

Message of Chief Information Commissioner

It gives me immense satisfaction to note that during first tenure of the members of Pakistan Information Commission, (PIC), under-staffed and under-resourced nascent PIC has become an effective public institution.

The PIC has endeavored to change secrecy narrative with the transparency narrative demonstrated through the legacy of 650 detailed judgements on contentious issues pertaining to transparency and right to information. To quote just couple of examples, the PIC has held through its judgements that information about the gifts received from foreign dignitaries is public as the disclosure of this information is not likely to harm inter-state relations; held that passengers manifest of the helicopter under the use of Prime Minister is public information; declared Rules governing post-retirement benefits, perks and privileges of army officers is public information; held that Supreme Court of Pakistan, (SCP) and Islamabad High Court are public bodies and issued orders to share information about plots allotted to judges and divulge information about the staff and audit reports of SCP; issued order against Establishment Division to proactively publish assets details of its cadre.

The PIC, with the help of citizens, continue to ensure that transparency in the functioning of federal public bodies becomes a norm and secrecy and exception and on justifiable grounds. I would like to especially mention that appeals filed by Naeem Sadiq orders of PIC that vail of secrecy surrounding wages of janitorial staff, hired through third party contractors and performing duties in different public bodies was eventually lifted. As a result, the citizens got to know that they were not being paid minimum wage according to the law. As a consequence, Civil Aviation Authority, 44 Cantonment Boards and CDA have started paying minimum wages to its janitorial staff.

I also want to congratulate the staff of the Commission and my fellow Commissioners, Mr. Fawad Malik and Mr. Zahid Abdullah for the achievements of Pakistan Information Commission despite limited resources.

My Special thanks to Mr. Fawad Malik for his continuous assistance to the Commission in legal matters. His well-informed and candid legal opinions enriched proceedings of the commission.

It has been an immense pleasure to work with my colleague Mr. Zahid Abdullah, first ever visually impaired person to hold office of Information Commissioner at the federal level anywhere in the world according to the best of my knowledge. I learnt from him that technology is a great leveler. Despite being blind, with the help of assistive technology/software and his hard work, he shed light on hidden files/records through the use of our sunshine law and has lent me great support during my tenure. It is testimony to his resilience and tenacity that he authored 310 out of a total of 350 detailed judgements of the commission, authored annual reports and developed content for official website of the Commission. I wish him best for his future endeavors.

As the tenure of first members of PIC ends in November, I sincerely hope that our successors will find the body of knowledge in the shape of detailed judgement beneficial, improve and build upon this legacy to protect and promote constitutional right of citizens in matters of public importance for public accountability of officials and elected representatives.

Mohammad Azam

Chief Information Commissioner

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The Implementation of the Right of Access to Information Act 2017 Progress and Challenges

Consolidated Report
November 18, 2018 to October 14, 2022

List Of Abbreviations

Abbreviations	Public Bodies
AOL	Academy of Letters
AGKP	Accountant General Khyber Pakhtoonkhwa
AGPR	Accountant General Pakistan Revenues
AGP	Accountant General Panjab
AAP	Action Against Poverty
ADCR	Additional Deputy Commissioner Revenue
CAR	Commissionerate for Afghan Refugees
PAF	Pakistan Airforce
ASF	Airport Security Force
AMC	Ali Medical Centre
AIOU	Allama Iqbal Open University
ANF	Anti Narcotics Force
ABL	Askari Bank Limited
ARU	Asset Recovery Unit
ACE	Association for creation of employment
AH	Atlas Honda Company
AG	Attorney General of Pakistan
AGP	Auditor General of Pakistan
Adpt	Auqaf Department
AD	Aviation Division
BHC	Baluchistan High Court

BO	Banking Ombudsman
BISP	Benazir income Support Program
BUI	Bolochistan University of Information
BE&OE	Bureau of Emigration & Overseas Employment
CD	Cabinet Division
CB	Cantonment Boards
CAD	Capital Administration and Development
CDA	Capital Development Authority
CPD	Center for Peace and Develoment
CEMB	Centre for Excellence in Molecular Biology
CC ICT	Chief Commissioner ICT
PAF	Pakistan Airforce
CSCPR	Chief Settlement Commissionerate Punjab Revenues
CAA	Civil Aviation Authority
CoC	Collectorate of Customs
CPSP	College of Physicians and Surgeons Pakistan
Cdiv	Commerce Division
CGD	Commissioner Gujranawala Division
COMSATS	Comsat University
CGA	Controller General of Accounts
CHS	Co-operative Housing Societies
CSD	Cooperative Societies Department
CII	Council of Islamic Ideology
CRWR	Council of Research in Water Resources
CPEC	CPEC Authority
DHA	Defence Housing Authority
DPP	Department of Plant Protection
DS&F	Department of Stationary and Forms
DC ICT	Deputy Commissioner Islamabad
ICTZ	Islamabad Zoo
E&TP	Excise & Taxation Department Punjab
C&WP	Communication & Works Department Punjab
SoP	Survey of Pakistan
DG-CD	Directorate General Civil Defence
DGI&P	Directorate General of Immigration and Passports
DGSE	Directorate General of Special Education
DGTO	Directorate General of Trade Organizations
DESED	Directorate of Elementary and Secondary Education Department
DILW	Directorate of Industries and Labour Welfare
CDNS	Central Directorate of National Savings
PP	Punjab Police

DF	DOVE Foundation
DRAP	Drug Regulatory Authority of Pakistan
ECC	Economic Coordination Committee
EDP	Education Department Punjab
ECP	Election Commission of Pakistan
ESE KP	Elementary and Secondary Education KP
EOBI	Employees Old Age Benefit Institute
EPA	Environment Protection Agency
check	Establishment Division (KP)
ED	Establishment Division
EO	Estate Office
ETPB	Evacuee Trust Property Board
ETT	Excise & Taxation Department
FESCO	Faisalabad Electric Supply Company
FIEDMC	Faisalabad Industrial Estate Development & Management Company
FJWU	Fatima Jinnah Women University
FBR	Federal Board of Revenue
FEB&GIF	Federal Employees Benevolent and Group Insurance Funds
FEPI	Federal Expanded Program on Immunisation
FGCW	Federal Government College for Women
FGEHSF	Federal Government Employees Housing Society Foundation
FGHA	Federal Government Housing Authority
FGBS	Federal Govt. Boys Secondary School, talhar
FIO	Federal Insurance Ombudsman
FIA	Federal Investigation Agency
FLC	Federal Land Commission
FOS	Federal Ombudsman Secretariat
FPGMI	Federal Post Graduate Medical Institute
FPSC	Federal Public Service Commission
MoIL	Ministry of Industries and Labour
FUUA	Federal Urdu University of Arts, Science & Technology
FATF	Financial Action Task Force
FOSPAH	Federal Ombudsman Secretariat for Protection Against Harassment
GDA	Gawadar Development Authority
GEDB	General Engineering Development Board
GPO	General Post Office
GU	Ghazi University
GEES	Global Educational, Economic and Social empowerment
GCUF	Government College University Faisalabad
GCUL	Government College University Lahore
GAJK	Government of Azad Jammu and Kashmir

GB	Government of Baluchistan
GP	Government of Punjab
GS	Government of Sindh
GEPCO	Gujranwala Electric Power Company
HBL	Habib Bank Limited
HF	Hashoo Foundation
HU	Hazara University
HEC	Higher Education Commission
HBFC	House Building Finance Company Limited
HOTA	Human Organ Transplant Authority
HESCO	Hyderabad Electric Supply Company
ICTP	ICT Police
ITNE	Implementation Tribunal for Newspaper Employees
IDSO	Insan dost social Organization
BP	Baluchistan Police
KP-P	KPK Police
SP	Sindh Police
Check	Inspectors of Boilers of KPK, Sindh, Punjab, Balochistan
IBA	Institute of Business Administration
ICAP	Institute of Chartered Accountants of Pakistan
IB	Intelligence Bureau
IU	International Islamic University
IC	Islamabad Club
IESCO	Islamabad Electric Supply Company
IHC	Islamabad High Court
IMCB	Islamabad Model Colleges
IWMB	Islamabad Wildlife Management Board
ISPR	Inter-Services Press Relations
KPT	Karachi Port Trust
KADO	Karakoram Area Development Organization
KE	K-Electric
KM	Khewra salt Mines
KPK-G	Khyber Pakhtoon Kha Government
KPK-A	KP Assembly
LWD	Labour welfare Department
LESCO	Lahore Electric Supply Company
LHC	Lahore High Court
LJCP	Law and justice commission of pakistan
LG&RD	Local Government & Rural Department Gilgit
LV	Lok Virsa
MoFEPT	Ministry of Federal Education and Professional Training

MoFA	Ministry of Foreign Affairs
MoHR	Ministry of Human Rights
MoIT	Ministry of Information and Technology & Telecommunication
MoI	Ministry of Interior
MoLJ	Ministry of Law and Justice
MOPHRD	Ministry of Overseas Pakistanis & Human Resource Development
MOPDR	Ministry of Planning Development and Reforms
MORA&IH	Ministry of Religious Affairs and Interfaith Harmony
MoWR	Ministry of Water Resources
MPCL	Marri Petroleum Company Limited
PPRA-BM	Members PPRA Board
MC	Metropolitan Corporation
MLC	DG Military Lands and Cantonments
MDD	Minerals Development Department
MCADD	Ministry of Capital Administration and Development Division
MoCC	Ministry of Climate Change
MoC	Ministry of Commerce
MoD	Ministry of Defence
MoE	Ministry of Energy
MoF	Ministry of Finance
MoFSR	Ministry of Food Security and Research
MoHW	Ministry of Housing and Works
MIP	Ministry of Industries and Production
MoIB	Ministry of Information and Broadcasting
MoIPC	Ministry of Inter-Provincial Coordination
MoKA&GB	Ministry of kashmir affairs and Gilgit Baltistan
MoNC	Ministry of Narcotics Control
MoNFSR	Ministry of National Food Security & Research
MoNHSRC	Ministry of National Health Services, Regulations & Coordination
MoPA	Ministry of Parliamentary Affairs
MoPet	Ministry of Petroleum
MoP	Ministry of Privatization
MoR	Ministry of Railways
MoS&T	Ministry of Science and Technology
MoSFR	Ministry of State and Frontier Regions
MDA	Multan Development Authority
MEPCO	Multan Electric Power Company
NAB	National Accountability Bereau
NARC	National Agriculture Research Centre
NA	National Assembly
NBP	National Bank of Pakistan

NBF	National Book Foundation
NCA	National College of Arts, Lahore
NCHD	National Commission for Human Development
NCHR	National Commission for Human Rights
NCRC	National Commission on Rights of Child
NCSW	National Commission on Status of Women
NCH	National Council of Homeopathy
NADRA	National Database & Registration Authority
NDU	National Defence University
NDMA	National Disaster Management Authority
NEPRA	National Electric Power Regulatory Authority
NEECA	National Energy, Efficiency and Conversation Authority
NESPAK	National Engineering Service of Pakistan (Pvt) Limited
NHEPRN	National Health Emergency Preparedness and Response Network
NH&MP	National Highway & Motorway Police
NHA	National Highway Authority
NIRC	National Industrial Relations Commission
NIP	National Institute of Population
NIRM	National Institute of Rehabilitation Medicine
NIH	National Institute of Health
NJC	National Judicial Committee
NRCCC	National Response Centre for Cyber Crime
NSPP	National School of Public Policy
NSU	National Skills University
NTC	National Technology Council
NTelC	National Telecommunication Corporation
NTB	National Training Bureau
NTDC	National Transmission & Dispatch Company
NUCES	National University of Computer and Emerging Sciences
NUMS	National University of Medical Sciences
NUML	National University of Modern Languages
OPR	Office of the Press Registrar
OGDCL	Oil and Gas Development Company Limited
check	Oil and Gas Pvt Limited
OGRA	Oil and Gas Regulatory Authority
OTS	Open Testing Service
OPF-C	OPF College F 8/4
OPF	Overseas Pakistanis Foundation
PM-S	Prime Minister Secretariat
PAF-PC	PAF Public College
PARCO	Pak Arab Refinery Company Limited

PAF	Pakistan Airforce
PBM	Pakistan Bait ul Mal
PBC	Pakistan Broadcasting Corporation
PBS	Pakistan Bureau of Statistics
check	Pakistan Cooperative Societies
PCRWR	Pakistan Council of Research in Water Resources
PCB	Pakistan Cricket Board
PEMRA	Pakistan Electronic Media Regulatory Authority
PEC	Pakistan Engineering Council
PEPA	Pakistan Environment Protection Agency
PHA	Pakistan Housing Authority
PHAF	Pakistan Housing Authority Foundation
PIC	Pakistan Information Commission
PIPS	Pakistan Institute for Parliamentary Services
PIMS	Pakistan Institute of Medical Sciences
PIA	Pakistan International Airline
PMC	Pakistan Medical Commission
SECP	Pakistan Mercantile & Securities and Exchange Commission of Pakistan
PMD	Pakistan Meteorological Department
PMDC	Pakistan Mineral Development Corporation
PNC	Pakistan Nursing Council
PPL	Pakistan Petroleum Limited
check	Pakistan Post
PPAF	Pakistan Poverty Alleviation Fund
PPWD	Pakistan Public Works Department
PR	Pakistan Railways
PRCS	Pakistan Red Crescent Society
PSEBGL	Pakistan Software Export Board (G) Ltd
PSQCA	Pakistan Standards and Quality Control Authority
PSO	Pakistan State Oil
PSDC	Pakistan Stone Development Company
PTA	Pakistan Telecommunication Authority
PTCL	Pakistan Telecommunication Company Limited
PTC	Pakistan Television Corporation
PTS	Pakistan Testing Service
PWD	Pakistan Works Department
PASSCO	Pakistan Agricultural Storage & Services Corporation Ltd
PESCO	Peshawar Electric Supply Company
PHC	Peshawar High Court
check	Pinstech Nilore
PNCA	Pakistan Nayional Council of Arts

PCH	Poly Clinic Hospital
PQA	Port Qasim Authority
check	Post Master General
PLI	Postal Life Insurance
PTC	Postal Training center
PPRA	PPRA
PPRABM	PPRA Board Members
PS	President Secretariat
PID	Press Information Department
PCP	Printing Corporation of Pakistan
PEIRA	Private Educational Institutions Regulatory Authority
PIIB	Private Power and Infrastructure Board
PPSC	Provincial Public Service Commission
PWD	Public Works Department
PbIC	Punjab Information Commission
QIAU	Quaid I Azam University
QAMMB	Quaid-e-Azam Mazar Management Board
QESCO	Quetta Electric Supply Company
PBC	Pakistan Broadcasting Corporation
R1122-KPK	Rescue 1122 KPK
RICA	Riphah International College Attock
SCI	Safe City Islamabad
SECP	Securities and Exchange Commission of Pakistan
SS	Senate Secretariat
ZABIST	Shaheed Zulfiqar Ali Bhutto University Islamabad
SZH	Sheikh Zayed Hospital
SHC	Sindh High Court
SSI	Social Security Islamabad
SHEI	Society for Human and Environmental Issues
SBP	State Bank of Pakistan
SEC	State Engineering Corporation
SLICP	State Life Insurance Corporation of Pakistan
SNGPL	Sui Northern Gas Pipelines Limited
SSGCL	Sui Southern Gas Company Ltd
SEPCO	Sukkur Electric Supply Company
SC	Supreme Court of Pakistan
SJC	Supreme Judicial Council
check	Surveyor General's Office
TDEA	Trust for Democratic Education & Accountability
TEVTA	Technical Education and Vocational Training Authority
TMB	Telenor Microfinance Bank
NACTA	The National Counter Terrorism Authority
TIM	Toyota Indus Motors
TCP	Trading Corporation of Pakistan
TESCO	Tribal Areas Electric Supply Company
UoL	University of Lahore
UoP	University of the Peshawar
PU	University of the Punjab

USCP	Utility Stores Corporation of Pakistan
WAPDA	Water and Power Development Authority
WDCO	Women Development and Community Organization
WWF	Worker Welfare Fund
ZTBL	Zarai Taraqiati Bank Limited

EXECUTIVE SUMMARY

In last 4 years, ever since its establishment on November 7, 2018, Pakistan Information Commission, (PIC) has been carrying out its statutory duties implementing the Right of Access to Information Act 2017.

Citizens are finding it difficult to get information from federal public bodies, be it constitutional bodies, federal ministries, commissions, educational institutions, electric supply companies, regulatory bodies or different commissions. Federal public bodies provide information as an exception when citizens file information request under the Act and not as a rule even when requested information is of simple nature does not need to be contested on any legitimate grounds. As a consequence, citizens had to file appeals with the commission which created grave problems for the under-staffed and under-resourced commission.

The PIC received a total of 2474 Appeals, out of which 2153 were received via post and whereas 321 were received via email through Information Management System, developed by the commission to facilitate citizens to file appeals online. Out of these, 1030 were resolved and the requested information was provided to the appellants to their satisfaction and Case Closure certificates were shared with both the Appellants and the Respondents.

