

# The RTI **implementation** challenge



**AN OVERVIEW OF IMPLEMENTATION OF  
RTI LAWS IN FEDERAL, SINDH, PUNJAB  
AND KHYBER PAKHTUNKHWA**

# THE RTI IMPLEMENTATION CHALLENGE

An overview of implementation  
status of RTI laws in Federal,  
Sindh, KP and Punjab

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## ABOUT THIS REPORT

Media Matters for Democracy (MMfD) and its team of four reporters sent 195 RTI requests to various government ministries, departments, and offices in the federal capital and three provinces of Pakistan between October 2017 and March 2018. We wanted to use the RTI laws to acquire data for long-form investigative news reports and, in doing so, also check the status of implementation of the laws. In this publication, we present a brief summary of the information requests, the type of responses received, and key insights gained about the implementation of the RTI laws from the entire process.

Information is a  
basic human right  
and the  
fundamental  
foundation for the  
formation of  
democratic  
institutions

Nelson Mandela

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## CHAPTER ONE

### INTRODUCTION

In the last five years the legislative landscape governing the practice of right to information in Pakistan has improved tremendously. Right to information (RTI) was codified as a constitutional right of the citizens of Pakistan with the 18<sup>th</sup> amendment in April 2010. The right was granted through the inclusion of Article 19(A) that states that **“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 the law”**.

Since 2010, RTI advocates across the country have worked towards the enactment of stronger RTI laws to ensure that citizens are able to enjoy this right in its true spirit. In mid 2013, Khyber Pakhtunkhwa Assembly became the first to enact a law that has been termed the “strongest RTI law in the whole world” by Tobey Mendel a global RTI advocate whose organization creates a global RTI ranking index. By the end of 2013, Punjab had followed suit with a strong legislation of its own. It took another three years of advocacy and pressure building before Sindh and then national assembly followed suit with strong RTI laws for their jurisdictions.

However, the presence of strong laws on paper has not directly translated into a strong tradition of public information provision. Implementation of these laws has been problematic across all regions.

In this report we present an analysis of our experience with filing and following up on 195 RTI requests in Sindh, Punjab, Khyber Pakhtunkhwa and Federal regions. The requests were filed over a period of six months between October 2017 and March 2018. The purpose of this report is to present evidence based analysis of the situation, gaps and challenges in the implementation of the law and its uptake by citizens.

## CHAPTER TWO SUMMARY AND DISTRIBUTION OF REQUESTS

The RTI requests were divided into five thematic areas: environment, governance, health, infrastructure, and law and justice. These areas were chosen for reporting after extensive brainstorming sessions with the project reporters during a boot camp at the start of the project. For each thematic area, the reporters generated story ideas and determined information needs for the stories during the boot camp sessions. Key questions for the information requests were also discussed and finalised. In some cases, the reporters and project team also went over the phrasing of the information requests and identified relevant government departments that had to be contacted for the required information.

After the boot camp, the project team initiated the process of sending out the RTI requests. In addition, the team also occasionally filed RTI requests on topical issues related to the thematic areas, for example, after news broke about the rape and murder of a six-year-old girl in Punjab's Kasur district, the project team submitted RTI requests to all police jurisdictions for statistics of crimes committed against children.



**All together 195 different requests were sent to 72 government departments between October 2017 and March 2018**

Altogether 195 RTI requests were sent to 72 different government departments during October 2017 and March 2018.

A thematic breakdown of these requests is given in Table 1.

| Region/Theme              | Environment | Governance | Health | Infrastructure | Law & Justice |
|---------------------------|-------------|------------|--------|----------------|---------------|
| <b>Federal</b>            | 9           | 36         | 3      | 2              | 3             |
| <b>Khyber Pakhtunkhwa</b> | 6           | 23         | 7      | 1              | 18            |
| <b>Punjab</b>             | 4           | 29         | 7      | 5              | 0             |
| <b>Sindh</b>              | 4           | 19         | 3      | 1              | 15            |
| <b>Total</b>              | 23          | 107        | 20     | 9              | 36            |

**Table 1: Thematic breakdown of submitted RTI requests**

The information requests filed under each thematic areas mostly connected with specific story ideas.

