

## BLURRING RTI EDGE:INDIAN DEMOCRACY

---

*ShahzeenAfsar*

*Lecturer at Department of Political Science,  
Mohan LalSukhadia University*

### ABSTRACT

The culmination of Right To Information Act of India 2005 has been widely accepted as a democratic process. It is a milestone in the deliberate route taken by the country for setting up an institution that would ensure people centric and responsive governance. As the scenario often turns that the laws of public interest and benefit are mostly used by the elite section of the society, this Act would ensure transparency and openness in the functioning of the government. It implies that the citizen should enjoy a reasonable free access to all files and documents pertaining to governmental operations, decisions, and performance. As **Aruna Roy** had undoubtedly said “right to know is right to live”, which is inevitable human right and a human should comprise of it.

This research paper highlights the importance and effectiveness of RTI Act 2005, along with various attempts made by the government to weaken this Act. RTI Amendment Act 2019 is a twin attack on accountability and the idea of federalism. The move by the NDA government to amend the far-sighted law aims at eroding the independence of the Information Commissions at the national level and in the States. This change has provoked discomfort among many. It gives the feeling that it will make those officials upholding the right to information vulnerable to pressure from the government. If this pressure affects the behaviour of these officers, the integrity of the right to information becomes compromised.

**KEYWORDS** : Right To Information, Participatory Democracy, Fundamental Right, Federalism, Amendment, Good Governance, RTI Activist.

### INTRODUCTION

“Democracy may not exist, but we ‘ll miss it when it’s gone”– Astra Taylor<sup>i</sup>

Democracy is a contested concept. And the contestation is found in our political practices rather than in the concept per se. Real democracy (Egalitarian and inclusive) has in fact, never existed.

True democracy cannot exist unless all the citizens of the country participate in its polity. This participation is meaningless unless the citizen's are well informed about the issues on which they express their views. In the name of democracy we see a raft of policies that spread inequality and xenophobia worldwide. The main principle of democracy which is, by the people, of the people and for the people is now blurred.

The Right to Information (RTI) Act, called the sunshine legislation, promulgated in 2005 can be used as a synonym for democracy. It replaced Freedom of Information Act 2002. It was hailed across the country as a major landmark in the country's march towards strengthening of democracy.

Eight two years of struggle has finally led to the transition from an opaque and arbitrary system of governance, legitimized by the colonial Official Secrets Act, to an era of greater transparency and empowerment where a citizen can demand the right to information. It has led to greater access to information by citizens, thus indeed increasing greater responsiveness of government to community needs. It has lifted the veil of secrecy from governmental processes, thus helped in keeping a check on arbitrary decision making by public institutions. It is the most successful laws in promoting transparency, accountability and combatting corruption. It gives twin effect of good governance and inclusive development.

## **RIGHT TO INFORMATION ACT 2005**

The book of **Aruna Roy**, *The RTI Story :Power to the people*<sup>ii</sup> is an important book to showcase the stages of MKSS and various campaigns that led to the culmination of the success of Indian democracy by passing of Right to Information Act 2005. In the early days of the movement, the public meetings which followed, in village after village in the presence of distressed government officials, is now the stuff of legend.

Mazdoor Kisan Shakti Sagathana grass root organization and the National Campaign for People's Right to Information (NCPRI) led by Aruna Roy played an active role in the passage of the bill. She is called mastermind behind the RTI Act 2005<sup>iii</sup>.

RTI Act 2005, replaced the erstwhile Freedom of Information Act 2002. RTI being legal right is implicit in the Right to Freedom of speech and

expression under Article 19(1) of the Indian constitution. It states, —All the citizens have the right to the freedom of speech and expression and Art 21 deals with right to life of citizens. Constitution of India 1950 stated that the court has recognized the right to access of information from government department is fundamental to democracy. However, the right to information does not mean the free flow of information without any restrictions. Like all other fundamental rights, the right to information has also certain reasonable restrictions

Under the RTI Act, 2005, Public Authorities are required to make disclosures on various aspects of their structure and functioning. It includes :disclosure on their organisation, functions, and structure,powers and duties of its officers and employees, and financial information.

The first states to pass the law were Tamil Nadu(1997) and Goa (1997). Some other states passed it later including Rajasthan (2000), Maharashtra (2000), Delhi(2001) and many others.

It has been a great success in disclosing information and has been supplemented by the Whistle Blowers protection Act, 2011.

