

Audit of Proactive Disclosure

under the Right to Information Act, 2005

- A Toolkit



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**AUDIT OF PROACTIVE DISCLOSURE
UNDER
THE RIGHT TO INFORMATION ACT, 2005
– A TOOLKIT**



Capacity Building for
Access to Information

NiA

A GoI-UNDP Initiative

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While all efforts have been made to make this Manual as accurate and elaborate as possible, the information given in this book is merely for reference and must not be taken as binding in any way. This Manual is intended to provide guidance to the readers, but cannot be a substitute for the Act and the Rules made thereunder.

www.rti.org.in

“In a Government of responsibility like ours where the agents of the public must be responsible for their conduct, there can be but a few secrets. The people of this country have a right to know every public act, everything that is done in a public way by their public functionaries. They are entitled to know the particulars of every public transaction in all its bearings”

- The Supreme Court of India in *State of UP v Raj Narain (1975)*

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1. About the Toolkit

What does the Toolkit provide?

This **toolkit** provides a simple, user-friendly and generic methodology for undertaking audit of proactive disclosure made by any public authority under the RTI Act, 2005.

Benefits of the Toolkit

By using the **toolkit**, one can:

- Assess the quality of proactive disclosure in both qualitative & quantitative terms; and therefore
- Benchmark public authorities on the quality of proactive disclosure.

Who can use the Toolkit?

- Citizens
- Information Commissions
- Public Authorities
- Civil Society Organisations

2. RTI Act 2005 and Proactive Disclosure

The Right to Information Act, 2005 seeks to provide for setting out the practical regime of right to information for citizens to secure access to information under the control of public authorities, in order to promote transparency and accountability in the working of every public authority.

An important aspect of the Act pertains to the obligation of public authorities to *proactively* disclose information to the public. **The RTI Act mandates every public authority to:**

- Disclose information as required under the 17 sub-clauses of section 4 (1) (b).
- Publish all relevant facts while formulating important policies or announcing the decisions which affect public [Section 4(1) (c)]
- Provide reasons for its administrative or quasi-judicial decisions to affected persons [Section 4(1) (d)]
- Update the information provided under Section 4(1) (b) every year. [Section 4(1) (b)(xvii)]
- Take steps to provide the information *suo motu* to the public at regular intervals so that public has minimum resort to the use of this Act to obtain information. [Section 4(2)]
- Disseminate information widely and in a form and manner easily accessible to the public. [Section 4(3)]
- Provide information in the local language and adopt the most effective method of communication for dissemination of information.
- Make information accessible to the extent possible in electronic format with the concerned Public Information Officer, available free of cost or at such cost of the medium or the prescribed print cost price. [Section 4(4)]

Means of dissemination

- Notice Boards
- Newspapers
- Public announcements
- Media broadcasts
- Internet
- Any other means including inspection of offices of any public authority.

Under **Section 4(1) (b)**, every public authority is mandated to publish the following categories of information within one hundred and twenty days from the enactment of the Act,-

1. Particulars of the Public Authority
2. Powers & duties of officers & employees
3. Procedure followed in decision making
4. Norms for discharge of functions
5. Rules, regulations, instructions, manuals and records under its control/ used by employees while discharging functions
6. Categories of documents held by the Authority or which are under its control
7. Arrangement for consultation with or representation by the members of the public in relation to the formulation of policy or implementation thereof
8. Boards, Councils, Committees and Other Bodies constituted as part of the Public
9. Directory of Officers and employees
10. Monthly Remuneration received by officers & employees including system of compensation
11. Budget allocated to each agency including all plans, proposed expenditures and reports on disbursements made etc.
12. Manner of execution of subsidy programmes
13. Particulars of recipients of concessions, permits or authorisation granted by the Public Authority
14. Information available in electronic form
15. Particulars of facilities available to citizens for obtaining information
16. Names, designations and other particulars of public information officers
17. Any other useful information.

3. Why Audit of Proactive Disclosure is required

In practice, however, it has been observed that, **implementation of proactive disclosure** under the Act by public authorities has been rather patchy and of poor quality. The following issues regarding proactive disclosure need to be addressed.

- Total Non-disclosure/ Non-compliance
- Partial disclosure
- Not updating information in time
- Poor efforts at dissemination of information

To address these issues, there is need for regular audit of the quality of proactive disclosure made by Public Authorities under the provisions of the RTI Act.

Audit of Proactive Disclosure is important as it can

- a. Foster better compliance with the provisions of the RTI Act relating to proactive disclosure
- b. Help identify information gaps in the proactive disclosure of public authorities

..... and thereby inculcate a culture of transparency and openness in the functioning of public authorities.

4. Audit Methodology

4.1 Classification of Disclosure Parameters

There is need to identify and categorise parameters of disclosure with the view to segregate them on the basis of their relative importance. Based on a rational examination of the provisions for proactive disclosure, the parameters of disclosure have been segregated into three basic categories. Based on the relative importance of the three categories, different weightages have been accorded to the different categories which will be used as part of the quantitative assessment of proactive disclosure made by the public authority being audited.

Sl. No.	Category	Importance	Reasons why	Weightage
1.	A Category	High	Information on these parameters has high relevance for the public.	0.5
2.	B Category	Medium	Information on these parameters may have reasonable importance for the public.	0.3
3.	C Category	Low	Information on these parameters has relatively low/limited relevance for the public (or both).	0.2

The methodology involves assessment of quality of proactive disclosure on **25 parameters**.