### **Environment RTI requests**

The environment stories were supposed to look at Pakistan's depleted forest cover and attempts by the various forestry departments to improve it. These requests asked for details about district-wise afforestation schemes, statistics on the forest areas in each province, and the status of land owned by forestry departments. The schemes and statistics were meant to provide an accurate picture of the current forest cover and compare ongoing afforestation attempts with required efforts. The land status information was important because forestry departments have been widely reported to have lost vast tracts of forest land to illegal encroachments. Additional RTIs were filed specifically to gather more information on the much-touted Billion Tree Tsunami Afforestation project of the Pakistan Tehreek-e Insaaf-led Khyber Pakhtunkhwa government.

### **Governance RTI requests**

The original governance story ideas finalised during the boot camp revolved around the performance of the capacity of law enforcement departments in dealing with domestic militancy. The associated requests asked police departments of the four regions about details about human, physical and financial resources available to the departments, crime statistics, and terrorist attacks on police personnel. In some instances, specific crimes statistics, such as crimes committed against children, were also demanded.

The governance requests filed during the course of the project also included other topical requests. These included requests to Pakistan's media and Internet regulators, the federal auditor general's office, provincial education departments, and revenue boards among others. The requests covered a variety of issues including Internet blocking, audits of mainstream media groups, allocated budgets of government departments, missing public facilities, expenses of government officials, and details of tax revenues.

### **Health RTI requests**

The health stories focused on the performance of basic health units (BHUs), the primary facilities that provide healthcare to Pakistani citizens at the lowest administrative level of the union council. The RTI requests, addressed to provincial health departments, asked for the financial resources available to the BHUs, the medical equipment available at BHUs, and statistics of the medical professionals working at the BHUs.



Additional RTIs were filed to find out the allocated and released budgets of a few major hospitals in the Khyber Pakhtunkhwa and the statistics related to specific diseases such as dengue and hepatitis in Punjab and Khyber Pakhtunkhwa.

### **Infrastructure RTI requests**

The infrastructure RTI requests were directed towards the National Highway Authority, which is a federal public body and builds road networks throughout the country.

### **Law and Justice RTI requests**

The law and justice story idea dealt with the access to justice for common Pakistani citizens and the challenges faced by the criminal justice system. RTI requests filed to high court registrars included statistics on district-wise judicial staff, the budgets allocated to the high courts, the number of judges and their perks and privileges, and data on submitted and pending court cases.

## CHAPTER THREE

### CLASSIFICATION OF RESPONSES TO THE RTI REQUESTS

The 195 RTI requests were sent to departments were located in four different jurisdictions of the country, each governed by a different RTI law. We divided our internal documentation of the status of each RTI in five categories:

1. **Pending** – These requests are still with the respective PIOs. We have not filed an internal review or complaint with the information commission. These include requests for which information provision is ongoing (for example, an RTI filed to the Punjab Police department was forwarded by the police headquarters to all district police offices and each district replied to the request separately; response from some districts is still awaited) and those for which we have received a receipt of acknowledgement from the PIO but no data yet.
2. **Completed** – These are the requests for which we have successfully received the requisite information
3. **Denied** – These requests were rejected for various reasons including the requested information being exempt from disclosure
4. **In Appeal** – We have filed a complaint with the information commission for non-provision of information or unsatisfactory response for these requests
5. **Internal Review** – We have written to the heads of the public bodies to request support for information provision for these requests. Two of the regions under consideration do not have information commissions, so the only option left for requesters including ourselves is to write internal review requests to the same department.

Table 2 provides the breakdown of our submitted RTI requests by region and category:

| Region                    | Total RTI Requests Submitted | Pending | Completed | Denied | In Appeal | Internal Review |
|---------------------------|------------------------------|---------|-----------|--------|-----------|-----------------|
| <b>Federal</b>            | 53                           | 34      | 10        | 0      | 0         | 9               |
| <b>Khyber Pakhtunkhwa</b> | 55                           | 16      | 18        | 19     | 2         | 0               |
| <b>Punjab</b>             | 45                           | 27      | 10        | 0      | 5         | 3               |
| <b>Sindh</b>              | 42                           | 12      | 10        | 0      | 0         | 20              |
| <b>Grand Total</b>        | 195                          | 89      | 48        | 19     | 7         | 32              |

**Table 2: Region-based breakdown of the status of RTI requests**

Our completion rate is almost one in 4, or around 25%, which is on par with the success rate we had heard through anecdotal accounts from other civil society organisations that conduct advocacy about RTI law implementation in Pakistan.

