

Right to information laws and transparency: progressive legislation, reluctant governments



A THREE-DIMENSIONAL RANKING OF PAKISTAN'S BEST AND WORST COMPLIANT PROVINCES AND GOVERNMENT OFFICES ON PROACTIVE DISCLOSURE OF INFORMATION ONLINE

September 28 – International Day for Universal Access to Information (IDUAI)

ANNUAL PROACTIVE DISCLOSURE REPORT 2020

Muhammad Aftab Alam | Adnan Rehmat

IRADA

Institute for Research, Advocacy and Development

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ACRONYMS

3D	Three Dimensional
IGI	Identical Group of Indicators
IC	Information Commission
IRADA	Institute for Research, Advocacy and Development
KP	Khyber Pakhtunkhwa
PD	Proactive Disclosure
PDI	Proactive Disclosure of Information
PB	Public Body
RTI	Right to Information
URL	Uniform Resource Locator



INTRODUCTION

Proactive disclosure is a distinctive feature of Pakistan’s second-generation right to information (RTI) laws. These laws were enacted after addition of Article 19-A in the Constitution through Eighteenth Constitutional Amendment in 2010. These laws include: the Federal Right of Access to Information Act 2017; the Khyber Pakhtunkhwa Right to Information Act 2013; the Punjab Transparency and Right to Information Act, 2013; and the Sindh Transparency and Right to Information Act, 2016.

These second-generation RTI laws require all public bodies, within their respective jurisdictions, to ‘proactively disclose information’ [online / on the websites]. The laws in fact require public bodies to ensure their online / digital presence by disclosing certain types of information on their websites. However, the number and kinds of information, required to be proactively disclosed, vary in each law. Moreover, each of the laws provides a detailed list of public bodies and covers literally hundreds of public organizations within its respective jurisdiction. Each ‘public body’ as defined in the respective law, is required to proactively disclose a variety of information on its website.

For example, Section 05 of the Federal Right of Access to Information Act 2017 requires all federal public bodies to ‘proactively disclose’ 43 types of information. Similarly, Section 05 of the Khyber Pakhtunkhwa Right to Information Act 2013 demands 30 types of information to be disclosed proactively by all provincial ‘public bodies’ in the province. Likewise, Section 06 of the Sindh Transparency and Right to Information Act, 2016 necessitates 25 types and Section 04 of the Punjab Transparency and Right to Information Act, 2013 mandates 24 types of information to be disclosed proactively by the public bodies in their respective provinces.¹

¹ Balochistan province is still having an outdated first-generation freedom of information law, which does not have any provision on proactive disclosure of information. The province has yet to enact a second-generation RTI law to introduce the principle of PDI for public bodies within its jurisdiction. Therefore, the scope of this study is limited to only those federating units which have enacted the second-generation laws with PDI clauses.

While the overall number and types of information required by each of the sections varies, there are several clauses on proactive disclosure of information (PDI), which are common in the four laws. It is, therefore, feasible to compare the status of implementation of the common clauses within their respective jurisdictions. In 2018 and 2019, Institute for Research, Advocacy and Development (IRADA) conducted two consecutive studies on implementation status of 'proactive disclosure of information' clauses of the Federal Right of Access to Information Act 2017. In 2020, we decided to conduct a comparative study of status of implementation of 'common clauses' on PDI in the jurisdictions where these RTI laws are prevalent.

This study provides a **three-dimensional (3D) comparison** – (i) inter-government (federal and provincial), (ii) inter-body and (iii) inter-indicator – of implementation status of PDI clauses. After the executive summary, this report provides a detailed framework of analysis for the study. This is followed by a chapter on inter-governmental comparison on PDI. The second chapter deals with inter-body comparison and the third chapter covers inter-indicator comparison. While information commissions constituted under these laws are principally responsible for implementation of the RTI laws, including PDI clauses within their respective jurisdictions, they too fall in the definition of a public body. Therefore, they are also required to proactively disclose their own information on their respective websites as required by their respective laws. In this context, the fourth chapter of this study provides a comparison of implementation status of PDI clauses by the four information commissions.



EXECUTIVE SUMMARY

This annual flagship report of IRADA on 'proactive disclosure of information' (PDI) starts with a detailed explanation of its framework of analysis and methodology. It provides a comparative study of implementation of PDI clauses of the four second generation RTI laws within their respective jurisdictions. All these laws have clauses on proactive disclosure of information which have some commonalities and some variations, when it comes to specific pieces of information or indicators. To draw a meaningful comparison on status of implementation of proactive disclosure (PD), only those specific aspects of information/ indicators which are common in all the four laws have been analyzed in this report. The process starts with breaking up the PD clauses into tangible indicators followed by a grouping of identical indicators into Identical Groups of Indicators (IGIs). Thereafter, IGIs common to all four RTI laws are segregated for assessing the implementation status in their respective jurisdictions. In all, there are 19 indicators common to all the four second generation RTI laws of Pakistan, which have been grouped under 6 IGIs for this research.

The definitions of 'public body' (PB) in the second-generation RTI laws provide a regulatory umbrella to a wide range of organizations and bodies and cover all ministries at the federal level and departments at the provincial level, besides hundreds of other organizations and bodies. The scope of this study has been confined to only six key federal ministries and their corresponding departments in each of the three provinces – Khyber Pakhtunkhwa, Punjab and Sindh. The six selected ministries/ departments include (i) communication/ works, (ii) finance, (iii) interior/ home, (iv) information, (v) law and planning and (vi) development, with slight variation of names. The four separate Information Commissions (ICs) constituted under these laws (for effective implementation of RTI laws) have also been included for assessment of their PDI. Tools and instruments used in the assessment process include datasheets on PD and the proactive disclosure of information index (PDI Index). This research is based on data available on the websites of 24 federal and provincial PBs during the month of July 2020 and is a representative sample for the short to medium term.

Chapter 1 is about inter-governmental comparison of PDI. The federal RTI law entails disclosure of 43 information categories (or indicators)

from federal public bodies while the KP RTI law demands disclosure of 30 indicators. Sindh RTI law requires disclosure of 25 information types and Punjab RTI law requires disclosure of 24 such information categories. All these indicators have been grouped into 15 IGIs in this research. In all there are 19 indicators which are common to all the RTI laws and have been grouped under 6 IGIs, out of total 15. Each indicator has a weightage of 01 point. Therefore, a public body can score maximum 19 points for information availability compliance and each government having 6 PBs covered in this study can secure a maximum of $19 \times 6 = 114$ marks.

The assessment of PDI reveals that overall the federal government is at the 4th position with a 42% score. Sindh government is 3rd with a 44% score and Punjab government is 2nd with 47% marks. KP has secured the 1st position with a collective score of 67%.

Chapter 2 deals with intra-province and inter-province comparison of PBs.

Among federal ministries only Ministry of Information and Broadcasting has crossed the 50% mark and scored 53%. Ministry of Interior occupies the lowest slot with only 26% score while the remaining 4 ministries have scored in the forties.

In **KP**, Information Department has secured 1st position with an impressive score of 89%. Law Department and Planning and Development Department have secured 2nd and 3rd positions and scored 74% and 68% marks respectively. The Home and Tribal Affairs Department occupies the lowest slot with 47% marks.

In **Punjab**, Information and Culture Department secured 1st position with 64% marks while all other departments remained below the 50% threshold.

In **Sindh**, Finance Department topped with 64% score. The rest of the departments in the province remained below 50%.

In inter-department comparison, Federal Ministry of Interior sits at the lowest position among the 24 PBs with only 26% compliance while Information and Culture Department of Sindh occupies the 2nd lowest slot with 32% score.

In terms of collective performance by similar departments/ ministry, the



information departments secured 1st position, followed by departments of law at 2nd, finance at 3rd and planning at 4th. Communication/works departments occupied 5th slot while interior/ home secured the lowest position, reflecting a fairly poor state of transparency.