The commission issued notices and held hearings on these appeals three days of every week. The commission facilitated citizens in exercising their right to information through summons to public officials and where necessary issues Orders.

Of the total of 2474 appeals filed by citizens, the commission received, 154, the highest number of appeals against the Ministry of Defence and its attached departments, followed by 60 appeals which were filed against the Ministry of Finance. Fifty-one Appeals were filed against each of CDA and FIA and 50 appeals were filed against each of Cabinet Division and FBR. Forty-nine appeals were filed against Ministry of Law and Justice and 49 appeals were filed against the Supreme Court of Pakistan and Islamabad High Court. Forty-six appeals were filed against each of Establishment Division and NADRA followed by 43 against NAB, 42 against Ministry of Information and Broadcasting. Forty-one appeals were filed against each of Ministry of Foreign Affairs and Ministry of Energy followed by 40 appeals against each of ECP and Ministry of Interior.

Thirty-seven appeals were filed against HEC, 35 against IESCO, 30 against FPSC and 29 appeals were filed against each of National Assembly Secretariat and PM Secretariat. Twenty-eight appeals were filed against each of AIOU and Senate Secretariat and 25 each against Ministry of Federal Education and Professional Training and SNGPL followed by 24 against Ministry of Climate Change, 23 against NBP and 22 against NTCL. Twenty-one appeals were filed against each of SBP and OGDCL and 20 appeals were filed against Ministry of Human Rights.

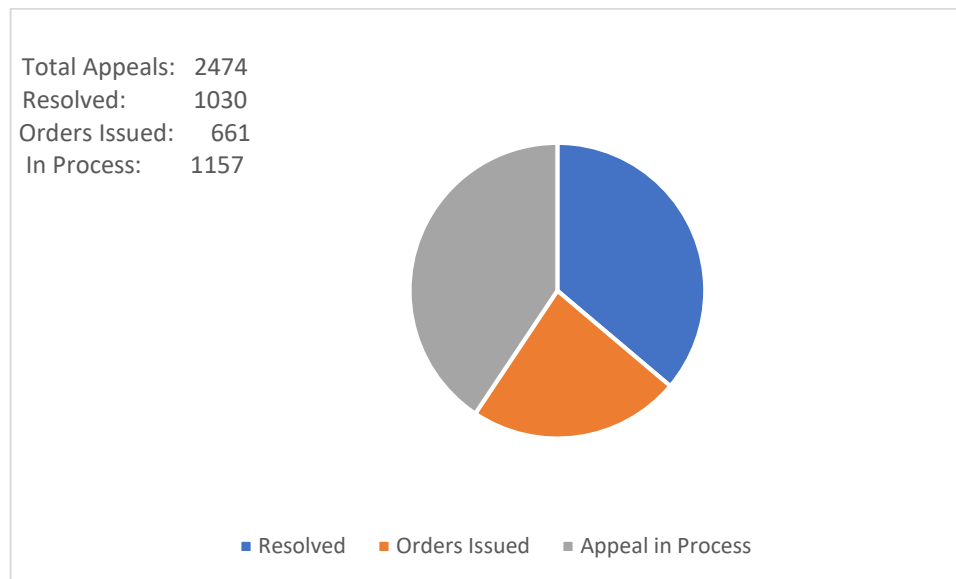
Sector wise, citizens filed a total of 105 appeals against constitutional bodies and the commission issued a total of 16 Orders.

Citizens are also interested in knowing what transpires in electric supply companies and they filed a total of 80 appeals against these companies and the commission issued a total of 32 Orders.

Citizens also sought information from different Commissions and filed a total of 183 appeals and the commission issued a total of 39 Orders.

The analysis of the appeals filed by citizens reveals that most of the requests pertained to the enquiry reports against officials, certified copies of the merit lists of candidates and recruitment

criteria , contracts signed by public bodies to hire services of sanitary workers and security guards through third party contractors, number of FIRs filed under different provisions of Cyber law and number of convictions, total number of sanctioned and vacant posts in different public bodies and the quota for the disabled and transgender persons. Citizens have also filed appeals to get access to finalized audit paras and audit reports of public bodies, information about legislative bills laid in the Parliament, information about the publications pertaining to the asset details submitted by parliamentarians to Election Commission of Pakistan, information available with NADRA about total number of CNIC issued to women, and the total number of transgender persons and people with disabilities in the country, details of assets of judges and officers and salaries, perks, privileges and benefits of judges, civil and military officers.



These appeals suggest that, through the exercise of their right of access to information in matters of public importance, citizens aim at realizing their other rights like access to justice, gainful employment on equal basis by ensuring judicious utilization of public funds, improving governance, reducing corruption and inefficiency in public bodies through transparency and public accountability.

The commission has issued a total of 661 detailed orders on the appeals filed by citizens against federal public bodies for delaying or unlawfully denying access to information. The highest number of orders, 58, were issued against the Ministry of Defence and its attached departments. Twenty Orders were issued against CDA followed by 16 against FBR and 14 against Ministry of Interior. Thirteen Orders were issued against each of FIA and NBP followed by 12 each against Ministry of Law and Justice and Ministry of Foreign Affairs. Eleven Orders were issued against each of NADRA and ECP and 10 each against National Assembly Secretariat and AIOU.

So far, a total of 73 Orders of the commission have been challenged in High Courts. Of these, 5 Orders of the commission have been upheld whereas 2 have been reversed and 1 has been disposed of. The five Orders of the commission that have been upheld are: Appeal No. 463/08/2020, Abdul Samad Sarla-Vs-National Bank of Pakistan, 888-02/2021, Kashif Ali-Vs-Oil and Gas Development Company, 1490-11/2021, Abdullah Rashid-Vs-Pakistan Housing Authority Foundation, 437-07/2020, Tariq Bashir-Vs-National Accountability Bureau, 052-06/2019, Mukhtar Ahmed Ali-Vs-Federal Board of Revenue and 1563-12/2021, Rana Abrar Khalid Vs Cabinet Division.

Islamabad High Court has reversed 2 Orders of the Commission and these are in Appeal No. 954-03/21 in the case of Muhammad Rehan Paracha VS PTCL A and in Appeal No. 813-12/20 in the case of Amer Ejaz VS Comsats University. In the case of Appeal NO. 936-03/2021 in the case of Muhammad Nawaz Vs Survey of Pakistan, the Appellant approached IHC for implementation of the Order of the commission which was disposed of by the IHC.

A total of 36 Orders of the commission have been suspended whereas in case of 29 Orders, notices have been issued to the Respondents and proceedings are taking place in the relevant High Courts.

Instead of implementing the Order of the commission or challenging in Islamabad High Court, as required under the Act, Senate Secretariat sent a letter to the commission stating that “Chairman, Senate is authorized to declare any, or, all record of the Senate Secretariat as classified”. The information requested from Senate Secretariat pertained to total number of sanctioned and vacant posts, quota for the disabled etc. which the commission declared to be public information under the Right of Access to Information Act 2017.

Some of the public interest Orders of the commission pertain to the right of access to information/records of officers with disabilities on equal basis with others, the issue of minimum wage of sanitary workers and security guards, rights of passengers and patients, constitutionality of right to information, declaration of records more than 20 years old as public record, disclosure of information pertaining to the fees paid to the lawyers from public funds and declaration of SNGPL, Pakistan Cricket Board and Islamabad Club as a public body.

After a citizen linked the right of access to information in matters of public importance with the issue of minimum wage of janitorial staff, hired through third party contractors and performing duties in different public bodies, 44 Cantonment Boards, Civil Aviation Authority, and CDA has started paying minimum wages to its janitorial staff after Orders of the commission. The commission has also settled the issue of applicability of the Act on superior courts. The commission has held in Dr. Abdul Hameed Nayyar and Others Vs Ministry of Law and Justice that the exercise of constitutional and statutory right of citizens in matters of public importance through the Act is neither likely to, nor, designed to curtail independence of the superior judiciary. The commission through its different Orders has also interpreted that the Right of Access to Information Act 2017 is also applicable to constitutional bodies. The commission through its different Orders has held that the attorney - client privileged communication does not cover legal fees paid to the lawyers from public funds.

With regard to the right of access to information/records of officers with disabilities, in Appeal No. 1418-10/21, Azaz Syed Vs-Ministry of Foreign Affairs, the commission maintained that “the Appellant has sought access to policy “to remove access barriers at the work place so that the officers with different disabilities could perform their official duties on equal basis with others”, those official duties include, inter alia, getting ‘access to official records in the performance of the official duties. Furthermore, ‘access’ needs of persons with disabilities are characterized by the nature of their different disabilities and can only be ensured through reasonable accommodations clearly spelled out in a legally binding policy document”.

With regard to the rights of patients to the information held by the hospitals and doctors, in Appeal No 175-11/2019, Ms. Nadia Naeem Vs. Pakistan Medical Commission, the commission held that any record that can be submitted to a regulatory body, or, the regulatory

body is empowered to get access to the record, is record/information for the purposes of this Act and can be shared with the applicants/appellants, if warranted by the provisions of the Act. With regard to protecting rights of passengers, in one of its Orders, the commission observed that Civil Aviation Authority, (CAA) is responsible to ensure that information about the rights of passengers is disseminated through all channels of communication which the airlines employ for transaction of business with their passengers. As such, the Respondent should ensure airlines make available information about the rights of passengers through their web sites, electronic and printed tickets and airlines counters.

Through its different Orders, the Commission declared Sui Northern Gas Pipeline Limited, PCB and Islamabad Club to be public bodies. Through its various Orders, the commission held that academic degrees, experience certificates of short-listed candidates, selection criterion, merit list allotted marks and remarks of the interview committee members are public records and should be provided to citizens to ensure transparency in the recruitment of government jobs.

In the case of Farhat Ullah Babar Vs. Ministry of Defence, the commission held that these records pertain to categories of records to be proactively published under Section 5 (1) (b) and (e) of the Act, 2017. The Commission also held that the Act, Rules and Regulations governing retirement benefits of Army officers have no nexus with defence preparedness. The Commission also maintained that Act, Rules and Regulations governing retirement benefits of Army officers pertain to the welfare activities which are not excluded under Section 7 (e) of the Act, 2017.

The Commission endeavored to ensure proactive disclosure of information through its Orders and issued specific directions for the implementation of Section 5 of the Act. In one of its Orders, the commission held that all reports that are more than 20 years old are public records. Through its different Orders, the Commission held that the information proactively published under Section 5 of the Right of Access to Information Act 2017 should be 'accessible' for all citizens, including the blind, low-vision, physically disabled, speech and hearing impaired and people with other disabilities. In all most all the Orders of the commission, federal public bodies were directed to implement Section 5 of the Act and in cases where a public body had not designated PIO, the Commission issues directions for the designation of the PIO through its Orders. Furthermore, the Commission directed the public bodies to submit compliance report within a specific time period, generally one month from the receipt of the Order.

In September and October, 2022, PIC held a total of 100 specific hearings seeking compliance reports from public bodies based on the templates for proactive disclosure of information and information accessibility as well, made available on the web site of the Commission and referred to in the Orders of the Commission.

Other achievements of the Commission during this period include the following:

- a) The Commission has drafted, notified and published the Right of Access to Information Act Rules 2020 in response to the queries of the Ministry of Law and Justice which has been notified after the approval of the Federal Cabinet.
- b) The commission developed service rules so that it could recruit staff for the commission once the commission has the budget. These service rules were shared with the Ministry of

Information and Broadcasting and Establishment Division once the Ministry of Finance formally sanctions post for officers and staff for the commission.

c) The Commission developed and notified a Schedule of Costs for the guidance of applicants and government officers on August 23, 2019. Citizens will be no longer required to first deposit fee for filing an information request under the Schedule of Cost notified by the Commission. Previously, citizens were required to deposit Rs.50 at the time of submitting an information request to a federal public body under Freedom of Information Rules 2004 which was great hindrance in the exercise of the right of access to information in matters of public importance as guaranteed by Article 19-A of the Constitution of Islamic Republic of Pakistan.

d) Giving primacy to proactive disclosure of information as required under Section 5 of the Act, the commission has developed 'Template for the Compliance Report-Proactive Disclosure of Information under Section 5 of the Right of Access to Information Act 2017'. The commission is ensuring through its Orders and Circulars that all federal public bodies publish information according to this template.

e) The commission developed 'Procedure for the Processing of Appeals' as required under Section 27 (c) of the Act.

f) Realizing the significance of the fact that information should be accessible to all citizens, including persons with disabilities, the commission has developed checklist for all federal public bodies to ensure that information provided through web sites is made accessible to the blind, low vision people and persons with other disabilities.

g) Letters and circulars were issued to remind and guide public bodies as well as PIOs about their responsibilities under the Act.

h) The Commission developed and issued 'Guidelines for Public Information Officers and Heads of Federal Public Bodies for the Implementation of the Right of Access to Information Act 2017' which are being shared with Public Information Officers and the heads of public bodies.

On the request of the commission, TDEA developed a website of the Commission (www.rti.gov.pk). This provides significant resources for the guidance of people and government officers including Public Information Officers (PIOs). The Commission has been able to establish its office after prolonged delay of One year and eight months; the commission has yet to acquire requisite staff to effectively perform its functions.

Despite the lack of requisite staff, the Commission has been doing all that is possible to achieve its goals ever since its inception. The Establishment Division has not yet approved Service Rules of the Commission. As such, the process of recruitment of staff above BPS 16 has not started yet. However, the Commission has recruited two Assistants-BPS-15, two steno typists, BPS-14 and one LDC, BPS-9 after following due legal process. With over 8 months of unreleased salaries of the members of the Commission as well as the lack of an official working space until June, 2020, the Commission has been taking significant steps towards the promotion of peoples' constitutional right of access to information and transparency in government.

After the appointment of the Chief Information Commissioner and two Information Commissioners, the major challenge for the Commission was to establish a functional office, which took considerable time in view of time-consuming government procedures related to approval of budget, creation of posts, opening up of account, hiring of office building, arranging staff and procurements. The commission began performing its substantive functions

right after its inception in 2018 and has been doing so tirelessly without even an official working space till June 2020. All functions were performed entirely in accordance with, *inter alia*, section 19 of the Right of Access to Information Act, 2019. One of the most important functions of the Commission is to receive and decide on appeals among others, wrongful denial or delay in providing access to information.

For the first year and eight months, working from the one-room office in the Information Services Academy, the Commissioners issued notices on all 185 appeals to the federal public bodies. In the absence of staff and required equipment, at the initial stages, the appeals were processed with the help of the TDEA.

Right to Information: Global Context

Right to information is universally recognized as a human right with over 120 countries which have enacted national right to information laws to facilitate citizens in the exercise of their right of access to information held by the government. However, Sweden was the first country in the world which acknowledged access to information as a right through its Freedom of Press Act 1766. United Nation's General Assembly passed resolution 59 (1) soon after it was established in 1946 which highlighted the significance of the right of information. It says:

Freedom of information is a fundamental human right ... the touchstone of all freedoms to which the UN is consecrated.

Previous century also witnessed the significance of right to information being recognized by a range of the regional and multilateral institutions. For example, Article 19 of UDHR, 1948 states:

Everyone has the right to freedom of opinion and expression; this right includes freedom to hold opinions without interference and to seek, receive and impart information and ideas through any media and regardless of frontiers.

The right of information is also affirmed by Article 19 of International Covenant on Civil and Political Rights (ICCPR) 1966:

"1. Everyone shall have the right to hold opinions without interference.

2. Everyone shall have the right to freedom of expression; this right shall include freedom to seek, receive and impart information and ideas of all kinds, regardless of frontiers, either orally, in writing or in print, in the form of art, or through any other media of his choice.

Article 9 of UN CRPWD recognizes barriers faced by persons with disabilities in the exercise of their fundamental rights including the right to information. The article talks about the elimination of barriers pertaining to "information, communications and other services, including electronic services and emergency services."

Article 21 Freedom of Expression and Opinion, and Access to Information:

Article 21 of UN CRPWD pertains to ensuring that persons with disabilities have freedom of expression as well as freedom of information. They should be able to receive and impart information in the manner of their choice. The states are required to ensure that information intended to be provided to the general public should be made available to persons with disabilities in formats they prefer, and in a timely manner and there should not be extra costs

involved for making the information accessible. The states parties should accept and facilitate “the use of sign language, Braille, augmentative and alternative communication, and all other accessible means, modes and formats of communication of their choice by persons with disabilities in official interactions”.

Furthermore, not only the officialdom should be able to communicate with persons with disabilities in the manner of their choice, the state’s parties are required to encourage private entities that provide services to the general public, including through Internet, to do the same. This provision of the article aims at fostering the spirit of accepting diversity and differences as the generally accepted modes of communication are not the only ways of communication and having access to information.