RTI aims at citizen centric approach of the government. A ₹10 application gives citizens hope, and to the receiver, a public duty to discharge. Under the provisions of the Act, any citizen of India is empowered to request information and public authority is required to reply expeditiously within thirty days and forty- eight hours when the information asked concerns the life and liberty of a person according to section 7(1) of the RTI Act, 2005.

What was needed after fifteen years of successful work,was an reappraisal of the act to make it more effective by strengthening the RTI regime as more and more poor people seek recourse to justice through RTI. But what has been done by the government is the opposite.

## **REVIEW OF ACT**

Decadal review undertaken by Commonwealth Human Rights Initiative (CHRI) in 2016 by the various stakeholders shows that over 4800 applications are filed everyday with commission. In the first ten years of commencement of the act over 17,500,000 applications has been filed. <sup>iv</sup>This indicates the faith of the people and effectiveness of the act to get better response by public authorities.

The rate of rejections of RTI applications is low, at an estimated 6% in

2017-18. In this lies the genius of the Act. The Act draws its teeth from the State's passion for paper work and files. The RTI requires that applications are submitted on paper, acknowledgment slips are mandatory, and responses too have to be given in a written format, on paper. In essence, every RTI application requires the system to open a file. And once a file has been opened, the system has to respond.

But even as the State has found RTI applications difficult to ignore, reforms — reviewing internal rules and procedures, improving record management, and implementing Section 4 of the RTI, which mandates proactive disclosure of information — have been resisted. Instead the focus, across political parties (including, ironically the Congress, which brought the law to Parliament), has been on finding loopholes to weaken the law.

This resistance is unsurprising; after all, the RTI exposes government decision-making to scrutiny. This resistance doesn't stem only out of a fear of exposing corruption, as is assumed. Rather, it comes from the challenge scrutiny poses to accepted norms of governmental decision-making.

Digitalization has made the process of filing applications, serving of notices, and uploading of decisions much easier. The Central Vigilance Commission plans to create more awareness about corruption in India. To encourage the fight against corruption, CVC has provided on their website, a "**Lodge Complaints Online**" portal.

As quoted by **Sir Francis Bacon** — “Knowledge is power” — this quote well explains the essence of the Right to Information Act (RTI). Information is indispensable to every citizen who wish to participate in the life and governance of society.

## **IMPORTANT JUDICIAL PRONOUNCEMENTS RELATING TO RTI**

In order to understand the effectiveness of a Fundamental Right it is important to analyse the various aspects in which the right has been given effect by the Judiciary. A few landmark cases have been taken to highlight the various facets relating to Right to Information:

- In *Bennett Coleman v. Union of India*<sup>v</sup>, for the first time, right to know as a Fundamental right was realized and consequently the

Supreme Court ruled that the right to freedom of speech and expression guaranteed by Art. 19(1) (a) included the right to information.

- In *State of UP v. Raj Narain*<sup>vi</sup>, Justice Mathew thoroughly stated, “It is not in the interest of the public to cover with a veil of secrecy the common routine business ... the responsibility of officials to explain and to justify their acts is the chief safeguard against oppression and corruption.
- In *Secretary, Ministry of I&B, Government of India v Cricket Association of Bengal*<sup>vii</sup>, the Supreme Court held that the right to impart and receive information from electronic media was included in the freedom of speech.
- In *S.P. Gupta v. Union of India*<sup>viii</sup>, the right of the people to know about every public act, and the details of every public transaction undertaken by public functionaries was illustrated by the Apex Court of India.
- In *People’s Union for Civil Liberties v. Union of India*<sup>ix</sup>, the right to information was further elevated to the status of a human right, necessary for making governance transparent and accountable.

## AMBIT OF THE ACT

The purview of the Act covers the whole of India, including Jammu and Kashmir now.<sup>x</sup>

Earlier private bodies were excluded from the ambit of the Act but in the landmark judgement of **Sarbajit V. Delhi Electricity Regulatory commission**<sup>xi</sup>, the central government reaffirmed that private utility companies continue to be within the RTI Act, notwithstanding their privatization. This implies that private entities are covered under the RTI Act irrespective whether they are substantially aided or funded by the government. However from 2014, any private institution or NGO’s receiving over 95% of their infrastructure funds from the government comes under the ambit of the Act.

