Three Years of Khyber Pakhtunkhwa and Punjab Right to Information Laws
Centre for Peace and Development Initiatives (CPDI) would welcome reproduction and dissemination of the contents of the report with due acknowledgments.

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<thead>
<tr>
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<tbody>
<tr>
<td>CDA</td>
<td>Capital Development Authority</td>
</tr>
<tr>
<td>CGPA</td>
<td>Centre for Governance and Public Accountability</td>
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<tr>
<td>CPDI</td>
<td>Centre for Peace and Development Initiatives</td>
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<tr>
<td>DCO</td>
<td>District Coordination Officer</td>
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<td>EDO</td>
<td>Executive District Officer</td>
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<td>FOI</td>
<td>Freedom of Information</td>
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<td>FOIO</td>
<td>Freedom of Information Ordinance</td>
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<td>KP</td>
<td>Khyber Pakhtunkhwa</td>
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<tr>
<td>NAP</td>
<td>National Awami Party</td>
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<tr>
<td>NGO</td>
<td>Non-Governmental Organization</td>
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<tr>
<td>PIO</td>
<td>Public Information Officer</td>
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<td>PLD</td>
<td>Pakistan Legal Decisions</td>
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<td>PMLN (N)</td>
<td>Pakistan Muslim League (N)</td>
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<td>PPP</td>
<td>Pakistan Peoples Party</td>
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<td>PTI</td>
<td>Pakistan Tehreek-e-Insaf</td>
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<td>SDEO</td>
<td>Sub Divisional Education Officer</td>
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<td>WASA</td>
<td>Water and Sanitation Agency</td>
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1. Executive Summary

October 31, 2016 will be the 3rd anniversary of Khyber Pakhtunkhwa Right to Information Act 2013 and December 16, 2016 that of the Punjab Transparency and Right to Information Act 2013. This report seeks to document challenges faced in the implementation of these laws. It also documents achievements of civil society groups, citizens and journalists in the use of these laws.

Major cooperation of the Punjab government with the Punjab Information Commission is in the shape of framing the Punjab Transparency and Right to Information Rules 2014. The Punjab government has neither provided requisite funds to Punjab Information Commission (PIC) nor framed service rules so that PIC could hire staff on its own to perform its duties. Consequently, PIC has not been able to dispose off a large number of complaints within the legally bound time-period of sixty days. According to the Chief Information Commissioner, Mr. Mazhar Minhas, out of a total of 1,800 complaints, 800 complaints are pending with the PIC. The delay in disposing off the complaints is discouraging citizens in filing information requests. Furthermore, paucity of funds has impacted the awareness raising campaign of the PIC about right to information. The PIC has to rely on civil society groups to impart training to Public Information Officers (PIOs) because of the lack of funds.

Khyber Pakhtunkhwa government has neither framed rules under Khyber Pakhtunkhwa Right to Information Act 2013, nor incorporated in the law proposals suggested by Khyber Pakhtunkhwa Information Commission. As a consequence, the Peshawar High Court is still out of the purview of Khyber Pakhtunkhwa Right to Information Act 2013. Furthermore, issues such as empowering Public Information Officers, prosecuting head of public bodies for obstructing access to information, criminalizing provision of false information and the collection of fines have not been resolved.

Despite the challenges in the implementation of these RTI laws, there are success stories which augur well for RTI movement in the country. Especially, some of the journalists have successfully used these laws for investigative reporting. For the first time in the history of Pakistan, these journalists have been able to highlight the abysmal conditions of hospitals and schools, and the misuse of public funds based on the certified information received through the use of RTI laws. Citizens are using these laws for merit-based recruitment and for seeking information in matters pertaining to transfers and promotions. Civil society groups are using these laws for greater transparency in the functioning of public bodies and proper utilization of public funds. A request for information filed by CPDI has led to the attendance record of Members of Punjab Assembly being declared as a public record and now citizens can see this record on the web site of the assembly.
Punjab government should provide requisite funds to the Punjab Information Commission and approve its service rules.

The Khyber Pakhtunkhwa government should frame rules for Khyber Pakhtunkhwa Right to Information Act 2013. Furthermore, they should incorporate in law, proposals suggested by Khyber Pakhtunkhwa Information Commission, without further delay. Khyber Pakhtunkhwa Information Commission should notify fee for soft copies of information and the fee for the time consumed to inspect documents.

The Federal and Khyber Pakhtunkhwa governments should take steps to extend right of information to citizens living in the Provincially Administered Tribal Areas and Federally Administered Tribal Areas.

The Punjab Information Commission and the Khyber Pakhtunkhwa Information Commission should priorities implementation of section 4 of the Punjab Transparency and Right to Information Act 2013 and Section 5 of Khyber Pakhtunkhwa Right to Information Act 2013. The Punjab Information Commission and the Khyber Pakhtunkhwa Information Commission should review all Provincial Laws, Rules, Regulations, Executive Orders and Secretarial Instructions, and anything found in these to be in conflict with the provisions of the Punjab Transparency and Right to Information Act 2013 and the Khyber Pakhtunkhwa Right to Information Act 2013 should be removed.
2. Introduction

When Khyber Pakhtunkhwa and Punjab assemblies passed the Khyber Pakhtunkhwa Right to Information Act 2013 and the Punjab Transparency and Right to Information Act 2013 on October 31, 2013 and December 16, 2013 respectively, it was thought that there would be greater flow of information from public bodies to citizens as these laws met standards of effective right to information legislation. As we approach an important milestone of three years since these laws were enacted, it is important to take stock of the situation and see to what extent these laws have lived up to the expectations. This report seeks to encapsulate challenges faced by the information commissions in operationalizing these laws and the support, or lack of it by, political parties to implement these laws. Furthermore, this report presents analysis of how journalists, citizens and civil society groups have been using these laws.

The report is divided into three sections. The first section pertains to the performance of the Khyber Pakhtunkhwa and the Punjab information commissions and the support provided to these commissions by the provincial governments in carrying out their functions as mandated by their respective laws. The second section is about the use of Khyber Pakhtunkhwa and Punjab RTI laws. This section depicts how these laws are being used by citizens, journalists and civil society groups. The third section contains findings and recommendations.

Centre for Peace and Development Initiatives, (CPDI) hopes that citizens, journalists, civil society groups, information commissions, elected representatives and public officials will find this report useful in terms of understanding where we stand with regard to the implementation of Khyber Pakhtunkhwa and Punjab RTI laws. CPDI hopes as well that the findings and recommendations of this report will help in plugging the loopholes in Khyber Pakhtunkhwa Right to Information Act 2013 and strengthen the implementation of the Khyber Pakhtunkhwa and Punjab RTI laws.

