

Ministry of Mines

Third Party Audit of *Suo Motu* Disclosure for 2021-22

The self assessment report as submitted by the Ministry of Mines leads to systematic and visibly indexed disclosure however, the RTI link on the website is not very organised. For example, the details of RTI application are placed in public domain however, only for the month of August, 2021 that too during 2-5th August, 2022. However, at some other webpage namely, <https://mines.gov.in/ViewData/Details?mid=1448&catID=27> the pending Report on RTI application has been disclosed for the months of May, 2022, February, 2022, August, 2021 etc. The RTI statistics should regularly say, every quarter be prepared and disclosed. Further, it is observed that the disclosure of the Ministry under the heading Function at <https://www.mines.gov.in/UserView/index?mid=1264> displays a blank page. This must be looked into. Besides, the disclosure regarding budgetary allocation and expenditure as displayed by the Public Authority at <https://www.mines.gov.in/UserView/index?mid=1303> displays a blank page. Such exhibition of the important and relevant information becoming null on clicking the link wouldn't leave good impression on the citizens. This may immediately be addressed by the Public Authority. Besides, the link RTI reply and RTI Appeal and Reply returns a blank page on the website at <https://www.mines.gov.in/ViewData/Details?mid=1448&catID=108> and <https://www.mines.gov.in/ViewData/Details?mid=1448&catID=107> respectively. These may be updated immediately. Displaying of the blank page on the website appears to be a perennial issue. Another example of such a blank response on the website may be seen for RTI Manuals and Disclosure at <https://www.mines.gov.in/ViewData/Details?mid=1448&catID=35> .

Further, in terms of the disclosure of the details of the CPIO and the Appellate Authority vide their Office Order dated 27.04.2022, it is observed that two of the CPIOs are of the rank of the Section Officer. This is against the spirit of the recommendation of the CIC wherein the CPIO should not be designated below the rank of the Under Secretary in the Ministry/Departments. The Public Authority may like to consider raising the level of CPIOs from Section Officer to at least at Under Secretary level.

All in all it is suggested that the PA must revisit their proactive disclosure and be specific about displaying their web links and not mention every where the link of the home page only. In my considered view, such disclosure of the information is likely to invite more number of RTI applications than reducing them. Further, it is advised that

the PA should prepare an integrated and complete information manual for the RTI disclosure in an indexed manner as provided for in the RTI Act.

Third Party Audit

Indian Bureau of Mines (IBM), Ministry of Mines

Third Party Audit of *Suo Motu* Disclosure for 2021-22

The self assessment report as submitted by the Indian Bureau of Mines (IBM) needs serious reconsideration. The details of the suo motu disclosure provided by the IBM during 2021-22, is not systematic and mostly would require the citizens to take several round of back and forth movement on their website <https://ibm.gov.in/?c=pages&m=index&id=317&mid=24191>. Their disclosure, *prima facie*, appears to be indexed and integrated as required in accordance with the law, but the information so provided therein is not adequate for some of the items. Besides, the biggest challenge for accessing the information through this portal is that for each of the expected information one may have to keep on navigating until he reaches the stipulated information. The very purpose of providing an updated RTI compendium, well linked indexed information etc. under a single window is to making available all necessary information at one place. A variety of information indeed is available on the home page of the Public Authority, the IBM, but to reach out to them is a mammoth task.

Some of the mandatory disclosures have not been met by the Public Authority (PA) at all. For example, they have not disclosed any details about monthly remuneration received by each of its officers and employees, including the system of compensation as provided in its regulations. Besides, for the directory of its officers and employees, the PA provides details of seniority list of the officials. This is quite inexplicable. Further, some of the disclosures under a subject heading contradicts the disclosures under another related subject. To illustrate, the PA has disclosed under item head 4 (1) (b) (xiii) the manner of execution of subsidy programmes, including the amounts allocated and the details of beneficiaries of such programmes, there are no subsidiary programmes in vogue in IBM. Only concession rates are made available to Mine-owners of 'B' category mines for taking up consultancy assignments by IBM. However, the disclosure under the item head 4 (1) (b) (xiv) particulars of recipients of concessions, permits granted by it, the PA discloses IBM does not grant any concession/ permit. This is clearly in contradiction as stated earlier.

It appears that the PA has not organized any training programme for their own RTI functionaries. It is matter of record that the PA has been advised by the Central Information Commission (CIC), in their advisories for the year 2019-20 and 2020-21, that they should look into placing the information relating to number of employees against whom disciplinary action has been initiated, it appears however, these details have not been complied with by the PA during 2021-22. All in all it is suggested that

the PA must revisit their proactive disclosure and be specific about displaying their web links and not mention every where the link of the home page only. In my considered view, such disclosure of the information is likely to invite more number of RTI applications than reducing them. Further, it is advised that the PA should prepare an integrated and complete information manual for the RTI disclosure in an indexed manner as provided for in the RTI Act.

Third Party Audit

Geological Survey of India (GSI), Ministry of Mines

Third Party Audit of *Suo Motu* Disclosure for 2021-22

The self assessment report as submitted by the Geological Survey of India (GSI) needs a thorough overhauling. The details provided by the GSI during 2021-22, is not systematic and mostly would require the citizens to take several round of back and forth movement on their website https://www.gsi.gov.in/webcenter/portal/OCBIS/pages_pageHome. Their RTI disclosure are neither indexed nor integrated as required in accordance with the law as also in terms of several guidelines issued by the DoPT in this regard.