Chapter 3 is about inter-indicator comparison and generally reflects what sort of information is readily shared and what information is held back by different PBs. The least disclosed indicators include description of decision-making processes, remuneration, perks and privileges of staff, duties/functions of employees, actual expenditures and particulars of recipients of any grants, licenses etc. in that order. The most disclosed indicators include information about organizational structure and functions of the PB, telephone directories of staff, statutory rules, orders and notifications and relevant Act/ Ordinance, in the same order.

Chapter 4 deals with PDI by Information Commissions (ICs) established under the federal and provincial RTI laws for implementation of these laws in respective jurisdictions. KP IC with 100% marks has secured 1st position among all PBs in Pakistan. Punjab IC is second by securing 89% marks and Pakistan IC third at a 63% score. Sindh IC has yet to develop its dedicated website and thus comes last.

FRAMEWORK OF ANALYSIS – THE METHODOLOGY

This research report provides a comparative study of implementation of ‘proactive disclosure of information’ (PDI) clauses of the four second-generation RTI laws within their respective jurisdictions. The PDI clauses of these laws require proactive disclosure of several similar – in four laws – and dissimilar kinds of information, hereinafter referred to as “**indicators**”. However, due to time and resource constraints, it is difficult to compare implementation status of all these types of information in the four jurisdictions. Therefore, it is practical for the purpose of this research to assess implementation status of only those *indicators, which are similar / common in all four laws.*

To embark on a comparison of implementation status of these common indicators, there is a need to first define and draw a detailed / long list of identical groups of indicators on PDI covering maximum indicators of information required by the four laws. Furthermore, it is also essential to identify those common identical groups of indicators (IGI), whose implementation status will be assessed through this research, from the long list. These common IGIs will be used for a three-dimensional (3D) - **inter-government** (federal and provincial), **inter-body** and **inter-indicator** - comparison of implementation of PDI clauses of the RTI laws.

Identical Group of Indicators (IGI)

Identical Group of Indicators (IGI) are those indicators or kinds of information, which are mentioned in a particular clause of the section on PDI of any of the four RTI laws. Each IGI represents one broader category of information. For example, “description of the public body’s organization and functions, duties, powers and any services it provides to the public, including a directory of its officers and employees, indicating their duties and functions and their respective remunerations, perks and privileges” can constitute one broader category of information or IGI, namely, General Information on Public Body and Details of its Staff. **(All IGIs and their constituents are explained in Annexure A)**



Following this criterion, Section 05 of the Federal Right of Access to Information Act 2017, which provides 43 types of information can be divided into fifteen IGIs. Similarly, Section 05 of the Khyber Pakhtunkhwa Right to Information Act 2013 specifies 30 types of information and can constitute twelve IGIs. Section 06 of the Sindh Transparency and Right to Information Act, 2016 and Section 04 of the Punjab Transparency and Right to Information Act, 2013 can be composed into eleven and ten IGIs, respectively. Since the Federal Right of Access to Information Act 2017 provides highest number of IGIs (15), as compared to the other three laws, therefore, it is selected as the foundation for the below list of IGIs. Here is the long list of IGIs:

- 1) Mode/ method of proactive disclosure;
- 2) General information on public body and details of its staff;
- 3) Applicable laws, rules, regulations, orders, notifications, policies, manuals etc.
- 4) Relevant facts, statement of the policies adopted and criteria standards for exercise of discretionary powers;
- 5) Categories of information held;
- 6) Decision making process and public inputs;
- 7) Detailed budget [of the public body];
- 8) Subsidy and details of beneficiaries;
- 9) Conditions for concessions, licenses, permits, grants, benefits etc., transactions/ contracts and particulars of recipients;
- 10) RTI related clauses, i.e., method of information request, designation of officials, etc.
- 11) Information prescribed in rules;
- 12) Maintenance of records and miscellaneous reports;
- 13) Additional matters added by the principal officer;
- 14) Camera footages; and
- 15) Old records (prior to 2008).

As mentioned above, *not all IGIs are given in the four laws*. However, there are several IGIs, which are common in all of the laws. (**Details of common IGIs are given in Annexure B**). The common IGIs are:

- 1) General information on public body and details of its staff (**six indicators**);
- 2) Applicable laws, rules, regulations, orders, notifications, policies, manuals etc. (**six indicators**);

- 3) Decision making process and public inputs (**two indicators**);
- 4) Detailed budget [of the public body] (**two indicator**);
- 5) Conditions for concessions, licenses, permits, grants, benefits etc., transactions/ contracts and particulars of recipients (**one indicator**);
- 6) RTI related clauses, i.e., method of information request, designation of officials etc. (**two indicators**).

In total, there are 19 individual indicators which are common and whose status of implementation is assessed through this research.

Weightage for IGI

As mentioned above, the *PDI clauses of the four laws have six common IGIs*. However, there is a slight inter-Act variance in the types of information in a few of these common IGIs. For example, types of information in IGIs on “General information on public body and details of its staff” is different in Federal RTI law (07 types) and Punjab RTI law (07 types) as compared to the Khyber Pakhtunkhwa RTI law (08 types) and Sindh RTI law (08 types) laws. Therefore, to avoid any confusion, *only similar indicators / types of information, given in four laws against that particular IGI, are selected as benchmark for the purpose of this research*.

For the purpose of calculation of the weightage, each indicator or type of information is given one (01) point. Moreover, the weightage of a common IGI is determined on the basis of number of indicators mentioned in the four RTI Acts against that particular IGI. Therefore, maximum weightage for IGIs on “General information on public body and details of its staff” will be six (06).

Sample Size (Selected Public Bodies)

The definitions of ‘public body’ in the second-generation RTI laws provide a wide range of organizations and bodies and cover all ministries at the federal level and departments at the provincial level. The definitions also include: all federal, municipal or local authorities established under any federal or provincial law; federal and provincial legislatures; courts and tribunals; and any other governmental or non-governmental organizations financed through public funds, etc. In practical, these definitions encompass hundreds of organizations and bodies. In this situation, it is almost impossible to assess the implementation status of PDI clauses by all ‘public bodies.’ Therefore, due to time and resource constrains, the *scope of the study has been reduced to only six key federal ministries and*



their corresponding departments in each of the three provinces – Khyber Pakhtunkhwa, Punjab and Sindh. Following are the selected public bodies for ‘three-dimensional (3D) comparison’ of implementation status of six (06) common IGIs, consisting of a selected group of 19 indicators in total, of PDI clauses of the RTI laws.

Table 1: List of selected public bodies

Federal	Khyber Pakhtunkhwa	Punjab	Sindh
Ministry of Communication	Communication and Works Department	Communication and Works Department	Works and Services Department
Ministry of Finance	Finance Department	Finance Department	Finance Department
Ministry of Interior	Home and Tribal Affairs Department	Home Department	Home Department
Ministry of Information and Broadcasting	Information Department	Information and Culture Department	Information and Culture Department
Ministry of Law and Justice	Law Department	Law and Parliamentary Affairs Department	Law and Parliamentary Affairs Department
Ministry of Planning, Development & Special Initiatives	Planning and Development Department	Planning and Development Department	Planning and Development Department

These RTI laws also provide institutional framework in the shape of information commissions (ICs) for implementation of these laws within their jurisdictions. The ICs have the primary duty to ensure compliance of statutory obligations including PDI by all public bodies. Interestingly, these commissions also fall in the definition of ‘public body.’ It is therefore also worth studying how much these commissions themselves are complying with these statutory obligations. Therefore, *this study also assesses the implementation status of PDI clauses by the ICs.*

Tools and Instruments

Datasheets on proactive disclosure

The compliance of the selected indicators is assessed on the basis of information available / not available against each of them on the websites of six (06) selected federal ministries and their corresponding departments in Khyber Pakhtunkhwa, Punjab and Sindh. For this purpose, a datasheet was developed consisting of following six columns:

1. Titles of Identical Group of Indicators (IGI)
2. List of indicators in each of the IGIs
3. Overall weightage of IGI
4. Number of indicators proactively disclosed
5. IGI-wise scorecard
6. Relevant Uniform Resource Locator (URL) for each of the indicators.