- There are **10 A Category** parameters for assessment
- There are **8 B Category** parameters for assessment
- There are **7 C Category** parameters for assessment

A Category Indicators (High Importance)	B Category Indicators (Medium Importance)	C Category Indicators (Low Importance)
1. Language in which Information Manual/ Handbook available	1. Form of accessibility of Information Manual/ Handbook u/s 4 (1) b	1. Particulars of its organization, functions and duties [Section 4(1) (b) (i)]
2. When was the information Manual/ Handbook last updated?	2. Whether Information Manual/ Handbook available free or not	2. Powers & Duties of its officers & employees [Section 4(1) (b) (ii)]
3. Dissemination of information to the public [Section 4 (3)]	3. Rules, regulations, instructions, manuals and records for discharging functions [Section 4(1) (b) (v)]	3. Consultation with or representation of the public in policy formulation or implementation [Section 4(1) (b) (vii)]
4. Procedure followed in decision making process [Section 4(1) (b) (iii)]	4. Categories of documents held by the authority under its control [Section 4(1) (b) (vi)]	4. Boards, Councils, Committees and Other Bodies constituted [Section 4(1) (b) (viii)]
5. Norms for discharge of functions [Section 4(1) (b) (iv)]	5. Information available in electronic form [Section 4(1) (b) (xiv)]	5. Directory of Officers and employees [Section 4(1) (b) (ix)]
6. Budget allocated to each agency including all plans, proposed expenditures and disbursements made etc. [Section 4(1) (b) (xi)]	6. Particulars of facilities available to citizens for obtaining information [Section 4(1) (b) (xv)]	6. Monthly Remuneration received by officers & employees including system of compensation [Section 4(1) (b) (x)]
7. Manner of execution of subsidy programmes [Section 4(1) (b) (xii)]	7. Any other information as may be prescribed u/s 4(1) (b) (xvii)	7. Names, designations and other particulars of public information officers [Section 4(1) (b) (xvi)]
8. Particulars of recipients of concessions, permits or authorisations granted [Section 4(1) (b) (xiii)]	8. Details regarding receipt & disposal of RTI applications	
9. Are important policies or decisions which affect public informed to them? [Section 4(1) (c)]		
10. Are reasons for administrative or quasi-judicial decisions taken, communicated to affected persons [Section 4(1) (d)]		

The methodology involves both quantitative & qualitative assessments.

4.2 Quantitative Assessment

- For each of the generic & specific indicator/parameter, a **3-point quantitative rating scale (0:1:2)** has been evolved to assess quality/extent of compliance on that parameter. A higher score indicates better compliance on that parameter and vice-versa.
- Add the Scores across all parameters within a particular category to get the **Category Score** (A, B or C).
- Calculate the **Maximum Possible Category Score** for the category of parameters. If any parameter is **not applicable** for a public authority, then the maximum possible score to be considered will be accordingly reduced by an amount of 2 times the no. of parameters not applicable.
 - For example: For A Category parameters, maximum possible score is 20 (10 x 2) if all parameters are applicable. In case one parameter does not apply to the public authority, maximum possible score for the category will be 18 (9 x 2).
- Calculate the **Category Percentage** for each category of parameters which is simply the category score as a proportion of maximum possible category score.
 - For example: If the Category Score on A Category parameters is 14 and the maximum possible category score is 20 (i.e. all parameters apply) then the Category Percentage is $14/20 \times 100 = 70\%$.
- Lastly, apply the **weightages** (i.e. 0.5 for Category A, 0.3 for Category B and 0.2 for Category C) to the respective category percentages to generate the **Weighted Category Percentages**.

- For example: If the Category Percentages for A, B & C parameters are 50%, 60% & 70% respectively, the Weighted Category Percentages would be:
 - A Category: $50\% \times 0.5 = 25\%$
 - B Category: $60\% \times 0.3 = 18\%$
 - C Category: $70\% \times 0.2 = 14\%$

- Add the weighted category percentages to get the **Final Score**.
 - For example: In the case above, the final score would be $25\%+18\%+14\% = 57\%$

- Identify the **Grade** that the public authority falls into on the basis of the Final Score obtained. The table below provides the grading methodology.

GRADES	FINAL SCORE	WHAT DOES IT MEAN?
A	81%-100% of Maximum Possible	Highly Transparent & RTI compliant
B	61%-80% of Maximum possible	Reasonably Transparent & RTI compliant
C	41%-60% of Maximum possible	Limited transparency & compliance with RTI
D	0-40% of Maximum possible	Poor levels of transparency & compliance with RTI

- For example: In the case above, the public authority would be graded as `C' as the final score (57%) lies between 41%-60%.

4.3 Qualitative Assessment

On each parameter, qualitative observations can be recorded in order to:

- a. validate the rating given on that parameter;
- b. record observations & inferences; and
- c. identify information gaps on various parameters of disclosure.

The auditor needs to remember the following points while recording the qualitative remarks on each parameter.

- Please provide proper & clear remarks or directions - do not give ambiguous statements.
- You may record detailed remarks on any parameter if you feel it is warranted - you may attach additional sheets to the audit proforma.
- Try as much as possible to give actionable directions/suggestions so that the public authority can initiate action in that regard easily.
- When pointing out information gaps, please check with the public authority whether that information exists or whether such information can be compiled by the public authority.

The auditor may also record any other observations or remarks at the overall level, after the completion of assessment on all parameters.

5. Audit Proforma

Name of Public Authority being audited:

Address :

Documents Referred: (List documents referred for the audit)

1.
2.
3.
4.
5.

'A' Category Parameters (High Importance)

Sl. No.	Parameter	Requirement	Rating Scale	Score	Qualitative Observations/ Remarks
	(1)	(2)	(3)	(4)	(5)
1.	Language in which Information Manual/ Handbook available	<input type="checkbox"/> English <input type="checkbox"/> Vernacular / Local Language	Language in which available: <ul style="list-style-type: none"> • Both English & Vernacular: 2 • In 1 language only: 1 • Not available: 0 		
2.	When was the information Manual/ Handbook last updated?	<input type="checkbox"/> Annual updation	<ul style="list-style-type: none"> • During last 1 year: 2 • More than 1 year ago: 1 • Not updated at all: 0 		