Many countries have framed necessary laws and operationalized standards to give equal access to information to their citizens with disabilities. In Pakistan, in the absence of web accessibility policy, almost all the official websites are inaccessible, in varying degrees, to the disabled people. This digital divide can be bridged only by framing a comprehensive web accessibility policy and enactment of relevant laws in this context. Through such a policy, the government should make it binding on all private sectors institutions and organization to make their website accessible.

The Constitution of the Islamic Republic of Pakistan, only recognized the freedom of speech and expression as a fundamental right but the right to information was not recognized as a fundamental right. However, the superior judiciary of the country realized and documented the importance of the right to information in some of its judgments. For example, the Supreme Court of Pakistan in PLD 1993 SC 746 stated:

... the Government is the major source of information, which in a democratic setup, it is duty bound to disseminate for public awareness, to enable them to adjudge the conduct of those who are in office and the wisdom and follies of their policies.

In PLD 2008 Karachi 68, the Sindh High Court states:

... access to information is sine qua non of constitutional democracy. The public has a right to know everything that is done by the public functionaries. The responsibility of public functionaries to disclose their acts works both against corruption and oppression. [...]

Therefore, as a rule information should be disclosed and only as an exception privilege should be claimed on justifiable grounds...

The right to information movement in the country got a major boost when Article 19-A was inserted in the constitution in 2010 through 18th Amendment which is as under:

19A. Right to Information. Every citizen shall have the right to have access to information in all matters of public importance subject to regulation and reasonable restrictions imposed by law.

The enactment of the Right of Access to Information Act 2017 is an important step not just towards the implementation of Article 19-A of the Constitution but also to bring about transparency in governance. However, it is a beginning of the process of a systemic change, which is long overdue, but still may face roadblocks and resistance by the forces of status quo.

1.1 Right to Information Legislation: Local Context

Although Pakistan was the first country in South Asia to have introduced a national law of right to information in the shape of Freedom of Information Ordinance 2002, it was a largely ineffective law and all its provisions were found lacking when juxtaposed with standards of the right to information legislation. Provinces of Balochistan and Sindh enacted replicas of Freedom of Information Ordinance 2002 in the shape of Balochistan Freedom of Information 2005 and Sindh Freedom of Information Act 2006. However, provinces of Khyber Pakhtunkhwa and Punjab did not carry out legislation on right to information till 2013.

The right to information movement in the country started getting momentum when general elections were announced to be held on May 12, 2013. Civil society groups started engaging political parties on the issue of the right to information legislation the political parties were urged to include right to information legislation in their party manifestoes.

Pakistan Tehreek-e-Insaf, (PTI) made a specific commitment through its manifesto that it would carry out legislation on right to information if it came to power. The other parties also mentioned the right to information in their party manifestoes but none came closer to PTI in terms of making a specific commitment in party manifesto to legislate on this issue.

PTI included also right to information legislation in its governance reform agenda for Khyber Pakhtunkhwa province where it was leading the coalition government. Khyber Pakhtunkhwa Right to Information Ordinance 2013 that was shared on August 17, 2013, met international standards of right to information legislation.

According to the constitution, an ordinance promulgated by a Governor has a life of 90 days after which it lapses if not extended for further 90 days by the provincial assembly. KP Assembly constituted Select Committee to give its recommendations so that KP Right to Information Ordinance 2013 could be adopted as an Act of Assembly before it lapsed and the Khyber Pakhtunkhwa Assembly passed Khyber Pakhtunkhwa Right to Information Act 2013 on August 17, 2013.

The Punjab government advertised its draft right to information law in major newspapers for public comments and feedback and eventually promulgated right to information law in the shape of Punjab Transparency and Right to Information Ordinance 2013 on October 04, 2013. This ordinance was passed as an Act of Punjab Assembly on November 12, 2013, in the shape of Punjab Transparency and Right to Information Act 2013.

On March 13, 2017, Sindh Assembly repealed Sindh Freedom of Information Act 2006 and enacted Sindh Transparency and Right to Information Act 2016. On February 01, 2021, The Balochistan Right to Information Act, 2021 was enacted, repealing the Balochistan Freedom of Information Act, 2005.

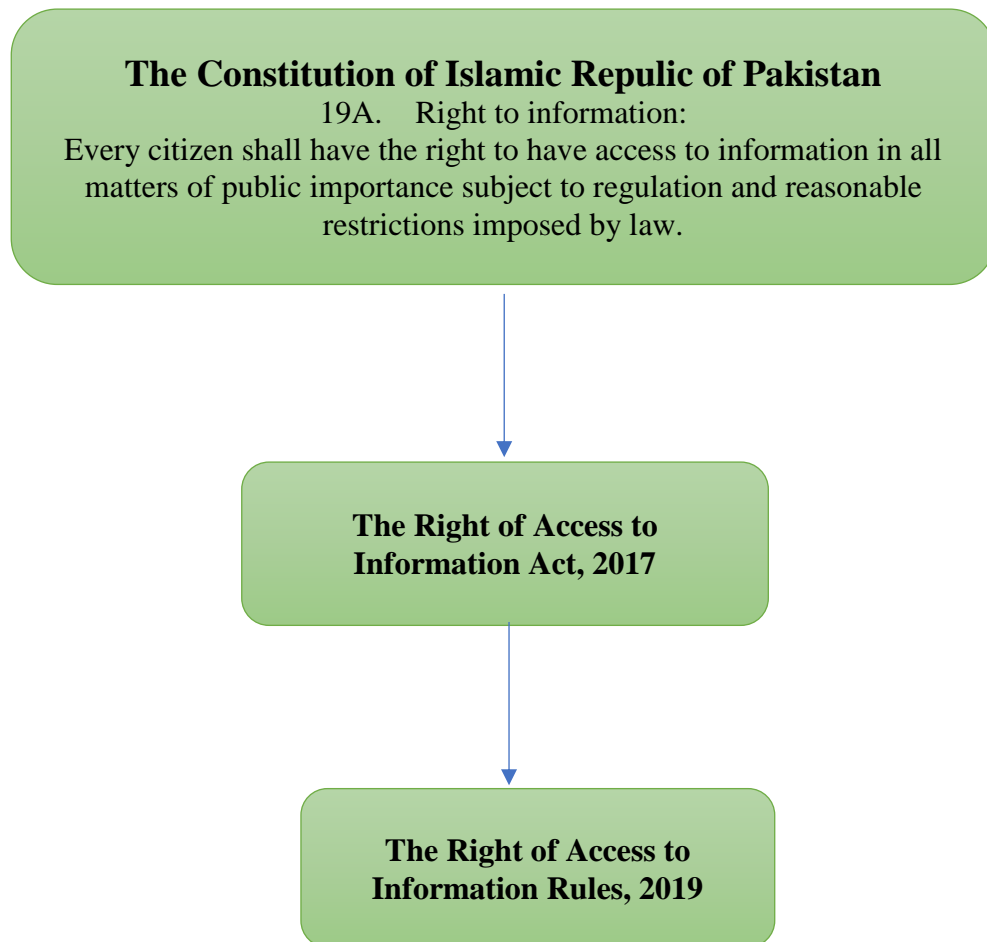
On February 14, 2017, Senate Committee on Information and Broadcasting approved the Right of Access to Information Bill 2017 which was enacted on October 16, 2017.

Implementation of the Right of Access to Information Act 2017: Progress and Challenges
The following sections explain the progress made by the Commission and the public bodies in terms of implementation of the Act as well as the challenges that have been faced so far.

2. LEGAL AND PROCEDURAL FRAMEWORK

The Article 19-A of the Constitution and the Right of Access to Information Act 2017 provide

an overall legal framework for the enforcement of citizens' right to information. However, under the law, it is a responsibility of the government and the Commission to come up with sub-ordinate legislation in the form of rules and procedures to clarify any ambiguities or provide detailed mechanisms for the implementation of the right to information.



2.1 The Right of Access to Information Rules 2020

Section 26 of the Right of Access to Information Act 2017 provides that the “Federal Government may be notification in the official gazette and within one hundred and twenty days from commencement of this act, make rules for carrying out the purposes of this act”. The draft rules developed by the Ministry of Information and Broadcasting were not in accordance with some of the provisions of the Right of Access to Information Act 2017 as these draft rules were modelled on the Freedom of Information Ordinance Rules 2004. For example, the form developed under these rules required an applicant to state the purpose for requesting information which was in direct contravention of Section 11 (5) of the Act which states that “In no case shall an applicant be required to provide reasons for his request “. Similarly, the applicant was required to deposit a fee of Rupees 200 at the time of filing an information request which is against the spirit of the law. Therefore, in view of the importance of these rules, the Commission took the initiative to draft the rules, which were submitted to the Ministry of Law and Justice for vetting and approval. The approval of these Rules was notified after formal approval of Federal Cabinet.

2.2 Schedule of Costs

Under section 27 (b) of the Right of Access to Information Act 2017, it was a responsibility of the Commission to develop and notify a schedule of cost for the supply of information to the applicants. The Commission fulfilled this responsibility by developing and notifying the schedule of cost on August 24, 2019. Under the notified schedule of cost, information involving copies up to 50 pages has been declared as free of any charge but, for any extra pages, a cost of Rupees 2 per page can be charged and deposited in the treasury in head "C0392925-Fee payable for obtaining information and copies of public record."

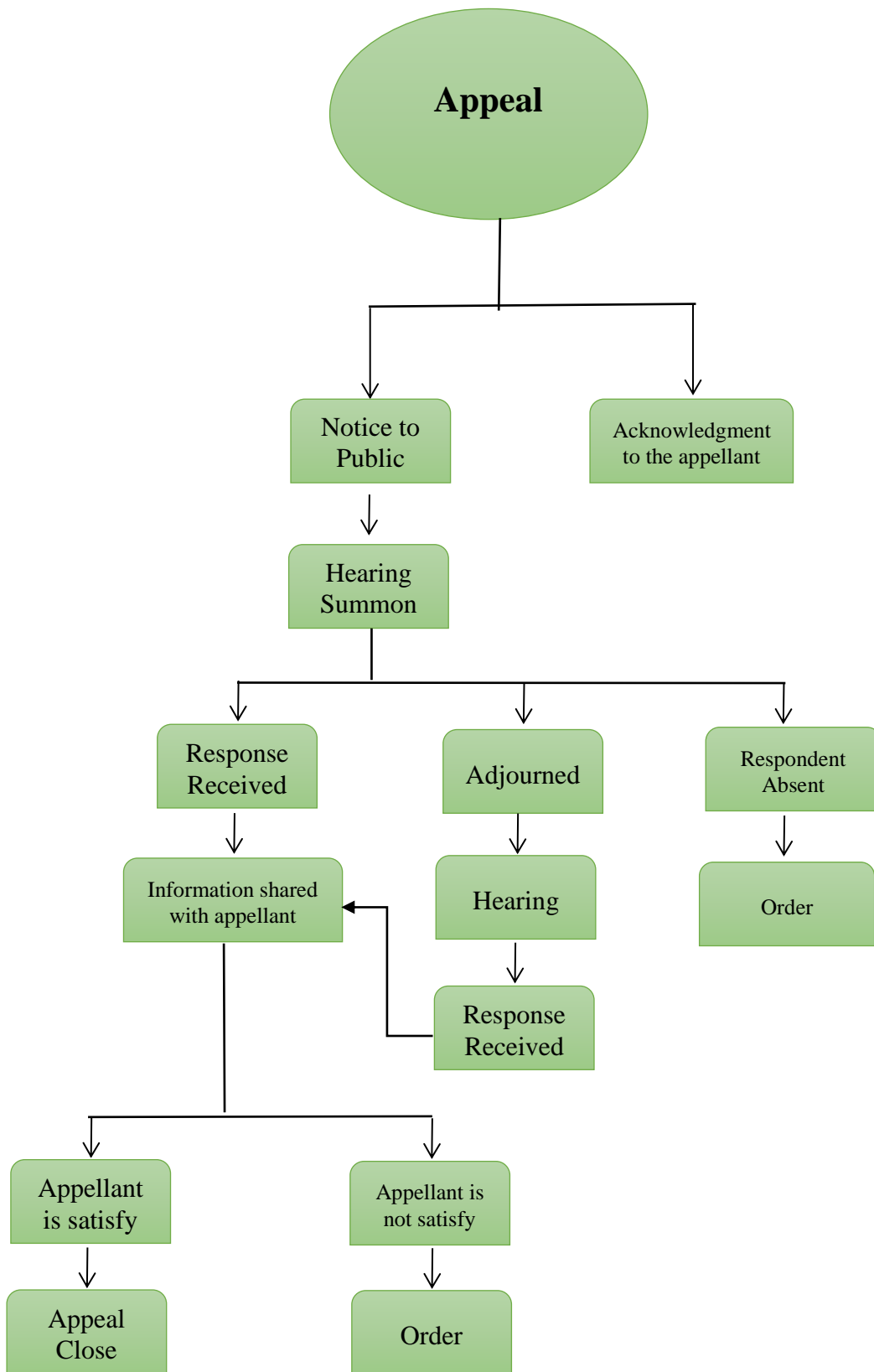
2.3 Service Rules

Under section 24 of the Right of Access to Information Act 2017, the “appointment of officers and staff in information commission from BS-16 and above shall be made through federal public service commission in line with the federal public service commission ordinance, 1977 (XLV of 1977). However, being a special institution, Pakistan Information Commission is empowered under Section 20 (g) of the Right of Access to Information Act 2017 to develop its own service rules to provide a mechanism for the transfer, posting or appointment of staff and officers. To fulfil this responsibility, the Commission drafted the service rules, which have been submitted to the government. The commission has recruited 2 Assistants, 2 steno-typists, one LDC and one Driver.

2.4 Procedure for the Processing of Appeals

As processing appeals filed by citizens is one of the core functions of the commission and also a legal obligation to develop regulations for developing a procedure for the processing of appeals under Section 27 of the Act, the commission developed ‘Procedure for the Processing of Appeals’. An attempt was made to develop a robust mechanism so that appeals are dealt with in a timely and professional manner.

Procedure for the Processing of Appeals



3. RESPONSIBILITIES OF PUBLIC BODIES

Under the Act, each public body is responsible to take a range of steps to ensure smooth implementation of citizens' right to information. The Commission issued several letters/notices to remind heads of public bodies about their responsibilities. However, most public bodies failed to fulfil their responsibilities, which is a matter of concern that requires the government's attention at the highest level. The following sub-sections explain the situation in further detail.

Designation of Public Information Officers (PIOs)

Under section 9 of the Act, each public body was required to designate and notify, within 30 days of the commencement of the Act, as many officers as public information officers in all administrative units or offices under it, as may be necessary. However, this legal requirement was not adequately understood and implemented within the prescribed timeframe. In view of this, the Commission issued letters to remind public bodies about this responsibility. Furthermore, the commission, through its detailed Orders on the appeals, directed public bodies to notify Public Information Officers and put their names, designations, contact details on their web sites. These efforts produced some positive results and, as per the notifications submitted to the Commission, the public bodies have so far designated over 190 PIOs. However, public bodies need to demonstrate much more seriousness and address the following concerns in relation to this important responsibility:

Many public bodies have still not designated PIOs for each of their administrative units, as required by law. This is a clear violation of section 9 of the Act.

- a) The biggest problem observed by the Commission was that the public bodies do not publicize information about the contact details of PIOs.

3.2 Proactive Disclosure under Section 5 of the Act

Under section 5 of the Act, each public body is required to proactively disclose a maximum of the information about, among others, its rules and procedures, functions, staff and their responsibilities, decision-making process, budget and its utilization, and names, designation and other particulars of PIOs. Despite repeated reminders by the Commission, the public bodies have not taken adequate steps to ensure full implementation of this provision of the Act. Although it is encouraging that increasing number of public bodies have developed or are developing their websites but the weak aspect is that content is often not developed in the light of section 5 of the Act or on the basis of any assessment of information needs of the public at large.

The public bodies, which remain oblivious of the importance of websites, will find it difficult to meet their obligation under section 5 of the Act. As Punjab Information Commission also noted in its first annual report, “Although information can also be proactively disclosed by traditional modes such as notice boards, it would be more efficient and forward-looking to explore technological possibilities, e.g. websites, intranets & management information systems (MIS), to promote the free flow of information and to build an enabling environment for citizens to engage with government institutions”.

Realizing this abysmal situation, the commission took rigorous measures to ensure proactive disclosure of information. In this connection, the commission developed ‘Template for the Compliance Report-Proactive Disclosure of Information under Section 5 of the Right of Access to Information’. The Commission ensured through its Orders and Circulars that the federal public bodies publish information according to this template. The commission continued monitoring the performance of federal public bodies on this count to ensure proactive disclosure of information.

In the months of September and October, 2022, PIC held a total of 125 specific hearings to seek compliance reports from public bodies regarding proactive disclosure of information.

As mentioned earlier, the commission developed, available on its web site, template for proactive disclosure of information which states that the implementation of Section 5 of the Act can only be ensured if federal public bodies continuously juxtapose categories of information enlisted in section 5 with the information provided on the web sites. In the following 165 out of 656 Orders of the commission, the commission issued directions to federal public bodies to submit compliance report to the commission in the format provided in the template.

