

BEFORE THE APPELLATE AUTHORITY
(Under the Right to Information Act, 2005)
SECURITIES AND EXCHANGE BOARD OF INDIA

Appeal No. 6559 of 2025

Divyansh Dwivedi : Appellant
Vs

CPIO, SEBI, Mumbai : Respondent

ORDER

1. The appellant had filed an application dated August 25, 2025 (received by the respondent through RTI MIS Portal) under the Right to Information Act, 2005 (“**RTI Act**”). The respondent, by a letter dated September 16, 2025, responded to the application filed by the appellant. The appellant filed an appeal (Reg. No. SEBIH/A/E/25/00245) dated September 16, 2025. I have carefully considered the application, the response and the appeal and find that the matter can be decided based on the material available on record.
2. **Queries in the application** - The appellant, in his application dated August 25, 2025, sought the following information:

“ Under Section 6 1 of the RTI Act 2005 I seek the following certified information and records

A On PMOPG grievance No PMOPG E 2025 0026603 forwarded by PMO on 24 February 2025 and marked to Deputy General Manager Vandana Rajesh Kumar

1 Certified copies of the diary register entry inward note or acknowledgement showing receipt of the grievance in SEBI

2 Certified copies of file notings movement orders and remarks recorded by SEBI officers while processing the grievance

3 Certified copies of all internal communications memoranda or emails exchanged within SEBI and with the Prime Ministers Office regarding this grievance

4 Certified copies of any correspondence issued to external entities including NSE BSE or Ministry of Finance while handling this grievance

5 Certified copies of the final action taken report note or order prepared by SEBI on this grievance If none exists kindly provide a certified Nil Statement

6 Certified copies of rules or office orders of SEBI prescribing the procedure for processing PMOPG grievances”

3. **Reply of the Respondent** –The respondent, in response to query nos. 1, 2 & 5 in the application, informed that the information with regards to CPGRAMS case PMOPG/E/2025/0026603 including Action History & Action Taken Report (ATR) may be obtained from CPGRAMS. The respondent also mentioned that applicant can view complaint status by logging in to CPGRAMS website.

The respondent, in response to query nos. 3 & 4, informed that the queries are vague and not specific. Accordingly, the same cannot be construed as “Information” as defined u/s 2(f) of the RTI Act.

The respondent, in response to query no. 6, informed that the information sought pertains to the internal functioning of SEBI and relates to the systems and procedures followed at SEBI. In view of the same, the respondent stated that the information sought is exempt u/s 8(1)(a) of the RTI Act. Notwithstanding the aforesaid, the respondent informed that appellant can refer to DARPG Office memorandum F No. S-15/21/2021-(PG)-DARPG(e-7085) dated August 23, 2024 on Comprehensive guidelines for handling the Public Grievance”.

4. **Ground of appeal** – The appellant has filed the appeal on the ground that he was refused access to information requested.
5. I have perused the application and the response provided thereto. With respect to query nos. 1, 2, 3, 4 & 5, I find that respondent has informed that the status and action taken on his CPGRAMS complaint can be accessed by the appellant by logging into CPGRAMS website. On consideration, I find that the respondent has adequately addressed the queries by providing the information available with him. Accordingly, I do not find any deficiency in the response of the respondent.
6. Additionally, I find that query nos. 3 & 4 are also vague and not specific. It is an established law that the information sought for in order to be disclosable under the RTI Act, must be clear, specific and available in the records of the public authority. In this context, I note that in the matter of *Mr. T. V. Sundaresan vs. CPIO, Securities and Exchange Board of India* (Decision dated November 24, 2021), the Hon’ble Central Information Commission (hereinafter referred to as “**CIC**”) held: “*The framework of the RTI Act, 2005 expects that the information sought is specific and believed to be existing with the public authority in documented or material form as*

such; which can be shared with the appellant as per the provisions of the RTI Act. Answering to broad, multiple and general queries and presumptive documents that should have been generated as per the expectation of the appellant cannot be furnished under the provisions of the Act.” Accordingly, I do not find any deficiency in the response of the respondent.

7. With regard to query no. 6, I note that the respondent has categorically informed the appellant that the information sought is strategic in nature and the information sought is exempt u/s 8(1)(a) of RTI Act. I agree with the response of the respondent that the requested information pertains to internal functioning of SEBI and relates to systems and procedure followed by SEBI, which is strategic in nature. In this context, I note that in *ICAI v. Shaunak H. Satya*, [(2011) 8 SCC 781], the Hon'ble Supreme Court held that:
- *"The competent authorities under the RTI Act will have to maintain a proper balance so that while achieving transparency, the demand for information does not reach unmanageable proportions affecting other public interests, which include efficient operation of public authorities and the Government, preservation of confidentiality of sensitive information and optimum use of limited fiscal resources."* Notwithstanding the aforesaid, the respondent informed that appellant can refer to DARPG Office memorandum F No. S-15/21/2021-(PG)-DARPG(e-7085) dated August 23, 2024 on “Comprehensive guidelines for handling the Public Grievance”. Accordingly, I do not find any deficiency in the response of the respondent.
8. In view of the above observations, I find that there is no need to interfere with the decision of the respondent. The appeal is accordingly dismissed.

Place: Mumbai

Date: October 10, 2025

RUCHI CHOJER

**APPELLATE AUTHORITY UNDER THE RTI ACT
SECURITIES AND EXCHANGE BOARD OF INDIA**