *The Right to Information Act, 2005* (RTI Act) across the Union Government. Now on the occasion of the RTI Act entering the 22<sup>nd</sup> year of its implementation we have attempted a deep dive into the statistics published in the annual report to spot trends of improvement and deterioration across the Union Government and the Union Territories. The RTI Act came into effect with its publication in the Official Gazette on 21 June, 2005. The application and appeal related provisions became operational later in October that year.

We have published detailed analysis of the CIC's annual reports from time to time. In the current study we have examined the RTI statistics reported by 53 ministries and the two independent departments of Atomic Energy and Space (total = 55). We have also separately studied the data of a dozen (12) key public authorities namely, the President's Secretariat, Prime Minister's Office, Supreme Court of India, Comptroller and Auditor General's Office, Election Commission of India, Cabinet Secretariat, the three defence forces- Army, Navy and Air Force, Delhi Police, NITI Aayog and the CIC itself. Please refer to the accompanying MS Excel spreadsheet for the data table we have compiled based on the CIC's annual reports for 2024-25 and 2023-24.

The findings from our study of the CIC's latest annual report (2024-25) in comparison with that of the immediately preceding year (2023-24) is presented under the following segments:

#### ***I. Compliance with regard to the obligation of reporting RTI statistics***

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<sup>1</sup> This study is released by **Commonwealth Human Rights Initiative (CHRI)**, New Delhi in June, 2026.

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- II. Trends with regard to the receipt and disposal of RTI applications***
- III. Trends with regard to the backlog of RTI applications***
- IV. Trends with regard to the transfer of RTI applications***
- V. Trends with regard to fees and penalty collected***
- VI. Trends with regard to RTI applications replied***
- VII. Trends with regard to the workload of Public Information Officers***
- VIII. Trends with regard to the rejection of RTI applications***
- IX. Trends with regard to the receipt and the disposal of first appeals***
- X. Trends with regard to the workload of First Appellate Authorities***

Our comparative analysis of the implementation trends is presented below. The major findings are summarised below followed by detailed findings **page no. 6** onwards. To the best of our knowledge, no media report has attempted such a comparison yet.

### **Major Findings**

- According to the **RTI Online Portal**, there are **2,914 public authorities registered on it to receive RTI applications and first appeals in digital mode**. But the CIC has claimed that the submission of RTI-related statistics in 2024-25 by **2,303 public authorities amounts to 100% compliance**. Surely, more than 600 public authorities could not have been added to the RTI Portal since the publication of the latest annual report. **So, the CIC's claim of 100% reporting compliance is open to doubt;**
- The RTI statistics of the Union Territory (UT) Administration of Ladakh has never reported since the bifurcation of the erstwhile J&K in 2019. Having promoted the use of RTI in the undivided J&K, we are aware of the existence of a vibrant group of RTI activists in ar. Unfortunately, data about their interventions does not merit a mention in the CIC's annual reports;
- **There is a growth of 2.52% in the volume of applications submitted in 2024-25**. If the RTI statistics of the UTs is excluded, the growth in volume becomes 1.26%. **However, if 2020-21 i.e., the first year of the COVID-19 pandemic is reckoned as the base year, the growth in volume is 34%;**
- **The Ministry of Corporate Affairs (2.54 lakhs) with 65 reporting public authorities has overtaken the Ministry of Finance (2.20 lakhs) with more than 200 reporting public authorities in terms of the highest number of RTI applications received for the first time;**
- **The top-5 ministries i.e., Corporate Affairs, Finance, Railways, Education and Defence covering only a quarter (25.05%) of the 2,303 reporting public authorities, accounted for more than half (51.52%) of the total no. of RTI applications received in 2024-25. The top-10 ministries (33.04% of the reporting public authorities) reporting receipt of**

more than 50,000 RTIs each account for more than two thirds of the RTI applications received in 2024-25;

- The backlog of RTI applications pending from the previous year across the 2,303 reporting public authorities **increased by 3.03%** in 2024-25. **The Corporate Affairs Ministry** had reported a backlog of 12,413 RTIs in 2023-24 but in 2024-25 it was only 1,619- indicating serious efforts made to drastically reduce the backlog;
- The **Indian Air Force (2,999), PMO (282), Election Commission of India (168), the Central Information Commission (101) and the NITI Aayog (71)** reported **significant increase** in backlog figures in 2024-25 as compared to the previous year;
- The UTs of Delhi and J&K reported a considerable increase in the number of RTIs received in 2024-25 in comparison with the previous year's figures;
- There is an almost **18% increase in the volume of RTI applications transferred between public authorities in 2024-25 (2,80,353)** as compared with the figures reported in 2023-24 (2,37,671). **The Cabinet Secretariat (51.66%) transferred one out of every two RTIs received in 2024-25. The proportion of transfer was the lowest in the Corporate Affairs Ministry (2.21%);**
- **While there is a rise of 2.52% in the volume of RTI applications in 2024-25 over the previous year, the quantum of application fee collected decreased by 6.15% and the amount of additional fees collected is down by 4.21%.** Despite reporting a 13.07% increase in the number of RTI applications received in 2024-25, the Corporate Affairs Ministry's fee collection (application and additional fees included) fell by 31.36% in comparison with the previous year's figures;
- In the narrative portion of its annual report, the CIC states that the **total amount of penalties imposed in 2024-25 was Rs. 1,56,750/- out of which Rs. 99,815/- was paid up by the errant CPIOs. However, in the last column of the detailed data table where the RTI statistics submitted by all 2,303 public authorities are totalled, only Rs. 453 is mentioned as the amount of penalty collected by them (see page no. 184). Even more bewildering are the claims of the following ministries about the penalty amounts collected- Personnel, Public Grievances and Pension: Rs. 79/- (Department of Personnel and Training); Coal: Rs. 17/- (Southeastern Coal Fields Ltd.); External Affairs: Rs. 2/- (Embassy of India in Argentina and Passport Seva Division: Re. 1/- each) and Micro, Small and Medium Enterprises (MSME DI, Mumbai: Re.1/-). The UT of Delhi collected penalty of Rs. 4/- (Directorate of Ayush: Rs. 2/-, Delhi Consumers Cooperative Wholesale Store Ltd. and Rajya Sainik Board: Re. 1/- each). These figures are much lower than the minimum penalty of Rs. 250/- that can be imposed under the RTI Act;**
- At 13.81 lakhs, the number of RTIs to which the 2,303 public authorities replied in 2024-25 was **3.46% lower than** the 14.30 lakh RTIs to which 2,298 public authorities replied in 2023-24;

- Many public authorities complain that they are groaning under the burden of work due to RTI which prevents them from doing other mandated work. With the appointment of more CPIOs under the Union Government (excluding the PIOs appointed in the UTs), the **average annual expected workload per CPIO** (i.e., if the PIO were to dispose of all RTIs received within the same year) **has actually come down from 63.88 in 2023-24 to 63.02 in 2024-25**. Consequently, the **monthly workload has also reduced from 5.32 to 5.25 RTIs per CPIO** during this period;
- In terms of the number of RTIs to which the CPIOs actually replied in 2024-25 (excluding those in the UTs), the **average was 49.85 RTIs per CPIO and the monthly average was 4.15 RTIs per CPIO**. In 2023-24, the average was 53.15 RTIs per CPIO and a monthly average of 4.4 RTIs per CPIO. So, the average workload per CPIO fell in 2024-25 as compared with the workload in 2023-24. Details of the workload among the top-5 Ministries, 12 key public authorities and the UTs are in the attachment;
- According to the CIC, 3% of the RTI applications i.e., **58,501 requests were rejected by 2,303 public authorities across the Union Government including the UTs which reported their RTI data in 2024-25**. However, at the end of the data table in Annexure 1 of the CIC's annual report the total of the exemption clause-wise rejections is shown as 57,985 cases. We have taken this figure for the purpose of the analysis instead of the figure- 58,501. The rationale for this choice is mentioned in Segment VIII of the attachment;
- **Almost 35% of the cases of rejection of RTIs reported across the Union Government including the UTs in 2024-25, are for unspecified reasons other than the ten exemption clauses contained in Sections 8, 9 and 11 of the RTI Act and Section 24 which partially excludes the intelligence and security organisations from the general obligations of transparency**. This proportion is slightly lesser than the 36.47% reported in 2023-24. Public authorities in the UTs used 'others' category significantly fewer times to reject RTIs in comparison with the Union Government. The last page of the attached data table gives a snapshot view of the number of times each of the exemptions was used to reject requests during both years under study;
- Public authorities under the Finance Ministry rejected 36.74% of the cases of rejections totalled under the Union Government (UTs included). **Even though the Ministry of Home affairs does not figure in the top-5 list of ministries receiving the largest number of RTI applications, it takes second place with 7,370 rejections i.e., 12.71% of the total number of rejections followed by the Defence Ministry with 4,937 rejections i.e., 8.51% of the total**. Just these three Ministries had contributed to more than half (almost 58%) of the total number of rejections. The ministries of Cooperation Panchayati Raj, Tribal Affairs, Minority Affairs, Parliamentary Affairs and Development of the Northeastern Region reported NIL rejections;
- The Election Commission of India (ECI) reported zero rejections for the years 2024-25 and 2023-24. However, this author was denied access to information under Section 7(9) in at least two cases by the CPIOs of the ECI during this period. This does not

count as rejection for the ECI. These two RTI applications and the ECI's responses are attached to this despatch;