Orders Seeking Compliance Report for Proactive Disclosure of Information and Information Accessibility for persons with disabilities compliance report.

S. NO.	Appeal No.	Title of the Order
1	958-03/21	Pervaiz Iqbal vs Sukkur Electric Power Company
2	1018-04/21	Salman Yousuf vs Shaheed Zulfiqar Ali Bhutto Medical University
3	887-02/21	Syed Hammad Hussain vs Comsats university
4	734-11/20	Sharafat Ali Zia vs Chief Commissioner
5	E96-03/21	Farhat shah vs Cantonment board Nowshehra
6	1072-05/21	Murtaza Hashim vs Secretariat senate of Pakistan
7	996-04/21	Zahid Hussain waseem vs Defence Housing Authority ICT
8	512-08/20	M. Tariq Mansoor vs Ministry of Privatization
9	1075-04/21	Social Security Islamabad
10	998-04/21	Zahid Hussain Waseem vs Defence Housing Authority Bahawalpur
11	427-07/20	Kashid Zubair Ahmad vs Securities and exchange commission of Pakistan
12	1011-04/21	Nadeem Omer vs Social Security Islamabad
13	1005-04/21	Muhammad Aman Ullah vs Federal Public Service Commission
14	942-03/21	Abdullah Rashid Waraich vs Pakistan Housing Authority Foundation
15	972-04/21	Boota Imtiaz vs Karachi Port trust
16	997-04/21	Zahid Hussain Waseem vs Defence Housing authority
17	936-03/21	Muhammad Nawaz vs Survey of Pakistan
18	689-11/20	Inam Akbar vs Accountant General Pakistan Revenues
19	978-04/21	Nadeem Umar vs Accountant General Pakistan Revenues
20	E70-01/21	Murtaza Hashim vs Ministry of Foreign Affairs
21	774-12/20	Yaqeen Baig vs K-Electric
22	814-01/21	Nadeem Umar vs National Highways authority

23	755-12/20	Dewan Adnan amlak vs Pakistan Railways
24	912-2/21	Bilal Asghar vs Ministry of Water Resources
25	731-11/20	Moon Haroon vs Airport security force
26	761-12/20	Dr. Syed Raza ali vs Cantonment board Clifton
27	813-12/20	Hamid Khwaja vs Military lands and cantonment Department
28	825-01/21	Nadia Omer Hayat Malik vs Pakistan International Airlines
29	966-03/21	Syed Raza Ali Shah vs Pakistan Insititute of Medical Sciences
30	954-03/21	Muhammad Rehan Paracha vs Pakistan Telecommunication company limited
31	908-02/21	Naeem ali vs Peshawar Electric Supply company
32	685-10/20	Raja khuram Shehzad vs Pakistan Railways
33	813-12/20	Amir Ejaz vs Comsats university Islamabad
34	773-12/20	Shazia mehboob vs Federal Investigation Agency
35	E001-10/20	Umair Ismail vs Cantonment Board Malir
36	438-07/20	Moon Shehbaz vs Ministry of Religious Affairs and interfaith Harmony
37	670-10-20	Taimur Khan vs Naya Pakistan Housing and Development Authority and National Data Base and Registration Authority
38	264-01/20	Nadeem Omar vs National Highways Authority
39	345-03/20	Syed Abu Ahmad Akif vs Civil Aviation Authority
40	360-03/20	Naveed Ahmad vs Benazir Income Support Program
41	E003-11/20	Nadeem Omar vs Pakistan Telecommunication Authority
42	679-10/20 & 649-10/20	Arshad H Siraj vs Hamid Baig
43	322-02/20	Fiza Mazhar vs Capital Development Authority
44	243-01/20	Dewan Adnan amlak vs Sui Northern Gas Pipelines limited
45	632-09/20	Taimor Khan vs National Assembly Secretariat and senate secretariat
46	646-09/20	Naim Saddiq vs Defence Housing Authority Karachi
47	554-09/20	Taimor Khan vs Pakistan environmental Protection Agency
48	533-08/20	Muhammad Noman Ul Haq vs Multan Electric power Company
49	667-10/20	Shahzia Mehboob vs Higher education commission
50	673-10/20	Shahzia Mehboob vs Ministry of Information and Broadcasting
51	458-08/20	Pervaiz said vs Cantonment Board Clifton
52	309-02/20	Muhammad Waseem Elahi vs Election commission of Pakistan
53	483-08/20	Usman Maqbool vs Intelligence Bureau
54	437-07/20	Rana Asad ullah khan vs National Accountability Bureau
55	641-09/20	Pervez Said-Vs-DHA Karachi
56	633-09/20	Nadeem Umer-Vs-Deputy Commission Islamabad
57	507-08/20	Khurram-Iqabl-Vs-Lahore-Electric-Supply-Company
58	671-10/20	Shazia-Mehboob-Vs-Ministry-of-Information-and-Broadcasting
59	474-08/20	Tanwir-Ahmed-Vs-Federal-Directorate-of-Education
60	756-12/20	Dewan-Adnan-Amlak-Vs-Pakistan-Railways-1-1
61	549-09/20	Muhammad-Nauman-Ul-Haq-Vs-National-Bank-of-Pakistan
62	E58-01/21	Taimoor-Khan-Vs-Ministry-of-Information-and-Broadcasting
63	E25-01/21	Ahsan-Akbar-Vs-Cantonment-Board-Walton-Lahore
64	1006-04/21	Hidayat-Ullah-Khan-Gandapur-Vs-Peshawar-Electric-Supply-Company
65	175-11/2019	Ms.-Nadia-Naeem-Vs-Pakistan-Medical-Commission

66	762-12/20	Muhammad-Tahir-Zia-Vs-Capital-Development-Authority-
67	199-12/2019	Major-Farooq-Ul-Hassan-Vs-Military-Accounts
68	1058-05/21	Shazia-Mehboob-Vs-Ministry-of-Narcotics-Control
69	985-04/21	Asif-Mehmood-Butt-Vs-EOBI
70	892-02/21	Zahid-Hussain-Waseem-Vs-PEC
71	1130-6/21	Ministry of Finance Vs Faisal Manzoor Anwar
72	1134-6/21	Ministry of Finance Vs Faisal Manzoor Anwar
73	1156-06/21	Muhammad Naeem Vs Ministry of Railways
74	1195-07/21	Amjad KhanVs Pakistan Railways
75	1318-09/21	Muhammad Waseem Elahi Vs Wafaqi Mohtasib
76	1339-09/2021	Naeem Sadiq v. Cantonment Board Malir, Karachi
77	1315-09/21	Shahnaz Begum Vs Ministry of States and Frontier Regions
78	E85-02/21	Muhammad Kashif VS Ministry of Energy
79	E151-09/21	Rafaqat Waheed VS Peshawar Electric Supply Company
80	1358-09/21	Bushra Pareveen VS National Highway and Motorway Police
81	898-02/21	Zahid Hussain Wasim Vs. Defence Housing Authority Gujranwala
82	1243-08/21	Malik Ummar Ali Vs. Ministry of Railways
83	1222-07/21	Jamil Akhtar Baig Vs Federal Board of Revenue
84	1282-08-2021	Muhammad Ikram Shah VS FBR
85	1345-09/21	Pervez Said Vs CDA
86	1270-08/21	Syed Raza Ali Shah VS Ministry of National Health Services, Regulations and Coordination
87	1361-09/21	Umar Hanif Khichi VS Ministry of Foreign Affairs
88	822-01/21	Tariq Badar VS-National-Bank-of-Pakistan
89	E144-08/21	Sajid Mehmood Janjua Vs Allama Iqbal Open University
90	E153-09/2021	Salim Ullah Khan Vs National Agricultural Research Centre
91	1239-08/21	Amjad Aziz Vs SNGPL
92	1207-07/21	Amir Shahzad VS Federal Government Employees Housing Authority
93	1248-08/21	Muhammad Sharafat Ali Zia VS Federal Employees Benevolent and Group Insurance Funds
94	1313-09/21	Muhammad Rafiq Vs Federal Employees Cooperative Housing Society
95	12730-08/21	Kashif Ali Sundrani Vs-Oil and Gas Development Company
96	E128-07/21	Raheela Sajid Vs NESPAK final
97	1112-06/21	Asad H. Kizilbash Vs. Cantonment Board, Clifton
98	1292-08/21	Muhammad Bashir Khan VS Ministry of Defence
99	1226-07/21	Dr Syed Raza Ali Gardezi VS Pakistan Mineral Development Corporation
100	1372-10/21	Ashfaq Ali Shah Vs State Engineering Corporation
101	1046-05/21	Zahid Gishkori Vs. Ministry of Federal Education and Professional Training
102	1132-06/21	Faisal Manzoor Anwar Vs. Ministry of Finance
103	976-04/21	Muhammad Umar Vs. State Bank of Pakistan
104	1226-07/21	Dr Syed Raza Ali Gardezi Vs. Pakistan Mineral Development Corporation
105	1298-08/21	Zubaida Aslam Awan Vs National Book Foundation
106	1328-09/21	Imaan Zainab Hazir Vs. Ministry of Information and Broadcasting
107	1219-07/21	Tariq Mehmood Vs. Pakistan Engineering Council
108	1236-07/2021	Luqman Vs Estate Office Islamabad
109	1490-11/21	Abdullah Rashed Waraich Vs. Pakistan Housing Authority Foundation
110	1424-10/21	Abdur Rehman Vs. Pakistan Engineering Council
111	E156-09/21	M. Mushtaq Ahmed Vs International Islamic University
112	1174-06/21	Ishteyaq Mustafa Bukhary Vs Ministry of Housing and Works
113	1451-11/21	Bushra perveen vs National Highway and motorway police
114	1397-10/21	Popular Goods Transport Vs PASSCO

115	1904-10/21	Syed M. Irfan Pirzada Vs Islamabad high Court
116	1883-04/22	M. Adnan Asif Vs National Tarrif Commission
117	1839-04/22	Nadeem Umer Vs Senate Secretariat
118	1879-04/22	Nadeem Umer Vs Ministry of Finance
119	2036-06/22	Aamir Baloch Vs Registrar, Supreme Court of Pakistan
120	1706-01/22	Mukhtar Ahmed Ali Vs Supreme Court of Pakistan
121	1964-06/22	Mumtaz Ahmed Vs Ministry of Climate Change
122	1406-01/22	Naveed Akhtar Vs Lahore Electric Supply Company
123	1394-10/21	Zahid Gaskhori Vs Election Commission of Pakistan
124	1869-04/22	Zahid ur Rehman Vs Election Commission of Pakistan
125	1925-05/22	Sharafat Ali Zia Vs Establishment Division
126	2069-07/22	Hafiz Arfat Ahmed Vs Islamabad Club
127	E260-04/22	Saeed Rashid Vs Comsats University
128	662-10/20	Sheikh Fayyaz Ahmed Vs Ministry of Kashmir Affairs and Gilgit Baltistan
129	1425-11/21	Sajid Iqbal vs Pakistan Software Export Board
130	1236-07/2021	Lugman vs Director General Estate Office Islamabad
131	1422-10/21	Samar Mukhtar vs Office of the Deputy Commissioner, Islamabad
132	1205-07/21	Zahid Hussain Wasim vs Defence Housing Authority, Multan
133	1383-10/21	Muhammad Ashraf vs Ministry of Energy (Power Division)
134	E196-12/21	Muhammad Tajamul Hanif vs National Commission for Human Development
135	1280-08/21	M. Ikram Shah vs Federal Board of Revenue
136	1407-10/21	Sharafat Ali Zia vs National Accountability Bureau
137	1274-08/21	Nadeem Umer vs Cooperative Societies Department
138	1246-08/21	Saddia Usman vs Capital Development Authority
139	1196-07/21	Yasir Mehmood Awan vs Directorate General Civil Defence
140	1625-01/22	Naveed Ahmed vs Ministry of Kashmir Affairs and Gilgit Baltistan
141	1295-08/21	Naeem Sadiq vs Employees Old Age Benefit Institution
142	1370-10/21	Sharafat Ali Zia vs Capital Development Authority
143	1419-10/21	Faseeh Ul Hassan Malik vs Ministry of Railways
144	1127-06/21	Farkhanda Manzoor vs Pakistan Railways
145	1563-12/21	Rana Abrar Khalid vs Cabinet Division
146	650-10/20	Sharafat Ali Zia vs Capital Development Authority
147	1603-01/21	Naveed Ahmed vs Ministry of Statistics
148	1509-12/21	Saddia Mazhar vs Federal Investigation Agency (Cyber Crime Wing)
149	1319-09/2021	Nadeem Tanoli vs Deputy Commissioner, Islamabad
150	1831-03/22	Hidayat Ullah vs National Accountability Bureau
151	1938-05/21	Muhammad Ashiq vs Poly Clinic Hospital, Islamabad
152	1689-01/22	Rana Abrar Khalid vs National Institute of Folk and Traditional Heritage
153	2060-07/22	M. Adil Shah Vs Federal Government Employees Housing Authority
154	2004-06/22	Faisal Munir Vs Ministry of Science and Technology
155	2005-06/22	Faisal Munir Vs Ministry of Science and Technology
156	2011-06/22	Faisal Munir Vs Ministry of National Health Services Regulation and Coordination

157	2012-06/22	Faisal Munir Vs Ministry of National Health Services Regulation and Coordination
159	2117-08/22	Amjad Rashid Vs National Highway Authority
160	E238-02/22	Dilraj Gill Vs Wapda Sports Board
162	2054-07/22	M. Mubeen Ahmed Vs Ministry of Energy (Power Division)
163	1913-05/22	Nadeem Umer Vs Islamabad Healthcare Regulatory authority
164	E175-10/21	Abdus Sattar Vs Registrar, Supreme Court of Pakistan
165	1418-10/21	Azaz Syed Vs-Ministry of Foreign Affairs

In September and October, 2022, PIC held a total of 125 specific hearings seeking compliance reports from public bodies based on the templates for proactive disclosure of information and information accessibility as well, made available on the web site of the commission and referred to in the Orders of the commission.

3.3 Accessibility of Web Sites

Pakistan has ratified UN Convention on Rights of Persons with Disabilities. Article 4: General Obligations lists obligations of the state parties in achieving the purpose of the convention as enunciated in Article 1. The states parties are expected to “adopt all appropriate legislative, administrative and other measures” to achieve the purpose of the convention and “modify or abolish existing laws, regulations, customs and practices” which run contrary to the spirit of the convention.

Article 9 of the UN Convention on Rights of Persons with Disabilities talks about the elimination of barriers pertaining to “information, communications and other services, including electronic services and emergency services.”

Article 21: Freedom of Expression and Opinion, and Access to Information aims at ensuring that persons with disabilities have freedom of expression as well as freedom of information.

They should be able to receive and impart information in the manner of their choice. The states are required to ensure that information intended to be provided to the general public should be made available to persons with disabilities in formats they prefer, and in timely manner and there should not be extra costs involved for making the information accessible. The states parties should accept and facilitate “the use of sign language, Braille, augmentative and alternative communication, and all other accessible means, modes and formats of communication of their choice by persons with disabilities in official interactions”. This provision of the article aims at fostering the spirit of accepting diversity and differences as the generally accepted modes of communication are not the only ways of communication and having access to information. Section 15 (5) states “The government shall ensure that all websites hosted by Pakistani website service providers are accessible for persons with disabilities”.

In Pakistan, in the absence of web accessibility policy, almost all the official websites are inaccessible, in varying degrees, to the disabled people.

The information proactively published under Section 5 of the Right of Access to Information Act 2017 should be accessible for all citizens, including the blind, low-vision, physically disabled, speech and hearing impaired and people with other

disabilities. The web sites of public bodies should be accessible to level AA of Web Content Accessibility Guidelines (WCAG) 2.1 (of W3C. A quick reference guide for WCAG2.1 is available at this link: <http://www.w3.org/WAI/WCAG21/quickref/>

The commission took a number of initiatives to the accessibility of the both the web site as well as information proactively published on the web sites. In this connection, the commission asked federal public bodies to conduct accessibility audit of their web sites and bring them at par with accessibility standards.

The Commission developed a checklist, as an initial resource to help IT sections of public bodies make websites accessible, for all citizens, including those with different disabilities. The implementation of Section 5 of the Act can only be ensured if federal public bodies continuously juxtapose categories of information enlisted in section 5 with the information provided on the web sites. In this regard, all federal public bodies are required to use the following template to ensure proactive disclosure of information. In this template, the Pakistan Information Commission has explained as to how each category of information is to be proactively disclosed through web sites.