For each ministry / department, a separate datasheet is developed and information is gathered therein for the assessment. Therefore, 24 datasheets are filled with the information extracted from the websites of the selected 24 ministries / departments. In addition, three datasheets are filled with the information from the websites of three information commissions.²

Given the equal weightage of each indicator, the maximum score for a public body can be 19. The datasheets provide maximum achievable score as well as the score that a public body has actually achieved. For example, a public body, which complies with 15 out of 19 indicators, will get 15 points (78.94%) of the maximum achievable score. Moreover, the maximum compliance score for each indicator can be 24. Similarly, one government – represented through a sample of six ministries / department – can achieve 114 points at maximum. Datasheets of the best performing and least performing ministries / departments are given as **Annexure C**.

Proactive Disclosure of Information Index (PDI Index)

Like the previous PDI reports, the data collected through the above-mentioned datasheets is put into a customized and structured excel sheet – named as Proactive Disclosure of Information Index (PDI Index). This Index contains a list of the above-mentioned indicators as well as ministry / department-wise scorecard on compliance of the indicators. It also provides data on indicator-wise compliance by ministries / departments which have

² The Sindh Information Commission has yet to develop its website



official websites. For example, the PDI Index shows how many indicators have been complied by a selected ministry (Ministries' Scorecard). Similarly, it also details out that how many ministries have implemented a particular indicator (Indicators' Scorecard).

The information gathered through PDI Index is used to undertake comparison of the selected public bodies – with each other within the jurisdiction of one particular RTI and with their corresponding departments in other selected provinces. The Index also enables conducting of inter-governmental ranking – compliance status by one federating unit against the others. The actual results of the scorecards, i.e., ministries' scorecard, indicators' scorecard and an overall scorecard for each of the governments are given in subsequent chapters of the study. The PDI Index is given as

Annexure D.

Data Collection Timeline

Recognizing the fact that information on the website can be changed at any time, it was crucial to determine a precise timeline for the research. Therefore, the data and information reviewed in this research were collected from the websites – of selected ministries / departments / information commissions – during July 2020.

Subsequent chapters provide a three-dimensional (inter-governmental, inter-body and inter-indicator) comparison of implementation status of the PDI clauses.

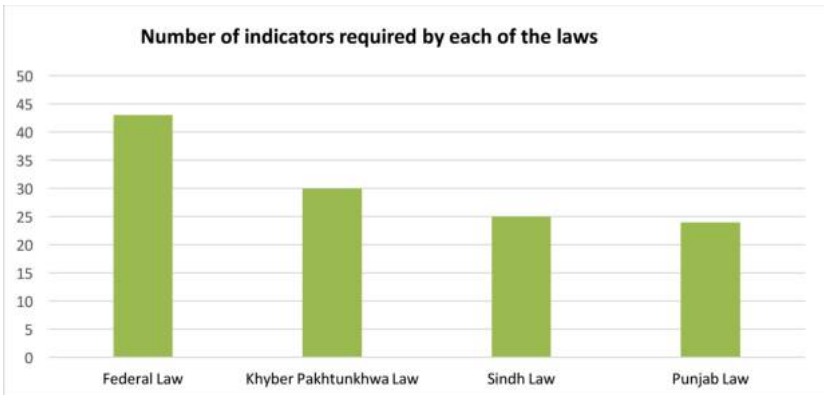
CHAPTER ONE:

INTER-GOVERNMENTAL COMPARISON OF PROACTIVE DISCLOSURE OF INFORMATION

After inclusion of Article 19A (Right to Information) in the Constitution of Pakistan through Eighteenth Constitutional Amendment, Khyber Pakhtunkhwa was the first province that enacted the second-generation RTI law (in November 2013). Punjab followed suit and enacted the RTI law in December 2013. Sindh province took four more years and enacted its RTI law in April 2017 whereas the Federal RTI law was enacted in October 2017. Balochistan, as mentioned earlier, has yet to enact the second-generation RTI law.

The Khyber Pakhtunkhwa Right to Information Act, 2013, when enacted, was ranked among the best RTI laws in the world. The law demands the public bodies to proactively disclose 30 categories/ types of information or 'indicators' on their websites. Likewise, the Punjab Transparency and Right to Information Act, 2013 requires the public bodies to disclose 24 types of information. Similarly, the Sindh Transparency and Right to Information Act 2017 demands the public bodies to proactively disclose 25 types of information. Nonetheless, the Federal Right of Access to Information Act 2017 provides the highest number of information categories (43 categories), which are required to be proactively disclosed by the public bodies.

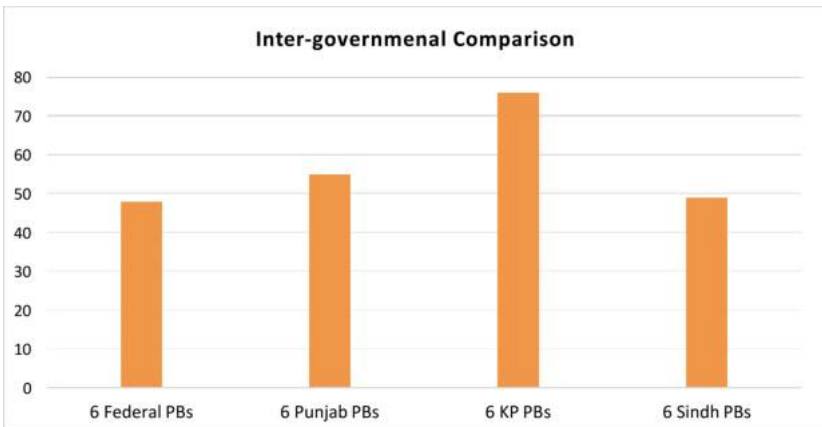
Figure 1: Number of indicators, required by each of the laws, for proactive disclosure



As mentioned in the methodology part, 43 categories of information mentioned in the Federal law can be divided into 15 Identical Groups of Indicators (IGI). However, there are only six groups, out of these 15 IGI, which are also given in other three laws. These six IGI consist of 19 common categories of information or indicators, which are required by four laws for proactive disclosure from the public bodies (PBs) in their respective jurisdictions. Given commonality of these indicators, data is collected from the websites of selected federal and provincial ministries / departments against these 19 indicators. Collectively, a government (federal or provincial) can achieve maximum 114 points, if each of its six ministries / departments have put all 19 categories of information on their websites. However, the data shows that:

- Federal government comes at fourth position in the IRADA ranking as its six selected ministries collectively secured only 48 (or 42.1%) out of 114 maximum points;
- Sindh province has acquired third position as its six selected departments collectively received 50 (or 43.85%) out of 114 points;
- Punjab has achieved second position in the ranking as its six selected departments collectively attained 54 (or 47.36%) out of 114 points; and
- Khyber Pakhtunkhwa province has topped the scorecard as its selected six departments collectively achieved 76 (or 66.66%) out of 114 points.

Figure 2: Performance of four governments in proactive disclosure of information



Moreover, four governments (one federal and three provincial) could jointly achieve a mere 228 (or 50%) out of the accumulative total 456 points. This shows the low level of interest of the respective governments towards PDI and compliance of their statutory obligations.



CHAPTER TWO:

INTER-BODY COMPARISON OF PROACTIVE DISCLOSURE OF INFORMATION

This chapter provides comparison of implementation status of the PDI clauses by the selected departments and ministries. The chapter consists of two parts: (a) comparison of selected bodies within a province,³ i.e., intra-province comparison; and (b) comparison of selected public bodies of one province with the selected public bodies of the others, i.e., inter-province comparison.

Intra-Province Comparison of Public Bodies

Federal Government Ministries

Starting with the federal government, it can be seen that only one selected ministry – the Ministry of Information and Broadcasting – could cross the 50% mark in compliance of the selected indicators. Following table outlines the scorecard of each of the selected federal ministries.