- **The use of national security-related grounds under Section 8(1)(a) of the RTI Act came down by almost 50% in 2024-25 (1,008 cases) in comparison with the previous year (2,206 cases). The use of Section 8(1)(j) relating to personal privacy of third parties increased from 36.36% in 2023-24 to 38.69% in 2024-25. While Section 8(1)(g) pertaining to the intelligence gathering exemption was used in more cases in 2024-25 the exemption relating to investigation and prosecution of offenders was used in fewer cases as compared with the figures reported in 2023-24;**
- **For those who think that truckloads of RTI applications are filed with the Indian Army every year threatening our national security, it needs to be pointed out that Section 8(1)(a) was invoked in one case only in 2024-25. In 2023-24, this exemption was invoked in 60 cases. 737 of the 744 cases in which permissible exemptions were invoked by the CPIOs of the Indian Army were for protecting personal privacy under Section 8(1)(j) of the Act;**
- **The number of appeals filed with the first appellate authorities (FAAs) across the Union Government (UTs included) were two and a half times more than the number of rejections recorded in 2024-25 indicating a very high level of dissatisfaction with the response or the lack of it to the RTI applications. The proportion of first appeals to the number of RTIs filed was much higher in 2024-25 as compared with the previous year. Thankfully the FAAs disposed of more first appeals in 2024-25 than they did during the previous year but the percentage of disposal had fallen in comparison with 2023-24;**
- **The ministries of Finance, Education, Railways, Defence and Home Affairs accounted for more than one half (51.85%) of the total number of first appeals filed across the Union Government (UTs included);**
- **FAAs in many public authorities complain that they are groaning under the burden of work due to RTI which prevents them from doing other mandated work. Overall, 11,425 FAAs across the Union Government (UTs included) disposed of 1.12 lakh of the 1.86 lakh first appeals. This amounts to an average of 9.85 cases per FAA per year. The monthly average will be less than zero and in decimal points. Strangely, the number of FAAs fell by 47.15% from the 2023-24 figure. Consequently, the average workload on each FAA almost doubled from 5.07 to 9.85 in 2024-25. The reasons for this drastic reduction in the number of FAAs does not merit a discussion in the CIC's latest annual report;**
- **Almost 40% (73,791 cases) of the first appeals remained pending across the 2,303 public authorities across the Union Government (including the UTs) at the end of the reporting year for 2024-25. At the end of the previous year 2023-24, the pendency was slightly lesser at almost 38% of the cases (67,190) filed that year;**
- **The poorest first appeal disposal rates in 2024-25 were reported by the Supreme Court of India (0.67%), Election Commission of India (1.88%), Comptroller and Auditor**

General (2.75%) and the PMO (6.15%). The lone FAA appointed in the President's Secretariat managed to dispose of more than 90% of the 850 appeals filed in 2024-25. Two FAAs of the Central Information Commission disposed of 593 of the 616 cases received in 2024-25 (96.27%) averaging at 296.5 cases per FAA per year. This is one of the best performances across public authorities which handled first appeals in the hundreds and the performance had actually improved over that reported in 2023-24.

### **Detailed Findings**

#### ***I. Compliance with regard to the obligation of reporting RTI statistics***

- i) The CIC claimed **100%** compliance with regard to the submission of RTI statistics by the 2,303 public authorities under its jurisdiction. In 2023-24, there were 2,298 public authorities who submitted their RTI data to the CIC and the latter claimed 100% compliance there as well. However, **according to the RTI Online Portal set up by the Union Government, as on date, there are 2,914 public authorities registered** to receive information requests in digital mode. Of course, this is a dynamic number which keeps changing with the addition of newer public authorities. For example, at the time of commencement of this analysis a few weeks ago, there were 2,913 registered public authorities on this portal. The number had increased by one, at the time of the completion of this report. However, it is highly unlikely that more than 600 public authorities would have been added to the RTI Portal since the publication of the CIC's annual report for 2024-25. **So, the CIC's claim of 100% reporting compliance is open to doubt;**
- ii) The Union Territory (UT) administration of Ladakh has not submitted its RTI statistics to the CIC ever since its creation in 2019. The CIC has not commented on this lapse in its annual reports either. Having promoted the use of RTI in the undivided J&K, we are aware of the existence of a vibrant group of RTI activists in Ladakh. They are using RTI to demand transparency and accountability of public authorities under the UT administration every year. Unfortunately, data about their interventions does not merit a mention in the CIC's annual reports.

#### ***II. Trends with regard to the receipt and disposal of RTI applications***

In recent years, writing of obituaries to the RTI Act based on anecdotal news reports of rejection of information requests, has become common. The CIC's annual reports demonstrate a contrary trend.

- i) A total of **17.95 lakh RTI applications were filed across the 2,303** public authorities under the Union Government in 2024-25. This is **44,161 applications (2.52%) more than the figure of 17.50 lakhs reported in 2023-24**. In 2020-21 which happened to be the first year of the COVID-19 pandemic, 2,182 central public authorities had received only 13.33 lakh RTI applications. **In 2024-25 the growth was more than 34% (4.6 lakh applications) compared to 2020-21**. This is no mean accomplishment for a law that several commentators say is almost dead (metaphorically speaking). The faith of the RTI users appears to be deeper than that of the RTI-watchers and commentators;

- ii) The total figures mentioned above include the RTI application statistics from the Union Territories (UTs) administration as well. So, **if the figure of 1.79 lakh RTI applications filed with the reporting UTs is deducted from the total figure of 17.97 lakhs the number of RTIs filed with the public authorities under the Union Government becomes 16.15 lakhs.** Despite this reduction in figures, central public authorities received **20,037 (1.26%) more RTIs in 2024-25 as compared with the previous years.** In other words, the CIC's data shows that more RTIs were filed with the public authorities under the Union Government also as compared with the previous year;
- iii) The **Ministry of Corporate Affairs** with 65 reporting public authorities **has topped the list of Ministries with regard to the number of RTI applications received (2.54 lakhs)** in 2024-25. This is an **increase of 13.07%** over the previous year's tally of 2.25 lakh RTIs. Until 2023-24 it was the Ministry of Finance with more than 200 public authorities that was reporting the highest number of RTI applications. In 2024-25, the Corporate Affairs Ministry has received 15.61% more RTIs (34,374) than the Finance Ministry. The reasons for change in the trend are worth probing because the Corporate Affairs Ministry is a regulatory ministry with limited public dealing. The Finance Ministry's RTI data comprises of data reported by banks, insurance companies and debt recovery tribunals amongst others, which deal with the public directly. The media has not recognised this change in trend while reporting on the CIC's latest AR;
- iv) As the CIC has published a table of the top-20 ministries and departments receiving the bulk of RTI applications, we are not repeating those findings here. **But suffice it to say that the top-5 ministries i.e., Corporate Affairs, Finance, Railways, Education and Defence covering only a quarter (25.05%) of the 2,303 reporting public authorities, accounted for more than half (51.52% i.e., 9.25 lakh applications) of the total volume of RTI applications in 2024-25.** If the next five ministries, namely **Communications (which includes the Department of Posts), Home Affairs, Labour and Employment, Health and Family Welfare and Personnel, Public Grievances and Pensions** (nodal ministry for implementing the RTI Act) that reported more than 50,000 RTI applications are added, **the top-10 account for more than two thirds (69.60% i.e., 12.49 lakhs) of the total volume, yet they cover only 33.04% (761) of the reporting public authorities.** This is where the bulk of the information requests are dealt with in the Union Government;
- v) **Of the 55 ministries and independent departments covered by this study, nearly three fourths of them reported receiving more RTI applications in 2024-25** as compared with the previous year. **Only 15** namely, the ministries of **Finance, Railways, Labour and Employment, Personnel Public Grievances and Pensions, External Affairs, Coal, Civil Aviation, Consumer Affairs Food and Public Distribution, Power, Tribal Affairs, Textiles, Fisheries Animal Husbandry and Dairying, Minority Affairs, Tourism and the Department of Atomic Energy** reported fewer RTI applications in 2024-25 as compared with the volume received during the previous year;
- vi) Among the 12 key public authorities singled out for this study, **five reported more than 15% increase** each in RTI applications as compared with the volume reported for 2023-24, namely- the **Supreme Court of India (15.84%), Election Commission of India (18.03%), Rashtrapati Bhawan (19.67%), Indian Air Force (20.88%) and Indian Army (23.52%).** Only

the **Prime Minister's Office (PMO)** and the **NITI Aayog** reported fewer RTI applications in 2024-25;

- vii) Among the UTs, the **Government of the National Capital Territory of Delhi (GNCTD)** reported an increase of **18.42%** in the number of RTI applications received in 2024-25 in comparison with the previous year. **Jammu and Kashmir (J&K)** reported a **25.5% increase in 2024-25**. Chandigarh, Andaman & Nicobar Islands and Lakshadweep reported a decrease in the number of RTIs received in comparison with 2023-24.