Sl. No.	Parameter	Requirement	Rating Scale	Score	Qualitative Observations/ Remarks
	(1)	(2)	(3)	(4)	(5)
3.	Dissemination of information widely and in such form and manner which is easily accessible to the public [Section 4 (3)]	Use of the most effective means of communication like <ul style="list-style-type: none"> <input type="checkbox"/> Notice boards <input type="checkbox"/> Newspapers <input type="checkbox"/> Public announcements <input type="checkbox"/> Media broadcasts <input type="checkbox"/> Internet or <input type="checkbox"/> Any other means including inspection of offices 	Dissemination of information done using <ul style="list-style-type: none"> • At least two effective means of communication : 2 • Only one means of communication: 1 • No means of communication used: 0 		
4.	Procedure followed in decision making process [Section 4(1) (b) (iii)]	<ul style="list-style-type: none"> <input type="checkbox"/> Process of decision making <input type="checkbox"/> Final decision making authority <input type="checkbox"/> Related provisions, acts, rules etc. <input type="checkbox"/> Time limit for taking a decision, if any <input type="checkbox"/> Channels of supervision and accountability. 	<ul style="list-style-type: none"> <input type="checkbox"/> Fully disclosed: 2 <input type="checkbox"/> Partially disclosed: 1 <input type="checkbox"/> Not disclosed: 0 		
5.	Norms for discharge of functions [Section 4(1) (b) (iv)]	<ul style="list-style-type: none"> <input type="checkbox"/> Nature of functions/services offered <input type="checkbox"/> Norms/standards for functions / service delivery <input type="checkbox"/> Time-limits for achieving the targets <input type="checkbox"/> Reference document prescribing the norms. 	<ul style="list-style-type: none"> <input type="checkbox"/> Fully disclosed: 2 <input type="checkbox"/> Partially disclosed: 1 <input type="checkbox"/> Not disclosed: 0 		
6.	Budget allocated to each agency including all plans, proposed	<ul style="list-style-type: none"> <input type="checkbox"/> Total Budget for the Public Authority <input type="checkbox"/> Budget for each agency 	<ul style="list-style-type: none"> <input type="checkbox"/> Fully disclosed: 2 <input type="checkbox"/> Partially disclosed: 1 <input type="checkbox"/> Not disclosed: 0 		

Sl. No.	Parameter	Requirement	Rating Scale	Score	Qualitative Observations/ Remarks
	(1)	(2)	(3)	(4)	(5)
	expenditures and reports on disbursements made etc. [Section 4(1) (b) (xi)]	and plan & programmes <input type="checkbox"/> Proposed expenditures <input type="checkbox"/> Revised budget for each agency, if any <input type="checkbox"/> Report on disbursements made and place where the related reports are available			
7.	Manner of execution of subsidy programmes [Section 4(1) (b) (xii)]	<input type="checkbox"/> Name of the programme or activity <input type="checkbox"/> Objective of the program <input type="checkbox"/> Procedure to avail benefits <input type="checkbox"/> Duration of the programme/scheme <input type="checkbox"/> Physical and financial targets of the program <input type="checkbox"/> Nature/scale of subsidy/amount allotted <input type="checkbox"/> Eligibility criteria for grant of subsidy <input type="checkbox"/> Details of beneficiaries of subsidy program (Number, profile etc.)	<input type="checkbox"/> Fully disclosed: 2 <input type="checkbox"/> Partially disclosed: 1 <input type="checkbox"/> Not disclosed: 0		
8.	Particulars of recipients of concessions, permits or authorisations granted by the Public Authority [Section 4(1) (b) (xiii)]	<input type="checkbox"/> Concessions, permits or authorisations granted by Public Authority <input type="checkbox"/> For each concessions, permit or authorisation granted	<input type="checkbox"/> Fully disclosed: 2 <input type="checkbox"/> Partially disclosed: 1 <input type="checkbox"/> Not disclosed: 0		

Sl. No.	Parameter	Requirement	Rating Scale	Score	Qualitative Observations/ Remarks
	(1)	(2)	(3)	(4)	(5)
		<ul style="list-style-type: none"> □ Eligibility criteria □ Procedure for getting the concession/grant and/or permits or authorisations □ Name and address of the recipients given concessions/ permits or authorisations □ Date of award of concessions/ permits or authorisations 			
9.	Are important policies or decisions which affect public informed to them? [Section 4(1) (c)]	<ul style="list-style-type: none"> □ Publish all relevant facts while formulating important policies or announcing decisions which affect public 	At all times: 2 Sometimes : 1 Never : 0		
10.	Are reasons for administrative or quasi-judicial decisions taken, communicated to affected persons [Section 4(1) (d)]	<ul style="list-style-type: none"> □ Provide reasons for its administrative or quasi-judicial decisions to affected persons 	At all times: 2 Sometimes : 1 Never : 0		
CATEGORY SCORE (A) [Sum of Scores across all A Category parameters]					
Maximum Possible Category Score Sum of Maximum Scores across all `applicable' parameters					

Sl. No.	Parameter	Requirement	Rating Scale	Score	Qualitative Observations/ Remarks
	(1)	(2)	(3)	(4)	(5)
CATEGORY PERCENTAGE (A)					
[Total Score (A)/ Maximum Score Possible] × 100					

N.B. Remove those parameters not applicable out of the maximum score possible

`B' Category Parameters (Medium Importance)

Sl. No.	Parameter	Requirement	Rating Scale	Score	Qualitative Observations/ Remarks
	(1)	(2)	(3)	(4)	(5)
1.	Form of accessibility of Information Manual/ Handbook u/s 4 (1) b	<ul style="list-style-type: none"> • Electronic format • Printed format 	Information Manual available in: <ul style="list-style-type: none"> • In Both Formats: 2 • In one format only: 1 • Not available: 0 		
2.	Whether Information Manual/ Handbook available free of cost or not	<ul style="list-style-type: none"> • Free or • At a reasonable cost of the medium 	Cost at which available: <ul style="list-style-type: none"> • Free: 2 • At Reasonable cost: 1 • At High cost: 0 		
3.	Rules, regulations, instructions, manuals and records for discharging functions [Section 4(1) (b) (v)]	<ul style="list-style-type: none"> □ Title and nature of the record / manual / instruction □ Gist of contents 	<ul style="list-style-type: none"> □ Fully disclosed: 2 □ Partially disclosed: 1 □ Not disclosed: 0 		
4.	Categories of documents held by the authority under its control [Section 4(1) (b) (vi)]	<ul style="list-style-type: none"> □ Title of the document □ Category of document □ Custodian of the document 	<ul style="list-style-type: none"> □ Fully disclosed: 2 □ Partially disclosed: 1 □ Not disclosed: 0 		
5.	Information available in electronic form [Section 4(1) (b) (xiv)]	<ul style="list-style-type: none"> □ Details of information available in electronic form <ul style="list-style-type: none"> □ Name/title of the document/record/other information □ Location where available 	<ul style="list-style-type: none"> □ Fully disclosed: 2 □ Partially disclosed: 1 □ Not disclosed: 0 		