However, we hope that the 39 requests for which our filed appeals and internal reviews are still in the process will result in some information provision and help us raise the success rate. We are also expecting to hear back with data on some of the pending requests for which we have had correspondence with the respective PIOs. This will also boost our number of completed requests.

## CHAPTER FOUR REGION WISE PERFORMANCE

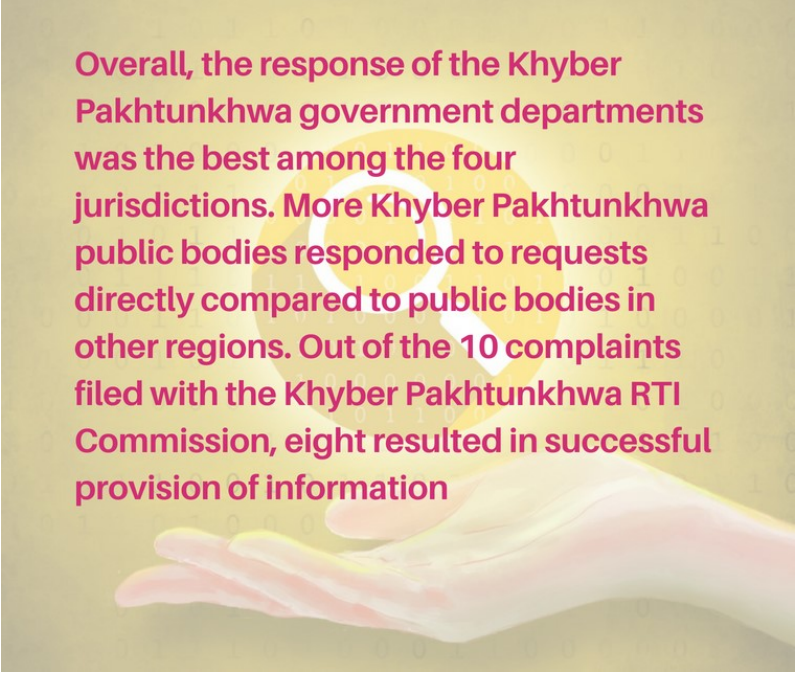
The Khyber Pakhtunkhwa government departments remained most responsive among all the regions. Out of the 10 complaints filed with the Khyber Pakhtunkhwa RTI Commission, 8 resulted in successful provision of information by the respective departments after the commission's interventions. With 32% success rate, the province was noticeably ahead of others in terms of performance. The performance of the RTI Commission in KP was also commendable, with 80% of the complaints resulting in successful acquisition of the data. Sixteen requests are still pending with provincial departments in the province.

Only 22% of the RTI requests filed under the Punjab Transparency and Right to Information Act 2013 between November 2017 and March 2018 were successful. Seven complaints were filed with the Punjab RTI Commission,

but in the absence of commissioners, the commission could only issue notices to the public bodies. Only two requests were completed as a result of the complaints while five complaints remain pending with the commission. Three internal requests were filed with heads of public bodies to expedite information provision.