Template for the Compliance Report-Proactive Disclosure of Information under Section 5 of the Right of Access to Information Act 2017

Serial No.	Information to be Proactively Disclosed	Explanation	Status as on (insert the date)
1	Description of the public body's organization and functions, duties, powers and any services it provides to the public, including a directory and any services it provides to the public, including a directory of its officers and employees, indicating their duties	The public body should ensure that all this information is available on its web site by analysing information made already available on its web site. The public body should indicate which of these have been uploaded and which are missing. The directory of officers and the employees should be maintained in tabular form along with names, designations, Basic Pay Scales, Salaries, benefits, perks and privileges of the officers and employees. The 'Directory of Officers and Employees of Pakistan Information Commission', available on its web site, should be used as a template.	
2	Statutes, statutory rules, regulations, bye-laws, orders and notifications, etc. applicable to the public body disclosing the date of their respective commencement or effect	Self-explanatory. The public body should indicate which of these have been uploaded and which are not.	
3	Substantive or procedural rules of the general application evolved or adopted by the public body, including any manual or policies by its employees	Self-explanatory	
4	Relevant facts and background information relating to important policies and decisions which have been adopted, along with a statement of policies adopted by the public body and the criteria, standards or guidelines upon which discretionary powers are exercised by it	Self-explanatory. The public body should indicate which of these have been uploaded and which are missing not.	
5	The condition upon which members of the public body can acquire any license, permit, consent, approval, grant, allotment or other benefits of whatsoever nature from any public body or upon which transactions,	Criteria and terms and conditions for all kinds of licenses, permits, consents, approval, grants, allotments or other benefits. The public body should also publish list with names and addresses of	

	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, license or authorization granted by the public body	those received concession, permit, license or authorization.	
6	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 the public to provide any input into or be consulted about decision	Self-explanatory	
7	Detailed budget of the public body; including proposed and actual expenditures, original or revised revenue targets, actual revenue, receipts, revision in the approved budget and the supplementary budget	The public body should indicate which of these have been uploaded and which are missing.	
8	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	Public bodies should put on their web sites Application Form developed by the commission for seeking information under the Act. This form and the 'Schedule of Costs' can be retrieved from www.rti.gov.pk . Federal public bodies should also put the name, designation, official E-mail and contact number of the Public Information Officer on the web site. These details should be placed below the heading: 'Public Information Officer Designated under the Right of Access to Information Act 2017'.	
9	Reports including performance reports, audit reports, evaluation reports, inquiry or investigative reports and other reports that have been finalized	All such finalised reports be made available on the web site. The public body should indicate which of these have been uploaded and which are missing.	
10	Such other matters which the principal officer of the public body deems fit to be published in the public interest	Especially all classified records that are more than 20 years old are public records and be made available on the web sites of federal public bodies.	
11	Camera footages at public places, wherever available, which have a bearing on a crime	Self-explanatory	

In following 96 Orders against different Federal Public Bodies, the commission issued specific directions to federal public bodies to incorporate web accessibility standards and follow 'Web Accessibility Checklist'.

Accessibility Template-Orders Seeking Compliance Report

S. No.	Appeal No	Title of the Order
1	755-12/20	Dewan-Adnan-Amlak-Vs-Pakistan-Railways
2	761-12/20	Dr-Syed-Raza-Ali-Vs-Cantonment-Board-Clifton
3	813-12/20	Hamid-Khawaja-Vs-Military-Lands-and-Cantonment
4	825-01/21	Nadia-Umar-Hayat-Malik-Vs-Pakistan-International-Airline
5	685-10/20	Raja-Khurram-Shahzad-Vs-Pakistan-Railways
6	813-12/20	Amer-Ejaz-Vs-Comsats-University-IslamabadShazia-Mehboob-Vs-Federal-Investigation-Agency
7	773-12/20	Umair-Ismail-Vs-Cantonment-Board-Malir
8	E001-10/20	Moon-Shahbaz-Vs-Ministry-of-Religious-Affairs
9	670-10/20	Taimoor-Khan-Vs-Naya-Pakistan-Housing-Authority-and-NADRA

10	264-01/20	Nadeem-Umer-Vs-National-Highways-Authority
11	345-03/20	Syed-Abu-Ahmad-Akif-Vs-Civil-Aviation-Authority
12	360-03/20	Naveed-Ahmed-Vs-Benazir-Income-Support-Program
13	E003-11/20	Nadeem-Umer-Vs-Pakistan-Telecommunication-Authority
14	679-10/20	Arshad-H-Siraj-Vs-Defence-Housing-Authority
15	322-02/2020	Fiza-Mazhar-Vs-Capital-Development-Authority
16	243-01/20	Dewan-Adnan-Amlak-Vs-Sui-Northern-Gas-Pipeline-LimitedTaimoor-Khan-Vs-NA-Secretariat-and-Senate-Secretariat
17	646-09/20	Naeem-Sadiq-Vs-DHA-Karachi
18	554-09/20	Taimoor-Khan-Vs-Environmental-Protection-Agency
19	533-08/20	Nauman-UI-Haque-Vs-MEPCO
20	667-10/20	Shazia-Mehboob-Vs-HEC
21	673-10/20	Shazia-Mehboob-Vs-Ministry-of-Information-and-Broadcasting
22	458-08/20	Pervez-Said-Vs-Cantonment-Board-Clifton
23	309-02/20	Muhammad-Waseem-Elahi-Vs.-Election-Commission-of-Pakistan
24	483-08/20	Usman-Maqbool-Muhammad-Sabir-Vs-Intelligence-Bureau
25	437-07/20	Rana-Asadullah-Khan-Vs-National-Accountability-Bureau
26	234-12/19	Schehr-Yar-Ahmed-Vs-Federal-Insurance-Ombudsman
27	1156-06/21	Muhammad Naeem Vs Ministry of Railways
28	1195-07/21	Amjad KhanVs Pakistan Railways
29	693-11-2020	Taimoor Khan Vs National Assembly Secretariat
30	1318-09/21	Muhammad Waseem Elahi Vs Wafaqi Mohtasib
31	1339-09/2021	Naeem Sadiq v. Cantonment Board Malir, Karachi
32	1315-09/21	Shahnaz Begum Vs Ministry of States and Frontier Regions
33	1358-09/21	Bushra Pareveen VS National Highway and Motorway Police
34	898-02/21	Zahid Hussain Wasim Vs. Defence Housing Authority
35	1243-08/21	Malik Ummar Ali Vs. Ministry of Railways
36	1282-08-2021	Muhammad Ikram Shah VS FBR
37	1222-07/21	Jamil Akhtar Baig Vs Federal Board of Revenue
38	1345-09/21	Pervez Said Vs CDA
39	1132-06/21	Faisal Manzoor Anwar VS Ministry of Finance
40	1361-09/21	Umar Hanif Khichi VS Ministry of Foreign Affairs
41	822-01/21	Tariq Badar VS-National-Bank-of-Pakistan
42	E144-08/21	Sajid Mehmood Janjua Vs Allama Iqbal Open University
43	E153-09/2021	Salim Ullah Khan Vs National Agricultural Research Centre
44	1207-07/21	Amir Shahzad VS Federal Government Employees Housing Authority
45	1248-08/21	Muhammad Sharafat Ali Zia VS Federal Employees Benevolent and Group Insurance Funds
46	1226-07/21	Dr Syed Raza Ali Gardezi VS Pakistan Mineral Development Corporation
47	1292-08/21	Muhammad Bashir Khan VS Ministry of Defence
48	12730-08/21	Kashif Ali Sundrani Vs-Oil and Gas Development Company
49	E128-07/21	Raheela Sajid Vs NESPAK final
50	1372-10/21	Ashfaq Ali Shah Vs State Engineering Corporation
51	1046-05/21	Zahid Gishkori Vs. Ministry of Federal Education and Professional Training
52	1132-06/21	Faisal Manzoor Anwar Vs. Ministry of Finance
53	976-04/21	Muhammad Umar Vs. State Bank of Pakistan
54	1226-07/21	Dr Syed Raza Ali Gardezi Vs. Pakistan Mineral Development Cooperation
55	1298-08/21	Zubaida Aslam Awan Vs National Book Foundation
56	1328-09/21	Imaan Zainab Hazir Vs. Ministry of Information and Broadcasting
57	1219-07/21	Tariq Mehmood Vs. Pakistan Engineering Council
58	1236-07/21	Luqman Vs Estate Office Islamabad
59	1490-11/21	Abdullah Rashed Waraich Vs. Pakistan Housing Authority Foundation
60	1424-10/21	Abdur Rehman Vs. Pakistan Engineering Council
61	E156-09/21	M. Mushtaq Ahmed Vs International Islamic University
62	1174-06/21	Ishteyaq Mustafa Bukhary Vs Ministry of Housing and Works
63	1451-11/21	Bushra perveen vs National Highway and motorway police
64	1397-10/21	Popular Goods Transport Vs PASSCO

65	1883-04/22	M. Adnan Asif Vs National Tariff Commission
66	1839-04/22	Nadeem Umer Vs Senate Secretariat
67	1879-04/22	Nadeem Umer Vs Ministry of Finance
68	2036-06/22	Aamir Baloch Vs Registrar, Supreme Court of Pakistan
69	1706-01/22	Mukhtar Ahmed Ali Vs Supreme Court of Pakistan
70	1964-06/22	Mumtaz Ahmed Vs Ministry of Climate Change
71	1406-01/22	Naveed Akhtar Vs Lahore Electric Supply Company
72	1394-10/21	Zahid Gaskhori Vs Election Commission of Pakistan
73	1869-04/22	Zahid ur Rehman Vs Election Commission of Pakistan
74	1925-05/22	Sharafat Ali Zia Vs Establishment Division
75	2069-07/22	Hafiz Arfat Ahmed Vs Islamabad Club
76	E260-04/22	Saeed Rashid Vs Comsats University
77	1298-08/21	Zubaida Aslam Awan Vs National Books Foundation
78	1046-05/21	Zahid Gishkori Vs Ministry of Federal Education and Professional Training
79	976-04/21	Muhammad Umar Vs State Bank of Pakistan
80	1292-08/21	Muhammad Bashir Khan Vs Ministry of Defence
81	1328-09/21	Imaan Zainab Hazir Vs Ministry of Information and Broadcasting
82	1132-06/21	Faisal Manzoor Awan Vs Ministry of Finance
83	1226-07/21	Dr Syed Raza Ali Gardezi Vs Pakistan Mineral Development Corporation
84	1157-06/21	Sajid Abbas Vs Federal Public Service Commission
85	1849-04/22	Dr. M. Shiraz Vs Allama Iqbal Open University
86	2060-07/22	M. Adil Shah Vs Federal Government Employees Housing Authority
87	2004-06/22	Faisal Munir Vs Ministry of Science and Technology
88	2005-06/22	Faisal Munir Vs Ministry of Science and Technology
89	2011-06/22	Faisal Munir Vs Ministry of National Health Services Regulation and Coordination
90	2012-06/22	Faisal Munir Vs Ministry of National Health Services Regulation and Coordination
91	2117-08/22	Amjad Rashid Vs National Highway Authority
92	E238-02/22	Dilraj Gill Vs Wapda Sports Board
93	2054-07/22	M. Mubeen Ahmed Vs Ministry of Energy (Power Division)
94	1913-05/22	Nadeem Umer Vs Islamabad Healthcare Regulatory authority
95	E175-10/21	Abdus Sattar Vs Registrar, Supreme Court of Pakistan
96	1418-10/21	Azaz Syed Vs-Ministry of Foreign Affairs

3.4 Maintenance and Indexing of Records

Section 4 of the Act makes it obligatory for the Principal Officer of each public body to ensure that record held by that body is properly maintained, so as to enable it to comply with its obligation under this Act. It also directs that “Each public body shall bring its record management practices in line with the secretariat instruction, 2004 or any other instructions of the Federal Government”.

There is an urgent need to invest in the strengthening of record management systems by allocating adequate storage facilities and improving record management capacities. Through its circulars, the Commission has emphasized the need for automation of records, especially by developing online information management systems and bringing record management practices of public bodies in line with the secretariat instruction, 2004.

3.5 Data about the Requests for Information filed with Federal Public Bodies

One of the obligation of this commission is to monitor the performance of federal public bodies with regard to their performance pertaining to the implementation of the Act and also gather

number of requests filed by citizens to federal public bodies. In this connection, the commission, in November 2021, sent letters to 169 federal public bodies to share the data about number of requests received by them in a pre-designed table. However, only 101 federal public bodies submitted information to the Commission whereas, 68 federal public bodies failed to respond to the letters of the Commission. This shows the lack of compliance in implementing the Right of Access to Information Act, 2017.

4. TRAINING OF PUBLIC INFORMATION OFFICERS



Under section 20 (1) (b) of the Act, one of the functions of the Commission is to train PIOs, so that they could efficiently perform their responsibilities. To fulfil this responsibility, the Commission developed training material and has been imparting training to PIOs since October 12, 2020. The trainings cover the topics like the concept and principles of right to information, the Right of Access to Information Act 2017, the exceptions provided in the law, role of PIOs and procedure for handling requests, procedure of complaints and their disposal, and other duties of PIOs.

5. PUBLIC AWARENESS CAMPAIGN

One of the statutory functions of the Commission is to publicize the requirements of this Act and the rights of individuals there under. (s. 20) (1) (c). In this regard, the Commission took the following steps:

5.1 Print and Electronic Media Products

The Commission developed material for several products meant for public awareness which can be used through brochures, posters and booklets for PIOs and the general public. The commission developed, in partnership with CGPA a comprehensive manual titled 'Exercising the Right of Access to Information' covering topics like 'how to submit request to

information’, ‘how to file appeal with the commission, ‘Guidelines for PIOs and Public Bodies on the Implementation of the Right of Access to Information Act, ‘Schedule of Costs’, ‘The Right of Access to Information Rules 2020 and ‘the Right of Access to Information Act 2017’. This manual was used in the training of PIOs and was also being widely distributed to citizens through printed form as well as by making it available on the web site of the commission. Furthermore, the commission printed pocket-sized booklet the Right of Access to Information Act 2017 with the help of CGPA which was shared with public bodies, lawyers, journalists and citizens.

The commission, in collaboration with UNESCO also developed 20 posters and AMS.

The Commission developed content for its website and then requested technical assistance from TDEA. The commission web site was launched in the first week of December 2019. It hosts a lot of useful information about, among others, the functions of the Commission, right to information, legal framework, application procedure, and complaint procedure.

During the COVID-19 lockdown phase, the Commission finalized the broad parameters for the development of AMS. The AMS to track down the status of all the appeals lodged with the commission. This Appeal Tracker has now successfully been developed and was launched on September 28, 2020.

5.2 Public Meetings and Media Appearances

The Chief Information Commissioner and Information Commissioners throughout their tenure participated in a number of public meetings organized by educational institutions, bars, press clubs and civil society, as well as in some TV programs in different cities of the country. For example, one of the Information Commissioners had an opportunity to explain the concept of the law and procedure of information requests or complaints through a TV program on Dawn News. Other programs or events attended by the commissioners include, among others, the following:

- Chief Information Commissioner and Information Commissioners participated in a training session organized by SSDO and explained salient features of the Right of Access to Information Act 2017 to officers of district administration, Islamabad, held in DC office.
- Chief Information Commissioner and Information Commissioners addressed the audience at the launching ceremony of Pakistan Information Commission organized by SSDO.
- Chief Information Commissioner and Information Commissioners participated in the inaugural first meeting of the National Forum of Information Commission organized by CPDI in Islamabad on September 19-20, 2019.
- Information Commissioner imparted training to journalists and civil society activists of newly merged districts of erstwhile FATA region on September 18, 2019, organized by CGPA.
- Information Commissioner spoke on ‘Access Barriers: Intersectionality of the Right to Information and Right to Vote’ at the launch of disability audit of the election law by TDEA.
- Chief Information Commissioner and Information Commissioners participated in a number of functions held in Islamabad and Lahore to celebrate Universal Day of Access to Information on September 28, 2019.
- Chief Information Commissioner and Information Commissioner addressed students,

lawyers and journalists in University of Punjab, LHC Bar Association and Lahore Press Club to create awareness about the Right of Access to Information Act 2017.

- Chief Information Commissioner and Information Commissioners visited Multan, Sakhar and Karachi and addressed seminars and conferences engaging students, journalists, lawyers, members of civil society in February, 2020.
- Chief Information Commissioner and Information Commissioners visited Upper Dir, Sawat and Bunair and addressed seminars and conferences engaging students, journalists, lawyers, members of civil society in September, 2020.
- Chief Information Commissioner and Information Commissioners participated in public events in Sakhar and Hyderabad Press Clubs, Federal Urdu University, Karachi, University of Karachi, State Bank of Pakistan, Pakistan Broadcasting Association and civil society events in Karachi in November 2021.



5.3 Media Coverage

The print and electronic media has been covering orders of the Commission. The commissioners also made efforts to positively explain the challenges, especially in the face of delay in establishing the office, and highlighted the achievements of the Commission.

Fighting for the poor through RTI law

By Umar Cheema

ISLAMABAD: Naeem Sadiq has a passion and that is for the poor. While politicians and TV pundits talk about the poor doing little to nothing for them, he talks with the poor in order to check how they are doing. Low-paid employees are persons of his interest. Whether they are paid the minimum legal wage or not remains his main concern.