Sl. No.	Parameter	Requirement	Rating Scale	Score	Qualitative Observations/ Remarks
	(1)	(2)	(3)	(4)	(5)
6.	Particulars of facilities available to citizens for obtaining information [Section 4(1) (b) (xv)]	<ul style="list-style-type: none"> <input type="checkbox"/> Name & location of the facility <input type="checkbox"/> Details of information made available <input type="checkbox"/> Working hours of the facility <input type="checkbox"/> Contact Person & contact details (phone, fax, email): 	<ul style="list-style-type: none"> <input type="checkbox"/> Fully disclosed: 2 <input type="checkbox"/> Partially disclosed: 1 <input type="checkbox"/> Not disclosed: 0 		
7.	Such other information as may be prescribed under Section 4(1) (b) (xvii)	<ul style="list-style-type: none"> <input type="checkbox"/> Citizen's charter of the public authority <input type="checkbox"/> Grievance redressal mechanisms <input type="checkbox"/> Details of applications received under RTI and information provided <input type="checkbox"/> List of completed schemes/projects/programmes <input type="checkbox"/> List of schemes/projects/programmes underway <input type="checkbox"/> Details of all contracts entered into including name of the contractor, amount of contract and period of completion of contract. <input type="checkbox"/> Any other Information 	<ul style="list-style-type: none"> <input type="checkbox"/> Fully disclosed: 2 <input type="checkbox"/> Partially disclosed: 1 <input type="checkbox"/> Not disclosed: 0 		
8.	Receipt & Disposal of RTI applications	<ul style="list-style-type: none"> <input type="checkbox"/> Details of applications received under RTI and 	<ul style="list-style-type: none"> <input type="checkbox"/> Fully disclosed: 2 <input type="checkbox"/> Partially disclosed: 1 		

Sl. No.	Parameter	Requirement	Rating Scale	Score	Qualitative Observations/ Remarks
	(1)	(2)	(3)	(4)	(5)
		information provided	<input type="checkbox"/> Not disclosed: 0		
	CATEGORY SCORE (B) [Sum of Scores across all B Category parameters]				
	Maximum Possible Category Score Sum of Maximum Scores across all `applicable' parameters				
	CATEGORY PERCENTAGE (B) [Total Score (B)/ Maximum Score Possible] x 100				

N.B. Remove those parameters not applicable out of the maximum score possible

`C' Category Parameters (Low Importance)

Sl. No.	Aspect of Disclosure	Details of Disclosure	Rating Scale	Score	Qualitative Observations/ Remarks
	(1)	(2)	(3)	(4)	(5)
1.	Particulars of its organization, functions and duties [Section 4(1) (b) (i)]	<input type="checkbox"/> Name and address of the organisation <input type="checkbox"/> Head of the organisation <input type="checkbox"/> Key Objectives <input type="checkbox"/> Functions and duties <input type="checkbox"/> Organisation chart <input type="checkbox"/> Any other details	<input type="checkbox"/> Fully disclosed: 2 <input type="checkbox"/> Partially disclosed: 1 <input type="checkbox"/> Not disclosed: 0		
2.	Powers & Duties of its officers & employees [Section 4(1) (b) (ii)]	<input type="checkbox"/> Powers and duties of officers (administrative, financial & judicial) <input type="checkbox"/> Powers and duties of other employees <input type="checkbox"/> Rules/orders under which powers and duties are derived	<input type="checkbox"/> Fully disclosed: 2 <input type="checkbox"/> Partially disclosed: 1 <input type="checkbox"/> Not disclosed: 0		
3.	Particulars for any arrangement for consultation with or representation by the members of the public in relation to the formulation of policy or implementation thereof [Section 4(1) (b) (vii)]	<input type="checkbox"/> Relevant rule, circular etc. <input type="checkbox"/> Arrangements for consultation with or representation by the members of the public in policy formulation / policy implementation	<input type="checkbox"/> Fully disclosed: 2 <input type="checkbox"/> Partially disclosed: 1 <input type="checkbox"/> Not disclosed: 0		
4.	Boards, Councils, Committees and Other Bodies constituted as	<input type="checkbox"/> Name of the Board, Council, committee etc <input type="checkbox"/> Composition	<input type="checkbox"/> Fully disclosed: 2 <input type="checkbox"/> Partially disclosed: 1 <input type="checkbox"/> Not disclosed: 0		

Sl. No.	Aspect of Disclosure	Details of Disclosure	Rating Scale	Score	Qualitative Observations/ Remarks
	(1)	(2)	(3)	(4)	(5)
	part of the Public Authority [Section 4(1) (b) (viii)]	<ul style="list-style-type: none"> <input type="checkbox"/> Powers & functions <input type="checkbox"/> Whether their meetings are open to the public? <input type="checkbox"/> Whether the minutes of the meeting are open to the public <input type="checkbox"/> Place where the minutes if open to the public are available? 			
5.	Directory of Officers and employees [Section 4(1) (b) (ix)]	<ul style="list-style-type: none"> <input type="checkbox"/> Name and designation <input type="checkbox"/> Telephone, fax and email ID 	<ul style="list-style-type: none"> <input type="checkbox"/> Fully disclosed: 2 <input type="checkbox"/> Partially disclosed: 1 <input type="checkbox"/> Not disclosed: 0 		
6.	Monthly Remuneration received by officers & employees including system of compensation [Section 4(1) (b) (x)]	<ul style="list-style-type: none"> <input type="checkbox"/> Name and designation of the employee <input type="checkbox"/> Monthly remuneration <input type="checkbox"/> System of compensation as provided by in its regulations 	<ul style="list-style-type: none"> <input type="checkbox"/> Fully disclosed: 2 <input type="checkbox"/> Partially disclosed: 1 <input type="checkbox"/> Not disclosed: 0 		
7.	Names, designations and other particulars of public information officers [Section 4(1) (b) (xvi)]	<ul style="list-style-type: none"> <input type="checkbox"/> Name and designation of the Public Information Officer, Assistant Public Information Officer (s) & Appellate Authority <input type="checkbox"/> Address, telephone numbers and email ID of each designated official 	<ul style="list-style-type: none"> <input type="checkbox"/> Fully disclosed: 2 <input type="checkbox"/> Partially disclosed: 1 <input type="checkbox"/> Not disclosed: 0 		
CATEGORY SCORE (C)					
[Sum of Scores across all C Category parameters]					

