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Juggling transparency and accountability: the RTI and R2P dilemma in India

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Abstract: Democracy is based on the people's consent. The Right to Information (RTI) Act grants citizens the authority to acquire official information from government authorities within limitations. The 'right to privacy' safeguards the confidentiality of personal information, preserves individual autonomy, and ensures freedom from unwarranted intrusion or surveillance. The Indian Constitution acknowledges and protects the fundamental rights of the 'right to access information' and 'right to privacy' within a unified legal framework. Nevertheless, it is plausible that numerous scenarios exist in which the rights mentioned above may intersect, leading to a conflict between an individual's right to privacy and the need to grant access to information. In instances of this nature, the judiciary is tasked with weighing the conflicting interests and ascertaining the suitable course of action. This paper explores the importance of the rights above and the judiciary's role in reconciling and aligning these rights.

Keywords: right to information; right to privacy; judiciary; legal rights; information commission; human rights.

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1 Introduction

Privacy is a fundamental aspect of human existence, crucial in fostering creativity and individuality (Jain, 1979). When contemplating a society devoid of personal privacy, one is reminded of George Orwell's famous literary work, '1984'. Within the context of this literary work, the author elucidates a dystopian vision of the future, wherein a despotic regime exercises pervasive surveillance over the populace, inundating them with a constant barrage of propaganda-laden visual media, including video displays and banners bearing the ominous slogan, "Big Brother is watching you". According to Rengel (2013) emerging technologies and recent activities threaten individuals' privacy. The advent of technologies such as biometrics and DNA analysis has facilitated the acquisition and

dissemination of sensitive personal information (Banisar, 2011). In light of these circumstances, more than 70 nations and numerous international conventions have implemented agreements and regulations to grant individuals a certain degree of authority over collecting and utilising sensitive information by both public and private entities.

The primary objective of the Freedom of Information Act (FOIA) is to facilitate the provision of information to citizens, enabling them to participate in self-governance effectively. According to Glenn Dickinson, the responsibility of being a watchdog has unquestionably served as the main driving force behind implementing the FOIA. Likewise, the concept of the right to privacy (RTP) pertains to the legitimate anticipation held by individuals, organisations, or institutions regarding their ability to exercise discretion in determining the manner, timing, and degree to which they disclose personal information to others (Westin, 1969).

The aforementioned rights are frequently perceived as interconnected, operating as mutually reinforcing principles that protect individuals and enhance governmental accountability (Banisar, 2011). The central issue under consideration pertains to the difficulty of defining a distinct boundary, as a significant portion of Freedom of Information (FOI) laws also serve as safeguards for individuals' personal information. The provision concerning the RTP is widely acknowledged as one of the most commonly invoked exemptions in global right to information (RTI) legislation. Unfortunately, the Right to Information Act (RTIA) lacks precise delineations for crucial terminologies, including 'personnel information', 'public activity or interest', 'unwarranted invasion', and 'public interest'. As a result, the absence of clear guidelines has resulted in this exemption's excessive and subjective interpretation (John et al., 2016).

1.1 Objectives of the study

The primary objective of this study is to investigate two core human rights, specifically the 'RTP' and the 'right to access information'. The primary aim of this article is to provide a comprehensive understanding of the concept of 'privacy' and assess the significance of the legal framework in protecting the fundamental rights associated with 'privacy' and 'information'. In addition, the author offers specific recommendations in the concluding section to resolve the dichotomy between the 'RTP' and the 'RTI'.

1.2 What is FOI legislation

Anders Chydenius, a prominent figure in the realms of politics and the clergy, is widely acknowledged as a leading proponent for enacting legislation on FOI. Chydenius derived inspiration from Chinese practices and articulated that China, as a sovereign entity, has employed Imperial censorship and established an institution rooted in a philosophy marked by humanist ambiguity. The primary aim of this institution is to conduct thorough assessments of the government and its officials, to uncover mismanagement, administrative inefficiency, and governmental corruption. China is widely regarded as a model that other nations can emulate in this particular domain.

The FOIA guarantees individuals the right to formally request and acquire any record, document, or data held by any governmental entity, irrespective of its jurisdictional level. Furthermore, under the 'FOIA', members of the general public possess the capacity to acquire government-held information relevant to public policy inquiries. According to Ackerman and Sandoval-Ballesteros (2006), the enactment of FIO legislation can

generate advantages across three significant domains of society, namely politics, economics, and public administration.