### ***III. Trends with regard to the backlog of RTI applications***

- i) The backlog of RTI applications pending from the previous year across the 2,303 reporting public authorities **increased by 3.03%** in 2024-25. **The Ministry of Parliamentary Affairs continued with the trend of zero backlog in 2024-25. Only 13 of the remaining 54 ministries and standalone departments reported a reduction in the backlog of RTIs pending from the previous year, namely- Corporate Affairs, Railways, Home Affairs, Health and Family Welfare, Personnel Public Grievances and Pensions, Road Transport and Highways, Consumer Affairs Food and Public Distribution, Panchayati Raj, Women and Child Development, Mines, Micro Medium and Small Enterprises, Youth Affairs and the Department of Space. The Corporate Affairs Ministry had reported a backlog of 12,413 RTIs in 2023-24 but in 2024-25 it was only 1,619- indicating serious efforts made to drastically reduce the backlog;**
- ii) **Four ministries reported a significantly large hike in the backlog RTI figures, namely, Education (7,282), Defence (4,516), Housing and Urban Affairs (3,919) and Labour and Employment (3,006)** when the figures for 2024-25 are compared with those of 2023-24;
- iii) Among the 12 key public authorities selected for this study, the **President's Secretariat, Supreme Court of India, Comptroller and Auditor General's office, Indian Navy and Delhi Police reported a reduction in the backlog of RTIs pending from the previous year. The Indian Air Force (2,999), PMO (282), Election Commission of India (168), the Central Information Commission (101) and the NITI Aayog (71) reported significant increase in backlog figures in 2024-25 as compared to the previous year;**
- iv) Strangely, the **Indian Army reported identical backlog figures (1,07,601) in both 2023-24 and 2024-25**. Apart from the fact that this is a very large number, the repetition of the same figure has not merited any discussion in the latest annual report;
- v) **Among the UTs while J&K reported a 63.02% increase in the backlog, Puducherry reported an increase of 47.73% in the number of RTI applications that were pending at the beginning of the year 2024-25. Andaman and Nicobar Islands, Chandigarh, GNCTD and Lakshadweep reported a drop in backlog figures in 2024-25.**

### ***IV. Trends with regard to the transfer of RTI applications***

- i) Section 6(3) of the RTI Act permits a public authority to transfer an RTI application to another public authority if the information sought is available with that other public

authority or if the subject matter of the request more closely relates to the working of that other public authority. There is an almost **18% increase in the volume of RTI applications transferred between public authorities in 2024-25 (2,80,353) as compared with the figures reported in 2023-24 (2,37,671);**

- ii) **The proportion of transfer of RTIs received in 2024-25 was more than 20% in the following ministries- Food Processing (41.93%), Defence (35.33%), Parliamentary Affairs (34.48%), Law and Justice (32.94%) Commerce and Industry (25.66%); New and Renewable Energy (24.68%), Minority Affairs (22.81%), Fisheries, Animal Husbandry and Dairying (22.79%), Ayush (21.56%);**
- iii) **The volume of transfer was between 10-20% in the following ministries: Chemicals and Fertilisers (15.80%), Agriculture and Farmers' Welfare (15.58%), Environment and Forests (15.46%) Railways (15.44%), Home Affairs (15.16%), Civil Aviation (14.73%), Women and Child Development (14.69%), Personnel, Public Grievances and Pensions (14.57%), Micro, Small and Medium Enterprises (14.33%), External Affairs (13.79%), Heavy Industries and Public Enterprises (13.36%), Earth Sciences (13.20%), Finance (12.98%), Tribal Affairs (12.22%), Textiles (11.41%), Housing and Urban Affairs (11.21%), Mines (11.12%), Labour and Employment (10.95%), Information and Broadcasting (10.91%), Coal (10.73%), Rural Development (10.66%), Power (10.53%), Education (10.29%), Consumer Affairs, Shipping (10.18%), Food and Public Distribution (10.02%) and the standalone Department of Space (13.06%);**
- iv) In the remaining ministries, the proportion of transfer of RTI applications received in 2024-25 was less than 10%. **It was lowest in the Corporate Affairs Ministry (2.21%);**
- v) Among the 12 key public authorities selected for this study, **Cabinet Secretariat (51.66%) transferred one out of every two RTIs received in 2024-25.** The transfer volume was highest in the following: **Comptroller and Auditor General's office (47.76%), Indian Army (46.99%), PMO (34.19%), Indian Navy (33.03%), NITI Aayog (22.86%) and the Central Information Commission (17.71%). Delhi Police (2.66%), Supreme Court of India (4.98%) and the Indian Air Force (5.18%) reported the smallest volume of transfer of RTI applications in 2024-25;**
- vi) Among the UTs, **GNCTD transferred 43.68% of the RTIs received in 2024-25 while J&K transferred almost 28% of the RTIs received between public authorities.** Other UTs transferred fewer RTIs between their public authorities.

## ***V. Trends with regard to fees and penalty collected***

### ***A. Fee-related trends***

Section 6(1) of the RTI Act permits a public authority to collect application fee from a citizen at the time of the submission of the information request. Subsequently, if the CPIO decides to provide access to the information sought, wholly or partially, the applicant is required to pay additional fees for reproducing the information. The RTI Rules, 2012 notified by the Union Government have stipulated the application fee at Rs. 10/- per application and photocopying charges at Rs. 2/- per page of A-4 size. These Rules also fix the rates at which fee is payable for

inspecting the official records, obtaining samples or models, accessing information in electronic form or for copying information on larger sized paper. According to the *proviso* to Section 7(6), applicants who furnish proof of belonging to below the poverty line (BPL) families are not required to pay either fee for obtaining information.

- i) According to the CIC's Annual Report a total sum of Rs. 76.81 lakhs (including application and additional fees) was collected by the 2,303 public authorities as fees in 2024-25. **This is 5.53% lesser than the quantum of fees collected by the 2,298 public authorities in 2023-24;**
- ii) The quantum of application fee collected in 2024-25 is Rs. 51.20 lakhs whereas in 2023-24 a collection of Rs. 55.40 lakhs was reported. The collection of additional fees also shows a downward trend. While a sum of Rs. 25.91 lakhs was collected as additional fee in 2023-24, it fell to Rs. 24.82 lakhs in 2024-25;
- iii) As pointed out in Segment II above, **there is a rise of 2.52% in the volume of RTI applications in 2024-25 as compared to the figures reported in 2023-24. Nevertheless, in 2024-25, the decrease in the quantum of application fee collected is 6.15% and the amount of additional fees collected is down by 4.21%.** These trends do not even merit a discussion in the narrative part of the Annual Report;
- iv) Is the fall in fee collection due to poor accounting and reporting by the public authorities or are more BPL applicants using the RTI Act, now? As non-BPL applicants are required to pay an application fee of Rs. 10/- the quantum of application fee collected would imply the submission of 5.20 lakh unique RTI applications in 2024-25 for which application fee was paid. Does this mean that the remaining 12.75 RTI applications were submitted by applicants belonging to the BPL category? If one were to make an allowance for the fact that some of those who paid the application fee might have filed more than one RTI application in 2024-25, the number of non-BPL applicants who filed at least one RTI application would come down further. Given the fact that the heaviest workload of RTI applications is reported from ministries like Corporate Affairs, Finance and Defence amongst the top-5, whose public authorities do not have direct dealing with BPL families, the anomalies with regard to the RTI fees statistics might be blamed on poor accounting and reporting by the public authorities;
- v) **The top-5 ministries reporting the highest collection of fees (application and additional fees included) in 2024-25 are: Finance: Rs. 10.10 lakhs, Education: Rs. 7.9 lakhs, Railways: 6.51 lakhs, Corporate Affairs: Rs. 5.68 lakhs and Communications: Rs. 4.71 lakhs;**
- vi) Interestingly, **despite reporting a 13.07% increase in the number of RTI applications received in 2024-25, the Corporate Affairs Ministry's fee collection (application and additional fees included) fell by 31.36%.** Similarly, **despite reporting a 8.81% increase in the number of RTI applications received in 2024-25 as compared with figures from the preceding year, the Ministry of Communications reported a 10.21% decrease in the quantum of fee collected (application and additional fees included) as compared with the previous year.** The remaining ministries in the top-5 reported higher fee collections in 2024-25 in comparison with the preceding year;