3. Section 1: Performance of Khyber Pakhtunkhwa and Punjab Information Commissions

The Punjab Information Commission and the Khyber Pakhtunkhwa Information Commission have been specifically mandated under their respective laws to ensure their implementation. That is why we see a greater level of implementation of Khyber Pakhtunkhwa Right to Information Act 2013 and the Punjab Transparency and Right to Information Act 2013 when compared with the Freedom of Information Ordinance 2002 and its replicas in Sindh and Balochistan, in the shape of the Sindh Freedom of Information Act 2005 and Balochistan Freedom of Information Act 2006.

The Punjab Information Commission and the Khyber Pakhtunkhwa Information Commission enjoy powers to impose penalties on public officials for unlawfully denying or delaying access to information. Furthermore, Khyber Pakhtunkhwa Information
Commission and Punjab Information Commission are mandated to create awareness about their laws, impart training to Public Information Officers about their roles and responsibilities, ensure proactive disclosure of information by public bodies, develop guidelines for record keeping, and present annual report to provincial governments, depicting the level of implementation of right to information laws.

What has been the performance of information commissions in carrying out their key duties assigned to them under their laws?

**3.1 Disposal Rate of Complaints**

The Khyber Pakhtunkhwa Information Commission, under Section 23 (3)\(^1\) of Khyber Pakhtunkhwa Right to Information Act 2013, is bound to decide complaints within sixty days. However, disaggregated data that throws light on the ability of Khyber Pakhtunkhwa Information Commission to decide complaints within the legally bound time-frame is available\(^2\) only for 2014. According to this data, out of a total of 290 complaints received, the number of complaints that the Khyber Pakhtunkhwa Information Commission could decide within sixty days stands at 183 whereas the number of complaints that took more than sixty day time period stands at 102. The Commission failed to decide 35% of the complaints within legally bound time period in 2014. The Commissions website does not contain disaggregated data for 2015-16. According to its web site, it has received a total of 2325 complaints out of which 342 are pending.

Punjab Information Commission, under Section 6 (2)\(^3\) of the Punjab Transparency and Right to Information Act 2013 is bound to decide complaints within thirty days and reasons are to be recorded in writing, if more than thirty days are taken to decide a complaint. The website\(^4\) of Punjab Information Commission does not have updated information about the number of complaints. According to the available information, it received a total of 70 complaints by June 30, 2014; 27 were closed and 43 complaints are mentioned as pending. The latest information about the number of complaints received by Punjab Information Commission is the statement attributed to Mr. Mazhar Minhas, Chief Information Commissioner in a story published in Dawn on February 24, 2016\(^5\) in which he stated that the Punjab Information Commission received a total of 1,800 complaints of which 1,000 were disposed off whilst 800 were pending.

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\(^1\) 25 (3) The Information Commission shall decide any complaint within a period of sixty (60) days.


\(^3\) 6 (2) The Commission shall decide a complaint within thirty days of its receipt or, for good reasons to be recorded in writing, within sixty days.


Both the Punjab Information and the Khyber Pakhtunkhwa Information Commissions are bound to decide on the complaints lodged by citizens within a maximum of 60 days. This deadline has not been strictly adhered to by them both, as they have been more focused on creating awareness about their respective laws, and changing the mind set of public officials rather than relying on imposing penalties, especially in the beginning of the implementation phase of their laws. However, the performance of information commissions with regard to the rate of disposal of complaints in relationship with that of the Federal, Sindh and Balochistan Ombudsmen is far better. Furthermore, the fact that these commissions, unlike the Ombudsman, have powers to impose penalties on public officials for unlawfully delaying or deny access to information has greatly influenced the decisions of public officials. As a result, information which is not otherwise shared with the public has been shared with the citizens when it has been requested under Khyber Pakhtunkhwa Right to Information Act 2013 and the Punjab Transparency and Right to Information Act 2013.

3.2 Designation of Public Information Officers

For the first time in the history of these provinces, Public Information Officers (PIOs) have been designated in provincial public bodies as required under their respective RTI laws. These PIOs are responsible to facilitate citizens in providing access to information, ensuring proactive disclosure of information by their public bodies and implementing other provisions of their laws.

In Punjab, a total of 1,311\(^{6}\) and in Khyber Pakhtunkhwa 162 PIOs\(^{7}\) have been designated. This data about Public Information Officers clearly suggests that PIOs have not been designated in all public bodies.

Thanks to Section 6 (2)\(^{8}\) of Khyber Pakhtunkhwa Right to Information Act 2013, citizens can still seek information from public bodies even if a public body has not designated a PIO, as the head of that public body is to act as the PIO, if the public body has not designated a PIO. The Punjab Transparency and Right to Information Act 2013 does not contain such a provision. However, this issue has been taken care of in the Punjab Transparency and Right to Information Rules 2014\(^{9}\).

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8 (2) In case no such official has been designated or in the event of the absence or non-availability of the designated officer, the person in charge of the public body shall be the designated officer.

3.3 Training of Public Information Officers

Both the Commissions\textsuperscript{10} are obligated to train Public Information Officers (PIC) on their roles and responsibilities under their respective laws. The bureaucracy is used to function in non-transparent and secretive manner. The official mind-set is not to share information with citizens, which needs to be changed. The PIC has faced resistance from provincial bureaucracy with regard to the training of PIOs. According to PIC website, 354 PIOs were trained through 16 trainings\textsuperscript{11} held with the support of Management Professionals Training Department, (MPTD). It is hard to understand why MPTD, a public body responsible for conducting trainings for officers has withdrawn its support for the training of PIOs. The Punjab Information Commission has been forced to arrange trainings of PIOs with the support of civil society organizations. CPDI signed a Memorandum of Understanding, (MoU) with the PIC in 2016 to provide it support to conduct 9 trainings of PIOs in as many districts of the province. So far, CPDI and PIC have arranged 7 such trainings in which a total of 176 PIOs have been trained on their roles and responsibilities under the Punjab Transparency and Right to Information Act 2013.

Khyber Pakhtunkhwa Information Commission has also conducted trainings for PIOs, but there is no data/information available about these trainings on its website.

3.4 Schedule of Costs

As the following table shows, the Punjab Information Commission has prepared a comprehensive ‘Schedule of Costs’\textsuperscript{12} under the Punjab Transparency and Right to Information Act 2013, covering fees to be paid for hard and soft copies as well as for the time taken by a person to inspect documents. However, Khyber Pakhtunkhwa Information Commission has only prepared the ‘Schedule of Fee for Hard Copies’\textsuperscript{13}.