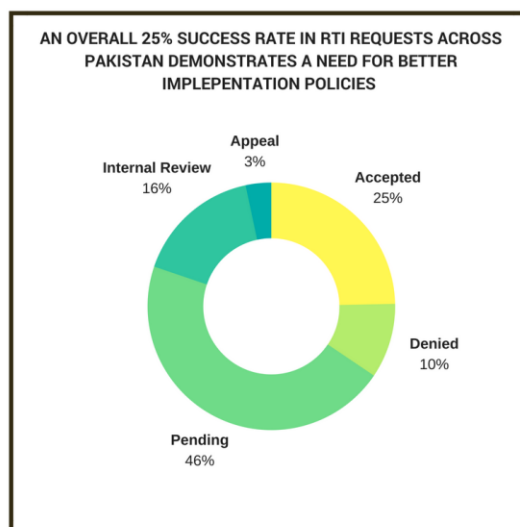
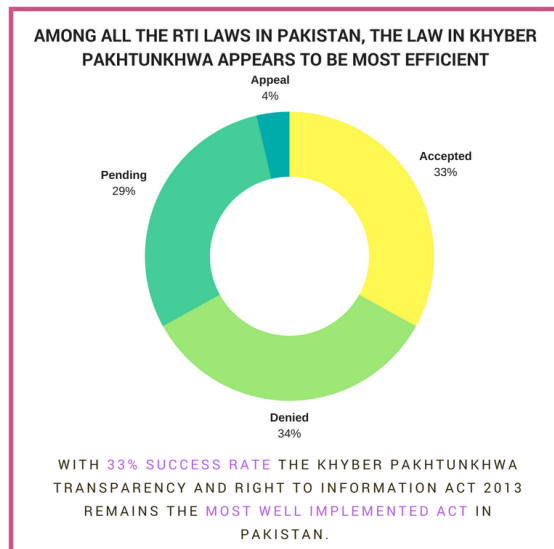
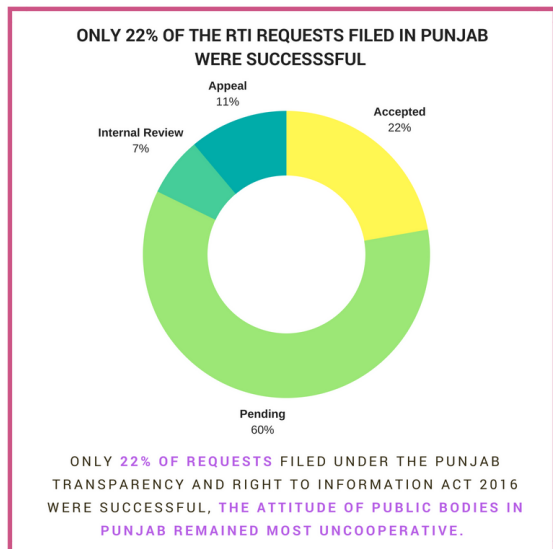
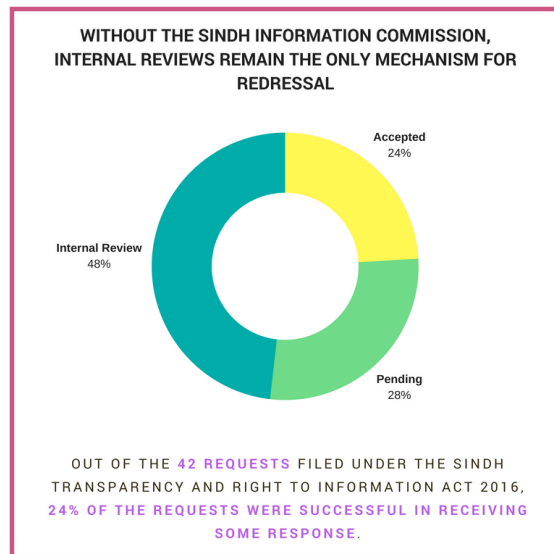
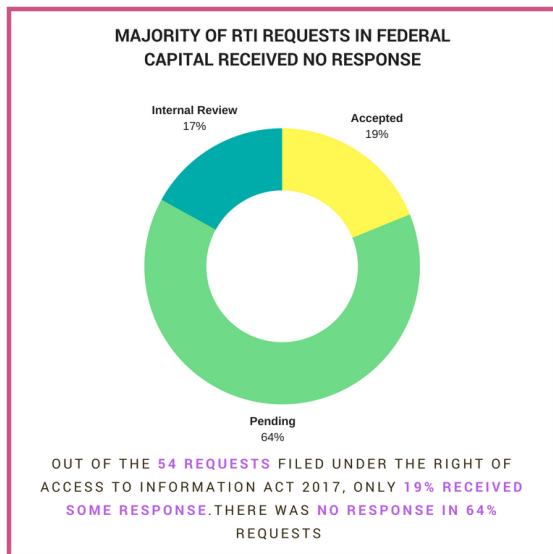
A total of 27 requests are still pending. A total of 42 RTI requests filed under the Sindh Transparency and Right to Information Act 2016. None of the requests were denied outright but responses were received only in 10 cases. Internal reviews were filed for 20 requests, most of them dealing with the Sindh High Court. Twelve requests are still pending.