Central Information commissioner (CIC) held that political parties being public authorities, are answerable to citizen under RTI Act. On June 3<sup>rd</sup> 2013, it brought all the 6 national parties- Congress, BJP, NCP, CPI(M), CPI and BSP and BJD<sup>xii</sup> –under RTI ambit. However, in August 2013 the

government introduced a Right to Information (Amendment) bill which removed political parties from the scope of the law.

On 13<sup>th</sup> November 2019, Supreme Court brought the office of Chief Justice of India under the purview of RTI Act. <sup>xiii</sup>**Subhash Chandra Agrawal**, considered as ‘the crusader of RTI’, has used this act as a tool to combat corruption. It was only after his application that the Central Information Commissioner brought the office of chief justice of India under the purview of RTI Act, which was upheld by High court in 2010 and supreme court in 2019.

The intelligence and security organizations established by the central government are not under the purview of the act. However, information concerning to the allegation of corruption and violation of human rights shall not be excluded under this section.

## ACHIEVEMENTS

Former Prime Minister **Rajiv Gandhi**'s famous remark in 1985, that, “of every rupee of development funds, barely 15 paise actually reach the poor on the ground.”<sup>xiv</sup> This well explains the need for an effective mechanism to combat the evils of the system. Despite launching various schemes and measures for empowering and developing rural India, the majority of Rural India is still recognized by high incidence of poverty and illiteracy, unemployment, miserable rural infrastructure, health, drinking water and other socio-political problems.

RTI has helped cure this malaise. It is a non deniable fact that rural people are less aware in knowing and exercising their rights that results in growing corruption rate of public works in rural area. It is here that RTI can make a path breaking impact to combat corruption and ineffectiveness. It gave hope to the people that if they fight together, the Right to Information can help change the situation. It has redesigned the structure of India's democratic governance and revolutionized citizen's ability to engage with the state, arming them with a mechanism to ferret out some truth from the government.

Success stories of RTI :-

- Through RTI applications it was revealed that between 2006 to 2010, a sum of Rs 744 crore was diverted from development of scheduled caste and communities to Commonwealth games.<sup>xv</sup>

- Rajasthan Villagers used RTI to end their woes. Disclosure of corruption at village level and putting an end to the practice of selling grains from ration shop in the black market, led to suspension of dozens of officials.<sup>xvi</sup>
- People in Karnataka have combined the campaigns for Right to Information and Right to Food to fight hunger. Poor villagers have successfully participated in social audits and public hearings to demand rations due to them at correct prices.
- RTI exposes Janawad scam “mother of all Rural Development scams” in Rajasthan. Over seventy per cent of the money was siphoned off by a corrupt nexus between the Sarpanch and government officials.<sup>xvii</sup>
- In 2007, **KrishakMuktiSamgramSamiti (KMSS)** a prominent organization based in the state of Assam formed by RTI Activist AkhilGogoi, filed an RTI application that revealed irregularities in the distribution of food meant for people below poverty line. The allegations of corruption were probed and several high profile government officials were arrested.
- Due to existence of unholy nexus between licensees of the fair price shops (FPS) and the officers of food supply department, substantial portion of money is siphoned off through black marketing, as a result of which the whole Public Distribution System (PDS) is in shambles. The fact that the use of RTI can change the whole PDS system was proved by the people of Sunder Nagri area of Delhi. The information showed the massive corruption in the system and immediate actions were taken.
- An RTI filed by activist **VenkateshNayak** revealed that the RBI did not agree with the Centre move to demonetization and its justification that the move would curb the circulation of black money and counterfeit money.<sup>xviii</sup>

And many more...

The role of CIC and ICs has been vital in the implementation of this act. An appeal can be made to them if the demand goes unheeded by Public Information Officer or authority within the department concerned.

## **THE DILUTION OF THE RTI ACT**

There have been various attempts to dilute the Act. The first attempt was made even before the bill was introduced i.e.2004. In the original version,

the appointment committee for Chief Information Commissioner and ten Information Commissioners was made by prime minister, leader of the opposition in Lok Sabha and the Chief Justice of India.

The amended version, replaced the Chief Justice of India with a Cabinet Minister nominated by the Prime Minister.