<table>
<thead>
<tr>
<th>S. No</th>
<th>Category</th>
<th>Khyber Pakhtunkhwa</th>
<th>Punjab</th>
<th>CPDI Comments</th>
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<tbody>
<tr>
<td>1</td>
<td>1\textsuperscript{st} 20 pages</td>
<td>No fee to be charged for 1\textsuperscript{st} 20 pages of the information</td>
<td>No fee to be charged for 1\textsuperscript{st} 20 pages of the information.</td>
<td>Excellent provision.</td>
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\textsuperscript{10} Section 6 (5) (e) conduct training of the public information officers.


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<tr>
<th>S. No</th>
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<th>Khyber Pakhtunkhwa</th>
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<th>CPDI Comments</th>
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<tbody>
<tr>
<td>2</td>
<td>More than 20 pages</td>
<td>Rs. 2 per page to be charged for extra copies and Rs. 4 per page if both side of the page is used</td>
<td>Rs. 2 per page to be charged for extra pages.</td>
<td>Reasonable fee of Rs. 2 for every extra page in both laws.</td>
</tr>
<tr>
<td>3</td>
<td>Postal and courier charges</td>
<td>Actual cost for extra copies</td>
<td>Public bodies to bear the postal cost for providing information to citizens.</td>
<td>Khyber Pakhtunkhwa Information Commission should ask public bodies to bear the postal cost even when information is more than 20 pages as in the case of Punjab Information Commission.</td>
</tr>
<tr>
<td>4</td>
<td>Fee for providing electronic data</td>
<td>Not notified yet</td>
<td>Actual cost of CD, diskette, floppy, cassette video or any other electronic device containing information as determined on the basis of official procurement record. No cost to be charged if applicant provides the device and requires only an electronic copy of the information.</td>
<td>Excellent provision of not charging fee to the applicant if the applicant provides the device. Khyber Pakhtunkhwa Information Commission should also notify fee for getting electronic data.</td>
</tr>
<tr>
<td>5</td>
<td>Fee for inspecting documents</td>
<td>Not notified yet</td>
<td>No cost to be charged for inspection of any work. Rs. 10 to be charged for the first hour of inspection of record/documents for taking notes or extracts. Rs. 5 to be charged for each extra 15 minutes after the first hour.</td>
<td>Excellent provision of not charging the applicant for inspecting documents. Khyber Pakhtunkhwa Information Commission should also notify fee for inspecting documents.</td>
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</table>
### 3.5 Imposition of Fines

The effectiveness of both the Punjab Transparency and Right to Information Act 2013 and Khyber Pakhtunkhwa Right to Information Act 2013 lies in the fact that the information commissions are empowered to impose fines on PIOs for delaying or unlawfully denying access to requested information. So far, Punjab Information Commission has imposed only one penalty on a PIO, whereas Khyber Pakhtunkhwa Information Commission has fined eight PIOs. This clearly shows that Punjab and Khyber Pakhtunkhwa information commissions have adopted different approaches with regard to ensuring the implementation of their respective laws.

### 3.6 Compensation of Requesters

Interpreting Section 26 (3) (b)\(^{14}\), Khyber Pakhtunkhwa Information Commission has started awarding fine money as compensation to the applicants, which it is not supposed to do according to some legal experts. Civil society groups have taken up this issue with the commission and it is hoped that it will reconsider its position. It is expected that the issue of imposing fines and compensating requesters with the fine money will be cleared in the Rules of Business.

### 3.7 Ensuring Cost-Effective and Easy Process of Access to Information

The spirit of both laws is that the process of providing access to information should be simple. However, the Khyber Pakhtunkhwa Information Commission made the process cumbersome by imposing conditionality to provide a copy of CNIC when lodging a complaint against a Public Information Officer. One can understand what led to the putting in place of this condition, as some complaints are lodged wherein the complainant might not be interested in pursuing the case or, very rarely, someone else

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\(^{14}\) Section 26 (3) (b) to impose a daily fine of up to Rs. 250 per day, up to a maximum of Rs. 25,000, on any official who has acted wilfully to obstruct any activity which is required to be undertaken by this Act, including with a view to preventing or delaying the disclosure of information to a requester; and
might have lodged a complaint on the behalf of some other person. Such cases are bound to happen in a country where people are not familiar with the culture of asking questions as their right. Especially, such things are bound to happen soon after the enactment of right to information law because of the very novelty of the idea of seeking information and lodging and complaints. However, CPDI took a stand against this conditionality and urged Khyber Pakhtunkhwa Information Commission, to do away with this practice on the following grounds:

1. Khyber Pakhtunkhwa Information Commission should not make it compulsory for all citizens to provide CNIC just because some citizens lodged false complaints. This is tantamount to collective punishment and the principle of the presumption of innocence till proven guilty has been compromised.

2. This requirement is in conflict with the spirit of Khyber Pakhtunkhwa Right to Information Act 2013 as there is emphasis on providing an easy process for citizens to submit information requests and lodge complaints.

3. There is no such requirement by Punjab Information Commission for lodging complaints. It should be enough for citizens to share the name and the address when lodging complaints. CPDI kept on raising the demand saying that if the Punjab Information Commission is able to deal with complaints lodged without a copy of CNIC so should be the Khyber Pakhtunkhwa Information Commission.

In an event organized by CPDI, Media Matters for Democracy, UNESCO, and the Embassy of the Kingdom of Netherlands, on May 03, 2016 to celebrate World Press Freedom day, the participants of the working group on right to information raised this issue with Mr. Abdul Matin, Information Commissioner, Khyber Pakhtunkhwa Information Commission. He promised that this conditionality will be withdrawn.

### 3.8 Proactive Disclosure of Information

Public bodies are not taking steps to proactively disclose information through websites, as required by the respective provisions of the Punjab Transparency and Right to Information Act 2013\(^\text{15}\) and Khyber Pakhtunkhwa Right to Information Act 2013\(^\text{16}\). Websites of public bodies contain broken links and do not contain key information, such as the allocated funds in budget and actual expenditure. In short, not only that most of the websites, surveyed\(^\text{17}\) by the Digital Rights Foundation, (DRF), do not provide key information, as required under RTI laws, the information which is made available is not presented in a professional manner. Furthermore, web accessibility standards are not adhered to in the design of websites and the presentation of information, according to

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\(^{15}\) Section 4 of the Punjab Transparency and Right to Information Act 2013

\(^{16}\) Section 5 of Khyber Pakhtunkhwa Right to Information Act 2013

the research study. This clearly suggests that both the commissions have to take proactive steps to ensure that relevant provisions of their respective RTI laws are respected.