Table 2: Scorecard of selected Federal Ministries

No	Name of Ministry	Achievable Score	Score Achieved	Percentage
1	Ministry of Communication	19	08	42%
2	Ministry of Finance	19	08	42%
3	Ministry of Interior	19	05	26%
4	Ministry of Information and Broadcasting	19	10	53%
5	Ministry of Law and Justice	19	09	47%
6	Ministry of Planning & Special Initiatives	19	08	42%
Total		114	48	42%

Khyber Pakhtunkhwa Government Departments

As per the data collected, five of the six selected departments of Khyber Pakhtunkhwa have managed to cross the 50% mark in compliance of PDI

³ For the purpose of this research, federal government is treated as a 'province.'

indicators. The Information Department of the province has topped the others by achieving 17 out of 19 points (89%). The following table provides details of the scorecard of selected provincial departments of the Khyber Pakhtunkhwa province.

Table 3: Scorecard of selected departments of Khyber Pakhtunkhwa (KP)

No	Name of Ministry	Achievable Score	Score Achieved	Percentage
1	Communication and Works Department	19	12	63%
2	Finance Department	19	11	58%
3	Home and Tribal Affairs Department	19	09	47%
4	Information Department	19	17	89%
5	Law Department	19	14	74%
6	Planning and Development Department	19	13	68%
Total		114	76	67%

Punjab Government Departments

Unlike Khyber Pakhtunkhwa (KP), the results of five of the six selected departments of the Punjab government remained below 50%. The Information and Culture Department is the lone exception and has got 12 out of 19 points (63%).

Table 4: Scorecard of selected departments of Punjab

No	Name of Ministry	Achievable Score	Score Achieved	Percentage
1	Communication and Works Department	19	07	37%
2	Finance Department	19	09	47%
3	Home Department	19	08	42%
4	Information and Culture Department	19	12	63%
5	Law and Parliamentary Affairs Department	19	09	47%
6	Planning and Development Department	19	09	47%
Total		114	54	47%



Sindh Government Departments

The results from six selected department of the Sindh government show that there is only one department, i.e., Finance Department that could cross the 50% mark in implementing the selected PDI indicators. Interestingly, the Information Department of the province could achieve implementation of only 06 (or 31%) out 19 indicators. Here is the detailed scorecard of the selected departments of Sindh government.

Table 5: Scorecard of selected departments of Sindh

No	Name of Ministry	Achievable Score	Score Achieved	Percentage
1	Works and Services Department	19	09	47%
2	Finance Department	19	12	63%
3	Home Department	19	07	37%
4	Information and Culture Department	19	06	32%
5	Law and Parliamentary Affairs Department	19	09	47%
6	Planning and Development Department	19	07	37%
Total		114	50	44%

Inter-Province Comparison of Public Bodies

Highly Compliant Departments

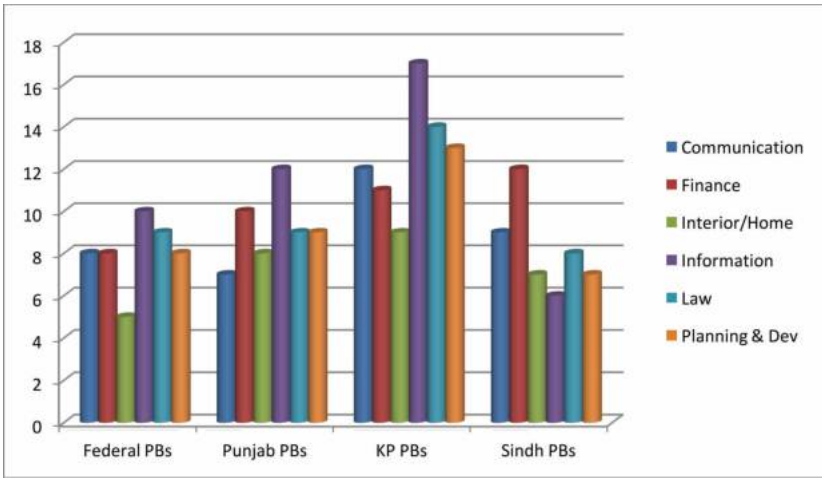
When we compare 24 selected public bodies – six federal ministries and six provincial departments in each of three provinces – it appears that three departments in Khyber Pakhtunkhwa are leading the process. The Khyber Pakhtunkhwa Information Department leads the pack of other selected departments and ministries with 89% (or 17 out of 19 points) compliance of the PDI indicators. The Khyber Pakhtunkhwa Law Department (74% compliance) and Khyber Pakhtunkhwa Planning and Development Department (68%) are, respectively, second and third in this race.

Least Compliant Departments

The Federal Ministry of Interior is the least transparent body among the selected ones as its website shows only 05 out 19 indicators (only 26% compliance). Similarly, Sindh Information Department is the second

least transparent body as its website carries 06 out of 19 indicators (32% of compliance). There are three departments – one in Punjab and two in Sindh – which are ranked at the position of third least transparent bodies. These are the Communication and Works Department in Punjab and Home and Planning & Development Departments in Sindh. Each one of these departments has secured only 07 out of 19 points (37% of compliance). Following chart shows an overall comparison of bodies in compliance of PDI indicators.

Figure 3: Inter-province comparison of public bodies (PBs)



Department-Wise Inter-Provincial Comparison

Within the thematic departmental categories, the Khyber Pakhtunkhwa Information Department has secured highest points as compared to the information departments in other two provinces and the federal information ministry. An identical group of departments can achieve 76 points at maximum. The table below provides details of department-wise inter-provincial comparison of compliance of PDI indicators.



Table 6: Department-wise inter-provincial comparison

Name of Department	Province / Area	Scorecard	percentage	Ranking
Information	Khyber Pakhtunkhwa	17	89%	First
	Punjab	12	63%	Second
	Federal	10	53%	Third
	Sindh	06	32%	Fourth
	45/76			
Law	Khyber Pakhtunkhwa	14	74%	First
	Federal	09	47%	Second
	Punjab	09	47%	Second
	Sindh	09	47%	Second
	41/76			
Finance	Sindh	12	63%	First
	Khyber Pakhtunkhwa	11	58%	Second
	Punjab	09	47%	Third
	Federal	08	42%	Fourth
	40/76			
Planning	Khyber Pakhtunkhwa	13	68%	First
	Punjab	09	47%	Second
	Federal	08	42%	Third
	Sindh	07	37%	Fourth
	37/76			
Communication / Works	Khyber Pakhtunkhwa	12	63%	First
	Sindh	09	47%	Second
	Federal	08	42%	Third
	Punjab	07	37%	Fourth
	36/76			
Interior / Home	Khyber Pakhtunkhwa	09	47%	First
	Punjab	08	42%	Second
	Sindh	07	37%	Third
	Federal	05	26%	Fourth
	29/76			

The above calculations reveal that:

- Information related (one federal and three provincial) public bodies, as a group, have secured the highest number of points, i.e., 45 out of 76 (or 59%);
- Law departments stand at number two through securing 41 out of 76 points (54%);
- Finance departments have gained third position as they have jointly secured 40 out of 76 points (53%);
- Planning and Development related PBs have got fourth position by securing 37 out of 76 (49%);
- Communication / Works departments could achieve 36 out 76 points (47%) and attained fifth position; and
- Interior / Home departments, collectively, secured lowest number of points, i.e., 29 out of 76 (38%).



CHAPTER THREE:

INTER-INDICATOR COMPARISON

This chapter deals with another dimension of comparison of implementation status of statutory obligations for proactive disclosure, i.e., comparison of implementation of PDI indicators. As mentioned earlier, there are nineteen (19) indicators / information types, which are common in the provisions relating to the PD in all RTI laws. These 19 indicators can be divided into six (06) identical groups of indicators. The table below provides details of all common indicators including formation of their identical groups.