- vii) It is noteworthy that the **Ministry of Panchayati Raj received 7,143 RTI application in 2024-25 but reported collecting only Rs. 100/-** (all by way of application fee). In the preceding year, this Ministry reported collecting Rs. 210/- as application fee against 6,738 RTI applications. In both years this Ministry reported that it had not collected any additional fee, implying that information was provided free of charge to all applicants. Interestingly this Ministry reported 0% rejection of RTI applications in both years;
- viii) Among the 12 key public authorities selected for this study the **Comptroller and Auditor General's Office received 4,068 RTI applications in 2024-25 but collected only Rs. 3,814/- by way of application fees**. With only 237 RTI rejected, they seem to have provided copies of requested records free of charge as they have reported **zero collection of additional fees**. Similarly, the **Cabinet Secretariat received 1,597 RTIs applications in 2024-25 but collected only Rs. 2,320/- by way of application fees**. With only 117 RTI being rejected, the Cabinet Secretariat seems to have furnished information to other applicants free of charge as the **additional fee collection reported is zero**. Either a very large number of RTI applicants belonged to the BPL category or the CPIOs of these public authorities have been negligent in accounting and reporting the amount of fees collected;
- ix) **In the case of the Indian Army, Navy and the Air Force, the quantum of fees collected from applicants showed a downward trend in 2024-25** as compared with the preceding year even though there was a significant increase in the number of RTI applications filed with them. A similar trend with regard to fee collection was reported by the President's Secretariat, Prime Minister's Office and the Election Commission of India.
- x) **Among the UTs GNCTD, Chandigarh, Puducherry and Lakshadweep reported a significant dip in the amount of fees collected** under the RTI Act. **J&K reported a 23.77% increase** in the amount of application fee and additional fee collected during 2024-25 as compared with the previous year's figures.

### ***B. Penalty-related trends***

Section 20(1) of the RTI Act empowers the CIC to impose penalties on an errant CPIO at the rate of Rs. 250/- per day subject to a maximum limit of Rs. 25,000/- in each case. Penalty may be imposed if the CPIO:

- a) without reasonable cause refuses to receive an RTI application; or
  - b) without reasonable cause has not furnished the information within the time limit specified in the Act; or
  - c) for malafidely denying access to information; or
  - d) knowingly giving incorrect, incomplete, misleading information; or
  - e) destroying information which was the subject of an RTI application; or
  - f) obstructing the furnishing of information in any manner.
- i) In the narrative portion of its annual report, the CIC states that the **total amount of penalties imposed in 2024-25 was Rs. 1,56,750/- out of which Rs. 99,815/- was paid up by**

the errant CPIOs. The CIC does not indicate in how many cases penalty was imposed on how many CPIOs;

- ii) Strangely, in the last column of the detailed data table where the RTI statistics submitted by all 2,303 public authorities are totalled, only Rs. 453 is mentioned as the amount of penalty collected by them (see page no. 184);
- iii) Even more bewildering are the claims of the following ministries about the penalty amounts collected- **Health and Family Welfare: Rs. 133/-** (Indian Pharmacopoeia Commission Ghaziabad: Rs. 110/- and Directorate General of Health Services: Rs. 23/-); **Finance: Rs. 131/-** (Chief Commissioner of Central Excise and Customs, Pune Zone: Rs. 130/- and Institute of Actuaries of India: Re.1/-); **Defence: Rs. 86/-** (Directorate General of Defence Estates: Rs. 80/- and Armoured Vehicles Nigam Ltd.: Rs. 6/-); **Personnel, Public Grievances and Pension: Rs. 79/-** (Department of Personnel and Training); **Coal: Rs. 17/-** (Southeastern Coal Fields Ltd.); **External Affairs: Rs. 2/-** (Embassy of India in Argentina and Passport Seva Division: Re. 1/- each) and **Micro, Small and Medium Enterprises (MSME DI, Mumbai: Re.1/-)**. The **UT of Delhi collected penalty of Rs. 4/-** (Directorate of Ayush: Rs. 2/-, Delhi Consumers Cooperative Wholesale Store Ltd. and Rajya Sainik Board: Re. 1/- each). These figures are much lower than the minimum penalty of Rs. 250/- that can be imposed under the RTI Act. **Does the CIC even read the data tables put together before they are published and tabled in Parliament is a fundamental question that they must answer.**

## ***VI. Trends with regard to RTI applications replied***

Section 7(1) of the RTI Act states that a PIO is required to either provide the information on payment of additional fee or reject the RTI application for reasons specified in Sections 8 or 9. Since 2020-21 the CIC has introduced a new category of statistics in its annual reports, namely, the '**number of RTIs replied**'. What does this datapoint signify and how is it calculated is not disclosed in the annual reports. Commonsense indicates that the no. of RTIs replied minus the total number of RTI applications requiring disposal in a reporting year (i.e., backlog from previous year plus fresh receipts during the reporting year) would be the figure for the backlog of RTI applications pending for disposal in the next reporting year. However, these two figures have not matched in any year since the practice of reporting the '**number of RTIs replied**' category of data began. Nevertheless, the comparative trends with regard to the '**No. of RTIs replied**' is given below:

- i) The 2,303 public authorities collectively claimed that they had **replied to 13.81 lakh RTIs in 2024-25**. This is **3.46% lower than the 14.30 lakh RTIs that were replied in 2023-24**;
- ii) Ministries which reported an **increase in the proportion of RTIs replied** in 2024-25 as compared with the previous year are: **Corporate Affairs (from 2.30 lakhs to 2.31 lakhs); Education (from 1.02 lakhs to 1.10 lakhs); Communications (from 86,168 to 91,548); Defence (from 54,835 to 65,295) and Road Transport and Highways (from 25,158 to 33,388)**;
- iii) Ministries which reported a significant **decline in the number of RTIs replied** in 2024-25 as compared to the preceding year are: **Railways (from 1.90 lakhs to 1.56 lakhs); Finance**

(from 1.85 lakhs to 1.73 lakhs); Home Affairs (from 63,989 to 40,244); Health and Family Welfare (from 47,254 to 44,018) and Personnel, Public Grievances and Pensions (from 65,171 to 39,080);

- iv) Among the 12 key public authorities selected for this study, the **Comptroller and Auditor Generals' Office (2,248 to 1,809); Indian Army (from 7,481 to 6,038) and the NITI Aayog (from 876 to 776)** reported a decline in the number of RTIs replied in 2024-25 as compared with the figures reported in the preceding year. The remaining public authorities reported an increase in the number of RTIs replied in 2024-25. **The Prime Minister's Office reported an increase in the number of RTIs replied (from 5,703 to 5,734) even though the volume of RTI applications received in 2024-25 declined** in comparison with the previous year's figures (from 9,430 to 9,074);
- v) Among the UTs, **J&K reported an increase in the number of RTIs replied in 2024-25 as compared to the previous year (from 9,998 to 11,579) as did Puducherry (from 4,849 to 5,248) and Andaman and Nicobar Islands (from 492 to 516). Other UTs reported a decline in the number of RTIs replied.**

## ***VII. Trends with regard to the workload of Public Information Officers***

Sections 7-11 of the RTI Act relate to the duties of public information officers. One of the complaints raised by several public authorities repeatedly over the years is that a lot of their time is spent on responding to RTI applications and appeals at the cost of doing other work as per their mandate. In 2020 we released [a multi-year study of the RTI workload](#) to show the hollowness of this claim. Our major finding is reproduced below:

*“On an average, a CPIO handled less than 42 RTIs (41.82) in a year in 2012-13. In 2018-19, this increased to almost 68 RTIs in a year (67.78). However, the monthly average no. of RTIs per CPIO rose from less than 4 to under 6 RTIs between 2012-13 and 2018-19.”*

We have examined the issue of workload on PIOs in the current study as well. **Even though the number of public authorities reporting their RTI data to the CIC increased by only five in 2024-25 (2,303) as compared with the preceding year (2,298) the number of PIOs increased from 27,657 to 28,383. This is an increase of 2.63% (726) over the previous year's total.** Our major findings regarding the workload of PIOs are given below.