It is encouraging to note that the Punjab Information Commission has developed ‘Transparency Standards and Public Records in Respect of the Punjab Prisons Department’18.

3.9 Orders and Judgments

Khyber Pakhtunkhwa Information Commission, in sharp contrast to Punjab Information Commission, has not written down even a single detailed judgment on disputed issues pertaining to access to information.

The Punjab bureaucracy has used all available tactics to thwart efforts of RTI activists and the Punjab Information Commission. However, the shenanigans of public officials are being recorded, since public officials are bound to put their reservations in writing for not providing the requested information. As a result, the Punjab Information Commission has been able to give some landmark decisions, which have put an end to some of the key excuses offered by public officials for not sharing information. The significance of these decisions can highly be exaggerated, given the prevailing culture of secrecy in the country. As the right to information movement progresses in the country, these decisions are going to serve as precedents for RTI activists in their struggle for transparent functioning of public bodies and greater flow of information from public bodies to citizens.

Punjab Information Commission has decided issues like overriding effect of the Punjab Transparency and Right to Information Act 2013 over all other laws, rules and orders, level of harm to personal safety to claim exemption from disclosure of information, head of public body to serve as Public Information Officer in the absence of the designation of a PIO, transfer of requests for information to the PIOs, claim to privacy with regard to disclosure of information, the declaration of entities as public bodies that are substantially funded by the government and oath of secrecy not to be a valid justification for not providing the requested information.

In its order dated October 18, 2015 in the case of Mr. Waseem Abbasi, Ch. Siraj Din, Mr. Muhammad Waseem Elahi vs. Mr. Tariq Shahzad Deputy Secretary (Coord.)/ Public Information Officer, Governor House, settled some key contentious issues with regard to the exercise of right to information.

The commission has settled the issue of the term ‘public importance’, as interpreted in the context of the question of admissibility under Article 184(3 vis-a-vis the term public

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importance in the context of Article 19-A of the constitution. The commission declared that “the term 'public importance', as interpreted in the context of the question of admissibility under Article 184(3), may not be exactly applicable in the context of its usage in Article 19A of the Constitution. In the context of right to information regarding official records, the term ‘public importance’ has to be understood in terms of what records should be accessible to each and every member of the public vis-à-vis the records which are of personal nature and whose disclosure may amount to invasion of privacy of a specific individual’.

Furthermore, while interpreting the term ‘public importance’ in the context of Article 19A of the Constitution, it has to be kept in mind that right to information is now universally recognized as a human right, which can be exercised to access information about matters of individual, community or public interest”.

In this case, the commission also put to rest the issue of the oath of the Governor as an excuse for not sharing the requested information. “Another argument made by the Respondent is that the oath taken by the Governor under the Constitution puts an obligation upon him in the following terms: “I will not directly or indirectly communicate or reveal to any person any matter which shall be brought under my consideration or shall become known to me as Governor of the Province of Punjab except as may be required for the discharge of my duties as Governor.” The Commission is not convinced that the above-referred part of the oath of the Governor can be used to claim exemption from the purview of Article 19A of the Constitution or the provisions of the Punjab Transparency and Right to Information Act 2013, which was assented by the Governor himself without expressing any reservations. In fact, the Governor is duty bound to disclose information, when it is required by the Constitution or law, and the underlined part of the above-referred quote from the oath refers exactly to such like situations.”

Some provisions of the Qanun-e-Shahadat Order 1984 and the Official Secret Act 1923 are also cited as reasons by public officials for not providing the requested information. Punjab Information Commission has, basing its argument on the overriding clause of the Punjab Transparency and Right to Information Act 2013, declared that these laws cannot be used to keep information from disclosure. In the same case, it also said: “As regards the section 6 and section 7 of the Qanun-e-Shahadat Order 1984, these provisions are about the presentation of evidence in the courts of law and, hence, are not relevant to the disclosure of information to the general public under the Punjab Transparency and Right to Information Act 2013. While the courts have a limited function of deciding cases brought before them, the objectives of the Punjab Transparency and Right to Information Act 2013 are much broader and include transparency, government accountability and improved access to public information. In addition, even if it is accepted for the sake of argument that the restriction imposed on presentation of evidence in the courts also means such information should not be disclosed to the general public as well, the question remains whether the heads of
departments really enjoy absolute discretion in such matters. In this context, it may be argued that the functions and discretion of the heads of provincial public bodies is regulated through laws and rules enacted by the provincial government and, therefore, the relevance of the Punjab Transparency and Right to Information Act cannot be disregarded or down-played". Regarding the Official Secrets Act 1923, the commission said: “As for the Official Secrets Act 1923 is concerned, it doesn’t specifically list documents, which are to be treated as secret, and instead leaves such a function to be performed through other statutes or rules enacted or notified by the respective Federal or a provincial government. Hence, while the Official Secrets Act 1923 is a Federal law, it leaves it to the respective provincial governments to decide scale or scope of secrecy, as it was earlier done through, inter alia, the relevant provisions of the Punjab Government Rules of Business 2011The Punjab Transparency and Right to Information Act 2013 has now specifically declared the kind of information that can be kept secret, and that all other information must be disclosed proactively or in reaction to applications filed by citizens. Therefore, the Punjab Transparency and Right to Information Act 2013 have no conflict with the Official Secrets Act 1923 and, in fact, both complement each other”.

Dwelling upon the concept of entities to be treated as public bodies that are substantially funded by public money, in its order dated November 24, 2015, in the case of Mr. Qalandar Hussain Khan and Ms. Ambreen Kanwal vs. Public Information Officer (PIO) Punjab Provincial Cooperative Bank, the commission said: “The Commission has carefully reviewed the documents and judgments submitted by the parties as well as the arguments that they made during the hearing, and holds that the PPCBL is a public body in view of, inter alia, sections 2(h)(iv) and 2(h)(vii) of the Act. It is evident from the record that the Government of Punjab currently owns 78% shares in the PPCBL, which is also being managed by the Respondent No. 3 in his capacity as Administrator of PPCBL”. In its order dated November 18, 2015, in the case of Mr. Muhammad Imran Zia (the Complainant) Vs. Deputy Secretary (Admn.)/ Designated PIO, Information & Culture Department, Punjab Information Commission settled the issue of a citizen using RTI as a tool for his personal interest and not for public interest. The commission said: “The Commission informed the Respondent that the Act makes no distinction between the information involving personal interest vis-à-vis public interest, and that access to information can only be denied if its disclosure is likely to cause harm to one or more of the interests mentioned in section 13 of the Act”. In the same case, the commission also dwelt upon the issue of noting on the files, and said: “He was further informed that noting portion of files or minutes of meetings per se are not exempt from disclosure. However, a specific part of noting or minutes can be withheld, provided it could be justified in the light of exceptions mentioned in section 13 of the Act”.