“Within the domain of politics, citizen engagement serves as a catalyst for transitioning from a state of passive participation, marked by occasional voting, to active involvement. This active involvement entails citizens assuming responsibility for holding the government accountable and actively contributing to developing public policies. This transition facilitates the improvement of political discourse and promotes a more streamlined policy-making process. Transparency in the economic sphere improves operational efficiency by cultivating a reliable investment climate. As a result, capital is empowered to make well-informed choices regarding the most advantageous allocation and timing of investments. Kaufmann and Vishwanath (2008) state that the market depends on information. Promoting transparency within public administration’s domain serves to augment public officials’ decision-making proficiencies, thereby cultivating heightened levels of responsiveness and accountability towards the broader citizenry. Rose-Ackerman argues that effective corruption management can be achieved by implementing measures to augment the complexity level involved in concealing illicit agreements and activities.” (Rose-Ackerman)

In a democratic society, it is incumbent upon decision-makers to fulfil their obligation of disclosure. The ‘FOI’ initiative aimed to safeguard against covert government activities. In addition, its design’s primary objective was to equip the general populace with the necessary information to assess the performance of public officials. In the realm of public policy, the citizens ultimately reap the benefits or bear the accountability for the decisions made. Individuals must be able to draw a definitive assessment regarding the efficacy of the policy currently deliberated. In order to accomplish this objective, the legislation was formulated to safeguard individuals subject to administrative precedents through the implementation and enforcement of laws, administrative regulations, or a combination of both. The primary objective of the ‘FOIA’ was to ensure that the public is informed about the nature of legal precedents on time, preventing the government from clandestinely implementing laws or administrative regulations without public knowledge. Therefore, the act aimed to guarantee that individuals whom administrative precedents would already safeguard possessed a comprehensive understanding of the essence of such decisions from the beginning.

2 What is the RTP?

Throughout the annals of human history, individuals have consistently exhibited an inherent need for a specific degree of personal privacy. Privacy is a multifaceted concept encompassing several dimensions, such as spatial privacy, bodily privacy, and personal belongings (Rengel, 2013). Aristotle, the esteemed philosopher from ancient Greece, emphasised distinguishing between matters about the public sphere, known as the ‘*polis*’, and those concerning personal life, referred to as ‘*Oikos*’. Furthermore, the development of the ‘RTP’ can be ascribed to the scholarly contributions of John Locke, a distinguished philosopher hailing from England. John Locke’s influential publication, ‘Two Treatises on Civil Government’, presented the concept of natural rights, positing that these rights are inherent and cannot be voluntarily surrendered (Tiwari, 2018). Privacy is not a newly recognised entitlement that requires additional clarification. The legal codification

process remains an essential prerequisite, despite its historical origins within the standard law system (Tiwari, 2018).

The concept of the 'RTP' was introduced by Samuel D. Warren and Louis D. Brandies, two American scholars, in their renowned article titled 'The RTP', which was published in 1890 (Alibeigi et al., 2019). In their paper, the authors discussed the aspect of privacy referred to as 'non-interference'. They posited that the concept of the 'Right to life' encompassed the notion of the 'right to enjoy life'.

According to, 'Black's Law Dictionary', the 'RTP' encompasses a variety of rights considered inherent within the framework of a properly regulated society. These rights restrict government intervention in an individual's relationships or activities while granting them the freedom to make crucial decisions regarding themselves, their family, and their interpersonal connections. According to Moore, defining privacy is a multifaceted and arduous undertaking. The original formulation of the concept of privacy was put forth by Thomas M. Cooley, who articulated it as the 'right to be free from interference' (Acharyulu, 2018). The committee, consisting of younger members, investigated in 1972 and ultimately determined that privacy could not be sufficiently defined (Younger, 1973).

Justice Jeevan Reddy further elaborated upon the concept of privacy in the landmark R. Rajagopalan case of 1994. Every individual has the right to protect their privacy, including their physical well-being, family relationships, marital status, reproductive choices, maternal duties, child-rearing responsibilities, and educational pursuits. Disseminating any information on the aforementioned topics is strictly forbidden without the individual's explicit permission, whether positive or negative, regardless of its veracity or sentiment. Engaging in such behaviour would constitute a breach of an individual's RTP and could result in legal liability, potentially leading to the payment of compensatory damages.