A Karachiite by location and a management consultant

by profession, Naeem visits different government offices to speak with the sanitary workers and security guards. And then he uses the Right to Information (RTI) law to gather details of the amount promised in the contract and if it is being denied. Efforts of this one-man brigade have already resulted in the implementation of minimum wage in all the 45 cantonments.

Employees Old-Age Benefit Institution (EOBI) was his next target. He paid a visit

there last year and came to know that the minimal wages ranged between Rs15,000 to Rs18,000 in an institution whose primary function was to protect workers' rights by enrolling them for pension and directing their employers in the private and public sector to pay for their pension funds. The minimal legal wage announced by the government is Rs25,000 but it is rarely implemented.

Continued on page 9

6. Appeals

One of the most important functions of the Commission is to receive and decide complaints about, among others, wrongful denial or delay in providing access to information.

6.1 Status of Appeals

The PIC received a total of 2474 Appeals, out of which 2153 were received via post and whereas 321 were received via Email through Information Management System, developed by the commission to facilitate citizens to file appeals online. Out of these, 1030 were resolved and the requested information was provided to the appellants to their satisfaction and Case Closure certificates were shared with both the Appellants and the Respondents.

The commission issued notices and held hearings on these appeals three days of every week. The commission facilitated citizens in exercising their right to information through summons to public officials and where necessary issues Orders.

Of the total of 2474 appeals filed by citizens, the commission received, 154, the highest number of appeals against the Ministry of Defence and its attached departments, followed by 60 appeals which were filed against the Ministry of Finance. Fifty-one Appeals were filed against each of CDA and FIA and 50 appeals were filed against each of Cabinet Division and FBR. Forty-nine appeals were filed against Ministry of Law and Justice and 49 appeals were filed against the Supreme Court of Pakistan and Islamabad High Court. Forty-six appeals were filed against each of Establishment Division and NADRA followed by 43 against NAB, 42 against Ministry of Information and Broadcasting. Forty-one appeals were filed against each of Ministry of Foreign Affairs and Ministry of Energy followed by 40 appeals against each of

ECP and Ministry of Interior. Thirty-seven appeals were filed against HEC, 35 against IESCO, 30 against FPSC and 29 appeals were filed against each of National Assembly Secretariat and PM Secretariat. Twenty-eight appeals were filed against each of AIOU and Senate Secretariat and 25 each against Ministry of Federal Education and Professional Training and SNGPL followed by 24 against Ministry of Climate Change, 23 against NBP and 22 against NTCL. Twenty-one appeals were filed against each of SBP and OGDCL and 20 appeals were filed against Ministry of Human Rights.

The analysis of the appeals filed by citizens reveals that most of the requests pertained to the enquiry reports against officials, certified copies of the merit lists of candidates and recruitment criteria, contracts signed by public bodies to hire services of sanitary workers and security guards through third party contractors, number of FIRs filed under different provisions of Cyber law and number of convictions, total number of sanctioned and vacant posts in different public bodies and the quota for the disabled and transgender persons.

Citizens also filed appeals to get access to finalized audit paras and audit reports of public bodies, information about legislative bills laid in the Parliament, information about the publications pertaining to the asset details submitted by Parliamentarians to Election Commission of Pakistan, information available with NADRA about total number of CNIC issued to women, and the total number of transgender persons and people with disabilities in the country, details of assets of judges and officers and salaries, perks, privileges and benefits of judges, civil and military officers.

These appeals suggest that, through the exercise of their right of access to information in matters of public importance, citizens aim at realizing their other rights like access to justice, gainful employment on equal basis by ensuring judicious utilization of public funds, improving governance, reducing corruption and inefficiency in public bodies through transparency and public accountability.

6.2 Nature of Appeals

In the first year of the establishment of the commission, most of the appeals were about non-response by relevant officers or public bodies to the applications submitted by citizens for access to information. In some cases, appeals were also received about wrongful denial of the requested information or about the supply of wrong, incomplete or misleading information.

As the Commission started persistently pursuing the resolution of the appeals, the public bodies have started responding to the requests for information of the citizens. Even when the public bodies started responding to the requests for information under the Act, the tendency has been observed to refer to the exemption clauses of the Act rather than interpreting the Act to disclose the information. Owing to the detailed judgements of the commissions, the stage has come where public bodies have started understanding the provisions of the Act. However, it will take time for public bodies to understand the significance of the disclosure of information in terms of improving good governance through transparent functioning of the public bodies.

The data shows that a large number of appeals were submitted by a relatively fewer number of individuals including journalists and civil society activists. With the passage of time, however, individuals from other segments of society, such as lawyers and retired or serving government employees, have also started filing applications for Access to information and then complaints.

A careful review of available data underlines the need of massive public awareness campaigns

to explain to the people the procedure, which they needed to follow to file applications for access to information request or submit a complaint to the Commission.

6.3 Response of Public Bodies to the Commission

The challenges in terms of the response of public bodies can be summed up as follows:

- In cases where the commission has held hearings against the public bodies earlier for not responding to requests for information, the public bodies have started responding but often respond rely on exemption clauses without referring to disclosure clauses of the Act. As such, there is delay by public bodies in providing access to information which should ordinarily be provided to the citizens. The Commission, on its part, imposed penalties against officers, who delay disposal of information requests beyond the prescribed timeframe, but penalties alone may be counter-productive until and unless heads of public bodies make simultaneous efforts to create an enabling environment for disclosure of information.
- Information requests and Commission's direction are seen as undue interference in the so-called "official" work. The importance of citizens' rights and involvement in governance process in a democratic society is not adequately understood.
- Earlier, most public bodies have either not designated PIOs or have not taken steps to widely share information about the contact details of designated PIOs. As a result, the applicants, as well as the Commission, have to mostly interact with heads of public bodies. In cases where public bodies have designated PIOs, direct communication with designated PIOs is helping in the more efficient management of information requests as well as appeals. However, a large number of public bodies have neither designated PIOs nor put their contact details on their web sites.
- Most designated PIOs and other officers have not received any training about the importance of the right to information, transparency or public participation in governance.

6.4 Orders of the Commission

The Commission has issued a total of 656 detailed orders on the appeals filed by citizens against federal public bodies for delaying or unlawfully denying access to information. The highest number of orders, 58, were issued against the Ministry of Defence and its attached departments. Twenty Orders were issued against CDA followed by 16 against FBR and 14 against Ministry of Interior. Thirteen Orders were issued against each of FIA and NBP followed by 12 each against Ministry of Law and Justice and Ministry of Foreign Affairs. Eleven Orders were issued against each of NADRA and ECP and 10 each against National Assembly Secretariat and AIOU.

Citizens are finding it difficult to get information from federal public bodies, be it constitutional bodies, federal ministries, commissions, educational institutions, electric supply companies, regulatory bodies or different commissions.

Public Body	Appeals	Orders
Ministry of Finance	60	8
Ministry of Defence and attached deaprtments	156	58
Capital Development Authority	51	20
Federal Investigation Agency (FIA)	51	13
Cabinet Division	50	16

Federal Board of Revenue	50	16
Ministry of Law and Justice	49	12
Establishment Division	46	8
National Database & Registration Authority- NADRA	46	11
National Accountability Bureau- NAB	43	9
Ministry of Information and Broadcasting	42	7
Ministry of Energy	41	6
Ministry of foreign Affairs	41	12
Election Commission of Pakistan	40	11
Ministry of Interior	40	14
Registrar Office, Supreme Court of Pakistan	47	4
Higher Education Commission	37	7
Islamabad Electric Supply Company- IESCO	35	2
Federal Public Service Commission	30	7
National Assembly	29	10
Prime Minister Office	29	5
Allama Iqbal Open University- AIOU	28	10
Senate of Pakistan	28	7
Ministry of National Health Service Regulations and Coordination	26	8
Ministry of Federal Education and Professional Training	25	5
Sui Northern Gas Pipeline Limited-- SNGPL	25	8
Ministry of Climate Change	24	5
National Bank of Pakistan	23	13
National Transmission & Dispatch Company	22	3
Oil & Gas Development Company Ltd-- OGDCL	21	3
State Bank of Pakistan	21	3
Ministry of Human Rights	20	5

6.4.1 Public Interest Orders of the Commission

Following Orders of the commission have not only contributed to the transparent functioning of the federal public bodies, but these Orders have also contributed to the realization of fundamental rights of the citizens.

6.4.2 Third party contracted employees and the minimum-wage issue:

After a citizen linked the right of access to information in matters of public importance with the issue of minimum wage of janitorial staff, hired through third party contractors and performing duties in different public bodies, Civil Aviation Authority, Six Cantonment Boards in Karachi and CDA has started paying minimum wages to its janitorial staff. He has filed information requests to various federal public bodies seeking proof of minimum wage paid to the staff and also the provision of allied facilities according to the laws of the land. On his appeals lodged with this commission, through its different Orders this commission has held that public bodies are bound to keep record of the means of verification pertaining to the minimum wage paid to the staff even if their services are hired through third-party contractors to ensure that public funds are spent in accordance with the laws of the land.

6.4.3 Constitutionality of right to information and disclosure of information about Salary, perks, privileges and plots allotted to the judges of superior judiciary

The Commission has held in Dr. Abdul Hameed Nayyar and Others Vs Ministry of Law and Justice that the exercise of constitutional and statutory right of citizens in matters of public

importance through the Act is neither likely to, nor, designed to curtail independence of the superior judiciary. The commission directed Public Information Officer, Ministry of Law and Justice to share with Appellants all notifications pertaining to the following:

Perks and privileges of Honourable Chief Justice and Honourable Judges of the Supreme Court of Pakistan and Islamabad High Court.

Pension and post retirement benefits of Honourable Chief Justice and Honourable Judges of the Supreme Court of Pakistan and Islamabad High Court

Plots allotted in any scheme administered by the government or a state owned or controlled statutory body, foundation, company or agency received by the Honourable Chief Justice and Honourable Judges of the Supreme Court of Pakistan and Islamabad High Court

6.4.4 Constitutionality of right to information and Constitutional Institutions

The commission through its different Orders has also interpreted that the Right of Access to Information Act 2017 is also applicable to constitutional bodies. The Registrar, Supreme Court of Pakistan filed application with the commission to review its Order and the commission disposed of the application maintaining that the commission did not have the powers to review its own Orders. The Registrar, Supreme Court has filed petition in IHC against the decision of the commission. Auditor General of Pakistan, also constitutional body has been responding to the requests for information of citizens as well as notices of this commission whereas ECP and President Office has filed petitions in the Islamabad High Court against the Orders of the commission, challenging jurisdiction of the commission which are pending decision. However, the Senate Secretariat has neither implemented nor challenged Orders of the commission.

6.4.5 Attorney-client privileged communication and Disclosure of information about fee paid to lawyers from public funds

The commission through its different Orders has held that the attorney - client privileged communication does not cover legal fees paid to the lawyers from public funds.

The Commission also maintained that when a public body procures services of an individual or a firm/company, it enters into a contract for the delivery of services against a certain amount which is paid through public funds.

6.4.6 Pakistan Medical Commission and disclosure of information to patients

In Appeal No 175-11/2019, Ms. Nadia Naeem Vs. Pakistan Medical Commission, issued on July 14, 2021, the commission held that any record that can be submitted to a regulatory body, or, the regulatory body is empowered to get access to the record, is record/information for the purposes of this Act and can be shared with the applicants/appellants, if warranted by the provisions of the Act. The record requested in the instant appeal, the commission observed, is a matter of public importance as it belongs to the life of a citizen and the quality of healthcare services provided to citizens. The commission also held that a patient does not only have the right to have access to records about the patient, but the patient has also the right of access to all information/records available with the hospital about the patient, including opinions of the medical staff/doctors.

6.4.7 Proactive disclosure of information about rights of all passengers, including passengers with different disabilities

In one of its Orders, the Commission observed that Civil Aviation Authority, (CAA) is responsible to ensure that information about the rights of passengers is disseminated through all channels of communication which the airlines employ for transaction of business with their passengers. As such, the Respondent should ensure airlines make available information about the rights of passengers through their web sites, electronic and printed tickets and airlines counters.

The Commission also maintained that the ability to exercise the right of access to information by passengers with different disabilities is dictated by the nature of their different disabilities. As such, it is responsibility of the Respondent, CAA to ensure that both the content and the design of the web sites of CAA and those of airlines is accessible and that information about rights of passengers should be provided catering to the special needs of passengers with different disabilities.

The Commission directed Director General, Civil Aviation Authority to ensure that:

information about the rights of passengers is prominently displayed at airports, on its web site and that passengers are apprised about their responsibilities as well as their rights through Public Address Systems;

airlines make available information about the rights of passengers through their web sites, electronic and printed tickets and at airlines counters; and

both ground staff and the plane crew are apprised of the rights of passengers with different disabilities.

6.4.8 Declaration of SNGPL and Islamabad Club as Public Bodies

Through its different Orders, the commission has declared Sui Northern Gas Pipeline Limited, Pakistan Cricket Board and Islamabad Club to be public bodies. In its Order against SNGPL, the commission maintained that the Respondent receives public funds from national exchequer for the development of infrastructure for Transmission, Distribution and Sale of gas.

The commission held that SNGPL is also a public body as according to its own web site, the President of Pakistan has more than 31 percent shares in SNGPL.

In its Order against Islamabad Club, the commission held that the copies of the pay orders in favour of CDA paid by the club reflect that an amount of Rs. 14,700/- on account of Annual Lease Rent of Islamabad Club land and Rs. 12,300/- on account of Annual Lease Rent of Polo Ground & Extension of golf Course for the year 2020-21 has been deposited in favour of the CDA. The lease agreement is a contract for the exclusive possession of land for life, for term of years, at will, or for any interest, usually for a specified rent or compensation. The club is thus utilizing the government land, on lease, under its use. On this score alone the club comes within the definition of “public body” as mentioned in section 2(ix)(h) of the Act. Both SNGPL

and Islamabad Club have challenged Orders of the commission in Islamabad High Court.

6.4.9 Declaration of academic degrees, experience certificates, answer sheets of short-listed candidates, selection criterion, merit list allotted marks and remarks of the interview committee members as public records

Through its various Orders, the commission has held that academic degrees, experience certificates of short-listed candidates, selection criterion, merit list allotted marks and remarks of the interview committee members are public records and should be provided to citizens to ensure transparency in the recruitment of government jobs.

6.4.10 Disclosure of Records Governing Retirement benefits of Army officers

In the case of Farhat Ullah Babar Vs. Ministry of Defence, the commission held that these records pertain to categories of records to be proactively published under Section 5 (1) (b) and (e) of the Act, 2017. The commission also held that the Act, Rules and Regulations governing retirement benefits of Army officers have no nexus with defence preparedness. The commission also maintained that Act, Rules and Regulations governing retirement benefits of Army officers pertain to the welfare activities which are not excluded under Section 7 (e) of the Act, 2017.

6.4.11 Proactive disclosure of records/reports older than 20 years

In one of its Orders, the commission has held that all reports that are more than 20 years old are public records. The Commission also held that while all federal public bodies are required to proactively publish all finalized reports, some of these reports, or, some parts thereof may be exempted from disclosure on legitimate security or other concerns. However, these concerns need to be articulated through the recorded reasons of the Minister-in-Charge and submitted before this commission to determine that the harm from disclosure outweighs public interest. Moreover, there is no blanket exemption to any finalised report.

6.4.2 Information accessibility for persons with disabilities

Through its different Orders, the commission has held that the information proactively published under Section 5 of the Right of Access to Information Act 2017 should be ‘accessible’ for all citizens, including the blind, low-vision, physically disabled, speech and hearing impaired and people with other disabilities. The commission has maintained that apart from the interpretation of ‘accessible’ in section 5 of the Act, section 15 (5) of the ICT Rights of Persons with Disabilities Act 2020 requires federal public bodies to ensure accessibility of web sites to the special needs of persons with disabilities and it is as under:

“The government shall ensure that all websites hosted by Pakistani website service providers are accessible for persons with disabilities”.

The Commission has observed that federal public bodies should start taking seriously the accessibility of the web sites as well. The web sites of public bodies should be accessible to level AA of Web Content Accessibility Guidelines (WCAG) 2.1 (of W3C).

The public bodies should ensure incorporation of web accessibility standards in the design of their web sites. In this connection, the commission has developed ‘Web Accessibility Checklist’ which is available on its web site and the commission has been directing federal public bodies to ensure accessibility of their web sites for persons with disabilities as well.

6.4.5 Directions on appeals pertaining to proactive disclosure of information

Using template developed by the commission, a citizen filed requests for information to federal public bodies seeking information proactively published on their web site as required under Section 5 of the Act. On the appeals lodged by this citizen, the commission has issued 9 detailed Orders against the federal public bodies pertaining to the proactive disclosure of information. The following table contains details of these Orders.