### ***A. Workload on PIOs vis-à-vis RTI applications received***

- i) As mentioned in Segment II above, 2,303 public authorities received a total of 17.95 lakh RTI applications in 2024-25. Consequently, the average expected workload on a PIO (i.e., if the PIO were to dispose them all within the same year) works out to 63.24 RTI applications per year which is slightly lesser than the average of 63.31 applications per PIO for the preceding year. So, the monthly average per PIO works out to **a little more than five (5.28)** in 2024-25. In our **2020 study, we had shown that a PIO was expected to handle an average of almost 57 RTIs** in 2018-19. **The monthly average was less than five RTIs (4.75).** In other words, despite the increase in the number of RTI applications received in 2024-25,

the average workload has not increased significantly from the average calculated for 2018-19, thanks to the increase in the number of PIOs appointed by public authorities;

- ii) The averages calculated above are based on the RTI applications and PIO statistics which include figures reported by six of the seven the Union Territories as well. **If those figures are deducted, the total number of RTIs received by the Union Government in 2024-25 is reduced to 16.15 lakhs. 25,631 CPIOs were expected to handle them. So, the average workload per CPIO works out to only 63.02 and the monthly average per CPIO remains a little more than five RTIs (5.25).** In comparison, public authorities had received only 15.95 lakh RTIs in the preceding year of 2023-24 which were required to be handled by 24,972 CPIOs. This was an average workload of 63.88 RTIs per CPIO and the monthly average is 5.32. So, with the appointment of more CPIOs, the average expected workload should have come down in 2024-25 as compared to the previous year.

### ***B. Workload on PIOs vis-à-vis RTI applications replied***

- i) As mentioned in Segment VI above, the total number of RTIs replied by 28,383 PIOs in 2024-25 was 13.80 lakhs (UTs data included). **This amounts to an average of 48.64 per PIO per year. The monthly workload is 4.05 RTIs per PIO. In 2023-24 with 14.30 lakh RTIs replied by 27,657 PIOs, the average annual workload was 51.71. The monthly workload per PIO was 4.31 in 2023-24.** As mentioned in Segment VI above, the disposal figures have come down despite an increase in the number of PIOs appointed. The causal factors behind the reduction in the disposal figures in 2024-25 ought to have been probed, but the CIC is silent on this issue in its annual report;
- ii) If the number of RTIs replied by PIOs in the UTs is deducted the total number of RTIs replied to by the CPIOs of the Union Government is reduced to 12.78 lakhs for 2024-25. These were replied to by 25,631 PIOs. **This works out to an average of 49.85 RTIs per CPIO and the monthly average becomes 4.15 per CPIO. In 2023-24, 24,972 CPIOs under the Union Government had replied to 13.27 lakh RTIs. This works out to an average of 53.15 RTIs per CPIO and a monthly average of 4.4 RTIs per CPIO.** The causal factors behind the reduction in the disposal figures ought to have been probed, but the CIC is silent on this issue in its annual report.

### ***C. Workload in the top-5 Ministries vis-à-vis RTI applications received and disposed***

- i) 65 CPIOs in the Ministry of Corporate Affairs which received the largest number of RTI applications received in 2024-25 were required to deal with 2.54 lakh requests. **This works out to an average of almost 3,918 RTIs per year per CPIO. The monthly average works out to 326.5 applications per CPIO. In 2023-24 the average workload per CPIO per year was about 3,412 RTIs and the monthly average per CPIO was a little more than 284 RTIs.** During 2024-25 the PIOs replied to 2.31 lakh RTIs. **This works out to an average of almost 3,566 RTIs per CPIO. The monthly average is a little more than 297 RTIs per CPIO.** In 2023-24 the average number of RTIs replied by each CPIO was a little more than 3,495 RTIs and the monthly average was more than 291 RTIs per CPIO. **However, the Corporate Affairs Ministry is the only outlier in terms of workload distribution amongst the top-5 Ministries reporting the largest number of RTI receipts as will be shown below.**

Clearly, even if the workload were to be equally distributed, the workload on each CPIO increased in 2024-25 as compared to the previous year. However, in reality some CPIOs would have handled much more than the average figure. The Ministry must urgently examine the nature of information sought and take steps to disclose more information under Section 4(1) of the RTI Act to reduce the need for citizens to file formal requests. More CPIOs need to be appointed to share the workload. Unfortunately, the CIC does not engage in any discussion with regard to finding ways and means to reducing the burden on the CPIOs in its Annual Report;

- ii) The workload was more evenly distributed across the remaining of the top-5 Ministries receiving the largest number of RTIs in 2024-25. **For example, 8,054 CPIOs of the Union Ministry of Finance had to deal with 2.20 lakh fresh RTIs during the year i.e., 18,924 fewer RTIs as compared to 2023-24. This works out to an average workload of 27.35 RTIs per CPIO per year and a little more than 2 RTIs per month per CPIO.** In 2023-24 the average workload on 7,887 CPIOs was 30.33 per RTIs per year. In terms of RTIs replied, the average works out to 21.52 per CPIO in 2024-25. During the previous year, the average number of RTIs replied per CPIO was higher at 23.46. **Clearly, the increase in the number of CPIOs available with the 219 reporting public authorities across the Finance Ministry helped bring down the average workload and disposal rate in 2024-25 and fewer fresh receipts also contributed to this reduction in workload;**
- iii) Figuring at number three on the top-5 list 1,343 CPIOs of the **Railways Ministry** had to deal with just about 2 lakh fresh RTIs in in 2024-25. This is 27,877 fewer requests as compared with the figure from 2023-24. **The average workload per CPIO was 148.93 which works out to a monthly average of more than 12 RTI applications per CPIO. CPIOs replied to 1.55 lakh RTI applications in 2024-25. This is an average of 115.93 RTIs per CPIO and the monthly average works out to 9.66 RTIs replied.** In 2023-24, the average number of RTIs that CPIOs had to deal with was 229.73 (monthly average was a little more than 19 RTIs per CPIO). The average number of RTIs replied per year was considerably higher at 192.27 (monthly average was a little more than 16 RTIs per CPIO). In 2024-25 this Ministry has appointed 351 more CPIOs to share the workload (albeit reduced) as compared with the previous year;
- iv) Figuring at number four on the top-5 list 1,343 CPIOs of the **Education Ministry** had to deal with just about **1.34 lakh fresh RTIs in in 2024-25 with the help of 1,641 CPIOs.** As only 202 of their 204 public authorities reported RTI statistics to the CIC, the number of CPIOs was slightly lesser as compared with the previous year. **However, the Ministry had to deal with 9,711 more fresh RTIs in 2024-25 as compared with the previous year's figures. So, the average workload per CPIO increased from 74.93 in 2023-24 to 81.67 in 2024-25. The monthly average workload per CPIO also increased from a little more than six RTIs to 6.8 RTIs during this period;**
- v) Figuring at the bottom of the top-5 list 1,939 CPIOs of the **Defence Ministry** had to deal with just about **1.15 lakh fresh RTIs in in 2024-25.** This was 29,433 more RTIs as compared with the figure reported in **2023-24. As there were 121 fewer CPIOs to deal with the increased fresh receipts in 2024-25, the average workload went up from 41.95 RTIs in 2023-24 to 59.75. Nevertheless, the monthly average worked out to a little less than 5**

**RTIs per CPIO. Concomitantly, the average number of RTIs replied per CPIO increased from 26.62 per month to 33.67 per month in 2024-25.**

**The pattern of receipt and disposal of RTIs across the top-5 ministries discussed above reaffirms what we have been saying in similar analyses of RTI data over the years, they can reduce the workload by appointing more CPIOs to share the burden.** The RTI Act is another law like all the others they are mandated to implement. The same commonsensical approach to sharing the workload of implementing other laws must apply to the implementation of the RTI Act, as well.

- vi) Among the 12 key public authorities selected for this study, **the President's Secretariat reported zero CPIOs.** However, the Rashtrapati Bhawan website mentions the name and designation of one CPIO. **So, it appears that just one person replied to 2,864 of the 3,158 RTIs received in 2024-25. The workload was the highest in the PMO with the lone CPIO replying to 5,734 RTIs, followed by her/his counterpart in the Supreme Court of India who replied to 3,945 RTI during 2024-25.** 32 CPIOs of the Election Commission of India were faced with an average workload of 112.91 RTIs per CPIO. The average number of RTIs replied by each CPIO was 88.34- up from 53.36 in 2023-24. **479 CPIOs of the Indian Army were saddled with an average workload of 34.83 RTIs per CPIO in 2024-25. The average number of RTIs replied was 12.61 per CPIO which is a considerable reduction from the figure of 15.62 in 2023-24;**
- vii) Among the UTs, **877 PIOs of GNCTD Delhi had an average workload of 160.60 RTIs per CPIO in 2024-25- up from 140.76 in 2023-24. However, the average number of RTIs replied fell to 85.80 from 90.85 in 2023-24.** In Jammu and Kashmir, **1,265 PIOs had an average workload of 15.19 RTIs in 2024-25 which is a slight increase from 13.20 for the previous year. The average number of RTIs replied per PIO increased from 8.63 in 2023-24 to 9.15 in 2024-25.**

## ***VIII. Trends with regard to the rejection of RTI applications***

### ***A. Overall Trends***

- i) According to the CIC, **3% of the RTI applications i.e., 58,501 requests were rejected by 2,303 public authorities across the Union Government including the UTs which reported their RTI data in 2024-25.** In 2023-24 fewer public authorities i.e., 2,298 of them had rejected 67,615 RTIs which was pegged at 4% of the total. At first glance, this seems like a big improvement in the success rate of RTI applications. However, as we have been saying in previous years, this rejection data is unreliable for reasons stated below. Further, the higher number of first appeals received in 2024-25 as compared with the previous year which trends we will analyse in Segment IX below indicates a major increase in the dissatisfaction levels with the manner of disposal or at least the handling of RTI applications by CPIOs (i.e., where no response is sent despite the lapse of the statutory deadline of 30 days);
- ii) For example, there is a discrepancy between the total number of rejections and percentage as calculated at row #8 of the data tables contained in Annexure I of the CIC's annual report and the total that is displayed at the bottom of the data tables where the clause-wise rejections are reported upon (unnumbered row after row #31 on page no.