In 1890, Warren and Brandeis authored a seminal paper positing that the 'RTP' primarily encompassed the entitlement to protection from unwarranted individual intrusion. The infringement upon individuals' privacy rights has been observed through various means in recent years, including government investigations, wiretapping, and electronic surveillance conducted by law enforcement agencies. Additionally, the violation of privacy has been perpetuated by irresponsible press coverage and research publications that have disregarded the boundaries of individuals' right to confidentiality (Callmann, 2013).

2.1 Constitutional guarantees for the 'RTIA' and 'RTP'

The ratification of the Universal Declaration of Human Rights (UDHR) by the United Nations General Assembly in 1948 marked a significant milestone in the progress of the RTI and privacy. The announcement represented the first official acknowledgment of both rights as fundamental human rights, indicating significant progress for each right. As per the provisions outlined in Article 12 of the Universal Declaration of Human Rights (UDHR), "Individuals possess the inherent entitlement to safeguard their privacy, family life, residence, and communication against unwarranted intrusions. Furthermore, this protection protects their dignity and reputation from unjustifiable assaults. Every person has an inherent right to legal protection against interference or attacks".

The freedom of speech and expression, as outlined in Article 19 of the Universal Declaration of Human Rights, encompasses the rights to FOI and a free press. The

inherent entitlement to freedom of expression encompasses the unrestricted ability to actively pursue, acquire, and disseminate a wide range of information and ideas without being constrained by geographical boundaries. This can be achieved through various channels, including oral or written communication, artistic forms of expression, or any preferred communication medium.

The interpretation of the 'RTP' within the framework of the Indian constitution is subject to certain ambiguities. Throughout the drafting process, proponents within the fundamental rights subcommittee advocated for incorporating the 'RTP' as a fundamental right. K.M. Munshi and others advocated for protecting the fundamental human RTP within the confines of one's residence and in personal correspondence (R. Rajagopal vs. State Of Tamil Nadu, 1994). In his seminal work titled 'States and Minorities Report', Dr. B.R. Ambedkar espoused safeguarding individuals' fundamental right to security in their persons, residences, and personal belongings, emphasising the importance of protecting against unwarranted searches and seizures. However, in subsequent stages, all endeavours to establish the 'RTP' as an inherent entitlement proved unsuccessful.

The Indian Supreme Court has interpreted several constitutional rights, focusing on Article 21. This article guarantees the right to life and liberty. The court has recognised the importance of the 'living tree doctrine' in interpreting the Constitution. This approach ensures the Constitution remains relevant and effective in addressing present-day concerns. The aforementioned interpretation has significantly contributed to acknowledging the 'RTP', a fundamental element of the Indian Constitution. The privacy issue gained prominence with the landmark case of 'Kharak Singh vs. State of Uttar Pradesh' in 1963. In this case, Justice Subbarao, in his dissenting opinion, underscored the imperative of acknowledging the RTP, even without explicit provisions within the Indian Constitution (Tiwari, 2018). The second significant event pertains to the Supreme Court's decision in the case of 'Justice K.S Puttaswamy & Others vs. Union of India (2017)' in which it upheld that the RTP is fundamental and constitutional. Nevertheless, the Court refrained from offering explicit direction regarding the degree to which this entitlement should be expansively construed. The Supreme Court has played a pivotal role in recognising and establishing the 'FOI' as a fundamental human right. The landmark legal case of 'S.P. Gupta v. Union of India' brought significant attention to the strong advocacy for the 'RTI'.

The emergence of the 'RTI' movement in India can be traced back to Article 19 of the Indian Constitution, which enshrines the fundamental right to freedom of speech and expression. The enactment of FOI legislation is crucial for a nation, even in cases where constitutional provisions already exist to protect fundamental rights such as the 'RTI' or 'freedom of expression'. The rationale is that the realisation of constitutional provisions can solely be accomplished through the intermediary role of legal statutes (Ackerman and Sandoval-Ballesteros, 2006). The Supreme Court has significantly contributed to recognising the right to access information as a fundamental human right. The legal proceeding known as 'S.P. Gupta v. Union of India' was marked by passionate advocacy for the right to access information (Malik, 2011).