This is Government of India's third attempt to amend this important law since its enforcement in October 2005. First attempt was made in August 2006, the Union Cabinet approved proposals to amend the law in order to keep "file notings" or opinion and advice recorded on file by officers involved in a decision-making chain on issues other than those relating to development and social issues. But due to the very vocal and widespread opposition from the citizenry, the government was compelled to shelve the proposal without ever introducing it in Parliament. Second attempt was made in 2013, Government tabled a Bill to amend the RTI Act in order to insulate from public scrutiny, all political parties and information that regulatory authorities hold about them. The Department-related Parliamentary Standing Committee on Personnel, Public Grievances, Law and Justice approved the amendment proposals despite widespread criticism from the citizenry. However that Bill lapsed with the dissolution of the Lok Sabha.

**The RTI (Amendment) Bill**, despite widespread opposition was passed by Lok Sabha on **22<sup>nd</sup> July 2019**, it has caused a lot of controversy. The government seeks to dilute the Act by downgrading Information Commissioners' status, salary and autonomy. It seeks to amend Sections 13 and 16 of the RTI Act, 2005. The Bill proposes that the Central Government will decide the tenure, salaries and allowances of all Information Commissioners. The proposed amendments are aimed at undermining the independence of information commissions, thereby diluting India's strongest and most widely used law for transparency. It has curtailed citizen's rights and have strengthened the hands of the government.

This means that the government can threaten and lure the chief information commissioners with arbitrary removal or extension and curtailment or increase in salary depending upon their suitability for ruling dispensation.

This is against the principle of Federalism as it not only took away the powers from the legislature, but also the state in determining the status of the State Information Commissioners.

The Amendment appears to be another manifestation of the form of “coercive federalism” seemingly practiced by the Central Government by infringing upon the powers of the respective states, and is therefore undemocratic. This would have serious implications for the credibility of the institution of the information commissioner in the future, which is crucial to removing information asymmetries between the citizen and the state, and is vital to making governance in a democracy accountable and transparent in its functioning. It also impacts the sovereignty of states since it curtails their powers to decide on the degree of independence for Information Commissioners in their own jurisdiction.

It creates an anomalous situation where states would have the power to appoint commissioners, but the Centre will decide their tenure, salary and status.

The anxiety is not purely because of the text of the law, but the lack of adequate justification for the same.

## **DEEP REACHING AMENDMENTS**

Congress Legislator **Jairam Ramesh** in Rajya Sabha called the RTI (Amendment) bill, 2019 “profoundly dangerous”. He said “The timing of the amendments was not innocent, highlighting how it followed several uncomfortable RTI queries and bold directions by Information commissioners- relating to Prime Minister’s educational qualifications, his claims on number of bogus ration cards weeded out through use of Aadhaar, disclosures related to demonetization and bank defaulters and other queries related to portion of black money brought from abroad.”<sup>xix</sup>

Today, the core of RTI act, which was meant to empower the citizens, is under threat as new amendments have been passed in the parliament without subjecting the draft law to scrutiny by a parliamentary committee. A feature which is common to every law enacted by parliament in its present session. This reduces the governance to a form of democracy which is only on papers.

Anna Hazare slams Modi govtsaying– “It is expected that while drafting a legislation, the government take the opinion of citizens. If the draft and the Act are both made only by the government, then it is not a democracy but a dictatorship. Instead of doing these "trivial" amendments, the government should implement the 17 points contained in Section 4 of RTI Act in letter and spirit.”

The government argues that RTI is not a constitutional right, and CIC and State Information Commission are not constitutional bodies.

But, the Supreme Court in a series of landmark cases, has held that RTI, like the right to vote, has emanated from right of expression under Article 19(1)(a). Both CEC and CIC enforce these two aspects of that fundamental right.

While the 2005 RTI Act says 'Right To Information' is a 'constitutional right', the 2019 Amendment Bill contradicts it.

It's a simple question in everybody's mind that the Election Commission that enforces a right under Article 324 (1), is considered a constitutional institution and Information Commission that enforces a fundamental right under Article 19(1)(a) is now with this amendment not a constitutional body. The objective of both being the same that is, to fulfill constitutional rights commitment.

Both CIC and CEC are, therefore, equal and, like the judiciary, should be separate from the legislative and executive, according to the well established theory of separation of powers propounded by Montesquieu and incorporated in Indian Constitution.