184). **The figure mentioned at the bottom of the data table is 57,985, i.e., 561 fewer cases.** In the case of some Ministries the total number of rejections mentioned in row #8 of Annexure-I and the total at the bottom of the data table tally with each other. In other cases, they do not tally. So, the discrepancy might be due to a glitch in the data entry software or it might be due to errors committed during data entry by the CPIOs of the public authorities. Wherever there is a discrepancy in the totals, the figure mentioned in row #8 is highlighted in red coloured font in the spreadsheet attached below for the convenience of readers and researchers;

- iii) **Further, the CIC does not clarify as to which is the baseline data against which the total percentage of rejection has been calculated.** For example, if the number of fresh receipts mentioned at row #2 of the data table at Annexure 1 is considered as the baseline data, the percentage of rejection works out to 3.25%. If on the other hand, the baseline data is the total number of requests calculated at row #3 of the same data table, the percentage reduces to only 2.5%. If the baseline data is the total number of RTIs replied mentioned in row #7 of the data table, the percentage of rejection is 4.24%;
- iv) **Regardless of this macro-level confusion, we have taken the figure mentioned at the bottom of the data table after row #31 in Annexure I for the purpose of our analysis in this report and the figure mentioned in row #7 is ignored due to its inaccuracy.** The following trends are noticeable with regard to rejections across the ministries: **as always, the Finance Ministry is at the top of the list with 21,304 instances of rejection of RTIs contributing more than a third of such cases (36.74%). Interestingly, the Corporate Affairs Ministry which reported more receipts than the Finance Ministry reported rejecting only 306 RTIs;**
- v) **Even though the Ministry of Home affairs does not figure in the top-5 list of ministries receiving the largest number of RTI applications, it takes second place with regard to the number of rejections. This may be attributed to the large number of intelligence and security organisations like the Intelligence Bureau and the CRPF which form part of this Ministry and are partially excluded from transparency obligations except with regard to allegations of corruption and human rights violation. In 2024-25 30 public authorities under the Home Ministry had rejected 7,370 RTIs i.e., 12.71% of the total (row #8 data mentions 7,750 rejections).** This is a considerable improvement over the 19,174 rejections reported in 2023-24. **At third place in the top-5, the Defence Ministry rejected 6,012 RTIs but the data in row #8 of Annexure I mentioned only 4,937 rejections.** Nevertheless, the Defence Ministry had rejected 1,298 fewer RTIs as compared with 2023-24;
- vi) **The Defence Ministry comes fourth in the top-5 list with 6,012 rejections reported in 2024-25 (row #8 data mentions only 4,937 rejections).** This is also a considerable improvement **over the figure of 7,310 rejections reported in 2023-24.** Despite not figuring in the top-5 list of ministries reporting the largest number of RTI receipts, the Ministry of Personnel, Public Grievances and Pensions reported the fifth highest number of rejections at 2,243 **(row #8 data mentions only 2,118 rejections).** There is a considerable spurt in the proportion of rejections over the figure reported in 2023-24 (1,761). The Personnel Ministry which is part of the Prime Minister's portfolio is the nodal ministry for implementing the RTI Act across the Union Government;

- vii) Taken together, public authorities under these three ministries accounted for more than one half (58%) of the rejections in 2024-25;
- viii) The Ministry of Tourism reported the lowest rejection figure of one case among all ministries and departments included in this study followed by the Ministry of Food Processing with six such cases. The ministries of Cooperation Panchayati Raj, Tribal Affairs, Minority Affairs, Parliamentary Affairs and Development of the Northeastern Region reported NIL rejections;
- ix) Among the 12 key public authorities, the Indian Army rejected 2,807 RTIs- the largest number. This was more than double the figure of 1,357 RTIs rejected in 2023-24. The number of rejections reported by the Supreme Court of India for 2024-25 (995) are also almost double the figure for the previous year (579). Public authorities such as banks and insurance companies under the Finance Ministry have reported much higher rejection rates. We hope to take these cases up for a detailed study at a later date;
- x) The Election Commission of India (ECI) reported zero rejections for the years 2024-25 and 2023-24. This is strange because, this author submitted an RTI application seeking copies of the Index Cards (which contain basic statistical data about the constituency such as the gender-wise number of electors and voters, the number of EVM and postal votes polled by contesting candidates) submitted by the Returning Officers who conducted the Lok Sabha elections in April-June 2024. The CPIO replied that there are about 700 Index Cards received in relation to the 543 constituencies and copies “cannot be provided as it would disproportionately divert the resources of the public authority as specifies [sic] under section 7(9) of the RTI Act”. Another RTI application seeking the list of expenditure sensitive constituencies and expenditure sensitive pockets in every State and UT identified by the ECI, reports of Expenditure Observers appointed by the ECI and their reports submitted in relation to the same elections was also rejected by another CPIO under Section 7(9). Further, Section 8(1)(g) was invoked to deny access to the Expenditure Observer reports. Several other RTIs seeking information about the 2024 Lok Sabha elections which the ECI does not proactively disclose, were disposed of simply by stating that it does not have the information and that it will not transfer those RTIs to the States and UTs because there are so many of them. None of these responses which amount to ‘rejection’ of the requests have been reported by the ECI to the CIC;
- xi) Among the UTs, GNCTD is shown as having rejected 3,296 (2%) RTIs during 2024-25 in row #8 of the CIC’s annual report. However, the last row in the data table after row#31 accounts for only 612 rejections. Similarly, public authorities in J&K are show as having rejected 634 RTIs in row #8 of the annual report but the last row below row #31 accounts for only 288 cases. With regard to the UT of Chandigarh, it is the reverse. Row #8 data pegs rejections at 338 cases but the last row beneath row #31 of the data table totals up the number of exemption clause-wise rejections to 745 instances.

### ***B. Exemption clause-wise trends***

- i) Almost 35% of the cases of rejection of RTIs reported across the Union Government including the UTs in 2024-25, are for unspecified reasons other than the ten exemption

clauses contained in Sections 8, 9 and 11 of the RTI Act and Section 24 which partially excludes the intelligence and security organisations from the general obligations of transparency. This proportion is slightly lesser than the 36.47% reported in 2023-24. **The ten exemption clauses under Section 8(1) account for 76.26% of all rejections reported in 2024-25.** This is higher than the 73.26% reported for 2023-24. **The use of Section 24 was reported in 21.76% of the cases in 2024-25 which is considerably lesser than the figure of 24.34% reported in 2023-24.** The last page of the attached data table gives a snapshot view of the number of times each of the exemptions was used to reject requests during both years under study;