In delivering the verdict, Justice Bhagwati articulated that the Indian constitution embraced the concept of democracy, recognising the imperative for any democratic administration to uphold accountability as a prerequisite for effective functioning. The fundamental concept of accountability is predicated upon the notion that individuals must acquire knowledge of the functioning of their democratic system. For citizens to fulfil

their civic responsibilities and effectively contribute to participatory democracy, they must possess a comprehensive understanding of the functioning of their government.

The current responsibility for acknowledging and interpreting the RTP lies with the Judiciary, as there is currently no established legal framework. The Indian Parliament has officially enshrined the RTI Act into legislative regulations for 17 years (Acharyulu, 2018).

2.2 Right to information vs. RTP

President Lyndon Johnson articulated the notion that a robust democracy relies on the public's ability to access information that is consistent with national security during the enactment of the 'FOI' legislation in the United States Congress. Withholding decisions that can be shared without detriment to the public interest should be universally prohibited. Nevertheless, the distinction between the concepts of transparency and privacy necessitated substantial exertion to establish.

Under the Right to Information legislation (RTI), individuals possess an inherent entitlement to obtain access to information held by the government. Nonetheless, the entitlement to privacy also confers upon individuals the inherent right to determine how their personal information is gathered, obtained, and employed by governmental bodies and establishments.

The prevailing consensus is that governmental institutions hold a significant quantity of personal information, including but not limited to medical records, biometric data, income tax returns, and other types of sensitive data. The potential encroachment upon an individual's privacy may arise due to incorporating such information within the scope of the RTI (Shairwal and Singh, 2021). As per the provisions outlined in Article 19(2) of the Indian constitution, the entitlement to privacy may be subject to reasonable limitations to safeguard the sovereignty and integrity of India, ensure state security, foster amicable relations with foreign nations, preserve public order, upholding standards of decency and morality, or addressing matters about contempt of court, defamation, or incitement to commit an offense.

The 'FOIA' aims to foster an environment characterised by transparency and accountability in both public and private entities. The conflict between the 'RTI' and the 'RTP' is delineated by Sections 8(1)(j) and 11 of the Right to Information Act (RTIA) of India. Contrarily, the provision outlined in Section 8(1)(j) of the legislation pertains to divulging personal information that could potentially lead to an unwarranted violation of privacy without any discernible societal benefit. Nevertheless, the release of the aforementioned data may be sanctioned by the central public information officer (PIO), the state PIO, or any other appellate authority, provided that it is deemed in the public's best interest. The 'RTIA' does not include specific definitions for the concepts of 'privacy' or 'unwarranted invasion', similar to how the Official Secrets Act (OSA) does not define the term 'secret'. As a result, a certain level of flexibility is present, which can impede the fulfilment of legitimate requests made under the RTIA.

In addition, it should be noted that Section 11 of the Right to Information (RTI) Act ensures the maintenance of specific principles of natural justice. In situations involving confidential information provided by a third party, it is crucial to allow the third party to express their viewpoint before reaching a definitive determination regarding the disclosure of said information. Unfortunately, a widespread misinterpretation of this specific section exists among PIOs and adjudicators. There is a proclivity among

individuals to extend the application of confidentiality to all external information rather than limiting it to information that warrants such treatment. Furthermore, it is common for Section 11 to be perceived as conferring upon the third party the power to reject decisions rather than allowing them to express their views. Simultaneous occurrences of both of these misinterpretations are observed in numerous instances (John et al., 2016).

The proper implementation of the privacy clause and consultation process of the third party under the 'RTIA' requires the appropriate guidance and instruction of the nodal agencies, such as the Department of Personnel and Training (DoPT) at the central level and the nodal departments in the respective states (Acharyulu, 2018).

2.3 *Judiciary's role in balancing RTI and RTP*

The Supreme Court of India, in its capacity as a guardian of the Constitution, has been granted the authority to interpret various clauses of the Constitution comprehensively when deliberating on multiple cases (Boruah, [year]). In the course of its duties, the esteemed Supreme Court of India has frequently emphasised the importance and necessity of establishing an interpretive framework to uphold both the 'RTP' and the 'RTIA'. This measure was implemented to ensure the accurate and appropriate interpretation of the laws—several crucial cases. The 'RTI' and the 'RTP' have been extensively deliberated upon in numerous prominent legal cases, including the following instances:

- In the '*Menaka Gandhi vs. Union of India*' case judgment, "A legal system may curtail the RTP, and this method would have to be just, fair, and reasonable to be effective" (Beg, 1978).
- In the '*Govind vs. State of Madhya Pradesh*' case Judgement, "If there is a compelling governmental balance of interest that outweighs the RTP, that must be fulfilled by reducing the right to privacy" (Mathew, 1975).
- In '*R. Rajagopal vs. State of Tamil Nadu*', case Supreme court gave a verdict that "A person who willingly inserts himself or herself into a controversial situation may not be entitled to the protection afforded by the right to privacy" (R. Rajagopal vs. State Of Tamil Nadu, 1994)

2.3.1 *Puttasawamy vs. Union of India Case*

'Law cannot remain static'. Various changes in people's political, economic, and social lives necessitate dynamic law (Tiwari, 2018). However, two well-known judgments, the Girish Ramchandra Deshpande case and the Canara bank case, have muddled the distinction between the two rights above.

2.3.2 *Girish Ramchandra Deshpande case*

The termination of the initial enthusiasm surrounding the conflict between the 'RTI' and the 'RTP' was observed with the Supreme Court's denial of the special leave petition (SLP). In this particular case, the Supreme Court upheld a decision made by the Mumbai high court in 2011. The Mumbai high court ruled that the information regarding memos, complaints, and disciplinary inquiry reports related to public officials should be considered as personal data and thus could be withheld. In the aforementioned ruling, the

Bombay High Court underscored that assessing an employee or officer's performance is primarily a matter that pertains to the dynamic between the employee and the employer. The court also contended that releasing these evaluations would lead to an unwarranted infringement upon the privacy of the implicated officers. The party accountable for supervision in this situation is not the store owner, but rather the state's governing body (Acharyulu, 2018). In the aftermath of this case, there are number of RTI applications stoned down

2.3.3 *Canara bank case*

In 2017, the Supreme Court rendered a verdict in the case of Canara Bank vs. CS Syam, establishing that the details about the appointment, posting, transfer, and the authority responsible for such transfers of a public servant are considered private information of the employee, and therefore, cannot be disclosed. Given the prevailing circumstances, it becomes challenging for individuals of lower social status to grasp the true essence of the concept of 'privacy', particularly within the context of the information age in a society driven by knowledge, where corruption is rampant and various activities are concealed under the guise of privacy (Acharyulu, 2018).

Justice Frankfurf of the 'United States Supreme Court', influenced these opinions in some way, who once said that "the security of one's private life is important to a free society, and as such, it should be protected against unjustified government intervention".

According to the perspective shared by Dr. Manmohan Singh, the former prime minister of India, it is crucial to uphold a delicate equilibrium between providing accurate information and protecting an individual's RTP, which is derived from the fundamental right to life and personal freedom. Protecting an individual's privacy necessitates limiting the citizen's right to access information. Determining the appropriate demarcation point is a complex matter.

3 Striking a balance between the 'RTI' and the 'RTP'

3.1 *Codification of 'RTP law'*

The full realisation of democracy's potential hinges on effectively regulating electronic surveillance, ensuring that state or criminal entities are prohibited from engaging in treacherous activities. This can be achieved through the implementation of comprehensive legislation, except in cases where there is an immediate and tangible threat to national security (Iyer, 1990). The Watergate scandal represents a significant breach of privacy through state treachery, specifically a burglary. The topic of privacy and confidentiality presents an additional aspect argued by both governmental entities and large corporations, which contradicts the principles of transparent governance and established judicial norms (Iyer, 1990).

The Constitution recognises the 'RTP', however, the responsibility for its expansion and evolution is solely entrusted to the Judiciary (Singh, 2011). Despite the apparent contradiction between RTI and RTP, they may be harmonised by establishing standard definitions and maintaining internal consistency. This will help limit conflict and establish a sense of equilibrium. However, legislative efforts might be required to do so, and it will involve the introduction of particular legal provisions.¹

- a The Canadian government has implemented measures to safeguard the privacy of its citizens and permanent residents by appointing a privacy commissioner as a member of the Human Rights Commission. Additionally, specific rights have been granted to individuals regarding the management of their personal information that the federal government holds.
- b In Britain, there have been several official inquiries into this subject; one among them is 'The United Kingdom committee on Privacy', also called as 'The Younger Report' which gave a report in the year 1972.

The ongoing discourse surrounding privacy necessitates the establishment of a functional definition. In 2011, a proposal was put forth advocating for the inclusion of the RTP for Indian citizens. Legislation pertaining to this matter, including regulations governing the collection, storage, and sharing of personal information and provisions for penalties in case of rights infringement, is currently pending (Malik, 2011).