Seen in the context of the fact that certain quarters in Punjab bureaucracy are trying their best to create hurdles in the way of Punjab Information Commission, the commission has done a tremendous job so far. These hurdles include, but are not limited to, delay in releasing funds for the commission, not providing staff to the
commission and using delaying tactics, as a result service rules of the commission have yet not been framed, owing to which, Punjab Information Commission cannot hire staff on its own. The fact that public officials have presented all sorts of arguments at their disposal for not sharing the information and the fact that the Punjab Information Commission has effectively countered these arguments by referring to the constitution, judgements of the superior courts and the provisions of the Punjab Transparency and Right to Information Act 2013, augurs well for the future of transparency and right to information movement in the country. For the first time in the history of the country, there is a forum where contentious issues pertaining to the disclosure of information are being debated within the bounds of law. As a result, not only have citizens been able to exercise their right of access to information held by public bodies for the attainment of their rights but journalists have also been able to get access to certified information from public bodies for investigative reporting, which will strengthen accountability of public officials and elected representatives as well as contribute to the greater public participation in democratic processes.

3.10 Proposals for Legal Reforms

The RTI laws of Khyber Pakhtunkhwa and Punjab also empower commissions to make recommendations for legal reforms with regard to citizens’ right to information and also to comment on specific legal proposal under consideration of the provincial governments. As reported in the national press on January 23, 2016\(^ {19} \), the Khyber Pakhtunkhwa Information Commission proposed amendments in the Khyber Pakhtunkhwa Right to Information Act 2013, which are aimed at making this law more effective. These amendments pertain to empowering Public Information Officers, prosecuting the head of public bodies for obstructing access to information, criminalizing provision of false information and the collection of fines.

The Punjab Information Commission has not suggested any amendments in the Punjab Transparency and Right to Information Act 2013, as the Punjab Transparency and Right to Information Rules 2014 clarify issues, wherever needed, in the light of the spirit of the Punjab RTI law.

3.11 Roles of PTI and PMLN Provincial Governments in Implementation of their RTI Laws

Both PML-N and PTI have mixed records with regard to the implementation of their respective laws.

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On June 23, 2015²⁰, Khyber Pakhtunkhwa Assembly exempted itself from the purview of Khyber Pakhtunkhwa Right to Information Act 2013 through a hastily introduced amendment in the law. It was through concerted efforts of civil society groups that enough pressure was exerted on the PTI government to eventually withdraw this amendment on September 10, 2015²¹. However, the attitude of the PMLN government in Punjab has been far from satisfactory with regard to supporting the Punjab Information Commission in the implementation of the Punjab Transparency and Right to Information Act 2013. It has not framed service rules for the Punjab Information Commission so that it could hire on its own and neither has it deputized staff at the commission so that its members could perform their duties in a proper manner. As a result, ever since its establishment, Punjab Information Commission has been dependent on the support of civil society to carry out its functions. Punjab Information Commission has documented the failure of Punjab government in providing it requisite budget and staff in its annual report as well which is available on its web site.

Both the Khyber Pakhtunkhwa²² and Punjab governments²³ are obligated to frame rules for their respective laws in consultation with the commissions. The Khyber Pakhtunkhwa government has not been able to frame Rules whereas Punjab government has not only been able to frame the Punjab Transparency and Right to Information Rules 2014²⁴, but has also been able to take care of loophole in the Punjab Transparency and Right to Information Act 2013 regarding as to who will be Public Information Officer in the absence, unavailability or in case Public Information has not been designated. In the Punjab Transparency and Right to Information Act 2013, the head of a public body is not to be declared as Public Information Officer in the absence or unavailability of a specific Public Information Officer. However, under the Punjab Transparency and Right to Information Rules 2014, a head of a public body has been declared to act as Public Information Officer if a public body has not designated one or in the absence or unavailability of the Public Information Officer.

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²² 32. Power to make rules.—Government in consultation with the Information Commission may, by notification in the official Gazette, make rules for carrying out the purposes of this Act.

²³ 19. Power to make rules.— (1) The Government, in consultation with the Commission and by notification in the official Gazette, may make rules for carrying out the purposes of this Act.

4. Section 2: Use of Khyber Pakhtunkhwa and Punjab RTI laws by Citizens, Civil Society Groups and Journalists

Since the process of submitting information requests and lodging complaints with the respective commissions is easy and cost-effective, citizens, journalists and civil society groups have been able to use Khyber Pakhtunkhwa Right to Information Act 2013 and the Punjab Transparency and Right to Information Act 2013 to seek certified information from public bodies. This section documents how these laws have been used so far.

4.1 Use of RTI for Investigative Reporting

It goes to the credit of journalists that they have been able to use RTI for investigative reporting despite the fact that media houses do not allocate funds to build capacity of journalists to learn how to use RTI for investigative reporting and filing information requests.

Importance of RTI for investigative reporting can hardly be exaggerated and has been beautifully summed up by Umar Cheema, one of Pakistan’s most outstanding investigative journalists, in these words: “Without effective RTI law, investigative journalism is leak journalism”\(^{25}\). RTI law empowers a journalist to make his own choice of which issue to follow and collect information accordingly instead of waiting for somebody to share information of his choice.

CPDI’s engagement with journalists to promote and popularize the use of RTI legislation for investigative reporting has been at multiple levels, ever since this engagement was started in 2006. CPDI has been imparting training to journalists on the use of RTI legislation for investigative reporting since 2007. Ever since 2006, CPDI has been setting example by using RTI laws and sharing with journalists, the information gathered through the use of RTI laws. As a result, CPDI was able to practically demonstrate how RTI laws could be used for investigative reporting.

It is exceedingly important that journalists have a support mechanism available, which facilitates them in filing information requests under different RTI laws of the country for their investigative reporting.

Realizing the potential of Khyber Pakhtunkhwa Right to Information Act 2013 and the Punjab Transparency and Right to Information Act 2013 for investigative reporting, CPDI established a RTI helpline\(^{26}\) for journalists and citizens to facilitate them in drafting RTI requests and in order to answer their queries about RTI laws. The RTI


helpline has been functioning since February 27, 2014. CPDI procured a number for this purpose. The number is 0092 51 2375160. At the same time the rtihelpline@cpdi-pakistan.org email address has also been created to share material with journalists and interact with them. CPDI’s trained staff manages the RTI helpline, queries of journalists are answered and proper data is maintained.