Table 7: List of common indicators and their respective identical groups

No	Identical Groups of Indicators (IGI)	Indicators	
1	General information on public body and details of its staff	1	Organization/Organogram
		2	Functions and duties of the public body
		3	Power of public body
		4	Directory of its officers and employees
		5	Duties and functions of officers and employees
		6	Remuneration, perks and privileges of officers and employees
2	Applicable laws, rules, regulations, orders, notifications, policies, manuals etc.	7	Statutes (Acts/ Ordinances) ⁴
		8	Statutory rules
		9	Regulations and by-laws
		10	Orders, notifications, circulars
		11	Instruments, Manual and instructions
		12	Policies used by employees

⁴ Section 6 (1) (a) Sindh Transparency and Right to Information Act 2016 does not use the word "Act / Ordinance." Instead there is a term "other legal instrument" used in the section. For the purpose of this research, this term is considered as replacement of the words "Act / Statute."

3	Decision making process and public inputs	13	Description of its decision-making processes
		14	Any instructions for the public to provide input into or be consulted about decisions
4	Detailed budget [of the public body]	15	Detailed budget of the public body and proposed expenditures
		16	Actual expenditures, revenue receipts, revisions in the approved budget and Supplementary budget
5	Conditions for concessions, licenses, permits, grants, benefits etc., transactions/ contracts and particulars of recipients	17	Particulars about the recipients of any concession, permit, licence or authorization granted by the public body
6	RTI related clauses, i.e., method of information request, designation of officials etc.	18	The methods whereby information in the possession or control of the public body may be obtained and the prescribed fee required
		19	Name, title and contact details of the designated officials

Least Performed Indicators

As per the information collected through this research, following indicators are among the least performed ones. These indicators are available on less than 50% of the 24 selected websites. This means that majority of the websites do not proactively disclose much of the required information in these areas and lack in fulfilling their statutory obligation.

Table 8: Least performed indicators

Sr. No of Indicator (as per Table 7)	The Indicator	Number of websites complying the Indicator	Ministry / Department making proactive disclosure of the indicator
#13	Description of decision-making processes	01	• KP Information Department
#06	Remuneration, perks and privileges of officers and employees	02	• KP Information Department • Sindh Finance Department



#05	Duties and functions of officers and employees	03	<ul style="list-style-type: none"> • KP Information Department • KP Planning and Development Department • Punjab Finance Department
#16	Actual expenditures, revenue receipts, revisions in the approved budget and Supplementary budget	04	<ul style="list-style-type: none"> • KP Finance Department • KP Law Department • Sindh Works Department • Sindh Finance Department
#17	Particulars about the recipients of any concession, permit, license or authorization granted by the public body	05	<ul style="list-style-type: none"> • Punjab Information Department • KP Communication Department • KP Information Department • KP Planning and Development Department • Sindh Home Department
#15	Detailed budget of the public body and proposed expenditures	06	<ul style="list-style-type: none"> • Punjab Law Department • KP Communication Department • KP Finance Department • KP Law Department • Sindh Works Department • Sindh Finance Department

In addition, 08 out of 24 websites have provided information about the name, title and contact details of the designated officials (Indicator # 19) and 12 out of 24 websites provide methods including prescribed fee for access to information from the public body (Indicator # 18).

Highly Performed Indicators

The data shows that there are only four (04) indicators which are present at 19 or more websites of the selected public bodies. These highly performed indicators are:

- **Indicator # 01 and # 02 (information about organizational structure and its functions and duties):** present on the websites of all 24 selected public bodies;

- **Indicator # 04 and # 08 (directories of the officers and employees and statutory rules concerning the function of public body):** available on 23 out of 24 websites of selected public bodies;
- **Indicator # 10 (orders and notifications):** posted on 22 of the 24 websites; and
- **Indicator # 07 (copies of Act or Ordinance):** given on 19 out of 24 websites of selected public bodies.



CHAPTER FOUR:

INFORMATION COMMISSIONS AND PROACTIVE DISCLOSURE OF INFORMATION

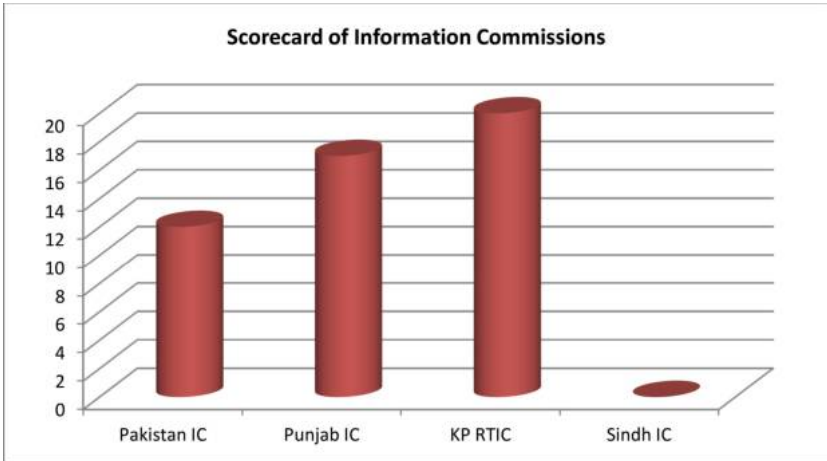
Another distinguished feature of the second-generation RTI laws in Pakistan is the formation of independent information commissions (ICs) as appellate forum. In addition to their role in disposal of information seekers' complaints against public bodies, these commissions are responsible for implementation of their respective RTI laws. Currently, Pakistan Information Commission at the federal level, Khyber Pakhtunkhwa Information Commission in KP province, Punjab Information Commission in Punjab province and Sindh Information Commission for Sindh province have been notified and are functional. Moreover, except Sindh Information Commission, the other three Commissions have their online presence through their dedicated websites.

Incidentally the ICs too fall under the definitions of 'public body' given in their respective governing statutes. Therefore, they are also under obligation to proactively disclose several categories of information, as mentioned in the PDI clauses of their laws, on their websites. However, this study discovered that except the website of KP Information Commission many of the PDI indicators are still missing on the websites of the Pakistan Information Commission and the Punjab Information Commission. The Sindh Information Commission does not have its website so far (2020). The Figure 4 shows overall scorecard of implementation of the PDI clauses by the ICs.

PDI Ranking of Information Commissions

- The Khyber Pakhtunkhwa Information Commission has secured 19/19 points as its website carries all the selected PDI indicators. It is the best among ICs by performance.
- The Punjab Information Commission stands at second position by disclosing 17 out of 19 indicators.
- The Pakistan Information Commission has put 12 out of 19 indicators on its website so far, and is at third position.
- The Sindh Information Commission gets zero points due to absence of its website by July 2020.

Figure 4: Scorecard of the implantation of PDI clauses by information commissions



Missing Indicators on the Website of Punjab Information Commission

Following two indicators are missing on the website of Punjab Information Commission:

- Details of functions of its officers and employees (Indicator # 05)
- Particulars of the recipients of concessions, permits or authorizations granted by the public body (Indicator # 17)

Missing Indicators on the Website of Pakistan Information Commission

- Directory of its officers and employees (Indicator # 04)
- Details of duties and functions of its officers and employees (Indicator # 05)
- Description of its decision-making processes as defined in the Federal Government's Secretariat Instructions, 2004 (Indicator # 13)
- Instructions for the public to provide input into or be consulted about decisions (Indicator # 14)
- Detailed budget of the public body: proposed expenditures. Original and Revised revenue targets (Indicator # 15)
- Actual expenditures, revenue receipts, revisions in the approved budget and Supplementary budget (Indicator # 16)
- Particulars about the recipients of any concession, permit, licence or authorization granted by the public body (Indicator # 17)



KEY FINDINGS OF THIS STUDY

1. The period between 2010 to 2020 can be regarded as the era for constitutionally endorsing RTI as a fundamental right and enacting second generation RTI laws in four federating units of Pakistan (except Balochistan, having first generation Freedom of Information Act 2005, still in force).
2. All the second generation federal and provincial RTI laws entail proactive disclosure of information by all public bodies in respective jurisdictions.
3. Federal RTI law entails PDI of 43 types of information (or simply indicators) while KP RTI law requires disclosure of 30 indicators. Sindh and Punjab provinces are required to proactively disclose 25 and 24 indicators respectively.
4. In all, there are 19 indicators which are common to all the 4 RTI laws and assessment of status of implementation of PDI clauses has been based on these 19 indicators.
8. In inter-governmental comparison of PDI, the KP government secured first position with overall score of 67%, while Punjab government got second position with 47% collective score. Sindh and federal governments secured third and fourth positions respectively.
9. Intra-province comparison:
 - **Federal Government Ministries:**
 - Ministry of Information and Broadcasting is at the top with 53% marks
 - Ministry of Interior is at the bottom with only 26% of the marks
 - **Khyber Pakhtunkhwa Government Departments:**
 - Information Department has topped the others by achieving 89% of marks
 - Home and Tribal Affairs Department is at last number with 47% of marks
 - **Punjab Government Departments:**
 - Information and Culture Department has secured top position with 63% marks