Out of 53 RTI requests filed to public bodies in the federal capital, responses were received in only 10 cases. Internal review appeals were filed to heads of public bodies in 9 cases, but decisions on the same are still pending in the absence of an appellate mechanism. All in all, the success rate of RTI requests filed under the federal Right to Access to Information Act 2017 was only 18.8%. This is the lowest response rate among all the laws tested for this story.



**Overall, the response of the Khyber Pakhtunkhwa government departments was the best among the four jurisdictions. More Khyber Pakhtunkhwa public bodies responded to requests directly compared to public bodies in other regions. Out of the 10 complaints filed with the Khyber Pakhtunkhwa RTI Commission, eight resulted in successful provision of information**

## A REGIONAL COMPARISON



## CHAPTER FOUR

### CLASSIFICATION OF DENIED INFORMATION

Most of our denied requests were due to the Peshawar High Court. Basically, we had envisioned a data story where we would report on the judicial arm of Pakistan's criminal justice system. We believed that if we could get data from the high courts of pending cases, budgets allocated and other such details, we would have evidence to contextualise the issues citizens face when they seek justice. Most of the information we had requested pertained to the lowest tier of the judiciary: the district and sessions court. These are the courts most frequented by common Pakistanis and it is here we felt that justice is delayed or denied. The Khyber Pakhtunkhwa RTI law includes the subordinate judiciary in its definition of a public body, but not the High Court. We thought the High Court's registrar office would have all the necessary information about the subordinate judiciary since it supervises their operation. However, we were mistaken.

The registrar refused to entertain the requests and would not hear our arguments about the requests pertaining to the subordinate judiciary. During this process, we also discovered that the advocacy campaigns for the Khyber Pakhtunkhwa RTI laws have been long demanding the High Court to be included in the definition of the public bodies in the law and there has been pushback from the judiciary and the legal segment of the bureaucracy on this issue. Not knowing these issues, we had walked right into the ongoing confrontation. We are now trying to re-route these RTI requests directly to the subordinate judicial offices so we may still be able to do our planned story.

Two other requests denied by Khyber Pakhtunkhwa departments included one request sent to the provincial information department and another to the law department. Both were regarding amendments to the provincial RTI law approved by the federal cabinet. While reporting on the approved amendments for our website, we found out that the government officials were uncooperative and did not want to share the draft amendments, even though these were apparently ready to be introduced to the provincial assembly for voting and passage into law. So we decided to access these draft amendments through RTI requests.

The law department denied the request and maintained that it was not custodian of the requisite information and that we should contact the information department. We had already done that. The information department used Section 18 of the provincial RTI law, which states that information whose disclosure affects the free and frank discussions on policy matters under deliberation are exempt. We were of the opinion the government had not had any public discussions on the law before it presented the amendments to the provincial cabinet for approval and now that these were approved by the cabinet, the amendments were technically beyond the policy deliberation phase.

We were about to file complaints with the information commission when the government put the amendments on the provincial assembly's legislative agenda and the assembly staff published the draft bill on its website thereby making it public. As we had feared, the amendments were aimed at reducing the law's strengths, which explained why perhaps the government officials did not want to disclose the amendments earlier. There was a significant resistance offered to the amendments by the civil society representatives and the bill was never introduced to the assembly. We have reported on the issue on our website. However, since the amendments were now accessible in the full, we did not feel the need to pursue the denied requests any further.

## CHAPTER FIVE

### INSIGHTS ABOUT IMPLEMENTATION OF RTI LAWS IN PAKISTAN

The process of filing information requests is slow and requires consistent follow-up with the government departments and public information officers (PIOs). Most government department ignored the requests or avoided providing completed information in a timely manner. The weak or non-existent appellate mechanisms in three RTI jurisdictions hindered our attempts to seek redress for non-provision of information. In some cases, the reporters working with the project team even had to use their personal connections and sources to push for information disclosure.

However, the use of RTI in Pakistan is not an entirely futile exercise. In fact, we had several positive responses, which resulted in the acquisition of rich information about the performance of certain government agencies. While we assumed all departments would be lethargic about providing information, we were often surprised by the efficiency of a few public bodies. The Khyber Pakhtunkhwa Police being one example.

In the following sections, we have documented some of the general and region-specific insights about the implementation of RTI laws in the country we were able to draw from our experience.