CPDI as partner organization, holding Secretariat of Coalition on Right to Information, (CRTI) constituted Annual RTI Champion Award to protect and promote citizens’ right to information held by public bodies. CRTI RTI Champion Award is given in 3 categories: a citizen, a journalist and a NGO. In 201427, Umar Cheema and in 201528 Waseem Abbasi won this award.

As a result of CPDI’s multi-pronged engagement with journalists, spanning over 7 years, coupled with the fact that the process of filing information requests under the Khyber Pakhtunkhwa and Punjab RTI laws is both cost-effective and easy, journalists have started filing truly remarkable stories from 2014 onwards using the Khyber Pakhtunkhwa Right to Information Act 2013 and the Punjab Transparency and Right to Information Act 2013. Journalists have used RTI laws in Pakistan to report on social issues and to investigate claims of austerity by politicians. At the same time, they have also reported on the implementation status and the quality of RTI laws. In fact, some of the stories filed by journalists would perhaps not have been possible otherwise.

The following table shows investigative stories filed by journalists based on the certified information/data received through the use of the Khyber Pakhtunkhwa Right to Information Act 2013 and the Punjab Transparency and Right to Information Act 2013.

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## Details of Investigative Stories filed using KP and Punjab RTI Laws

<table>
<thead>
<tr>
<th>S. No.</th>
<th>Date of story published</th>
<th>Story Headline</th>
<th>Newspaper</th>
<th>Link</th>
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<tr>
<td>1</td>
<td>18-09-2014</td>
<td>KPK govt better than Punjab in access to information</td>
<td>The News</td>
<td>KPK govt better than Punjab in access to information</td>
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<td>2</td>
<td>29-09-2014</td>
<td>پنجاب،پختونخوا کی بیورکریسی ام معلومات دینے سے انکاری</td>
<td>Dunya News</td>
<td>پنجاب،پختونخوا کی بیورکریسی ام معلومات دینے سے انکاری</td>
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<td>3</td>
<td>18-10-2014</td>
<td>KP CM spends Rs2.6m on entertainment, bakery items</td>
<td>The News</td>
<td>KP CM spends Rs2.6m on entertainment, bakery items</td>
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<td>4</td>
<td>6-11-2014</td>
<td>Punjab conceals facts while KP provides requested details</td>
<td>The News</td>
<td>Punjab conceals facts while KP provides requested details</td>
</tr>
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<td>6</td>
<td>16-11-2014</td>
<td>310 out of 732 Punjab BHUs working sans doctors</td>
<td>The News</td>
<td>310 out of 732 Punjab BHUs working sans doctors</td>
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<td>7</td>
<td>20-11-2014</td>
<td>Most DCOs continue to jealously guard ‘information’</td>
<td>Dawn</td>
<td>Most DCOs continue to jealously guard ‘information’</td>
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<td>9</td>
<td>28-11-2014</td>
<td>No doctor for 70pc BHUs in three KP districts</td>
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<td>No doctor for 70pc BHUs in three KP districts</td>
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<td>10</td>
<td>29-11-2014</td>
<td>Imran used govt helicopter four times: KP govt</td>
<td>The News</td>
<td>Imran used govt helicopter four times: KP govt</td>
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<td>11</td>
<td>4-12-2014</td>
<td>No CT scan machines in 16 districts of Punjab, seven of KPK</td>
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<td>No CT scan machines in 16 districts of Punjab, seven of KPK</td>
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<td>12</td>
<td>10-12-2014</td>
<td>Education not top priority of Punjab, KP govts</td>
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<td>Education not top priority of Punjab, KP govts</td>
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<td>13</td>
<td>13-01-2015</td>
<td>Upload MPAs attendance on web, Punjab PA directed</td>
<td>The News</td>
<td>Upload MPAs attendance on web, Punjab PA directed</td>
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<td>30-01-2015</td>
<td>30pc newborns die in DI Khan, Mianwali hospitals</td>
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<td>15</td>
<td>04-02-2015</td>
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<td>15 Punjab MPAs claim medical bills worth Rs2.7m</td>
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<td>Punjab CM’s copter makes 627 flights costing Rs37 million</td>
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<td>16-04-2015</td>
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<td>Punjab provides information after eight months, KP within 14 days</td>
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<td>Expenses on security of KP MPs far higher than tax they pay</td>
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<td>13-07-2015</td>
<td>Schools dept fails to grant RTI request even in five months</td>
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<td>Schools dept fails to grant RTI request even in five months</td>
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<td>23</td>
<td>21-08-2015</td>
<td>Punjab schools data remains elusive</td>
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<td>Punjab schools data remains elusive</td>
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<td>27-08-2015</td>
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<td>Punjab commission summons Governor House official under RTI law</td>
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<td>25</td>
<td>28-08-2015</td>
<td>Has Punjab really achieved 87pc enrolment target at primary level?</td>
<td>The News</td>
<td>Has Punjab really achieved 87pc enrolment target at primary level?</td>
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<td>26</td>
<td>15-10-2015</td>
<td>Punjab Governor House asked to provide info to citizen by 23rd</td>
<td>The News</td>
<td>Punjab Governor House asked to provide info to citizen by 23rd</td>
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<td>27</td>
<td>17-10-2015</td>
<td>52pc girls, 21pc boys schools without playgrounds in Punjab</td>
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<td>52pc girls, 21pc boys schools without playgrounds in Punjab</td>
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<td>28</td>
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<td>Effective steps bring dengue deaths to zero in KP so far</td>
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<td>Effective steps bring dengue deaths to zero in KP so far</td>
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<td>PPCBL declared public body owned by Punjab government</td>
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<td>PPCBL declared public body owned by Punjab government</td>
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<td>19-01-2016</td>
<td>PIC asks Punjab Governor House to share details of expenses</td>
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<td>PIC asks Punjab Governor House to share details of expenses</td>
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<td>30-01-2016</td>
<td>LHC says president can't overturn Ombudsman's verdict</td>
<td>The News</td>
<td>LHC says president can't overturn Ombudsman's verdict</td>
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<td>29-03-2016</td>
<td>2,000 high schools without heads</td>
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<td>2,000 high schools without heads</td>
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<td>33</td>
<td>25-06-2016</td>
<td>Commission directs Punjab govt to share info on Orange Line Project</td>
<td>The News</td>
<td>Commission directs Punjab govt to share info on Orange Line Project</td>
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<tr>
<td>34</td>
<td>13-07-2016</td>
<td>No doctor in 284 Basic Health Units of 13 Punjab districts</td>
<td>The News</td>
<td>No doctor in 284 Basic Health Units of 13 Punjab districts</td>
</tr>
</tbody>
</table>
4.2 Use of RTI Legislation by Civil Society Groups

Civil society groups in Pakistan have led the way and have explored the unchartered waters with regard to the use of the right to information for getting access to certified information from public bodies. Predominantly, civil society groups have sought certified information from government departments to highlight incidents of misuse of public funds, maladministration to ensure accountability of public officials and elected representatives.