3.2 Establishment of two separate commissions

The government ought to contemplate the creation of two distinct autonomous entities that are unbiased and efficient in their monitoring capacities. These entities would be tasked with overseeing all aspects of communication interceptions to ensure compliance with both domestic and international obligations of India. These obligations encompass the safeguarding of fundamental rights such as the 'RTP' and other human rights. An optimal approach would involve the establishment of distinct commissions tasked with the reception of complaints and the overall enforcement of the 'RTI' and 'RTP' provisions. Without such commissions, appeals would be directed to the courts as complaints, resulting in a protracted process and substantial financial burdens.

Several countries, including Canada, France, and Belgium, have implemented separate institutions tasked with the enforcement of the 'RTI' and the protection of privacy, respectively. As per Banisar's (2011) analysis, the creation of distinct commissions can enhance efficiency by enabling a more targeted approach towards fulfilling their individual mandates and obligations, without the added complexity of reconciling potentially divergent interests. However, the coexistence of two independent entities can present a similar disadvantage due to their functioning within a closely interconnected geographical area, which can lead to conflicting situations. The resolution of these conflicts may involve a considerable period, which could potentially result in legal ambiguity in certain situations.

3.3 Civil societies contribution

Given the absence of a comprehensive codification of privacy legislation, the responsibility of reconciling the privacy act with the 'RTIA' has been primarily entrusted to the Judiciary. The majority of cases about the 'RTP' have been adjudicated based on the criterion of 'procedure established by the law' in order to limit personal freedom (Malik, 2011). The Supreme Court, in the case of Selvi, observed the evaluation of the validity of specific techniques. The court emphasised the importance of employing a broad reasonableness perspective in this assessment. This broader inquiry entails determining whether these techniques align with various dimensions of personal liberty recognised by the judiciary, including the 'RTP'.

Based on the constitutional provisions and supported by judicial precedents, one can contend that “The freedom of speech and expression is a fundamental cornerstone of a democratic society”. The incorporation of discussions concerning judicial decisions without attributing intentions is a crucial element of this fundamental entitlement (Acharyulu, 2018). There is a recognised necessity for providing sufficient avenues for civil society organisations and other pertinent stakeholders to actively participate in deliberation and discourse pertaining to the decisions rendered by judicial entities.

In order to further advance the nationwide initiative towards open government and the promotion of FOI, the active involvement of civil societies will be imperative. In the absence of sustained pressure and activism, laws pertaining to the FOI may become ineffectual, rendering them obsolete, while other issues gradually undermine the core provisions of these statutes.

It is unrealistic to anticipate autonomous change from the government. The processes of modernisation and globalisation do not inherently guarantee the transformation of closed bureaucrats into open public servants. Political action and public debates play a pivotal role in the establishment and strengthening of transparency.

4 Conclusions

The democratic principle encapsulated in the Latin phrase ‘*Salus Populi est suprema lex*’ emphasises the paramount importance of safeguarding the welfare of the populace, and it is imperative to ensure its preservation without compromise. The two apparently conflicting rights of the ‘RTI’ and RTP are inherently interconnected. Both of these rights will undoubtedly aid individuals in advancing transparency within the system and holding the government accountable. However, it is imperative for governments to develop a comprehensive strategy that effectively reconciles these rights without compromising the efficacy of the respective entities involved.

The privacy law of 2011 is currently awaiting approval in the legislative body. The concept of the ‘doctrine of colourable legislation’ is rooted in the notion that actions that cannot be carried out transparently are likewise impermissible when pursued indirectly. Challenges such as the emergence of a novel form of structural pluralism in the field of public administration serve as instances of such issues. Due to the reduction in the scale and extent of government intervention, an increasing number of obligations mandated by the public are being fulfilled by entities such as private corporations, non-profit organisations, private contractors, and quasi-governmental organisations (Roberts, 2001). It is imperative for governments to implement measures aimed at fostering the adoption and enforcement of global FOI laws. The ‘RTI’ and the ‘RTP’ have become integral components of contemporary public administration, with enduring implications for the future.

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Note

- 1 <https://www.livemint.com/opinion/online-views/the-paradox-of-our-rights-to-information-and-privacy-11576085219492.html> (accessed 10 May 2022).