#### **General Issues**

The following issues seemed pervasive in all the four RTI jurisdictions where we sought information. These could be attributed to bureaucratic attitudes of information secrecy and control that are consistent throughout the country. These attitudes might be due to historical reasons – the Pakistani bureaucracy is fashioned after the pre-Independence British bureaucratic system, which did not allow local citizens access to government information – or the lack of training of the bureaucratic cadre in transparent governance and the public’s constitutional right to information. The end result, as our reporters perceived, was that government officials closely guarded public records. This practice often led to secrecy about governance issues and resistance to information disclosure.

#### **Systemic Unresponsiveness**

Chronic unresponsiveness by government departments towards information requests meant consistent follow-up became crucial. Other than a few public bodies in Khyber Pakhtunkhwa and Sindh, most government departments across the country remained oblivious to the information requests sent them. Many did not even bother to acknowledge receipt of the requests. In most cases, the project’s reporters had to persistently follow-up with the concerned departments and, in some situations, use their news contacts and sources to get the government officials to address the requests.



We used registered Pakistan Post to mail our RTI requests to the public bodies. This meant we had receipts of the outgoing mail. The Pakistan Post “return to sender” service is also quite effective, as we found out. This meant that if we made a mistake in the street address of the recipient PIO, the post would be returned to our mailing address. In most cases, we either called government agencies to confirm their addresses prior to mailing the information requests or got the addresses off their official websites, so we were quite certain about the correctness of the addresses. Overall, we only had four letters returned. Some of these were returned because the official to whom the envelope was addressed had left office or because another officer in the same department had been appointed as the PIO. For some of the requests where government departments provided us with data in response, we also noted that they had received our letter within two to three days of our post date. Therefore, we are confident that almost all our mail was received by the PIOs and heads of public bodies we addressed. Ideally, as per the RTI laws, we should have received letters acknowledging receipt of the RTI requests. But, in most cases, we did not.

We attempted to confirm the receipt of each RTI request the best we could. This was far more difficult than calling a government department to confirm their street address. It was especially challenging for departments which have still not appointed a PIO. In such cases, we often had to contend with the office staff of a secretary – the top bureaucratic position in a department – and the excuse we heard most often was the staff could not sift through a huge volume of mail to confirm our letter was received. In some instances we did receive verbal confirmations only, but nothing in writing.

Our reporter in Karachi, Sindh, had to pay multiple visits to the government departments where we had submitted RTI requests. In some instances, he sat for hours in the government offices to get the officials to acknowledge and address the records requests. His informed opinion was that the RTI process in Sindh is too time-consuming and frustrating for ordinary citizens to regularly use their legal right. He also discovered that the postal system on which we were depending in all the four jurisdictions was weak in the rural areas of interior Sindh. Getting information about the receipt of requests was nearly impossible without persistent telephone contact, he noticed.

The lack of receipts of acknowledgement from the PIOs added uncertainty to the overall performance of the country’s RTI regime. Each of the four RTI laws we used in the four different jurisdictions gives a different timeframe for the PIOs to respond to information requests. This time period varies from 10 working days to 15 working days but can be extended to as many as 20 to 28 working days if the PIO (Public Information Officer) sees fit. We had set up a spreadsheet system to alert us when the stipulated time for requests was over so we could send reminders to the PIOs or file internal reviews with their bosses or submit complaints with the information commissions. But in the absence of confirmed dates of receipt, we had to rely on guesswork and that put our system at a certain disadvantage. When we filed complaints with the Khyber Pakhtunkhwa information commission, it also required us to confirm if our requests had been

received by the PIOs and we had to rely on registered post submission receipts to convince it that we were not making the requests up.

We also noticed that sometimes we would get opportunities to speak with the PIOs initially but they would disappear after we had sent them the information requests. This again put us in the dark about the fate of the requests and in some cases we would have to consider filing complaints and internal reviews.

We did receive some receipts. Sometimes these were in the form of carbon copies of internal communication where the PIOs wrote to other officials within their departments to seek the records we had requested. The receipt letters were not always followed up with provision of information, though.

In a few cases, we also received calls from the PIOs to negotiate delivery of the public records. Mostly, they either needed some clarification on the data we had requested or wanted to check if we can receive the public records via e-mail or fax.