## **IMPLEMENTATION CHALLENGES**

Though there are recent efforts on digital governance, Right to Information implementation has been a digitalization neglect even after 14 years of its enactment. A research on "BallotBoxIndia" shows that though the central ministries are under the purview of the act, anyone can file by a single Digital window RTI requests with integrated payment gateways and tracking mechanism, none of the states have, as of yet, has come forward to implement their versions or use the existing Right to Information Digital Infrastructure. 64% State Public Information failed to respond as to the time limit within which they seek to implement their plan of action. The research also shows delays ranging many months of wait time and various follow ups and rejection. <sup>xx</sup>

Success in implementing the Act has been mixed, although a lot of information has been made available, at the same time there have been serious allegations of political interference, as well as obstruction from the civil service.

There have been so many positions of State Information Commissioners and staff vacant that RTI applications are inordinately delayed with the back log mounting daily.

The Act is quite unambiguous in terms of the responsibilities of the appropriate Government and the Information Commission. However, as per the current situation on the ground level currently the Information Commission is as effective as the support provided by the appropriate Government. The Information Commission is always dependent on the financial and infrastructural support from the Government. In some of the States, (like UP), the effectiveness of communication/guide from the State Government carries more emphasis than the communication by the State Information Commission.

Since 2014, no appointments to the CIC have been made unless the matter was agitated in the courts.

In 2018, CIC had to function with just three out of eleven commissioners until supreme court passed severe strictures that government was forced to make some more appointments. Despite that there still four out of 10 posts vacant of information commissioners in the CIC.

In June 2019, more than 9,000 of 31,000 total appeals were pending for more than a year.

It is widely accepted around the world that one of the most important structural elements of any independent oversight institution such as CVC, the Election Commission, Lokpal, the CIC is a basic guarantee of tenure and a fixed salary. There is strong nexus between the independence of an institution and the fixity of tenure and stable income of those who are appointed to it.

The Supreme Court of India in *Union of India vs R. Gandhi*, President Madras bar association, has recognized fixed tenure and salaries as essential aspects of institutional independence.

This shows that is not just a technical change but it is an attempt to weaken RTI framework.

In April 2018, after 13 years of RTI Act, a survey was conducted by SatarkNagrikSagathan (SNS) and the Centre of Equity Studies, made a key observation that the act empowering citizens of the country to seek information on governance, was slowly being chipped away. It left a

question if the government is deliberately diluting the act to protect themselves<sup>xxi</sup>.

Absence of any public participation, no real justification for Amendment, the government is just making a statement of facts that Election commission and Information commission are performing different functions, this gives no justification of why they shouldn't be accorded the same status. Keeping in mind that right to information enjoys the same constitutional status as right to vote, the justification offered by the government is not enough.

## ATTACKS ON RTI ACTIVISTS

Though RTI Act is helping in promoting good governance, it has major lacunae when it comes to the safety and security of activists. Since 2011, the number of murders of RTI activists has risen according to Commonwealth Human Rights Initiative (CHRI) data to 67. There are over 310 cases of people being attacked, physically or mentally harassed or had their property damaged because of the information they sought under RTI act. Media and civil society organizations have particularly been instrumental in raising the issue of protection of the RTI users with the policy makers.

Bihar alone has recorded more than 300 cases of harassment of activists. The Union Rural Development Minister, **Jairam Ramesh** is of the opinion that if a single panchayat level activist can expose corruption worth Rs 25 lakh, then each and every such activist needs to be protected for effective implementation of development schemes.

There is need felt to amend the RTI Act to provide for the protection of those seeking information under the Act. The Asian center for Human Rights recommends that a separate chapter, "Protection of those seeking information under the (RTI) Act," be inserted into Act.

Protection measures suggested include - Mandatory registration of complaints of threats or attacks against RTI activists on First Information Report and placing such FIRs before the magistrate or judge of the area within twenty-four hours for issuance of direction for protection of those under threats and periodic review of such protection.

The issue of protection of witnesses, whistle blowers and activists was taken up suo motu (on its own) by the court after the murder of Pune based RTI activist **Satish Shetty** in 2010. He was known for exposing

many land scams, irregularities in government offices in Maharashtra using Right To Information Act. He was killed by unknown attackers in Talegaon.