S. No.	Appeal No.	Title of the Order
1	786-12/20	Syed Kausar Abbas Vs Ministry of Planning Development and Reforms
2	784-12/20	Syed Kausar Abbas Vs Ministry of Interior
3	793-12/20	Syed Kausar Abbas Vs National Highways Authority
4	796-12/20	Syed Kausar Abbas Vs Ministry of Law and Justice
5	787-12/20	Syed-Kausar-Abbas-Vs-Ministry-of-Industries-and-Production
6	781-12/20	Syed-Kausar-Abbas-Vs-Ministry-of-Religious-Affairs
7	798-12/20	Syed-Kausar-Abbas-Vs-Ministry-of-Science-and-Technology
8	788-12/20	Syed-Kausar-Abbas-Vs-Ministry-of-Narcotics-Control
9	801-12/20	Syed-Kausar-Abbas-Vs-Ministry-of-Railways

The key features that emerge from these Orders are as under:

6.4.5.1 Explanation of the categories of proactive disclosure of information

Through these Orders, the commission has also further explained to officers of the federal public bodies the categories of information under Section 5 to be proactively published through web sites. For example, the commission has clarified that the directory of officers should contain information about total sanctioned posts, filled/vacant posts, and the responsibilities of officers of the public body. About the recipients of the benefits from the public body, the commission has explained that the web site should contain list. Regarding the prescribed fee to be charged for providing information to citizens, the commission has explained that the federal bodies should publish on their web sites of Schedule of costs, developed by Pakistan Information Commission, (available on the commission’s web site) for seeking information from federal public bodies. Regarding the particulars of the Public Information Officer, the commission has clarified that the federal public bodies should put name, designation, title, E-mail and telephone number of the PIO on its web site.

6.4.5.2 Observations about the benefits of proactive disclosure of information

Through these Orders, the commission has dwelt upon the benefits of each category of information to be proactively disclosed through web site. These include: resolving the issue of under-staffing, dissemination of information about licenses, permits, consents, approvals, grants, allotments etc, dissemination of information about agreements and contracts, dissemination of information about the recipients of concessions, permits,

licenses or authorizations granted by public bodies, improving public participation in decision making processes, dissemination of information about budgetary allocations and spending, dissemination of information about Public Information Officers and information-seeking methods, disclosure and dissemination of enquiry, investigative, evaluation and all other finalised reports.

6.4.6 Directions to public bodies seeking compliance reports through template for the proactive disclosure of information

The Commission has developed, available on its web site, template for proactive disclosure of information which states that the implementation of Section 5 of the Act can only be ensured if federal public bodies continuously juxtapose categories of information enlisted in section 5 with the information provided on the web sites. In more than 100 out of a total of 336 detailed Orders issued against different public bodies so far, the commission has issued directions to federal public bodies to submit compliance report to the commission in the format provided in the template.

6.4.7 Directions for designation of PIOs and implementation of Section 5

In all most all the Orders of the commission, federal public bodies are directed to implement Section 5 of the Act and in cases where a public body has not designated PIO, the commission issues directions for the designation of the PIO through its Orders. Furthermore, the commission directs the public bodies to submit compliance report within a specific time period, generally one month from the receipt of the Order.

6.5 Status of Orders of the Commission Challenged in High Courts

So far, a total of 73 Orders of the commission have been challenged in High Courts. Of these, 5 Orders of the commission have been upheld whereas 2 have been reversed and 1 has been disposed of. The five Orders of the commission that have been upheld are: Appeal No. 463/08/2020, Abdul Samad Sarla-Vs-National Bank of Pakistan, 888-02/2021, Kashif Ali-Vs-Oil and Gas Development Company, 1490-11/2021, Abdullah Rashid-Vs-Pakistan Housing Authority Foundation, 437-07/2020, Tariq Bashir-Vs-National Accountability Bureau, 052-06/2019, Mukhtar Ahmed Ali-Vs-Federal Board of Revenue and 1563-12/2021, Rana Abrar Khalid Vs Cabinet Division.

Islamabad High Court has reversed 2 Orders of the Commission and these are in Appeal No. 954-03/21 in the case of Muhammad Rehan Paracha VS PTCL A and in Appeal No. 813-12/20 in the case of Amer Ejaz VS Comsats University. In the case of Appeal NO. 936-03/2021 in the case of Muhammad Nawaz Vs Survey of Pakistan, the Appellant approached IHC for implementation of the Order of the commission which was disposed of by the IHC.

A total of 36 Orders of the commission have been suspended whereas in case of 29 Orders, notices have been issued to the Respondents and proceedings are taking place in the relevant High Courts.

Instead of implementing the Order of the commission or challenging in Islamabad High Court, as required under the Act, Senate Secretariat sent a letter to the commission stating that “Chairman, Senate is authorized to declare any, or, all record of the Senate Secretariat as classified”. The information requested from Senate Secretariat pertained to total number of sanctioned and vacant posts, quota for the disabled etc. which the commission declared to be public information under the Right of Access to Information Act 2017.

Order of the Commission Challenged in High Courts.

SR	Court	Petition Institution Date	Writ Petition Number	Writ Petition Case Title	BENCH	Order Status	PIC Appeal No.	PIC Appeal Title	Order Issue Date
31	Lahore	29-09-2020	W.P. 2782/2020 Misc. Other (SB)	National Bank of Pakistan-Vs-Pakistan Information Commission & others		upheld	463-09-2020	Abdul Samad Sarla-Vs-National Bank of Pakistan	
40	Islamabad	6-8-2022	W.P. 2888/2022	Muhammad Nawaz-Vs-Secretary Finance Division	Mr. Justice Ahsan Muhammad Tahir	disposed of	956-05-2021	Muhammad Nawaz-Vs-Survey of Pakistan	6.10.2020
5	Islamabad	3-5-2021	W.P. 1625/2021	Comsats University Islamabad-Vs-Pakistan Information Commission Islamabad etc	Mr. Justice Mangal Hassan Aurangzeb	Dismissed	813-12-2020	Amer Ehsa-Vs-Comsat University	10.6.2021
26	Islamabad	27-07-2021	W.P. 2688/2021	PTCL-Vs-Pakistan Information Commission etc	Mr. Justice Mubashir Akhtar Kayani	Dismissed	954-03-2021	M. Rahan Paracha-Vs-Pakistan Telecommunication Company Ltd	9.2.2021
6	Islamabad	18-05-2022	W.P. 1738/2022	Tariq Mahmood-Vs-Pakistan Information, etc	Mr. Justice Ameer Farooq	Notice Issued			25.5.2021
11	Islamabad	21-01-2021	W.P. 246/2021	ISGPL-Vs-Muhammad Wasim Ellahi & others	Mr. Justice Ahsan Muhammad Tahir	Notice Issued	243-01-2020	Devan Adnan Amlak-Vs-Sin Northern Gas Pipeline Ltd	14.12.2020
12	Islamabad	20-09-2021	W.P. 3357/2021	Saima Tasneem-Vs-FIA & others	Mr. Justice Ameer Farooq	Notice Issued	455-06-2020	Saima Tasneem-Vs-PPRA Board Member	13.01.2021
13	Islamabad	7/7/2021	W.P. 2455/2021	International Islamic University-Vs-Pakistan Information Commission	Mr. Justice Mangal Hassan Aurangzeb	Notice Issued			
17	Islamabad	25-04-2022	W.P. 1438/2022	FBR-Vs-Pakistan Information Commission etc	Mr. Justice Mangal Hassan Aurangzeb	Notice Issued	242-01-2020	Pervez Said-Vs-Federal Board of Revenue	7.2.2022
18	Islamabad	26-07-2021	W.P. 3674/2021	Shahid Nawaz-Vs-BEC, etc	Mr. Justice Ameer Farooq	Notice Issued			2.10.2020
23	Islamabad	3-10-2020	W.P. 2833/2020	Ministry of Interior etc-Vs-Pakistan Information Commission etc	Mr. Justice Ameer Farooq	Notice Issued	273-02-20	Moonis Khan Zahra-Vs-Ministry of Interior	2.10.2020
25	Islamabad	11-1-2022	W.P. 97/2022	Muhammad Ali -Vs-FOP, etc	Mr. Justice Ameer Farooq	Notice Issued			
29	Islamabad	3-6-2020	W.P. 1485/2020	FOP-Vs-Pakistan Information Commission etc	The Honorable Chief Justice	Notice Issued	049-06-2019	Mukhtar Ahmed Ali-Vs-President Secretariat	11.01.2022
30	Islamabad	20-09-2020	W.P. 2285/2020	ISGPL-Vs-Muhammad Wasim Ellahi etc	Mr. Justice Ghulam Azam Qureshi	Notice Issued	243-01-2020	Devan Adnan Amlak-Vs-Sin Northern Gas Pipeline Ltd	14.12.2020
34	Islamabad	26-03-2022	W.P. 940/2022	Cabinet Division, -Vs-PIC	Mr. Justice Mangal Hassan Aurangzeb	Notice Issued	1457-11-2021	Pervez Said-Vs-Cabinet Division	11.01.2022
36	Islamabad	15-09-2021	W.P. 3247/2021	Government of Pakistan-Vs-Pakistan Information Commission etc	Mr. Justice Mangal Hassan Aurangzeb	Notice Issued	1457-11-2021	Pervez Said-Vs-Cabinet Division	11.01.2022
37	Islamabad	15-09-2021	W.P. 3247/2021	Government of Pakistan-Vs-Pakistan Information Commission etc	Mr. Justice Mangal Hassan Aurangzeb	Notice Issued	810-12-2020	Raza Akbar Khalid-Vs-Cabinet Division	26.01.2021
38	Islamabad	9-11-2020	W.P. 3355/2020	Administrative Islamabad Club through Secretary Islamabad Club-Vs-Pakistan Information Commission etc	Mr. Justice Ameer Farooq	Notice Issued	341-02-2020	Nadeem Umar-Vs-Islamabad Club	19.8.2020
42	Islamabad	9-5-2022	W.P. 1597/2022	FOP-Vs-Pakistan Information Commission etc	The Honorable Chief Justice	Notice Issued	1544-12-2021	Mariam Malik-Vs-Prime Minister's Office	7.3.2022
44	Islamabad	7-4-2022	W.P. 691/2022	FOP-Vs-Pakistan Information Commission etc	The Honorable Chief Justice	Notice Issued	1501-11-2021	Mariam Malik-Vs-Prime Minister's Office	7.2.2022
45	Islamabad	10-11-2021	W.P. 3934/2021	ISGPL -Vs- Muhammad Iqbal etc	The Honorable Chief Justice	Notice Issued	1139-06-2021	Muhammad Iqbal-Vs-Sin Northern Gas Pipeline Ltd	30.8.2021
47	Lahore	27-01-2022	W.P. 4830/2022	Pakistan Cricket Board -Vs-PIC and others		Notice Issued	1234-07-2021	Syed Raza Ali Shah-Vs-Pakistan Cricket Board	15.12.2021
48	Lahore	9-5-2022	W.P. 4839/2022	Pakistan Cricket Board -Vs-PIC and others		Notice Issued	1233-07-2021	Syed Raza Ali Shah-Vs-Pakistan Cricket Board	15.12.2021
49	Lahore	28-02-2022	W.P. 1208/2022	ZAHID HUSSAIN WAHEED -Vs-DHA, etc		Notice Issued	896-01-2021	Munhaq Ahmed Khan-Vs-Pakistan Citizen Raza	27.07.2022
50	Lahore	14-04-2022	W.P. 2270/2022	PASISCO-Vs-Pakistan Information Commission, etc		Notice Issued	1397-10-2021	Abdul Wahid-Vs-PASISCO	08.04.2022
54	Lahore	28-04-2022	W.P. 13802/2021	NBP-Vs-Pakistan Information Commission, etc		Notice Issued	549-08-2020	Nasim ul Haq-Vs-National Bank of Pakistan	02.06.2021
55	Lahore	6-27-2022	W.P. 2782/2022	NBP-Vs-Pakistan Information Commission, etc		Notice Issued	033-09-2019	Abdul Samad Sarla-Vs-National Bank of Pakistan	05.09.2019
56	Peshawar	1-2-2022	W.P. 3839/2021	FBR, Pak Information Commission and others		Notice Issued	971-04-2021	Tariq Jamil-Vs-Federal Board of Revenue	26.7.2021
66	Islamabad	14-7-2021	W.P. 2545/2021 Misc. Other (SB)	Fahsen Ullah Jan-Vs-Pakistan Information Commission, etc	Mr. Justice Mangal Hassan Aurangzeb	Notice Issued			
72	Islamabad	12-1-2021	W.P. 4284/2021 Misc. Other (SB)	Registrar Supreme Court of Pakistan-Vs-Pakistan Information Commission, etc	The Honorable Chief Justice	Notice Issued	060-06-2019	Mukhtar Ahmed Ali-Vs-Supreme Court of Pakistan	12.07.2021
76	Islamabad	19-9-2022	W.P. 855/2022 Misc. Other (SB)	National Bank of Pakistan-Vs-Tariq Badar	Mr. Justice Tariq Mahmood Jahangiri	Notice Issued	964-06-2021	Syed Tariq Badar-Vs-National Bank of Pakistan	07.12.2021
1	Islamabad	6-10-2020	W.P. 2884/2020	FOP-Vs-Pakistan Information Commission through its Chief Information Commissioner Islamabad	Mr. Justice Ameer Farooq	Stay Granted	294-02-2020	Shahzad Ahmed Khan-Vs-Cabinet Division	27.08.2020
2	Islamabad	23-08-2021	W.P. 2969/2021	POLITAN-Vs-FOP, Mo Information & others	Mr. Justice Ameer Farooq	Stay Granted	949-03-2021	Nasim Sadiq-Vs- Pakistan State Oil (PSO)	5.7.2021
3	Islamabad	23-08-2021	W.P. 2969/2021	PIO LT&S-Vs-FOP, Mo Information & others	Mr. Justice Ameer Farooq	Stay Granted	1136-12-2021	Kashif Ali-Vs- Pakistan State Oil (PSO)	check
4	Islamabad	9-9-2021	W.P. 3188/2021	FOP-Vs-Pakistan Information Commission, etc	Mr. Justice Ameer Farooq	Stay Granted	856-01-2021	Muhammad Tariq Khan-Vs-Ministry of Commerce and Textile	2.8.2021
7	Islamabad	15-07-2021	W.P. 2575/2021	FOP-Vs-Pakistan Information Commission etc	Mr. Justice Ameer Farooq	Stay Granted	910-02-2021	Khalid Hussain-Vs-Ministry of Law and Justice	28.04.2021
8	Islamabad	7-5-2022	W.P. 1534/2022	PPSC-Vs-FOP, Mo Information	Mr. Justice Tariq Mahmood Jahangiri	Stay Granted			
9	Islamabad	7-5-2022	W.P. 1534/2022	Directorate General, Intelligence & Investigation, Customs-Vs-Chief Information Commissioner, & others	Mr. Justice Sana Raza Inayat Khan	Stay Granted	1280-08-2021	Ibrahim Shah-Vs-Federal Board of Revenue	14.08.2022
10	Islamabad	14-02-2022	W.P. 499/2022	International Islamic University-Vs-Pakistan Information Commission	Mr. Justice Mangal Hassan Aurangzeb	Stay Granted	E154-09-2021	Munhaq Ahmed Khan-Vs-International Islamic University	26.01.2022
14	Islamabad	30-04-2022	W.P. 1542/2022	Federal Public Service Commission-Vs-FOP etc	Mr. Justice Tariq Mahmood Jahangiri	Stay Granted	1365-10-2021	Yasmin Shabir Bano-Vs-Federal Public Service Commission	11.1.2022
15	Islamabad	9-8-2021	W.P. 2836/2021	PIO Co. Ltd-Vs-FOP, Mo Information	Mr. Justice Ameer Farooq	Stay Granted	675-10-2020	Mian Saleh Hussain-Vs-Pakistan State Oil	7.6.2021
16	Islamabad	22-7-2022	W.P. 360/2022	Pakistan Software Export Board Ltd-Vs-FOP, etc	Mr. Justice Ameer Farooq	Stay Granted	1425-11-2021	Sajid Iqbal-Vs-Pakistan Software Export Board	18.01.2022
19	Islamabad	29-03-2022	W.P. 990/2022	FOP-Vs-Chief Information, etc	Mr. Justice Ameer Farooq	Stay Granted	662-10-2020	Shahid Fayaz Ahmed-Vs-Mo's Consumer Affairs & GB	14.01.2022
20	Islamabad	13-7-2022	W.P. 749/2022	PHA Foundation-Vs-PIC & others	Mr. Justice Mangal Hassan Aurangzeb	Stay Granted	1490-11-2021	Abdullah Rashid-Vs-Pakistan Housing Authority Foundation	19.01.2022
22	Islamabad	20-03-2021	W.P. 1123/2021	Establishment Division-Vs-Pakistan Information Commission & others	Mr. Justice Ameer Farooq	Stay Granted	761-12-2020	Nadeem Umar-Vs-Establishment Division	17.02.2021
23	Islamabad	21-06-2021	W.P. 2190/2021	Secretary Establishment Division-Vs-Pakistan Information Commission Islamabad	Mr. Justice Ameer Farooq	Stay Granted	295-02-2020	Shahzad Ahmed Khan-Vs-Establishment Division	20.05.2021
27	Islamabad	14-02-2022	W.P. 499/2022	International Islamic University-Vs-Pakistan Information Commission & others	Mr. Justice Mangal Hassan Aurangzeb	Stay Granted	E148-09-2021	Muhammad Amir-Vs-International Islamic University	10.02.2022
28	Islamabad	30-04-2022	W.P. 1541/2022	Federal Public Service Commission Islamabad-Vs-FOP etc	Mr. Justice Tariq Mahmood Jahangiri	Stay Granted	1314-09-2021	Syed Kamal Shah-Vs-Federal Public Service Commission	09.11.2021
31	Islamabad	11-5-2022	W.P. 1385/2022	FOP-Vs-Pakistan Information Commission, etc	Mr. Justice Ameer Farooq	Stay Granted	937-02-2021	Khalid Hussain-Vs-Ministry of Law and Justice	27.12.2021
32	Islamabad	30-08-2022	W.P. 3174/2022	Pakistan Institute of Development Economics-Vs-FOP, OI others	Mr. Justice Mubashir Akhtar Kayani	Stay Granted	8253-04-2022	Ashraf Akram-Vs-Pakistan Institute of Development Economics	26.07.2022
33	Islamabad	6-1-2022	W.P. 41/2022	State Engineering Corporation Management Petition Fund-Vs-Pakistan Information Commission	Mr. Justice Ameer Farooq	Stay Granted	1372-10-2021	Adilq Ali Shah-Vs-State Engineering Corporation	21.12.2021
35	Islamabad	14-07-2022	W.P. 2603/2022	Secretary, ICAAP-Vs-Secretary, Mo Information etc	Mr. Justice Ameer Farooq	Stay Granted	1717-01-2022	Raza Raza Hashim-Vs-Institute of Chartered Accounts of Pakistan	01.06.2022
39	Islamabad	22-06-2022	W.P. 2331/2022	Pakistan Software Export Board (Government) Ltd -Vs-Federation of Pakistan through Secretary Mo Information & Broadcasting, etc	Mr. Justice Ameer Farooq	Stay Granted	1425-11-2021	Sajid Iqbal-Vs-Pakistan Software Export Board	18.01.2022
42	Islamabad	13-06-2022	W.P. 1304/2022	Pakistan Nursing Council-Vs-Pakistan Information Commission	Mr. Justice Mangal Hassan Aurangzeb	Stay Granted	1305-12-2021	Waqar Ali-Vs-Pakistan Nursing Council	08.02.2022
52	Lahore	10-28-2021	W.P. 13584/2021	National Bank of Pakistan-Vs-Pakistan Information Commission etc	Mr. Justice Muhammad Raza Qureshi	Stay Granted	1065-05-2021	Mughes Raza Malik-Vs-National Bank of Pakistan	23.8.2021
53	Lahore	21-04-2022	W.P. 4611/2022	Munir Ali Solangi-Vs-Pakistan Information Commission, etc		Stay Granted	651-10-2020	Muhammad Ayub-Vs-Multan Electric Supply Company	26.07.2021
57	Sindh, Karachi	27-10-2021	W.P. 2464/2021	Institute of Chartered Accountants of Pakistan-Vs-Pakistan Information Commission		Stay Granted	1368-08-2021	Jamil Akhtar Baig-Vs-Institute of Chartered Accounts of Pakistan	check
58	Sindh, Karachi	13-05-2022	W.P. 817/2022	Custodian Board Clifton-Vs-Pakistan Information Commission		Stay Granted	1578-12-2021	Ali Adil Muhammad-Vs-Custodian Board Clifton	08.4.2022
59	Islamabad	7-3-2020	W.P. 783/2020 Misc. Other (SB)	Election Commission of Pakistan-Vs-Pakistan Information Commission, etc	The Honorable Chief Justice	Stay Granted	232-12-2019	Nasim Sadiq-Vs-Election Commission of Pakistan	18.02.2020
60	Islamabad	7-9-2020	W.P. 784/2020 Misc. Other (SB)	Election Commission of Pakistan-Vs-Pakistan Information Commission, etc	The Honorable Chief Justice	Stay Granted	091-07-2019	Shahzad Ahmed Jandani-Vs-Election Commission of Pakistan	11.02.2020
61	Islamabad	25-3-2020	W.P. 963/2020 Misc. Other (SB)	Election Commission of Pakistan-Vs-Pakistan Information Commission, etc	The Honorable Chief Justice	Stay Granted	206-12-2019	Shahzad Ahmed Jandani-Vs-Election Commission of Pakistan	26.02.2020
62	Islamabad	25-9-2021	W.P. 964/2020 Misc. Other (SB)	Election Commission of Pakistan-Vs-Pakistan Information Commission, etc	The Honorable Chief Justice	Stay Granted	045-04-2019	Shahzad Ahmed Jandani-Vs-Election Commission of Pakistan	check
63	Islamabad	25-9-2022	W.P. 965/2020 Misc. Other (SB)	Election Commission of Pakistan-Vs-Pakistan Information Commission, etc	The Honorable Chief Justice	Stay Granted	205-12-2019	Shahzad Ahmed Jandani-Vs-Election Commission of Pakistan	03.09.2020
64	Islamabad	26-11-2020	W.P. 3564/2020 Misc. Other (SB)	Election Commission of Pakistan-Vs-Pakistan Information Commission, etc	The Honorable Chief Justice	Notice Issued	2889-04/22	Zahid ur Rehman-Vs Election Commission of Pakistan	09.09.2022
70	Lahore	14-10-2020	W.P. 50490/2022	National Transmission and Dispatch Company-Vs-Munhaq Ahmed Warraich, etc		Stay Granted	341-01-2020	Munhaq Ahmed Warraich-Vs-National Transmission and Dispatch Company	21.9.2020
71	Lahore	14-10-2020	W.P. 50490/2022	National Transmission and Dispatch Company-Vs-Munhaq Ahmed Warraich, etc		Stay Granted	482-08-2020	Munhaq Ahmed Warraich-Vs-National Transmission and Dispatch Company	21.9.2020
75	Islamabad	13-9-2022	W.P. 3400/2022 Misc. Other (SB)	Higher Education Commission-Vs-Pakistan Information Commission, etc	The Honorable Chief Justice	Stay Granted	1340-09-2021	Syed Ali Asghar Shah-Vs-Higher Education Commission	03.02.2022
65	Islamabad	28-7-2021	W.P. 2698/2021 Misc. Other (SB)	OGDCL-Vs-Pakistan Information Commission, etc	Mr. Justice Mangal Hassan Aurangzeb	Upheld	888-02-2021	Kashif Ali-Vs-Oil and Gas Development Company	7.6.2021
67	Islamabad	10-7-2021	W.P. 2491/2021 Misc. Other (SB)	Pakistan Housing Authority Foundation-Vs-Pakistan Information Commission, etc	Mr. Justice Badar Sattar	Upheld	1490-11-2021	Abdullah Rashid-Vs-Pakistan Housing Authority Foundation	19.01.2022
68	Islamabad	7-5-2021	W.P. 1750/2021 Misc. Other (SB)	Raza Asadullah Khan-Vs-Pakistan Information Commission	Mr. Justice Mangal Hassan Aurangzeb	Upheld	437-07-2020	Raza Asadullah Khan-Vs-National Accountability Bureau	29.10.2020
73	Islamabad	14-9-2019	W.P. 3080/2019 Misc. Other (SB)	Federal Board of Revenue-Vs-Pakistan Information Commission, etc	The Honorable Chief Justice	Upheld	952-06-2019	Mukhtar Ahmed Ali-Vs-Federal Board of Revenue	07.08.2021
74	Islamabad						1563-12-2021	Raza Akbar Khalid-Vs-Cabinet Division	30.05.2022