- o Department of Communication and Works Department could get only 37% marks and remained at the last number.
 - **Sindh Government Departments:**
 - o Finance Department achieved 53% marks to attain top position.
 - o Information Department stood at bottom with only 31% marks.
10. In inter-province comparison of public bodies, the highly compliant ones out of 24 PBs include KP Information Department (89%), KP Law Department (74%) and KP Planning and Development Department (68%). The least compliant PBs include Federal Ministry of Interior (26%) and Sindh Information Department (32%).
11. In department-wise ranking, information ministry/ departments collectively occupy the top slot followed by law departments in second position and finance departments securing overall third position. Planning & development, communication/ works and interior/ home departments occupy the fourth, fifth and sixth positions respectively.
12. In the inter-indicator comparison, least disclosed indicators include; description of decision-making processes, remuneration, perks and privileges and functions/ duties of staff. Budget/ expenditures and particulars about the recipients of grants, licenses and other benefits are also poorly disclosed indicators. To the contrary, information related to organizational structure/ functions, staff directories, statutory rules, orders, notifications and relevant Act/ Ordinance have been frequently disclosed proactively.
13. PDI ranking of ICs reveals that KP IC has secured overall first position by scoring 100% marks, followed by Punjab IC with 89% score. Pakistan IC has scored 63% points and is at the third position among ICs. The Sindh IC could not be assessed because they do not have a website yet.



ANNEXURES

ANNEXURE – A

Proactive Disclosure of Information (PDI) Clauses of the Federal and [Three] Provincial RTI Acts

IGI Title	Federal: The Right of Access to Information Act 2017: (Section 5)	Punjab: Transparency and Right to Information Act 2013: (Section 4)	KP: Right to Information Act 2013: (Section 5)	Sindh: Transparency and Right to Information Act 2016: (Section 6)
<p>1. Mode/ Method of Proactive Disclosure</p>	<p>5. Publication and availability of record.- (1) The principal officer of each public body shall, within six months of the commencement of this Act, ensure that the following categories of information and record are duly published including uploading over the internet in a manner which best ensures that these are accessible subject to reasonable restrictions based on limited resources:-</p>	<p>4. Proactive disclosure. – Subject to the provisions of this Act, a public body shall proactively disclose–</p>	<p>5. Publication and availability of records. (1) The following categories of information shall be duly published by public bodies in an up-to-date fashion and in a manner which best ensures that they are accessible to those for whom they may be relevant, including over the Internet, subject to reasonable restrictions based on limited resources:</p>	<p>6. (1) Subject to the provisions of this Act, a Public Body shall proactively disclose and publish (2) For the purpose of sub-section (1), every Public Body shall disseminate all information as widely as possible including the internet where possible so that all citizens have easy access to it. (3) Every public body shall endeavour to ensure proactive disclosure of information as explained in sub-section (1) of section 6.</p>

<p>2. General information on public body and details of its staff</p>	<p>5(1)(a) description of the public body's organisation and functions, duties, powers and any services it provides to the public, including a directory of its officers and employees, indicating their duties and functions and their respective remunerations, perks and privileges; (7)</p>	<p>4(a) particulars of the public body, its functions and duties; 4(b) powers and functions of its officers and employees; 4(c) norms and criteria set by the public body for the discharge of its functions; 4(g) a directory of its officers and employees with their respective remuneration, perks and privileges; (7)</p>	<p>5(1)(b) information about the public body, including its organization, functions, duties, powers and any services it provides to the public; 5(1) (c) a directory of its officers and employees, including a description of their powers and functions and their respective remunerations, perks and privileges; (8)</p>	<p>6(1)(a) Particulars of its organization, functions and duties; 6(1)(b) Powers and functions of its officers and employees; 6(1)(c) Norms and criteria set by it for the discharge of its daily functions; 6(1)(h) Directory of its officers and employees with their qualifications and respective remuneration, perks and privileges; (8)</p>
<p>3. Applicable laws, rules, regulations, orders, notifications, policies, procedures etc.</p>	<p>5(1)(b) statutes, statutory rules, regulations, bye-laws, orders and notifications, etc. applicable to the public body disclosing the date of their respective commencement or effect; 5(1)(c) substantive or procedural rules and regulations of general application evolved or adopted by the public body, including any manuals or policies used by its employees; (8)</p>	<p>4(d) Acts, Ordinances, rules, regulations, notifications, circulars and other legal instruments being enforced, issued or used by the public body in the discharge of its functions; (6)</p>	<p>5(1) (a) Acts and subordinate legislation such as rules, regulations, notifications, bye-laws, manuals and orders having the force of law in the Province, including being made available at a reasonable price at an adequate number of outlets to ensure reasonable access by the public; (d) norms and criteria set by the public body for the discharge of its functions, including any rules, manuals or policies used by its employees to this end; (8)</p>	<p>6(1)(d) Rules, regulations, notifications circulars, instructions and other legal instruments being enforced, issued or used by it or being used by its employees in the discharge of its functions; (6)</p>



<p>4. Relevant Facts, Statement of the Policies adopted and Criteria Standards for Exercise of Discretionary Powers</p>	<p>5(1)(d) relevant facts and background information relating to important policies and decisions which have been adopted, along with a statement of the policies adopted by the public body and the criteria standards or guidelines upon which discretionary powers are exercised by it; (4)</p>		<p>5(1) (f) relevant facts and background information relating to important policies and decisions which are being formulated or have been made and which affect the public; (2)</p>	
<p>5. Categories of Information held.</p>		<p>4(e) a statement of categories of information being held by the public body; (1)</p>	<p>5(1) (j) the categories of information held by the public body; (1)</p>	<p>6(1)(e) Statement of categories of information that are under its control (1)</p>
<p>6. Decision-making process and public inputs.</p>	<p>5(1)(f) a description of its decision-making processes as defined in the Federal Government's Secretariat Instructions, 2004 and any instructions for the time being in force for public to provide input into or be consulted about decisions; (2)</p>	<p>4(f) a description of its decision-making processes and any opportunities for the public to provide input into or be consulted about decisions; (2)</p>	<p>5(1) (e) a description of its decision-making processes and any opportunities for the public to provide input into or be consulted about decisions; (2)</p>	<p>6(1)(f) Description of its decision-making processes; 6(1)(g) Details of all its administrative and developmental decisions; (2)</p>

7. Detailed budget.	5(1)(g) detailed budget of the public body, including proposed and actual expenditures, original or revised revenue targets, actual revenue receipts, revisions in the approved budget and the supplementary budget; (7)	4(h) budget of the public body including details of all proposed and actual expenditures; (2)	5(1) (g) a detailed budget of the public body, including proposed and actual expenditures; (2)	6(1)(i) Budget including details of all proposed and actual expenditures; (2)
8. Subsidy and details of beneficiaries		4(i) amount of subsidy and details of beneficiaries if the public body provides any subsidy; (2)	5(1) (h) details about any subsidy or benefit programmes operated by the public body, including details about the amount or benefits provided and the beneficiaries; (2)	6(1)(j) Manner of execution of subsidy programs; (1)
9. Conditions for concessions, licences, permits, grants, benefits etc., transactions/ contracts and particulars of recipients	5(1)(e) the conditions upon which members of the public can acquire any licence, permit, consent, approval, grant, allotment or other benefits of whatsoever nature from any public body or upon which transactions, agreements and contracts, including contracts of employment which can be entered into with the public body, along with particulars about the recipients of any concession, permit, licence or authorisation granted by the public body; (3)	4(j) particulars of the recipients of concessions, permits or authorizations granted by the public body; (1)	5(1) (i) particulars of the recipients of concessions, permits, licences or authorizations granted by the public body; (1)	6(1)(k) Full particulars of the recipients of concessions, permits or authorizations granted by it; (1)