The first ever request for information under an RTI law was filed by Mukhtar Ahmed Ali when he was the Executive Director at Consumer Rights Commission of Pakistan. He sought details from the Capital Development Authority, (CDA) under the Freedom of Information Ordinance 2002, about date palm trees that were planted in Islamabad as this plant is not suited for the climate of Islamabad.

CPDI, as the available data in the public domain suggests, has been the leading organization with regard to the use of RTI laws. By filing such RTI requests as seeking information about fees paid to the lawyers for representing government in courts to highlight nexus between public officials at the Ministry of Law and Justice and lawyers; information request to the Ministry of Information and Broadcasting seeking copy of the policy document pertaining to secret fund maintained by the ministry that eventually led to PMLN government announcing in 2014 that no secret or discretionary funds will be maintained by federal ministries, CPDI was able to establish the potential of RTI laws for investigative reporting, as stories based on these information requests made to prominent pages in the press. However, since procedure of filing information requests under the Freedom of Information Ordinance 2002 is neither cost-effective, nor easy, civil society groups have not used this law in greater frequency to seek information from federal public bodies.

When Khyber Pakhtunkhwa Right to Information Act 2013 and the Punjab Transparency and Right to Information Act 2013 were enacted, CPDI started using these laws as a tool to spread awareness about these laws amongst public officials, general public and civil society groups and journalists. That is why CPDI submitted well over 1,000 information requests in first few months of the enactment of these laws. As a result, when public officials in both these provinces started receiving information requests under these laws, they started talking about these laws and were made aware about the enactment of these laws as well as citizens’ right to information held by their
departments. Furthermore, high quantum of RTI requests also served the purpose of generating work for information commissions established under these laws, used the laws as well for public accountability by submitting RTI requests under the laws. As a result of these information requests, CPDI got certified information about the use of official helicopters\textsuperscript{29}, status of medical equipment in District Headquarter Hospitals,\textsuperscript{30} information about sanctioned and vacant posts of doctors in Basic Health Units\textsuperscript{31} and the information about sanctioned and vacant posts of teachers in schools of these provinces\textsuperscript{32}. Furthermore, CPDI also engaged citizens in the process of filing information requests under these laws and, as a result of this engagement, citizens have also started filing requests for information in greater numbers under these laws.

Shehri, a Karachi based civil society organization is one of the oldest organization that has been using RTI laws. Since the organization works on environmental issues, it has sought information about plots that have been earmarked for residential use, but have been used for commercial purposes or have been allotted to certain organizations on throw away prices.

Centre for Governance and Public Accountability, (CGPA), a relatively young organization based in Peshawar, has been using Khyber Pakhtunkhwa Right to Information Act 2013 to test the effectiveness of this law as well as to get certified information to hold elected representatives and public officials accountable. CGPA established\textsuperscript{33}, through the use of Khyber Pakhtunkhwa Right to Information Act 2013, that district courts were not willing to provide information under this law. Furthermore, the organization has also been using this law to collect certified information about the status of medical equipment in District Headquarter Hospitals.

As a leading organization in the area of transparency and right to information, CPDI has also demonstrated in how different ways RTI laws could be used. For example, CPDI filed the first ever request for information in Pakistan seeking sample of a material. CPDI filed an information request with the Water and Sanitation Agency Multan under Section 2 Sub-section J (3) of the Punjab Transparency and Right to Information Act


2013 to take water samples of filtration plant. The WASA not only provided certified water samples but also offered to test samples with the WASA water testing laboratory. The WASA laboratory declared water samples fit for consumption. The same samples were sent to the Punjab Health Engineering Research Regional Laboratory, Multan. The results declared samples bacteria positive and declared it unfit for human consumption. This report was shared with the Managing Director WASA and he issued directions to his staff to change water filter of the plant on an immediate basis.

4.3 **RTI and Citizens: Emerging Trends**

Four distinct trends emerge when we scrutinize requests for information filed by citizens under both 1st and 2nd generation RTI laws in Pakistan.

First, the dichotomy between the number of requests for information filed under the 1st and the 2nd generation RTI laws is too pronounced to be ignored. There is no data available on the websites of the federal and provincial Ombudsman about the number of complaints lodged under the federal, Balochistan and Sindh freedom of information laws. If those working in the area of transparency and right to information are to be believed, not more than 500 or 600 information requests have been filed under these laws in all these years. Whereas, according to Khyber Pakhtunkhwa Information Commission's website, the number of complaints lodged stands at 1,784 on March 01, 2016. Punjab Information Commission has yet to update complaint figures on its website but according to news item published in the press on February 24, 2016, the chief Information Commissioner shared that the commission received over 1,800 complaints ever since its establishment in March 2014. This suggests that a higher number of complaints have been lodged with information commissions in relatively far less period of time, when compared with the complaint lodged with the federal and provincial Ombudsmen. However, when seen in relationship with population of these provinces, number of requests for information is staggeringly low which shows that both information commissions have failed to raise awareness level about right to information in their provinces.

The second trend that has clearly emerged is that public officials, apart from employing a host of other tactics for not divulging the requested information, do not feel any qualms to take even punitive measures against those who request information. Ever since the enactment of these laws, at least 3 teachers have faced the wrath of bureaucracy in the shape of transfers, suspensions and enquiries for seeking copies of seniority lists.