Sl. No.	Aspect of Disclosure	Details of Disclosure	Rating Scale	Score	Qualitative Observations/ Remarks
	(1)	(2)	(3)	(4)	(5)
	Maximum Possible Category Score				
	Sum of Maximum Scores across all `applicable' parameters				
	CATEGORY PERCENTAGE (C)				
	[Total Score (C)/ Maximum Score Possible] × 100				

N.B. Remove those parameters not applicable out of the maximum score possible

Generating the Final Score & Grade for the Public Authority

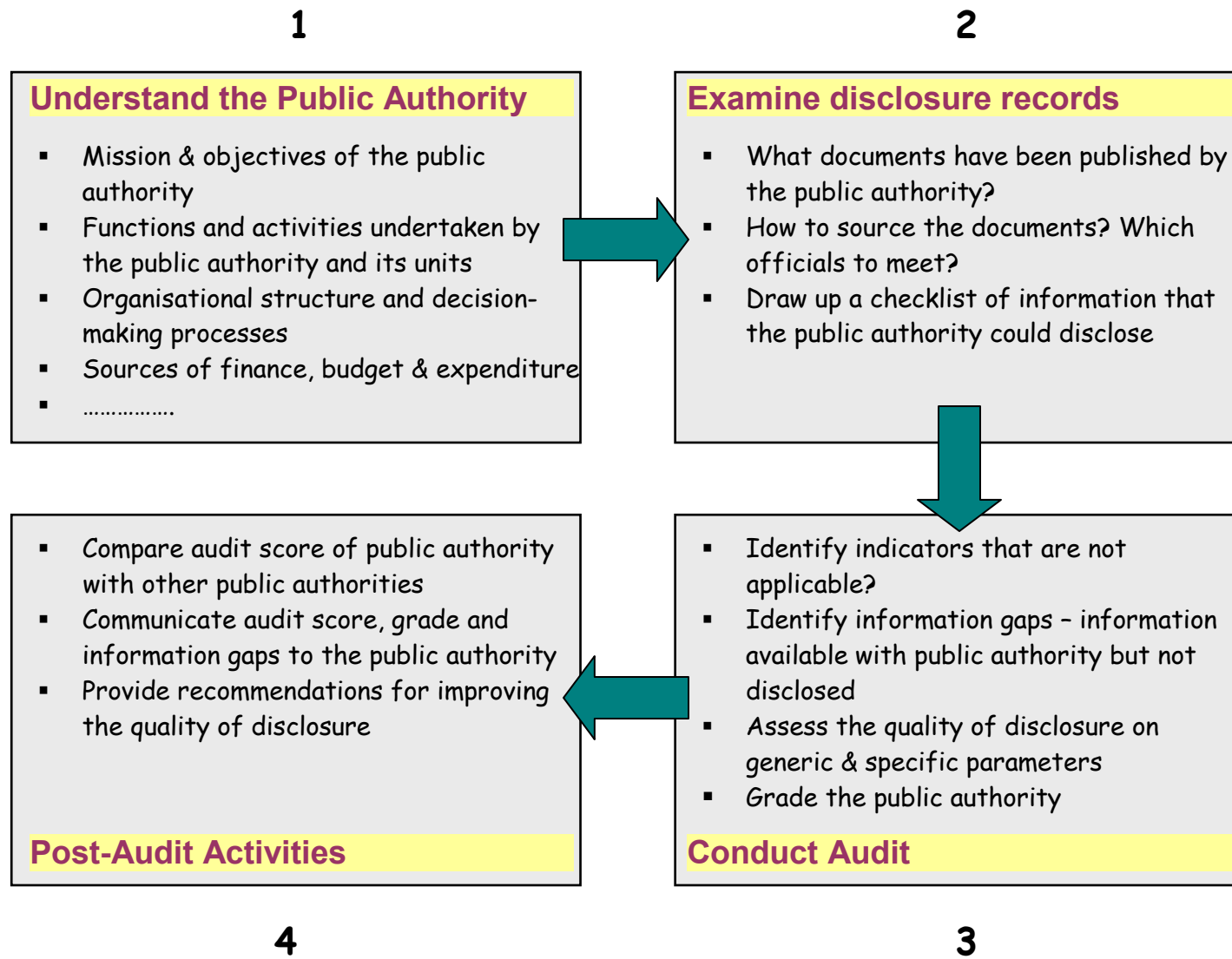
Sl. No	Percentage	Percentage Obtained	Weightage	Weighted Percentages
	(1)	(2)	(3)	(2) × (3)
1	A Category Parameters		0.5	
2	B Category Parameters		0.3	
3	C Category Parameters		0.2	
	FINAL SCORE			
	[Sum of Weighted Percentages across A, B & C Categories]			
	GRADE			

Any other Observations/Remarks:

Date:

Name & Signature of the Auditor

6. Audit Process



7. Case Study: Rural Development Department, Government of Andhra Pradesh

This is a sample audit of proactive disclosure for the Department of Rural Development, Government of Andhra Pradesh. It is done purely for the purpose of illustration for the audit toolkit and, therefore, cannot be taken as a true reflection of the quality of proactive disclosure done by the Public Authority under the RTI Act 2005.

For conducting this audit, we have used the Information Handbook prepared by the Department under Section 4 (1) (b) of the RTI Act. We have also referred other documents disclosed through the Departmental website.

This case study is for illustration purpose only.

Audit Proforma

Name of Public Authority being audited: *Department of Rural Development, Government of Andhra Pradesh*
Address : *A.P. Secretariat, Hyderabad; www.rd.ap.gov.in*

Documents Referred:

1. Information Handbook (Volume 1)
2. Information Handbook (Volume 2)
3. Other documents available on the department website

`A' Category Parameters (High Importance)