Some of the mandatory disclosures have not been met by the Public Authority (PA) at all. For example, they have not disclosed any details about the budgetary allocations, proposed budgetary projections, and the expenditure that they would have met in the current or previous financial years. Besides, the PA under reference is conspicuously silent about the system of compensation as also on the total emoluments in respect of their employees. Whereas some of the details as displayed by the PA on the home page of the website, the other details are not at all available.

It appears that the PA has not organized any training programme for their own RTI functionaries. It is matter of record that the PA has been advised by the Central Information Commission (CIC), in their advisories for the year 2020-21, that they should take up this aspect for a better understanding of their CPIOs. Besides, they should also provide details of the penalty imposed on their employees.

All in all it is suggested that the PA must revisit their proactive disclosure and be specific about displaying their web links and not mention every where the link of the home page only. In my considered view, such disclosure of the information is likely to invite more number of RTI applications than reducing them. Further, it is advised that the PA should prepare an integrated and complete information manual for the RTI disclosure in an indexed manner as provided for in the RTI Act.

Hindustan Copper Limited (HCL), Ministry of Mines

Third Party Audit of *Suo Motu* Disclosure for 2021-22

The self assessment report as submitted by the Hindustan Copper Limited (HCL) is systematic and is visibly indexed. The self assessment report of the HCL for each of the items listed in the self assessment provides for a single webpage detail namely, <https://www.hindustancopper.com/> which is essentially the home page of the Public Authority. Merely, providing the webpage link in the self assessment portal doesn't necessarily imply compliance since, the citizens have to fathom into the sea of information to access the desired information. The RTI indexed information is provided on the homepage of the PA is at <https://www.hindustancopper.com/Page/RIAct> which should have been suggested in the self assessment by the PA.

The disclosures of the PA, though may be termed as being compliant but the contents have been presented quite rhetorically mayn't necessarily be meaningful to the stakeholders. For example, while disclosing the norms for discharge of the function, the PA states that "for effective & smooth functioning of the Company including Investment decisions are initiated/mooted by the Executives of respective functional Areas for approval of the competent Authority, who accord approvals within their approved delegation of Powers." This statement in no way indicates anything about the norms. Similarly, the disclosure relating to Rules and Regulations the PA only lists four items without providing any hyperlink for accessing them. Besides, the PA against another four items namely, statements from Board/Committee/Council, Budgetary details, Subsidy programmes, and Concessions/permits etc., have stated not applicable. This aspect of the disclosure needs a revisit by the Public Authority.

On the other hand, while disclosing the other category of information, the PA have not provided any link for third party agreements, and work orders for the value having more than 5 lakh. The PA has also not disclosed information relating to the number of RTI application, and their responses on the website. The PA has also not disclosed any FAQ. These two were also the items of advisories by the CIC during 2019-20 and 2020-21 to the PA. The transfer policy of the PA is as old as of 2011 they should be revised even if no change is needed in the policy. Besides, the PA has provided the details of the training programme of the CPIOs till 2017 suggesting that there were no programme organised during 2021-22.

All in all it is suggested that the PA must revisit their proactive disclosure and be specific about displaying their web links and not mention every where the link of the home page only. In my considered view, such disclosure of the information is likely to invite more number of RTI applications than reducing them. Further, it is advised that

the PA should prepare an integrated and complete information manual for the RTI disclosure in an indexed manner as provided for in the RTI Act.

Third Party Audit

National Institute of Rock Mechanics (NIRM), Ministry of Mines

Third Party Audit of *Suo Motu* Disclosure for 2021-22

The self assessment report as submitted by the National Institute of Rock Mechanics (NIRM) calls for a complete introspection. The details provided by the NIRM during 2021-22, is not systematic and mostly would require the citizens to take several round of back and forth movement of their website <https://www.nirm.in/index.php> . Their RTI disclosure are neither indexed nor integrated as required in accordance with the law as also in terms of several guidelines issued by the DoPT in this regard.

Some of the mandatory disclosures have not been met by the Public Authority (PA) at all. For example, they have not disclosed any details about the budgetary allocations, proposed budgetary projections, and the expenditure that they would have met in the current or previous financial years. Besides, the PA under reference is conspicuously silent about the system of compensation as also on the total emoluments in respect of their employees. Whereas some of the details as displayed by the PA on the home page of the website, the other details are not at all available.

It appears that the PA has not organized any training programme for their own RTI functionaries. It is matter of record that the PA has been advised by the Central Information Commission (CIC), in their advisories for the year 2019-20 and 2020-21, that they should take up this aspect for a better understanding of their CPIOs.

All in all it is suggested that the PA must revisit their proactive disclosure and be specific about displaying their web links and not mention every where the link of the home page only. In my considered view, such disclosure of the information is likely to invite more number of RTI applications than reducing them. Further, it is advised that the PA should prepare an integrated and complete information manual for the RTI disclosure in an indexed manner as provided for in the RTI Act.