<p>10. RTI related clauses i.e. method of information request, designation of officials etc.</p>	<p>5(1)(h) the methods whereby information in the possession or control of the public body may be obtained and the prescribed fee required along with the name, title and contact details of the designated officials; (3)</p>	<p>4(k) facilities available with the public body for obtaining information held by it; 4(l) name, designation and other particulars of the public information officer of the public body; and (2)</p>	<p>5(1) (k) a description of the manner in which requests for information may be made to the public body, including the name, title and contact details of all designated officers; and (2)</p>	<p>6(1)(1) Facilities available with the public body for obtaining information held by it; m) Complete particulars of its public information officer; (2)</p>
<p>11. Information prescribed in Rules</p>	<p>5(1)(k) such other information as may be prescribed; and (1)</p>	<p>4(m) any other information that the Government may notify in the official Gazette. (1)</p>	<p>5(1) (l) such other information as may be prescribed. (1)</p>	<p>6(1)(n) Any other information as may be prescribed. (1)</p>
<p>12. Maintenance of records and miscellaneous reports</p>	<p>5(1)(i) reports including performance reports, audit reports, evaluation reports, inquiry or investigation reports and other reports that have been finalised; (5)</p>		<p>5(2) Public body shall also publish an annual report on what they have done to implement their obligations under this Act, which shall include detailed information about the requests for information which they have received, and how they have processed these requests. (1)</p>	<p>6(1)(o) Maintenance of record in respect of applications received and actions taken thereto; (1)</p>

13. Additional Matters added by the Principal Officer	5(1)(j) such other matters which the principal officer of the public body deems fit to be published in the public interest; (1)			
14. Camera Footages	5(1) (l) Camera footages at public places, wherever available, which have a bearing on a crime: (1)			
15. Old Records (prior to 2008)	Provided that if the information or record pertains to a period earlier than the year 2008, the same shall be published within reasonable time. (1)			
Total	43	24	30	25



ANNEXURE – B

Details of Common Identical Groups of Indicators (IGIs)

IGI Title	Weight-age	Federal: The Right of Access to Information Act 2017: (Section 5)	Punjab: Transparency and Right to Information Act 2013: (Section 4)	KP: Right to Information Act 2013: (Section 5)	Sindh: Transparency and Right to Information Act 2016: (Section 6)
1. General information on public body and details about its staff	6	<ol style="list-style-type: none"> 1. Organization/ Organogram 2. Functions, duties 3. Powers 4. A directory of its officers and employees 5. Their duties and functions 6. Their respective remunerations, perks and privileges 	<ol style="list-style-type: none"> 1. Particulars of the public body, (Organization) 2. Functions, duties 3. Powers 4. a directory of its officers and employees 5. functions of its officers and employees 6. Their respective remuneration, perks and privileges 	<ol style="list-style-type: none"> 1. Organization, 2. Functions, duties 3. Powers 4. a directory of its officers and employees 5. Functions 6. Their respective remunerations, perks and privileges 	<ol style="list-style-type: none"> 1. Organization, 2. functions, duties 3. Powers 4. Directory of its officers and employees 5. Functions of its officers and employees; 6. Their respective remuneration, perks and privileges
2. Applicable laws, rules, regulations, orders, notification, policies, etc.	6	<ol style="list-style-type: none"> 1. Statutes (Acts/ Ordinances) 2. Statutory rules 3. Regulations, by-laws 4. Orders, Notifications, etc. 5. Manuals policies used by its employees 	<ol style="list-style-type: none"> 1. Acts, Ordinances 2. Rules 3. Regulations 4. Notifications, Circulars 5. other legal instruments being enforced, issued [Manuals] 6. [policies]used by public body in the discharge of its functions 	<ol style="list-style-type: none"> 1. Acts 2. Rules 3. Regulations, bye-laws 4. Notifications, orders having the force of law in the Province 5. Manuals 6. policies used by its employees to this end 	<ol style="list-style-type: none"> 1. Legal instruments being enforced, issued (Statute /Act) 2. Rules 3. Regulations 4. Notifications, Circulars 5. Instructions [Manuals] 6. [policies] used by it or being used by its employees in the discharge of its functions



<p>3. Decision-making process and public inputs.</p>	<p>2</p>	<p>1. Description of its decision-making processes 2. Any instructions for the public to provide input into or be consulted about decisions;</p>	<p>1. a description of its decision-making processes and 2. any opportunities for the public to provide input into or be consulted about decisions;</p>	<p>1. a description of its decision making processes and 2. any opportunities for the public to provide input into or be consulted about decisions;</p>	<p>1. Description of its decision making processes; 2. Details of all its administrative and developmental decisions;</p>
<p>4. Detailed budget and expenditure</p>	<p>2</p>	<p>1. Detailed budget of the public body: proposed expenditures. 2. Actual expenditures, revenue receipts, revisions in the approved budget and Supplementary budget;</p>	<p>1. budget of the public body including details of all proposed and 2. actual expenditures;</p>	<p>1. a detailed budget of the public body, including proposed and 2. actual expenditures;</p>	<p>1. Budget including details of all proposed and 2. actual expenditures;</p>
<p>5. Particulars of recipients of any concession, permit, licence or authorization granted by public body;</p>	<p>1</p>	<p>1. Particulars about the recipients of any concession, permit, licence or authorization granted by the public body;</p>	<p>1. particulars of the recipients of concessions, permits or authorizations granted by the public body;</p>	<p>1. particulars of the recipients of concessions, permits, licences or authorizations granted by the public body;</p>	<p>1. Full particulars of the recipients of concessions, permits or authorizations granted by it;</p>
<p>6. RTI related clauses i.e. method of information request, designation of officials etc.</p>	<p>2</p>	<p>1. The methods whereby information in the possession or control of the public body may be obtained and the prescribed fee required. 2. Name, title and contact details of the designated officials;</p>	<p>1. facilities available with the public body for obtaining information held by it; 2. name, designation and other particulars of the public information officer of the public body;</p>	<p>1. a description of the manner in which requests for information may be made to the public body, including 2. the name, title and contact details of all designated officers;</p>	<p>1. Facilities available with the public body for obtaining information held by it; 2. Complete particulars of its public information officer;</p>
<p>Grand Total</p>	<p>19</p>	<p>19</p>	<p>19</p>	<p>19</p>	<p>19</p>

ANNEXURE – C

Scorecards of Best and Least Performing Public Bodies

Best Performing Body: Khyber Pakhtunkhwa Information Department: http://information_public.kp.gov.pk/ and <http://rti.infokhyberpakhtunkhwa.gov.pk/rti/administrative-department>