A large number of instances of corruption have been exposed in the flagship employment scheme of UPA government, the Mahatma Gandhi National Rural Employment guarantee schemes. Shiv Prakash, an RTI activist in Bihar, claims that RTI activists in Bihar alone have exposed corruption worth Rs 200 crore. "Majority of activists who were harassed and murdered have taken on corrupt officials and mukhiyas swindling MGNREGA funds," he says. <sup>xxii</sup>

A new provision that allows for an RTI case to be closed in the event of death of the applicant has come under criticism from activists who fear that this will encourage attacks on whistle blowers. The provision is part of the draft RTI rules made public by the Modi Government. In 2017, there have been more than 375 recorded cases of attacks on citizens who sought information to expose corruption and wrong doing in various public authorities. Of these, 56 are murders, at least 157 cases of physical assault and more than 160 cases of harassment and threats – some of which have resulted in death by suicide. <sup>xxiii</sup>

The process of fighting the atrocities, attack or torture without any strong legislative back up indicates that the victims or their families often do not get justice.

## CONCLUSION

The continuous and ongoing protests by the civil society against the lack of action of the current government in effectively protecting the people's Right To Information reflects the severity of the problem.

The interference of the BJP-government in the autonomous institutions of our country, shows an attempt to take away the free flow of unbiased information and place before the general public, the filtered information which is beneficial to the ruling class.

One area where the BJP government has failed to imitate the UPA government is in its commitment to uphold democracy by supporting people-centric initiatives. A democratic government's duty is to ensure the trust of its citizens emboldens with every step it takes. However, the recent efforts of the present regime go against this fundamental principle.

The real fear with these amendments is the way in which the government has tried to push them through the parliament. No large scale consultation or discussion has been conducted by the government to get some feedback of the public on the bill.

The government instead should give up its anti-people decisions approach and must ensure that it fills the loopholes in the RTI Act rather than digging for more of them.

The RTI has emerged through mass movement, and its continuance and deepening would also hinge on its use as a form of collective action to ensure accountability. Hundreds of RTI activists have been murdered, assaulted, harassed or threatened. The process to roll back these amendments and restore the right to information cannot be achieved without mobilising the masses in defence of their hard-won rights. If Information commission lost its independence then RTI would become tooth less.

This is not just a threat to the RTI Act, but to the notion of participative democracy itself.

## REFERENCES:

<sup>i</sup> ASTRA TAYLOR : Democracy may not exist, but we'll miss it when it's gone

<sup>ii</sup> ARUNA ROY : The RTI Story : Power to the people

<sup>iii</sup> How the government is sabotaging the spirit of RTI? – The Companion

<sup>iv</sup> 1.75 CRORE RTI applications filed since 2005 : Study – Economics Times

<sup>v</sup> AIR 1973 SC 106

<sup>vi</sup> 1975 (004) SCC 0428 SC

<sup>vii</sup> 1995 (002) SCC 0161 SC

<sup>viii</sup> AIR 1982 SC 149

<sup>ix</sup> 2003(001)SCW 2353 SC

<sup>x</sup> Earlier J&K Right to information was in force in the state but after revocation of Article 370 on 5<sup>th</sup> August 2019, the state was brought under ambit of Indian constitution.

<sup>xi</sup> Application No: CIC/WB/A/2006/00011 (Right to information Act – Section 19).2006

<sup>xii</sup> Political parties under RTI : Election Commission contradicts CIC directive – The Hindu

<sup>xiii</sup> Supreme Court bring CJI's office under the ambit of RTI Act – Economic Times

<sup>xiv</sup> Rajiv Gandhi's popular 15 paise remark finds mention in supreme court verdict. – The Indian Express

<sup>xv</sup> Rs 744cr dalit fund diverted for Games – Times Of India

<sup>xvi</sup> [rtiindia.org](http://rtiindia.org) Rajasthan villagers use RTI to end woes

---

<sup>xvii</sup> rtiindia.org – RTI success stories

<sup>xviii</sup> How the RBI dodged RTI appeals for minutes of meeting on demonetization- The Wire, M. Sridhar Acharyulu

<sup>xix</sup> Five ways to save the spirit of RTI - SayantanBera, LiveMint

<sup>xx</sup> <https://parappanangadimunicipality.lsgkerala.gov.in/en/rti>

<sup>xxi</sup> The RTI Story : Power to people's review : Towards transparency - Anuradha Raman, The Hindu

<sup>xxii</sup> Protocol to protect RTI activists in the works- Alok Gupta, Down To Earth

<sup>xxiii</sup> <https://timesofindia.indiatimes.com/india/new-rti-provisions-endanger-whistleblowers-lives-activists/articleshow/57999795.cms>