### **The Institution of the PIOs**

Through our conversations with advocates and activists of the access to information movement in Pakistan, we had learned that the office of the PIO was a cornerstone of the entire RTI system. We started seeing the truth of this statement right from the start of the project. Early in the project, we started a task of confirming the PIOs of government departments in Punjab and Khyber Pakhtunkhwa. We abandoned this task after a week of calling public bodies. What we found in this short period was most of the existing contact information available with the provincial commissions was outdated. Often the phone numbers were disconnected. Sometimes the designated PIOs had been transferred to other departments and the people who had replaced them did not know about their PIO duties. In several cases, we had to explain the right of access to information and the role of a PIO to officers who were listed as PIOs in government records.

The problem was more severe in government offices located in rural and remote areas compared to urban centres. In fact, in our week's worth of contacting PIOs, we observed that the farther we moved from provincial capitals, the worse the level of familiarity with RTI laws and regulations got.

Some of the PIOs who did seem confident over these telephone conversations about their role in the RTI system also confessed that they had undergone trainings conducted by the information commission or other civil society organisations. This suggests that more training for the PIOs got actually bring an improvement in the implementation of the RTI laws in Pakistan.

We also noticed that government offices which already had an active public-facing function or had efficient public relations personnel were more amenable to information requests. In these offices, it was mostly the people in-charge of handling media requests

were also given the task of addressing information requests. The Punjab Emergency Services popularly known as Rescue 1122, for example, had its Public Relations Officer working as the PIO and this officer quickly responded to our information request. Similarly, departments where the RTI task was assigned to either legal or research and development units also appeared to be more efficient in dealing with the requests. These units, we felt, had easier access to the data, especially statistics, which we often requested.

In some cases, we found out that even though the PIOs were active in communicating with us and understood the requirements of the RTI laws, they were dependent on other officials in their establishment to provide the required public records. Often these officials were superior in rank and command to the PIOs and therefore the PIOs were forced to either defer to their orders or leave their indifference to the information requests unchallenged.

We encountered this with the Pakistan Electronic Media Regulatory Authority (PEMRA), the country's private broadcast media regulator, where we discovered the Operations wing was reluctant to provide information even though the PIO had taken up our requests with the wing several times. Similarly, the Punjab Police's PIO forwarded our request to the district police offices of 36 Punjab districts but now we had to wait for individual responses from each district. While some of the districts responded quickly, we are still waiting to hear back from over 20 districts on the request.

The PIO position is an additional charge, which means it is not a new job created in the government departments to specifically deal with information requests rather existing employees are tasked with handling the requests on top of their regular work. The PIOs do not have any incentive to provide the information in a timely and efficient manner, especially if information provision is additional work-load for them or if they are bosses do not approve of information disclosure.

### **Better Record-Keeping and RTI Efficiency**

One of the early successes in our RTI requests was from Karachi in Sindh. Sindh only passed its new RTI law in April 2016 and we knew that there was no implementation of the law there when we sent out requests to Sindh government departments in September. So, it was pleasantly surprising that a government office from Karachi wrote back with data. Right around the time, we also received information on a request we had written to the Khyber Pakhtunkhwa police department.

A similarity in the data provided for these two requests was it seemed the departments had the information well-compiled and ready in their records prior to our requests. So they probably did not have to do much hard work to gather the information and provide it to us. This observation aligns with an important section in all the RTI laws in the country which orders the government departments to improve their record-keeping.

We feel that those organisations which are good at maintaining records internally and especially those departments that are doing their record-keeping in digital formats are more open to and less fearful of information requests. For example, the Punjab Emergency Services or Rescue 1122, which is the equivalent of Pakistan’s 911, keeps digitised records of its rescue operations. So when we requested them to share the data of total number of emergency calls from the past five years for all 37 districts of the province, they responded within days to our request despite the large volume of data we had requested. This suggests that along with the strengthening the institutional position of PIOs, improvements in record keeping could also make the RTI laws more effective.

## **Region-Specific Issues**

The following challenges were faced regarding the RTI requests in one or a few, but not all, jurisdictions during the course of the project.