6.6 Orders and Transparency Standards

Through its detailed orders, the commission has established following principles under the Act:

- Bodies which receive any support in cash or kind by the federal government are public bodies as in the case of Islamabad Club.
- The principle of attorney-client privileged communication is not applicable when fees paid to the lawyers from public funds are involved.
- A PIO can only demand from an appellant production of CNIC when it is warranted by objective grounds, i.e. a request for information seems to have been filed from abroad.
- Public bodies have to record reasons for relying on an exemption clause and mere reference to an exemption clause does not mean that a public body has been able to establish burden of proof in accordance with the provisions of the Act;
- The Right of Access to Information Act 2017 overrides all other laws and exceptions of other laws are not applicable.
- The requested information can only be classified if the harm from disclosure outweighs public interest and it has to be established through the reasons recorded by the minister-in-charge.
- The word ‘accessible’ in Section 5 pertaining to the proactive disclosure of information through web sites means that information proactively disclosed through the web sites of the public bodies should be accessible to all citizens, including those with different disabilities and that the public bodies need to incorporate WCAG of W3C; and Noting’s on the file, minutes of the meetings and intermediary opinions are public documents if the requested information pertains to a matter about which final decision has already been made by the public body.
- The appeal seeking asset details of NAB employees, their children and spouses was dismissed as the commission held that harm to the legitimate privacy interests of NAB employees, their spouses and children far outweigh any public interest that the disclosure of the details of their assets may entail. However, NAB was directed to proactively disclose performance reports, audit reports, evaluation reports, inquiry or investigative reports and other reports pertaining to its employees that have been finalized through its web site.

7. Approval of Budget and Related Matters

When the Commission was established in November 2018, it started the process for the budget and staff for the commission. The terms and conditions of the information commissioners were not finalised at the time of their appointment. The draft summary of the terms and conditions of the Information Commissioners, budget for the commission was submitted to the Secretary Ministry of Information and Broadcasting. However, the summary was sent to the Prime Minister Office in March, after a lapse of more than 4 months. The decision on the terms and conditions of the Information Commissioners was taken by the Federal Cabinet in May 2019.

Since November 2018 to June 2019, the Information Commissioners kept on working without getting salaries. The commission also provided a list of officers and staff required for the smooth functioning of the commission to carry out its responsibilities. The Ministry of Information and Broadcasting sent the proposal of the required staff for the commission to the MS Wing of the Establishment Division in April 2019. The MS Wing approved the proposal with some amendments and the Ministry of Information and Broadcasting sent the proposal to the Ministry of Finance for the formal sanction of the posts for the commission. While the

commission has hired 6 staff members up to Grade 15, the Establishment Division has yet to approve service rules for the recruitment of the staff for Grades 16 and above through FPSC.

The Federal Government allocated Rupees 65.64 million for the commission in FY 2020-2021.

The commission was able to establish its office in June, 2020 after prolonged delays which has helped in performing its functions.

8. Challenges

The challenges faced by the Commission, which affected its performance in terms of ensuring citizens' access to information, are summarized below:

8.1 The Non-Serious Attitude of Federal Public Bodies

Federal public bodies do not seem serious in implementing the Act which is a serious challenge. Most public bodies have failed to implement their responsibilities in terms of proactive disclosure, (sec.5), the designation of Public Information Officers, (sec.9). and maintenance, indexing and computerization of records, (sec.4). In many cases, where PIOs have been designated, people don't know of their contact details, as the public bodies have failed to disseminate the same through notice boards or websites, despite reminders by the Commission through its letter's circulars.

8.2 Lack of public awareness

There is a general lack of awareness about the existence of the Right of Access to Information Act 2017 and it explains why a fewer number of people are exercising their right to information. Even journalists have filed very few requests although utility and effectiveness of the right to information laws in getting access to certified documents from public bodies are well established for investigative reporting. In the initial phase, owing to the unavailability of resources, the Commission could not launch a public awareness campaign through print and electronic media. The awareness campaign launched by the Commission on social media received positive feedback. However, a sustained awareness-raising campaign needs to be launched involving print, electronic and social media.

8.3 Lack of Staff

The Ministry of Information and Broadcasting provided 2 Naib Qasid, 1 Driver, 1 Assistant and 1 Steno-typist through internal arrangement but this staff is not enough to carry out roles and responsibilities of the commission. The Commission recruited 2 assistants, 2 Steno-typists and one LDC.

8.4 Failure of Public Bodies in Responding to Requests for Information

In general, the public bodies have failed to decide information requests in accordance with section 14 of the Act, whereby each information request should ordinarily be decided within 10 working days. As a result, in most cases, applicants have to file an appeal to the Commission, which is a worrying trend as the Commission may not be able to cope with the workload if most information requests become Appeals.

9. RECOMMENDATIONS

For smooth implementation of the Act and to advance the cause of peoples' right to information

and transparency in governance, the Commission makes the following recommendations:

9.1 The Ownership of the Act by the Federal Government

Federal Government must take cognizance of the non-serious attitude of public bodies, and direct them to ensure immediate implementation of, inter alia, provisions of sections 4, 5 and 9 of the Act. The Commission has repeatedly reminded and directed public bodies about their responsibilities but the response remains unsatisfactory and the Commission lacks adequate resources to ensure compliance.

9.2 The Designation of Public Information Officers

Heads of public bodies may be directed that they not only designate PIOs in accordance with section 9 of the Act and the guidelines issued by the Commission but also ensure that their contact details are easily accessible through notice-boards, websites and publications. The commission has made available list of designated PIOs on its web site but it is of fundamental importance that heads of public bodies become proactive in this regard and share details of designated PIOs on the web sites of the public bodies.

9.3 The Prioritizing Proactive Disclosure of Information

Public bodies may be directed to adopt maximum disclosure policies, and the modes of disclosure may include notice-boards, websites, helplines and publications like leaflets, brochures and posters. It has been observed that public officials often complain that it is time-consuming to respond to information requests filed by citizens. The proactive disclosure would help public bodies in averting the workload, which they may have to otherwise deal with in order to decide applications for access to information. As of now, most public bodies, lack useful websites and make little effort to disseminate information through notice-boards or publications.

9.4 The Ensuring Accessibility of Information

It is the responsibility of federal public bodies to ensure that not only categories of information mentioned in Section 5 of the Act are proactively shared through web sites, but all federal public bodies need to ensure that this information is accessible for all, including persons with disabilities. The government may take steps to ensure that information about official working, budget, utilization of funds, development projects and other categories as mentioned in section 5 of the Act is made accessible to citizens in the Urdu language so that maximum number of people could benefit from it.

10. Indexation and Computerization of Records

The government needs to invest in indexation, automation and online management of records for easy and prompt access and retrieval. Currently, one of the major challenges that explain delays in providing access to information is the inefficient and outdated record management system, which makes it difficult for concerned officers to promptly track the relevant file and retrieve the requested information.

10.1 Ensuring Accessibility of Web Sites for the Disabled

Web sites of the federal public bodies should comply with international benchmarks set for

web accessibility in WCAG developed by the W3C. All web sites need to clearly provide the facility to change the font size of the text and options to change the background colour of the website according to the needs of visually impaired persons. As per web accessibility standards, the buttons used on the website should be clearly labelled and easily readable by screen readers. The websites should provide relatively easy navigation using the keyboard such as logical tabbing and navigation between headings and elements. The websites need to provide the search facility on all websites clearly and also readable on screen readers. The websites need to provide the images and graphs used on websites accompanied with a meaningful description that is also readable on screen reader. Similarly, the websites also need to provide audio descriptions for all important visual information though text captioning provided for audible output. Keeping in mind the needs of visually impaired persons, the websites need to provide the content in simple tabular forms. The web accessibility standards for PWDs requires content in tables be presented in a simple table (single level of row/column headers) form, and the row/column headers easily identifiable. Many websites contain electronic forms to be filled online especially filling application for scholarship, employability or registration. These forms should be carefully designed to be easily accessible and readable on-screen readers. Sharing content through social media is the need of the hour. Therefore, all pages on the website should provide clearly the social media icons that describe clearly and are easily readable;

Finally, yet importantly, the websites should provide the facility to visitors to leave comments for the rights-based and enhanced participation of visually impaired persons.

10.2 Allocation of Adequate Funds and Human Resources for the Commission

Adequate funds and support may be provided to the Commission so that it could effectively perform its statutory responsibilities in terms of public awareness and training of PIOs. The total number of public bodies is likely to be in hundreds as all federal ministries, attached department will be changed, autonomous institutions, boards, public educational institutions are to be individually treated as public bodies. Commission's performance continues to be affected due to lack of staff, office space and other facilities. It is recommended that the government should address these challenges by, inter alia, improving on providing necessary staff when required as well as catering to their functional requirements, and approving a special allowance as an incentive for staff working at the Commission.

10.3 Amendments in the Right of Access to Information Act 2017

There are major lacunas in the Act which are a major hindrance in the exercise of citizens' right of access to information in matters of public importance. In this connection, the commission endorses proposed amendments in the Act suggested by Centre For Peace and Development Initiatives, (CPDI).