Sl. No.	Parameter	Requirement	Rating Scale	Score	Qualitative Observations/Remarks
	(1)	(2)	(3)	(4)	(5)
1.	Language in which Information Manual/ Handbook available	<input type="checkbox"/> English <input type="checkbox"/> Vernacular / Local Language	Language in which available: <input type="checkbox"/> Both English & Vernacular: 2 <input type="checkbox"/> In 1 language only: 1 <input type="checkbox"/> Not available: 0	<u>2</u>	<i>However, discrepancy observed in extent of disclosure made in English and Telugu.</i>
2.	When was the information Manual/ Handbook last updated?	<input type="checkbox"/> Annual update	<input type="checkbox"/> During last 1 year: 2 <input type="checkbox"/> More than 1 year ago: 1 <input type="checkbox"/> Not updated at all: 0	<u>0</u>	<i>Except for the budget, the Manual has been pending for updation since October 12, 2005</i>
3.	Dissemination of information widely and in such form and manner which is easily accessible to the public [Section 4 (3)]	Use of the most effective means of communication like <input type="checkbox"/> Notice boards <input type="checkbox"/> Newspapers <input type="checkbox"/> Public announcements <input type="checkbox"/> Media broadcasts <input type="checkbox"/> Internet or <input type="checkbox"/> Any other means including inspection of offices	Dissemination of information done using <input type="checkbox"/> At least two effective means of communication : 2 <input type="checkbox"/> Only one means of communication: 1 <input type="checkbox"/> No means of communication used: 0	<u>2</u>	<i>The schemes, programmes and other activities are widely disseminated by the department using the print and electronic media including the internet.</i>
4.	Procedure followed in decision making process [Section 4(1) (b) (iii)]	<input type="checkbox"/> Process of decision making <input type="checkbox"/> Final decision making authority <input type="checkbox"/> Related provisions, acts, rules etc. <input type="checkbox"/> Time limit for taking a decision, if any <input type="checkbox"/> Channels of supervision and accountability.	<input type="checkbox"/> Fully disclosed: 2 <input type="checkbox"/> Partially disclosed: 1 <input type="checkbox"/> Not disclosed: 0	<u>1</u>	<i>Except for few references here and there, this information is not exclusively dealt with</i>

Sl. No.	Parameter	Requirement	Rating Scale	Score	Qualitative Observations/Remarks
	(1)	(2)	(3)	(4)	(5)
5.	Norms for discharge of functions [Section 4(1) (b) (iv)]	<ul style="list-style-type: none"> <input type="checkbox"/> Nature of functions/services offered <input type="checkbox"/> Norms/standards for functions / service delivery <input type="checkbox"/> Time-limits for achieving the targets <input type="checkbox"/> Reference document prescribing the norms. 	<ul style="list-style-type: none"> <input type="checkbox"/> Fully disclosed: 2 <input type="checkbox"/> Partially disclosed: 1 <input type="checkbox"/> Not disclosed: 0 	<u>1</u>	<i>Except under SERP (in the name of expected outcomes which also does not completely adhere to the requirements of this sub-clause), this information is nowhere exclusively disclosed</i>
6.	Budget allocated to each agency including all plans, proposed expenditures and reports on disbursements made etc. [Section 4(1) (b) (xi)]	<ul style="list-style-type: none"> <input type="checkbox"/> Total Budget for the Public Authority <input type="checkbox"/> Budget for each agency and plan & programmes <input type="checkbox"/> Proposed expenditures <input type="checkbox"/> Revised budget for each agency, if any <input type="checkbox"/> Report on disbursements made and place where the related reports are available 	<ul style="list-style-type: none"> <input type="checkbox"/> Fully disclosed: 2 <input type="checkbox"/> Partially disclosed: 1 <input type="checkbox"/> Not disclosed: 0 	<u>1</u>	<i>Total budget and agency wise break-up not systematically given. Details of the proposed expenditure, report on disbursements, location of the report etc. missing.</i>
7.	Manner of execution of subsidy programmes [Section 4(1) (b) (xii)]	<ul style="list-style-type: none"> <input type="checkbox"/> Name of the programme or activity <input type="checkbox"/> Objective of the program <input type="checkbox"/> Procedure to avail benefits <input type="checkbox"/> Duration of the programme/scheme <input type="checkbox"/> Physical and financial targets of the program <input type="checkbox"/> Nature/scale of subsidy/amount allotted 	<ul style="list-style-type: none"> <input type="checkbox"/> Fully disclosed: 2 <input type="checkbox"/> Partially disclosed: 1 <input type="checkbox"/> Not disclosed: 0 	<u>2</u>	<i>Information given under details of various programmes taken up by the Department – can be made more detailed.</i>

Sl. No.	Parameter	Requirement	Rating Scale	Score	Qualitative Observations/Remarks
	(1)	(2)	(3)	(4)	(5)
		<ul style="list-style-type: none"> <input type="checkbox"/> Eligibility criteria for grant of subsidy <input type="checkbox"/> Details of beneficiaries of subsidy program (Number, profile etc.) 			
8.	Particulars of recipients of concessions, permits or authorisations granted by the Public Authority [Section 4(1) (b) (xiii)]	<ul style="list-style-type: none"> <input type="checkbox"/> Concessions, permits or authorisations granted by Public Authority <input type="checkbox"/> For each concessions, permit or authorisation granted <ul style="list-style-type: none"> <input type="checkbox"/> Eligibility criteria <input type="checkbox"/> Procedure for getting the concession/grant and/or permits or authorisations <input type="checkbox"/> Name and address of the recipients given concessions/ permits or authorisations <input type="checkbox"/> Date of award of concessions/ permits or authorisations 	<ul style="list-style-type: none"> <input type="checkbox"/> Fully disclosed: 2 <input type="checkbox"/> Partially disclosed: 1 <input type="checkbox"/> Not disclosed: 0 	<u>1</u>	<i>Information provided is not exhaustive</i>
9.	Are important policies or decisions which affect public informed to them? [Section 4(1) (c)]	<ul style="list-style-type: none"> <input type="checkbox"/> Publish all relevant facts while formulating important policies or announcing decisions which affect public 	At all times: 2 Sometimes : 1 Never : 0	<u>2</u>	<i>This clause requires regular tracking to ascertain whether the latest information on policies is being disbursed.</i>
10.	Are reasons for	<ul style="list-style-type: none"> <input type="checkbox"/> Provide reasons for its 	At all times: 2	<u>0</u>	<i>The auditor was unable to get</i>

Sl. No.	Parameter	Requirement	Rating Scale	Score	Qualitative Observations/Remarks
	(1)	(2)	(3)	(4)	(5)
	administrative or quasi-judicial decisions taken, communicated to affected persons [Section 4(1) (d)]	administrative or quasi-judicial decisions to affected persons	Sometimes : 1 Never : 0		<i>first hand information on this . Therefore, this is not being counted for auditing purposes.</i>
	TOTAL SCORE (A) [Sum of Scores across all A Category parameters]			12	
	Maximum Possible Score Sum of Maximum Scores across all `applicable' parameters			20	
	PERCENTAGE on A Category Parameters [Total Score (A)/ Maximum Score Possible] × 100			60%	