IGI Title	Identical Group of Indicators (IGI) showing Indicators in each IGI	Weightage	Indicators Disclosed Proactively	Marks Scored (as per weightage)	URL (as on July 31, 2020)
1. General information on public body and details about its staff	<ol style="list-style-type: none"> organization, functions and duties a directory of its officers and employees a description of their powers and functions and their respective remunerations, perks and privileges 	6	<ol style="list-style-type: none"> 1 1 1 1 1 	6	http://information_public.kp.gov.pk/page/organogram http://information_public.kp.gov.pk/page/functions http://rti.infokhyberpakhtunkhwa.gov.pk/rti/functions-duties-under-the-rules-of-business http://kp.gov.pk/page/service_locator_main http://kp.gov.pk/page_type/contacts?search_key=&department=29 http://rti.infokhyberpakhtunkhwa.gov.pk/rti/financial-powers-of-director http://rti.infokhyberpakhtunkhwa.gov.pk/rti/remunerations-and-perks-privileges-of-officers
2. Applicable laws, rules, regulations, orders, notifications, policies, etc.	<ol style="list-style-type: none"> Acts and rules regulations, bye-laws, notifications, orders having the force of law in the Province manuals or policies used by its employees to this end 	6	<ol style="list-style-type: none"> 1 1 1 1 1 	6	http://information_public.kp.gov.pk/page/right_to_information_act_2013/page_type/rules http://essi.kp.gov.pk/page/contribution_rules/page_type/rules http://kp.gov.pk/uploads/2016/02/1_Newspaper_Employees_(Conditions_of_Service)_Act_(Application_to_PATA)_Regulation,_1987_.pdf http://labourcourtswat.kp.gov.pk/page/minimum_wages_notification/page_type/rules http://kp.gov.pk/uploads/2020/02/Esta_Code8.pdf

					http://rti.infokhyberpakhtunkhwa.gov.pk/rti/wp-content/uploads/2018/04/Advertisement-Policy-2018.pdf
3. Decision-making process and public inputs.	<ol style="list-style-type: none"> 1. a description of its decision-making processes and 2. any opportunities for the public to provide input into or be consulted about decisions 	2	1 1	2	http://rti.infokhyberpakhtunkhwa.gov.pk/rti/decision-making-process http://kp.gov.pk/page/feedback_us
4. Detailed budget and expenditure	<ol style="list-style-type: none"> 1. a detailed budget of the public body, including proposed and actual expenditures 2. 	2	0 0	0	
5. Particulars of recipients of any concession, permit, licence or authorization granted by public body;	<ol style="list-style-type: none"> 1. particulars of the recipients of concessions, permits, licences or authorizations granted by the public body; 	1	1	1	http://rti.infokhyberpakhtunkhwa.gov.pk/rti/1124
6. RTI related clauses i.e. method of information request, designation of officials etc.	<ol style="list-style-type: none"> 1. a description of the manner in which requests for information may be made to the public body, including 2. the name, title and contact details of all designated officers; 	2	1 1	2	http://erti.kp.gov.pk/ & http://information_public.kp.gov.pk/page/right_to_information_act_2013/page_type/rules & http://rti.infokhyberpakhtunkhwa.gov.pk/rti/how-to-request-for-information http://information_public.kp.gov.pk/page/pio
Grand Total	19	19	17	17	



Least performing Body: Federal Ministry of Interior
<https://www.interior.gov.pk/>

IGI Title	Identical Group of Indicators (IGI) showing Indicators in each IGI	Weightage	Indicators Disclosed Proactively	IGI wise Scored	URL (as on July 31, 2020)
1. General information on public body and details about its staff	<ol style="list-style-type: none"> 1. Organization/ Organogram 2. Functions, duties. 3. Powers 4. A directory of its officers and employees 5. Their duties and functions 6. Their respective remunerations, perks and privileges 	6	1 1 0 1 0 0	3	https://www.interior.gov.pk/index.php/about-moi/about-us/organogram-2 https://www.interior.gov.pk/index.php/about-moi/policies-moi/business-rules-2 https://www.interior.gov.pk/index.php/about-moi/about-us/2014-02-10-12-50-40
2. Applicable laws, rules, regulations, orders, notifications, policies, etc.	<ol style="list-style-type: none"> 1. Statutes (Acts/ Ordinances) 2. Statutory rules, 3. Regulations, By-laws, 4. Orders, Notifications, etc. 5. Manuals 6. Policies used by its employees 	6	0 0 0 1 0 1	2	https://www.interior.gov.pk/index.php/downloads/category/3-public-notice file:///C:/Users/hp/Downloads/National%20Internal%20Security%20Policy%202018-2023.pdf
3. Decision-making process and public inputs.	<ol style="list-style-type: none"> 1. Description of its decision-making processes as defined in the Federal Government's Secretariat Instructions, 2004 2. Any instructions for the public to provide input into or be consulted about decisions 	2	0 0		

4. Detailed budget and expenditure	<p>1. Detailed budget of the public body: proposed expenditures. Original and Revised revenue targets</p> <p>2. Actual expenditures, revenue receipts, revisions in the approved budget and Supplementary budget</p>	2	0 0	0	
5. Particulars about the recipients of any concession, permit, licence or authorization granted by the public body;	<p>1. Particulars about the recipients of any concession, permit, licence or authorization granted by the public body</p>	1	0	0	
6. RTI related clauses i.e. method of information request, designation of officials etc.	<p>1. The methods whereby information in the possession or control of the public body may be obtained and the prescribed fee required.</p> <p>2. Name, title and contact details of the designated officials</p>	2	0 0	0	
Grand Total	19	19	5	5	



ANNEXURE – D

Proactive Disclosure of Information (PDI) Index Under Federal & Provincial RTI Laws
Summary of Federal and Provincial Score Cards - Six Selected Public Bodies Rank

Max. Possible Points	No. of Public Bodies		No. of Public Bodies		No. of Public Bodies		No. of Public Bodies		No. of Public Bodies		Total	Percentage	
	Score	Index	Score	Index	Score	Index	Score	Index	Score	Index			
1	0	0	0	0	0	0	0	0	0	0	0	0%	
2	Organizational systems, procedures, policies and processes	1. Organizational systems	0	0	0	0	0	0	0	0	0	0	0%
		2. Procedures, policies and processes	0	0	0	0	0	0	0	0	0	0	0%
		3. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		4. Data and history of decisions	0	0	0	0	0	0	0	0	0	0	0%
		5. Systems (IT/ITC/Information systems)	0	0	0	0	0	0	0	0	0	0	0%
		6. Policies, procedures and processes	0	0	0	0	0	0	0	0	0	0	0%
		7. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		8. Data and history of decisions	0	0	0	0	0	0	0	0	0	0	0%
		9. Systems (IT/ITC/Information systems)	0	0	0	0	0	0	0	0	0	0	0%
		10. Policies, procedures and processes	0	0	0	0	0	0	0	0	0	0	0%
3	Proactive disclosure and public access	11. Mechanism of access to information	0	0	0	0	0	0	0	0	0	0	0%
		12. Mechanism of access to records	0	0	0	0	0	0	0	0	0	0	0%
		13. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		14. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		15. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		16. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		17. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		18. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		19. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		20. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
4	Proactive disclosure and public access	21. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		22. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		23. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		24. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		25. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		26. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		27. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		28. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		29. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		30. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
5	Proactive disclosure and public access	31. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		32. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		33. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		34. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		35. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		36. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		37. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		38. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		39. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		40. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
6	Proactive disclosure and public access	41. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		42. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		43. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		44. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		45. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		46. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		47. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		48. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		49. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		50. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
7	Proactive disclosure and public access	51. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		52. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		53. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		54. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		55. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		56. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		57. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		58. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		59. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		60. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
8	Proactive disclosure and public access	61. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		62. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		63. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		64. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		65. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		66. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		67. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		68. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		69. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		70. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
9	Proactive disclosure and public access	71. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		72. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		73. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		74. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		75. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		76. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		77. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		78. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		79. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		80. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
10	Proactive disclosure and public access	81. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		82. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		83. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		84. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		85. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		86. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		87. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		88. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		89. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%
		90. Access to information and records	0	0	0	0	0	0	0	0	0	0	0%

Source: Statistics Canada, PDI Index, RTI & ATIA
Overall Index: 0.00

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OUR VISION

We envision a democratic, participatory, peaceful and just polity in Pakistan

OUR MISSION

1. Strengthening democracy *through* inclusivity and pluralisms
2. Strengthening local empowerment *through* devolution of powers
3. Strengthening governance through accountability and transparency
4. Strengthening justice *through* fundamental rights

OUR WORK

1. Promoting inclusivity and pluralisms *through* support for free speech, civil liberties, peace and rights of minorities and marginalized communities
2. Promoting devolution of powers *through* support for empowerment of provinces and districts, policy development, provincial-level legislation and local governance
3. Promoting accountability and transparency *through* support for right to information, free media, open internet, open government
4. Promoting fundamental rights *through* support for equality, access to justice and rule of law.



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