### **Absence of Information Commissions at the Federal Capital and in Sindh**

The Sindh and Federal governments passed new RTI legislations in April and September 2017 respectively. Both laws called for setting up an appellate body – the information commission – to not only hear citizen complaints about the non-provision of public records but also to raise the awareness of government officials about the law’s salient features. However, both the Sindh government and the federal government failed to set up the commissions and appoint three information commissioners within the six-month timeframe stipulated in the law. (Both governments appointed the commissioners in May at the end of their parliamentary terms, but there is no indication if the commissions became functional in June.)

Due to the absence of the information commissions, there was no way for the project team and its reporters to file appeals against the unresponsiveness of government departments. We initially resorted to submitting internal review applications to heads of public bodies in the two jurisdictions but it soon became clear that these applications were also not having any effect. Our Islamabad reporter went to court against two public bodies and got a decision in his favour, which resulted in some data provision and intimation to the federal government by the high court to set up the information commission as soon as possible.

### **Controversial Projects and Alleged Nepotism in Khyber Pakhtunkhwa**

Our reporter in Peshawar, Khyber Pakhtunkhwa, found it extremely difficult to get public records through RTI requests from the Lady Reading Hospital and the Billion Tree Tsunami Afforestation project office. Both public bodies are not exempt from information disclosure. However, both have direct links with the ruling party in the province, the Pakistan Tehreek-e Insaaf. The administrator of the hospital is a cousin of the party’s chief, and the afforestation project has become a pivotal point in the party’s

political sloganeering. At the same time, allegations of irregularities are regularly levelled against both the hospital's administration and the project's claims. Our Peshawar reporter believed the blocking of access to information linked to these public bodies might be an attempt to protect the party against any potential bad press.

### **Inaccessible Budget Information in Sindh and Punjab**

Our Sindh reporter hit a wall when trying to seek access to public records about the budgetary allocations for basic health units in Sindh. The province is notorious for its terrible state of public health and education facilities. Our reporter felt the provincial authorities were closely guarding the budgetary data and deflecting attempts to access it.

In Punjab, too, our reporter found resistance in accessing health-related expenses. Even though annual budgets are publicly published by the provincial finance departments on their websites, specific budget information about primary healthcare was inaccessible. Our Punjab reporter believed the information might have been kept away from the public eye to cover up irregularities.

## CHAPTER SIX RECOMMENDATIONS

The citizens' constitutional right of access to information cannot be truly realized without ensuring effective implementation of the RTI laws. The following recommendations have been derived from the analysis of implementation issues across Pakistan

### Recommendations for civil society

1. Continued mapping of RTI implementation, in particular identification of gaps and challenges
2. Continued filing of requests to public bodies to ensure that both public bodies and citizens are aware of the law and legal processes surrounding it
3. Sustained follow ups of filed request, including the testing of redress mechanisms, both internal reviews and through Commissions
4. Continued advocacy with government bodies to ensure that the procedural issues with the law's implementation like non formation of rules, constitution of commissions, budgetary allocations etc. do not hamper the effective implementation of the law

### Recommendations for media

1. Continued coverage of developments related to RTI law and its implementation, including journalistic commentary on the lack of necessary measures like the formulation of commissions and appointment of commissioners
2. Continued use of RTI laws for public data acquisition, regardless of the challenges, in order to demonstrate the potential of bringing transparency and facilitating accountability through public data

### Recommendations for government

1. Urgent constitution of National and Sindh RTI Commissions
2. Operationalization of laws in Federal and Sindh, including budgetary allocation and establishment of set up to assist the commissioners
3. Awareness building about the law within public bodies
4. Review of the current structure within which PIOs are operating and creation of negation mechanisms to ensure their response to information requests is not hampered by a fear of negative impact on departmental performance reviews
5. Educational campaigns and strategies to educate bureaucracy about the law, including but not limited to aware raising sessions in the CSS Academy and the likes.

## ABOUT THIS INITIATIVE

**Media for Transparency** is a Media Matters for Democracy initiative that aims to combine data journalism skills with the use of right to information (RTI) laws to develop data-driven investigative news stories that serve the public interest. We are seeking to build the capacity of selected Pakistani journalists to use local RTI laws effectively for their news reporting to help journalists work on collaborative investigative news projects and to produce in-depth news stories about political and social issues that can increase accountability of elected governments at the federal, provincial and local levels.