- ii) As always, **Section 8(1)(j) which protects personal information from unwarranted disclosure accounted for the most frequently invoked ground for rejection at 38.69% of the legally permissible exemptions** under the RTI Act (excluding the 'others' category). In 2023-24 despite the large number of overall rejections this clause was invoked only in 36.36% of the cases. **Section 8(1)(d) which exempts information in the nature of commercial confidence, trade secrets and intellectual property rights where disclosure may adversely impact the competitive position of a third party was the second most frequently invoked exemption clause under Section 8(1) at 11.76%.** In 2023-24 this clause was invoked in only 10.4% of the cases. **The fiduciary exemption under Section 8(1)(e) came a close third at 11.55% in 2024-25.** In 2023-24, this clause was invoked in only 10.47% of the cases. **The sharpest fall was in the category of national security related exemption. Section 8(1)(a) was invoked in only 1,088 cases (2.66%) in 2024-25 as compared with the 2,206 cases (5.09%) reported the previous year.** Similarly, there was a more than 50% reduction in the number of times the contempt of court related exemption under Section 8(1)(b) was invoked in 2024-25 (63 cases) as compared with 2023-24 (144 cases);
- iii) There is a **significant increase in the number of times Section 8(1)(g) pertaining to intelligence gathering was invoked in 2024-25 (910 cases) as compared with the previous year (720 cases).** Contrastingly, **Section 8(1)(h) which prohibits the disclosure of information that would impede investigation or prosecution of cases was invoked fewer times in 2024-25 (2,141 cases) as compared with 2023-24 (2,876 cases).** **Section 8(1)(c) which protects parliamentary privilege at the Union and State level was invoked the least number of times both in 2024-25 (39 cases) and 2023-24 (38 cases);**
- iv) Among the 12 key public authorities, the following interesting trends with regard to the use of exemptions is noticeable. **For those who think that truckloads of RTI applications are filed with the Indian Army every year threatening our national security, it needs to be pointed out that Section 8(1)(a) was invoked in one case only in 2024-25. In 2023-24, this exemption was invoked in 60 cases.** 737 of the 744 cases in which permissible exemptions were invoked by the CPIOs of the Indian Army were for protecting personal privacy under Section 8(1)(j) of the Act. But a large number of cases i.e., **2,063 out of 2,807, RTIs were rejected under the 'others' category. The Indian Air Force rejected only 87 of the 623 cases under 'others' category in 2024-25** which was much higher than the figures in the previous year- 224 of 512 cases;

- v) **236 of the 246 cases of rejection reported by the PMO in 2024-25 were under the 'others' category** rather than the permissible exemptions in Sections 8, 9, 11 and 24 of the RTI Act. In 2023-24 178 of 196 rejections belonged to this category;
- vi) **Among the UTs, fewer rejections were in the 'other's category as compared with the Union Government's performance. GNCTD rejected only 288 of the 612 cases under this category in 2024-25.** However, these figures were much lower at 56 of 208 cases in 2023-24. **In J&K also, only 53 out of 288 cases were rejected under the 'others' category in 2024-25.** This was much lesser than the track record during the previous year (55 out of 145 cases). **In J&K Section 8(1)(h) which exempts disclosure of investigation or prosecution-related information if it is likely to impede those processes was invoked more frequently than the personal privacy exemption under Section 8(1)(j) in 2024-25.** This is similar to the trend noticed in 2023-24.

### ***IX. Trends with regard to the receipt and the disposal of first appeals***

- i) As mentioned at the beginning of Segment IX above, though the number of rejections was less than 5% (whichever baseline data for the volume of RTI applications received/disposed is used), a large number of first appeals were filed against the replies or silence of the CPIOs. Across the 2,303 public authorities under the Union Government (including the UTs), 1.86 lakh first appeals were received during 2024-25. **If the figure of 57,985 rejections mentioned at the end of the data table in Annexe I of the CIC's annual report is taken into consideration, the number of first appeals is two and a half times that figure.** Comparably despite the rejections being much higher at 68,189 cases in 2023-24, the number of first appeals filed that year was only 1.76 lakhs. **So, despite the instances of rejection going down in 2024-25 as compared with the previous year, the proportion of first filed that year rose significantly;**
- ii) There was a corresponding increase in the number of first appeals disposed by the first appellate authorities (FAAs) across the 2,303 public authorities in 2024-25. **While the disposal was 1.12 lakhs in 2024-25, only 1.09 lakh first appeals were disposed of in 2023-24 indicating a disposal rate of 60.39%.** But in 2023-24 the disposal was significantly higher at 62.01%;
- iii) As has been the trend in previous years, 219 public authorities across the **Finance Ministry received the highest number of first appeals- 26,219 in 2024-25.** This figure is considerably higher than the 24,960 first appeal cases received in 2023-24. While 57.11% of the first appeals was disposed of in 2023-24, **in 2024-25 disposal was much higher at 62.20% (16,307 cases).** In comparison, the **Corporate Affairs Ministry which topped the list of ministries with the largest number of RTI applications, had received only 2,135 appeals in 2024-25.** Even this figure is much lower than the 2,629 first appeals it received in 2023-24. **But disposal rate had come down to 68.43% (1,461 cases) in 2024-25 as compared to 77.33% (2,033 cases) during the previous year;**
- iv) **Public authorities under the Education Ministry received 25,658 appeals in 2024-25. This is almost 500 cases more than that received in 2023-24 (25,166).** While the FAAs had

disposed of 49.62% of the first appeals in 2023-24 (12,487 cases) **they were able to dispose of only 46.30% of the first appeals filed in 2024-25;**

- v) **The Railways Ministry reported the third highest number of first appeals received in 2024-25 (18,458 cases).** In 2023-24 it had received only 17,780 first appeals i.e., 678 more cases. **Disposal of first appeals had come down to 73.49% (13,565 cases) in 2024-25 from 74.23% (13,198 cases) noticeable during the previous year;**
- vi) **At fourth place, the Defence Ministry received 16,876 first appeals in 2024-25 which is 1,284 more cases** than that reported in 2023-24 (15,592). This indicates a much higher level of dissatisfaction with the responses/silence of the CPIOs as compared with that of the previous year. The proportion of disposal of first appeals in the Defence Ministry was the lowest among the top-5 ministries receiving the largest number of cases. The FAAs were able to dispose of less than 40% of the first appeals (6,734 cases). **But this is a significant improvement over the 35.37% disposal rate reported in 2023-24 (5,515 cases);**
- vii) **The Home Ministry stood fifth in terms of the number of first appeals received in 2024-25 (9,389 cases).** This was 1,650 cases more than what was reported in 2023-24 (7,739 cases) indicating the highest level of dissatisfaction of RTI applicants with the responses/silence of the CPIOs among the top-5 ministries. The FAAs disposed of only 63.83% of these cases (5,993) as compared with a disposal of rate of 68.92% (5,334 cases) in 2023-24;
- viii) **Together these five ministries accounted for more than one half (51.85%) of the total number of first appeals filed across the Union Government (UTs included);**
- ix) **The Ministry of Development of Northeastern Region received the least number of first appeals at 17 while the Parliament Affairs Ministry received 19 such cases in 2024-25. The Food Processing Ministry had received only 35 first appeals during this period. These three were at the bottom of the pile in terms of first appeals received. However, only the Parliamentary Affairs Ministry was able to dispose of all the appeals received** but the remaining had between 1-3 cases pending at the end of the year. Is this a problem of reporting or were the FAAs truly not able to dispose of such a small number of appeals completely needs to be explored;
- x) Among the 12 key public authorities included in this study, the Indian Army received the highest number of first appeals (9,090 cases) in 2024-25. This is slightly lesser than the number of cases (9,159) received in 2023-24. **The FAAs were able to dispose of only 8% of these cases (693) according to the CIC's annual report.** This proportion remains unchanged from 2023-24. The **Delhi Police was at second place with 5,214 first appeals received in 2024-25.** This was 631 cases more than what was reported in 2023-24. **The FAAs disposed of 76% of these cases (3,939) in 2024-25 which is significantly lesser than the disposal rate of 81% in 2023-24;**
- xi) **The PMO was at third place with 1,268 first appeals received in 2024-25.** This is 50 cases more than that reported for the previous year. However, the disposal rate reported was a dismal 6% (78 cases) - the lowest among the 12 public authorities. **In 2023-24 the disposal rate was slightly better at 7% (87 cases).** Is this because of poor quality of data reporting

or was the lone FAA just not able to handle the large number of cases requires deeper probing;

- xii) With **937 first appeals received, the Indian Air Force was at fourth place**. This is ten cases more than that reported in 2023-24. **The disposal rate was a high 72%** (672 cases) similar to that reported during the previous year (667 cases). **The President's Secretariat was at fifth place with 850 first appeals** received in 2024-25. This is four cases lesser than what was reported in 2023-24. **The disposal of first appeals was 91% in 2024-25 which is lesser than the 93% disposal rate reported during the previous year;**
- xiii) **Among the UTs, GNCTD reported the highest number of first appeals (15,799 cases) which was more than 25 times the number of rejections reported (612 cases. However, at row #8 the CIC report mentions 3,296 rejections. This figure has not been taken into consideration for this study as the breakups tally to a much lower figure)**. This was 1,245 cases more than that reported in 2023-24. FAAs disposed of 58.33% of appeals (9,215 cases) in 2024-25 as compared to the slightly lesser disposal rate of 57% reported during the previous year (8,303 cases). J&K reported receiving 1,047 cases in 2024-25 which is almost 460 cases more than that reported in the previous year (588 cases). The FAAs disposed of 83.76% of these cases (877) which is slightly lesser than the almost 85% disposal rate reported in 2023-24 (498 cases). Puducherry reported receiving 986 appeals which is slightly more than the figure of 958 cases reported during the previous year. FAAs disposed of 77.69% of these cases (766) in 2024-25 which is slightly lesser than the disposal rate of 78.60% (753 cases) reported during the previous year.