`B' Category Parameters (Medium Importance)

Sl. No.	Parameter	Requirement	Rating Scale	Score	Qualitative Observations/ Remarks
	(1)	(2)	(3)	(4)	(5)
1.	Form of accessibility of Information Manual/ Handbook u/s 4 (1) b	<input type="checkbox"/> Electronic format <input type="checkbox"/> Printed format	Information Manual available in: <input type="checkbox"/> In Both Formats: 2 <input type="checkbox"/> In one format only: 1 <input type="checkbox"/> Not available: 0	<u>2</u>	<i>Information Manual though available in both the format needs to be updated</i>
2.	Whether Information Manual/ Handbook available free of cost or not	<input type="checkbox"/> Free or <input type="checkbox"/> At a reasonable cost of the medium	Cost at which available: <input type="checkbox"/> Free: 2 <input type="checkbox"/> At Reasonable cost: 1 <input type="checkbox"/> At High cost: 0	<u>2</u>	<i>nil</i>
3.	Rules, regulations, instructions, manuals and records for discharging functions [Section 4(1) (b) (v)]	<input type="checkbox"/> Title and nature of the record / manual / instruction <input type="checkbox"/> Gist of contents	<input type="checkbox"/> Fully disclosed: 2 <input type="checkbox"/> Partially disclosed: 1 <input type="checkbox"/> Not disclosed: 0	<u>1</u>	<i>Information given is not complete – can be made more exhaustive</i>
4.	Categories of documents held by the authority under its control [Section 4(1) (b) (vi)]	<input type="checkbox"/> Title of the document <input type="checkbox"/> Category of document <input type="checkbox"/> Custodian of the document	<input type="checkbox"/> Fully disclosed: 2 <input type="checkbox"/> Partially disclosed: 1 <input type="checkbox"/> Not disclosed: 0	<u>1</u>	<i>Categories of documents held by its various agencies along with custodian of the documents could have been given in detail under one head.</i>
5.	<i>Information available in electronic form [Section 4(1) (b) (xiv)]</i>	<i>Details of information available in electronic form Name/title of the document/record/other information Location where available</i>	<i>Fully disclosed: 2 Partially disclosed: 1 Not disclosed: 0</i>	1	<i>Link to websites of its various agencies given in Volume I. What information can be accessed under these websites not given.</i>
6.	Particulars of facilities available to citizens for obtaining	<input type="checkbox"/> Name & location of the facility <input type="checkbox"/> Details of information	<input type="checkbox"/> Fully disclosed: 2 <input type="checkbox"/> Partially disclosed: 1 <input type="checkbox"/> Not disclosed: 0	<u>1</u>	<i>How information can be accessed under the RTI Act has been given in detail. Facilities</i>

Sl. No.	Parameter	Requirement	Rating Scale	Score	Qualitative Observations/ Remarks
	(1)	(2)	(3)	(4)	(5)
	information [Section 4(1) (b) (xv)]	<p>made available</p> <ul style="list-style-type: none"> <input type="checkbox"/> Working hours of the facility <input type="checkbox"/> Contact Person & contact details (phone, fax, email): 			<i>otherwise available to provide other kinds of information not disclosed.</i>
7.	Such other information as may be prescribed under Section 4(1) (b) (xvii)	<ul style="list-style-type: none"> <input type="checkbox"/> Citizen's charter of the public authority <input type="checkbox"/> Grievance redressal mechanisms <input type="checkbox"/> Details of applications received under RTI and information provided <input type="checkbox"/> List of completed schemes/projects/programmes <input type="checkbox"/> List of schemes/projects/programmes underway <input type="checkbox"/> Details of all contracts entered into including name of the contractor, amount of contract and period of completion of contract. <input type="checkbox"/> Any other Information 	<ul style="list-style-type: none"> <input type="checkbox"/> Fully disclosed: 2 <input type="checkbox"/> Partially disclosed: 1 <input type="checkbox"/> Not disclosed: 0 	<u>1</u>	<p><i>Details of schemes/projects/programmes being implemented by the department in 2005 alone given. Grievance Redressal Mechanisms, completed programmes, citizen charters etc not given.</i></p>
8.	Receipt & Disposal of RTI applications	<ul style="list-style-type: none"> <input type="checkbox"/> Details of applications received under RTI and information provided 	<ul style="list-style-type: none"> <input type="checkbox"/> Fully disclosed: 2 <input type="checkbox"/> Partially disclosed: 1 <input type="checkbox"/> Not disclosed: 0 	<u>1</u>	<p><i>Could not be found on the website though information is available in the Annual Report submitted by the Department to the State Information Commission</i></p>

Sl. No.	Parameter	Requirement	Rating Scale	Score	Qualitative Observations/ Remarks
	(1)	(2)	(3)	(4)	(5)
	TOTAL SCORE (B) [Sum of Scores across all B Category parameters]			10	
	Maximum Possible Score Sum of Maximum Scores across all `applicable' parameters			16	
	PERCENTAGE on B Category Parameters [Total Score (B)/ Maximum Score Possible] x 100			62.5%	

`C' Category Parameters (Low Importance)