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As reported in the press on March 25, 2015, district education officer (DEO) Nowshera suspended the two school teachers Ijaz Ur Rahman and Mudassir Shah, under West Pakistan Government Servants (Conduct) Rules 1966. According to Ijaz Ur Rahman, he was first transferred and then suspended because he had sought information about the seniority list and the PTC Fund from the District Officer, Education Department. The Sub Divisional Education Officer (SDEO) Nowshera, Abdul Samad, said that such information requests are not responded to, as requested information is displayed on notice boards of some circle offices. Mr. Samad obviously did not know that even if the requested information was available in the public domain, the public body is bound under the Khyber Pakhtunkhwa Right to Information Act 2013 to guide the requester as to where the requested information could be obtained. Earlier in June 2014, the Executive District Officer Vehari launched an inquiry against a primary school teacher for seeking seniority list under the Punjab Transparency and Right to Information Act 2013. Apart from these three teachers, on March 04, 2015, it was reported in the national press that the Punjab University found a former professor guilty of misuse of authority in an inquiry conducted after he had requested release of information under the Punjab Transparency and Right to Information Act 2013 about faculty who continued to occupy official residences after their retirement.

The third trend pertains to the nature of requests for information being filed by citizens. According to Mukhtar Ahmed Ali, Information Commissioner, Punjab Information Commission, employees of government departments have filed information requests about their issues pertaining to transfers, promotions and enquiries. Citizens have also filed information requests on issues surrounding recruitments and have sought certified copies of merit list. Information requests have also been filed about the maintenance of parks and water filter plans.

While journalists have used these laws for public accountability and civil society groups have utilized them to highlight incidents of maladministration, citizens have used these laws to solve their personal issues and for the attainment of their rights. Fourth, both the Punjab Information Commission and the Khyber Pakhtunkhwa Information

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35 ‘Two KP teachers suspended for seeking information’, The News, 25 March 2016,

36 ‘Punjab official fined for delaying access to information’, The News, 25 October 2014,

37 ‘RTI request follows misconduct charge’, The Express Tribune, 4 March 2015,

38 ‘Citizens’ right: Information commission says govt support missing’, The Express Tribune, 3 December 2015,

39 ‘Sabahat Ghaznavi gets his right through KPK RTI Law’,
Commission have imposed penalties, though sparingly so far, on public officials that have denied citizens access to the requested information. The Punjab Information Commission imposed a fine equal to sixty days of the salary of the District Officer, Education Department, Vehari on October 24, 2014 and also said that “he acted with malafide intentions to first delay and then obstruct access to the requested information by intimidating the complainant to withdraw the complaint filed with the commission”. This was the first ever penalty imposed on an official in the country for not providing access to information. The Khyber Pakhtunkhwa Information Commission imposed first ever penalty under the Khyber Pakhtunkhwa Right to Information Act 2013 on July 16, 2015 when it slapped a fine of Rs. 25,000 on the Registrar, Abdul Wali Khan university, Mr. Sher Alam Khan for not providing information about hiring of the staff to a citizen. On December 19, 2015, Qazi Sajiduddin, AIG legal, Khyber Pakhtunkhwa Police Department, got dubious distinction of being fined twice and was asked to deposit Rs. 50,000 for failing to provide copies of the enquiry reports to fellow colleagues. So far, Khyber Pakhtunkhwa Information Commission has imposed fines on PIOs in 8 cases.

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5. Section 3: Findings and Recommendations

5.1 Findings

The Punjab government is creating hurdles in the implementation of the Punjab Transparency and Right to Information Act 2013 by not releasing requisite funds to Punjab Information Commission and by not framing its service rules. As a consequence, the performance of Punjab Information Commission is being impacted in the following ways:

1. The Punjab Information Commission is unable to recruit staff and is unable to perform its duties assigned under the law.

2. There is inordinate delay in the disposal of complaints, at times, more than sixty days, which is tantamount to the violation of the Punjab Transparency and Right to Information Act 2013. This has led to creation of negative perceptions, about the utility of the Punjab RTI law, amongst citizens who lodged complaints with the Punjab Information Commission against PIOs for not providing the requested information.

3. Paucity of funds is hurting the Punjab Information Commission’s awareness raising campaign about citizens’ right to information to off-set the impact of unavailability of requisite funds to carry out training for the Public Information Officers, Punjab Information Commission, has entered into partnerships with civil society groups to conduct such trainings. However, the lack of funds is severely impacting the ability of the Punjab Information Commission to train PIOs in great numbers.

4. The Khyber Pakhtunkhwa government is delaying the incorporation of amendments suggested by the Khyber Pakhtunkhwa Information Commission in the Khyber Pakhtunkhwa Right to Information Act 2013. As a result, the Peshawar High Court is still out of the purview of the Khyber Pakhtunkhwa Right to Information Act 2013, and issues such as empowering Public Information Officers, prosecuting the head of public bodies for obstructing access to information, criminalizing the provision of false information and the collection of fines have not be resolved.
5.2 Recommendations

1. The Punjab government should provide requisite funds to Punjab Information Commission and approve its service rules.

2. CPDI urges the Khyber Pakhtunkhwa government to
   a) Incorporate amendments in the Khyber Pakhtunkhwa Right to Information Act 2013 without further delay. Bring the Peshawar High Court within the ambit of the Khyber Pakhtunkhwa Right to Information Act 2013;
   b) Remove Section 28 (b) criminalizing the use of information with possible bad intentions. The Khyber Pakhtunkhwa Right to Information Act 2013 is a law about access to information and not as to how information should be used. The possible misuse of information should be left to the courts to decide.
   c) The Khyber Pakhtunkhwa government should frame rules in consultation with the Khyber Pakhtunkhwa Information Commission.
   d) The Khyber Pakhtunkhwa Information Commission should notify a fee for soft copies of information and a fee for the time consumed to inspect documents.

3. The Federal and Khyber Pakhtunkhwa governments should take steps to extend right of information to citizens living in Provincially Administered Tribal Areas and Federally Administered Tribal Areas.


5. The Punjab Information Commission and the Khyber Pakhtunkhwa Information Commission should review all Provincial Laws, Rules, Regulations, Executive Orders and Secretarial Instructions and anything found in these to be in conflict with the provisions of the Punjab Transparency and Right to Information Act 2013 and the Khyber Pakhtunkhwa Right to Information Act 2013 should be removed.
Centre for Peace and Development Initiatives, (CPDI) is an independent, non-partisan and a not-for-profit civil society organization working on issues of peace and development in Pakistan. It is registered Under Section 42 of the Companies Ordinance, 1984 (XLVII of 1984). It was established in September 2003 by a group of concerned citizens who realized that there was a need to approach the issue of peace and development in an integrated manner. CPDI is a first initiative of its kind in Pakistan. It seeks to inform and influence public policies and civil society initiatives through research-based advocacy and capacity building in order to promote citizenship, build peace and achieve inclusive and sustainable development. Areas of special sectoral focus include promotion of peace and tolerance, rule of law, transparency and access to information, budget watch, legislative watch and development.

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