## ***X. Trends with regard to the workload of First Appellate Authorities***

- i) As mentioned at the beginning of Segment IX, overall, the 2,303 public authorities under the Union Government including the UTs received 1.86 lakh first appeals. 11,425 FAAs disposed of 1.12 lakh cases. **This amounts to an average of 9.85 cases per FAA per year. The monthly average will be less than zero and in decimal points.** Strangely, the number of FAAs fell by 47.15% from the 2023-24 figure. There were as many as 21,619 FAAs who disposed of 1.09 lakh appeals that year. **Consequently, the average workload on each FAA almost doubled from 5.07 to 9.85 in 2024-25.** The reasons for this drastic reduction in the number of FAAs does not merit a discussion in the CIC's latest annual report;
- ii) As in the previous years, public authorities under the **Finance Ministry reported disposing the highest number of first appeals in 2024-25 also, at 16,307 cases. This works out to an average of 6.39 cases per FAA per year.** The average monthly workload was less than one case per FAA. In 2023-24 as there were 1,259 more FAAs, the average disposal per FAA was 1.11 cases. Clearly, the workload on FAAs had increased significantly in 2024-25;
- iii) With 13,565 first appeals disposed of by **598 FAAs in the Railways Ministry, the average workload was 22.68 cases per FAA per year. The average workload per FAA has come down from 29.07% in 2023-24. This is attributable to the appointment of 678 more FAAs in 2024-25.** They were able to absorb the additional workload created by the increased number of first appeals filed in 2024-25. In the **Education Ministry, 11,879 first appeals were disposed of by 720 FAAs with the average workload working out to 16.50 per FAA**

**per year.** This average is slightly higher than the 15.38 cases per FAA calculable for 2023-24 because there were 92 more FAAs that year. The Defence Ministry also reported an increased workload of 6.16 cases per FAA with the disposal of 6,734 cases by 1094 FAAs in 2024-25. In 2023-24 the average workload per FAA was 5.19 cases because there were about 1,200 fewer appeals to dispose of that year.

- iv) **Almost 40% (73,791 cases) of the first appeals remained pending across the 2,303 public authorities across the Union Government (including the UTs) at the end of the reporting year for 2024-25.** At the end of the previous year 2023-24, the pendency was slightly lesser at almost 38% of the cases (67,190) filed that year;
- v) Among the 12 key public authorities, the President's Secretariat has not reported the number of FAAs who have dealt with first appeals in 2024-25 and the previous year. However, the Rashtrapati Bhawan website mentions the name and designation of one FAA. **It appears that 770 out of the 850 appeals received was disposed of by this FAA clocking an average of a little more than 64 appeals per month.** In 2023-24 the monthly average worked out to 66.5 appeals. **The PMO has reported the existence of only one FAA to deal with 1,268 appeals in 2024-25. With only 78 of these cases disposed (6.15%), the monthly average workload was 6.5 cases.** In 2023-24 this FAA disposed of 87 of the 1,218 appeals received (7.14%) and the monthly average workload was much better at 101 cases;
- vi) The **Comptroller and Auditor General's office also reported only one FAA for both years. Out of the 800 appeals received in 2024-25 only 22 were disposed of (2.75%).** During the previous year the FAA had disposed of only 23 of the 580 appeals (3.96%). **The Supreme Court of India's lone FAA disposed of only five of the 743 appeals (0.67%) received in 2024-25.** During the previous year, the FAA had disposed more appeals- 74 out of 674 (almost 11%). We have not calculated the monthly workload because of the miniscule numbers. It is not clear whether this data is an accurate report of the state of handling of first appeals in these public authorities or if these are errors of misreporting'
- vii) **Despite reporting zero rejections, the ECI received 480 appeals out of which only 9 were disposed (1.88%) of by two FAAs in 2024-25.** During the previous year they had disposed of 64 of the 222 appeals received. This not only indicates a very high degree of dissatisfaction with the manner in which the CPIOs have handled the RTI applications but also very poor levels of performance with regard to the disposal of first appeals, if the data has been accurately reported to the CIC;
- viii) **The Indian Army also seems to have done a very poor job of disposing first appeals despite having appointed hundreds of FAAs, if the data has been reported to the CIC accurately.** Their 479 FAAs disposed of only 693 of the 9,090 appeals received in 2024-25 (7.6%) averaging 1.45 cases per FAA per year. In 2023-24 with the disposal of 745 of the 9,159 appeals (8.13%), the average was slightly higher at 1.56 appeals per FAA. **In contrast the Indian Air Force's eight FAAs managed to dispose of 672 of the 937 appeals received in 2024-25 (71.72%) averaging 84 cases per FAA per year.** This was a slight improvement over the performance in 2023-24 when 667 of the 927 cases had been disposed by the same number of FAAs (71.95%) and the average disposal rate worked out slightly lower at 83.38 cases per FAA. **The Indian Navy's FAA managed to dispose of 260 of the 405**

appeals received in 2024-25 (64.19%). This is a considerable improvement over the performance during the previous year when only 209 of the 347 cases (60.23%) were disposed of;

- ix) **47 FAAs of the Delhi Police seem to have toiled hard to dispose of 3,939 of the 5,214 appeals received in 2024-25 (75.55%) averaging at almost 84 cases per FAA per year.** As the number of FAAs of the Delhi Police is not mentioned in the CIC's annual report for 2023-24, it is not possible to compare their performance with that year;
- x) **Perhaps one of the best performances regarding the disposal of first appeals is that of the CIC itself. Two FAAs disposed of 593 of the 616 cases received in 2024-25 (96.27%) averaging at 296.5 cases per FAA per year. This works out to an average monthly workload of more than 24 cases per FAA.** In 2023-24 with the disposal of 613 of the 676 cases (90.68%) the average workload per year being slightly lower at 204.33 cases and the average monthly workload working out to 17 cases per FAA. The FAAs had disposed of more cases in 2024-25 as compared with the previous year;
- xi) **Among the UTs, 324 FAAs under GNCTD disposed of 9,215 of the 15,799 first appeals received in 2024-25 (58%).** There were 62 fewer FAAs compared with the previous year when 386 FAAs disposed of 8,303 of the 14,554 cases received (52.55%). **So fewer FAAs worked harder to dispose of more cases in 2024-25 with an average workload per of 28.44 cases.** This is a little more than two cases per month per PIO. The average workload per PIO in 2023-24 was a lot lesser at 21.51 because there were more FAAs available to deal with these cases. In Chandigarh 78 FAAs disposed of 1,368 of the 1,568 first appeals received in 2024-25 (87.24%) in 2024-25. The average workload per PIO was 17.54. Interestingly, there were only 67 FAAs in 2023-24 to dispose of 1,054 of the 1,176 appeals which were filed that year (89.63%) and the average workload per FAA was lower at 15.73.
- xii) **In J&K, 184 FAAs disposed of 877 of the 1,047 first appeals received in 2024-25 (83.76%) and the average workload per FAA was 4.77.** As there were 299 FAAs in 2023-24 to dispose of fewer appeals (498 of 588 i.e., 84.69%) the average workload per FAA was 1.67. **In Puducherry, 111 FAAs disposed of 766 of the 986 first appeals received in 2024-25 (77.69%). The average workload per FAA was 6.90 cases.** In 2023-24 only 77 FAAs disposed of 753 of the 958 appeals received (78.60%) averaging 9.78 appeals per PIO. **Clearly, the appointment of more FAAs helped bring down the workload considerably in 2024-25.**

## **Conclusion**

The foregoing is only the first set of findings from our deep dive into the RTI statistics reported by the CIC. We hope to publish more trends across specific public authorities in the coming months. Based on this first set of findings it must be said that the CIC does not appear to have deeply examined the data submitted by public authorities, ministries and departments. After 21 years of enforcement of the RTI Act, the CIC must make the effort to redefine its role from being a mere accountant of RTI statistics to that of an auditor of the performance of ministries, departments and public authorities vis-à-vis their obligations under the regime of transparency established by the RTI Act. There is much that needs to be done to improve the performance

of CPIOs and FAAs. There is no need to look abroad for examples of good practice. Several ministries, departments and public authorities have taken the necessary steps to dispose of RTIs and appeals in a timely manner while others have been laggard. The CIC must initiate academic studies to analyse what has worked in some public authorities and what has hindered others from implementing the RTI Act effectively. This law which gives effect to a fundamental right was expected to be a game changer when implementation commenced in 2005. The wait for the game to change has been two-decades long with little documentation to show how governance processes have been reformed using RTIs as feedback for poor, weak and unaccountable administration. Perhaps it is time to appoint a body to examine the impact of RTI on the public administration at the Union and state levels.

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