Sl. No.	Aspect of Disclosure	Details of Disclosure	Rating Scale	Score	Qualitative Observations/ Remarks
	(1)	(2)	(3)	(4)	(5)
1.	Particulars of its organization, functions and duties [Section 4(1) (b) (i)]	<input type="checkbox"/> Name and address of the organisation <input type="checkbox"/> Head of the organisation <input type="checkbox"/> Key Objectives <input type="checkbox"/> Functions and duties <input type="checkbox"/> Organisation chart <input type="checkbox"/> Any other details	<input type="checkbox"/> Fully disclosed: 2 <input type="checkbox"/> Partially disclosed: 1 <input type="checkbox"/> Not disclosed: 0	<u>2</u>	<i>Could do with a little more structuring and fine-tuning.</i>
2.	Powers & Duties of its officers & employees [Section 4(1) (b) (ii)]	<input type="checkbox"/> Powers and duties of officers (administrative, financial & judicial) <input type="checkbox"/> Powers and duties of other employees <input type="checkbox"/> Rules/orders under which powers and duties are derived	<input type="checkbox"/> Fully disclosed: 2 <input type="checkbox"/> Partially disclosed: 1 <input type="checkbox"/> Not disclosed: 0	<u>2</u>	<i>Information generic in nature. Could be more detailed.</i>
3.	Particulars for any arrangement for consultation with or representation by the members of the public in relation to the formulation of policy or implementation thereof [Section 4(1) (b) (vii)]	<input type="checkbox"/> Relevant rule, circular etc. <input type="checkbox"/> Arrangements for consultation with or representation by the members of the public in policy formulation / policy implementation	<input type="checkbox"/> Fully disclosed: 2 <input type="checkbox"/> Partially disclosed: 1 <input type="checkbox"/> Not disclosed: 0	<u>1</u>	<i>Information not provided for each of its agency. In other cases, this information can only be inferred either from composition of the agency and its functions, roles and responsibilities</i>
4.	Boards, Councils, Committees and Other Bodies constituted as	<input type="checkbox"/> Name of the Board, Council, committee etc <input type="checkbox"/> Composition	<input type="checkbox"/> Fully disclosed: 2 <input type="checkbox"/> Partially disclosed: 1 <input type="checkbox"/> Not disclosed: 0	<u>1</u>	<i>Composition and functions of various Boards and Committees given. However, whether their</i>

Sl. No.	Aspect of Disclosure	Details of Disclosure	Rating Scale	Score	Qualitative Observations/ Remarks
	(1)	(2)	(3)	(4)	(5)
	part of the Public Authority [Section 4(1) (b) (viii)]	<ul style="list-style-type: none"> <input type="checkbox"/> Powers & functions <input type="checkbox"/> Whether their meetings are open to the public? <input type="checkbox"/> Whether the minutes of the meeting are open to the public <input type="checkbox"/> Place where the minutes if open to the public are available? 			<i>meetings and minutes are open and accessible to public has not been disclosed</i>
5.	Directory of Officers and employees [Section 4(1) (b) (ix)]	<ul style="list-style-type: none"> <input type="checkbox"/> Name and designation <input type="checkbox"/> Telephone, fax and email ID 	<ul style="list-style-type: none"> <input type="checkbox"/> Fully disclosed: 2 <input type="checkbox"/> Partially disclosed: 1 <input type="checkbox"/> Not disclosed: 0 	<u>2</u>	<i>Contained in Volume II</i>
6..	Monthly Remuneration received by officers & employees including system of compensation [Section 4(1) (b) (x)]	<ul style="list-style-type: none"> <input type="checkbox"/> Name and designation of the employee <input type="checkbox"/> Monthly remuneration <input type="checkbox"/> System of compensation as provided by in its regulations 	<ul style="list-style-type: none"> <input type="checkbox"/> Fully disclosed: 2 <input type="checkbox"/> Partially disclosed: 1 <input type="checkbox"/> Not disclosed: 0 	<u>2</u>	<i>Contained in Volume II</i>
7.	Names, designations and other particulars of public information officers [Section 4(1) (b) (xvi)]	<ul style="list-style-type: none"> <input type="checkbox"/> Name and designation of the Public Information Officer, Assistant Public Information Officer (s) & Appellate Authority <input type="checkbox"/> Address, telephone numbers and email ID of each designated official 	<ul style="list-style-type: none"> <input type="checkbox"/> Fully disclosed: 2 <input type="checkbox"/> Partially disclosed: 1 <input type="checkbox"/> Not disclosed: 0 	<u>2</u>	
TOTAL SCORE (A) [Sum of Scores across all A Category parameters]				12	

Sl. No.	Aspect of Disclosure	Details of Disclosure	Rating Scale	Score	Qualitative Observations/ Remarks
	(1)	(2)	(3)	(4)	(5)
	Maximum Possible Score				
	Sum of Maximum Scores across all `applicable' parameters			14	
	PERCENTAGE on A Category Parameters				
	[Total Score (A)/ Maximum Score Possible] x 100			85.7%	

Generating the Final Score & Grade for the Public Authority

Sl. No	Percentage	Percentage Obtained	Weightage	Revised Score
	(1)	(2)	(3)	(2) x (3)
1	A Category Parameters	60	0.5	30.00
2	B Category Parameters	62.5	0.3	18.75
3	C Category Parameters	85.7	0.2	17.14
	FINAL SCORE [Sum of Scores across all A, B & C Category parameters]			65.89
	GRADE			B

Any other Observations/Remarks:

The extent and quality of disclosure on the Departmental website is very good. The website gives detailed information on various activities, programmes & schemes (and budgets) being taken up by the Department and its various agencies. However, the information handbook prepared by the Department u/s 4(1) (b) contains limited information in this regard and this could be made more extensive.

Introduction to Volume I of the Information Manual of the Department says the information has been provided in two volumes. However, only volume I has been properly disseminated. The department may take steps to disseminate Volume II at the earliest.

The Information Manual requires to be updated. The Department must adopt a practice of updating the Information Manual on an annual and regular basis as per the Act.

The Department had provided agency/programme wise details. Instead, it could actually break the Information Manual into 17 different chapters as per the RTI Act and provide details of a particular aspect as given in the sub-clause for each agency.

Date: April 25, 2008

ABC

Name & Signature of the Auditor

8. Points to Remember

- Assessment of proactive disclosures must be based on **objective** evaluation only. Refrain from making arbitrary remarks/observations and awarding scores on the basis of a biased or opinionated judgment.
- Before assessing a public authority, **follow the audit process** explained above. Understand the public authority; examine the records/documents published by the authority and map the information that the authority must disclose under the Right to Information Act.
- Check each indicator **whether it is applicable** for the public authority and then use the audit proforma to assess the quality of disclosure. In case of uncertainty, exclude the parameter from assessment and reduce the maximum possible score accordingly.
- Remember to **validate** each of your ratings and give appropriate reasons for each of your rating.
- Focus on highlighting the **gaps in information disclosure** so that the public authority would be benefited from the audit and not intimidated by this exercise.
- This exercise could be **repeated regularly** so that audit of proactive disclosures becomes a standardized method of checking/monitoring the implementation of the relevant provisions of the RTI Act.

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