

RESEARCH ARTICLE

Five years of RTI regime in Sri Lanka: factors causing low proactive disclosure of information and possible remedies

Maringa Sumanadasa*

Former Senior Researcher, Right to Information Commission, Sri Lanka.
Former Member of Sri Lanka Administrative Service, Sri Lanka.

Abstract: Statutory obligations are imposed upon ministers by sections 8 and 9 of the Right to Information Act (RTI Act)¹, while Regulation No. 20² issues guidelines for public authorities on the proactive disclosure of information through a digital or electronic format. However, slow progress in implementing proactive disclosure measures and the resultant absence of vital information on digital platforms in a constantly updated and user-friendly manner is not only a failure of the public authority to comply with legal obligations to disclose information proactively but also causing a further delay in realising full benefits of the RTI Act by the citizen. This paper examines the present status of the proactive disclosure of information by public authorities in terms of the RTI Act and analyses factors that cause the low performance. Secondary data, particularly results of two studies in 2017 and 2020 undertaken by Verité Research and the Right to Information Commission (RTIC), respectively, have been analysed using descriptive methods. The study found that a key factor causing the low proactive online disclosure is the absence of practices of modern record management and the near absence of proper identification of ‘records’ or ‘information’ generated by public authorities by indexing and cataloguing and by maintaining regularly updated schedules of records. The second key factor found is the absence of a schedule of proactively disclosable records that is maintained constantly updated for monitoring such records. The lack of awareness and a clear knowledge of concepts on the part of state officials are also found as critical issues. The study recommends that all public authorities maintain (a) a general records schedule [common to all agencies]; and (b) an agency records schedule [unique to the agency], preferably in electronic format, and update the same on a daily basis. It is also recommended that a public authority maintains a schedule of proactively disclosable records called a “Proactive Disclosure Matrix”, preferably in electronic format and updates the same on a daily basis.

Keywords: Proactive disclosure; schedules of records; record management; retention schedule.

INTRODUCTION

Information is fundamental to the functioning of modern democracy and is a key element of the overall global trend towards more open government. (Centre for Policy Alternatives, 2016). The guarantee of access to the right to information and use of it across the society helps not only the meaningful operation of many other human rights but also facilitates the socio-economic progress of a country through the efficient use of resources resulting from transparency, accountability, and public participation in governance. By 2019, 125 countries have implemented laws to provide access to information for citizens of various degrees³. The Right to Information Act (RTI Act) provides the legal framework to safeguard the right of access to information guaranteed by the Constitution of Sri Lanka⁴. Primarily the Act enables citizens to submit information requests to public authorities and make appeals to the Designated Officer and the Right to Information Commission (RTIC) in case of rejection. In equal terms, by Sections 7,8,9 and 10 in part III, the Act also directs Ministers and public authorities to manage their records and disclose information proactively.

The Constitution⁵ stipulates that as ‘Every citizen shall have the right of access to any information as provided by law, being information that is required for the exercise or protection of a citizen’s right.’ The RTI Act contains a number of elements which comprehensively facilitate the conception of RTI. Its overarching public interest clause provides that, notwithstanding specified grounds for denial⁶, a request for information shall not be refused where the public interest in disclosing the information outweighs the harm that would result from its disclosure⁷. The specified grounds of denial are, by and large, standard ones, covering various facets of privacy, national

* Corresponding author (ms1949@gmail.com;  <https://orcid.org/0000-0002-9100-0342>)



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security and legal privilege⁸. More noteworthy is that none of the grounds of denial is absolute; even besides the public interest override, a number of grounds can be overruled if the requested information is over ten years old⁹.

The public interest override is not a universal feature in RTI laws, and its inclusion in Sri Lankan law is noteworthy¹⁰. Importantly, the Act places the burden of disproving an overriding public interest onto public authorities instead of requiring requesters to prove it throughout the process. (Verité Research, 2017). This is also complemented by the RTI Act's supremacy over the other laws. The Act provides that in the event of any inconsistency or conflict between the RTI Act and any other law, the provisions of the RTI Act shall prevail¹¹.

RTI Act's regulations and rules provide a comprehensive legal framework and the procedure for reactively requesting and providing information. A citizen or a public authority could contest their position to the Court of Appeal and finally to the Supreme Court. The Act also directs public authorities requiring them to disclose information proactively. Section 14 affirms the principle of proactive disclosure in the context of the RTI Commission's mandate to prescribe fees levied by public authorities to release information. The requirements for proactive disclosure are set out under sections 8 and 9 of the RTI Act and Regulation No. 20 under the Act. Sections 8 and 9 are applicable to all ministries, while Regulation No. 20 is applicable to 'all public authorities', the term that includes ministries¹².

Provisions on proactive disclosure of information imposed upon ministers by sections 8 and 9 of the RTI Act are statutory obligations. Section 8 of the Act places a duty on every minister to bi-annually publish a report containing information relating to their respective ministry and all the public authorities falling under the purview of that ministry. This duty is also applicable to ministers of provincial councils¹³. Furthermore, section 8 requires ministries to publish information in all three languages. Section 9 of the RTI Act requires every minister to inform the public about the initiation of projects three months prior to the project's commencement. Regulation No. 20 sets out a public authority's obligations with respect to proactive disclosure. These regulations expand the statutory obligations under section 8 and section 9.

The Regulation 20¹⁴ enumerates a set of guidelines for 'public authorities' on proactive disclosure of information. In accordance with the power to direct a Public Authority to provide information in a particular form under the Act¹⁵ and in keeping with the overriding principle of Proactive Disclosure, all Public Authorities shall routinely disseminate, at a minimum, the key information through a digital or electronic format¹⁶; These key information include 16 broad themes, e.g. Institutional information, Organisational information, Operational information, Public services information, Budget information etc. which should be disclosed proactively, vide Annex-I.

Regulation -20 also provides the procedure for any citizen to make a complaint to the Head or the CEO of the relevant Public Authority in the event any information disclosed proactively pursuant to the duty contained in this Regulation is improper and/or false and/or has not been updated. If the Head or the CEO fails to rectify the same, the citizen may apply to the Commission within three months of the said disclosure to rectify improper/false/outdated information for reasons stated¹⁷. If the Commission finds merit in the complaint upon inquiry, the Commission shall call upon the said Public Authority to rectify the same and report to the Commission within one month¹⁸. Details of the inquiry and follow-up action (if any) shall be included in the report of the activities of the Commission required to be prepared and thereafter to be tabled before Parliament and sent to the President in terms of Section 37 of the Act¹⁹.

With the beginning of the operation of RTI in February 2017, reactive disclosure became very much in use. Citizens, individual media personnel, NGOs and various groups of people started sending information requests to the Information Officers of various public authorities. The great majority of these requests were based on individual grievances or issues, and a small number on common issues. Appeals against Designated Officers were received at the RTIC at an increasing rate. With limited human and financial resources, the RTIC had to devote

two days a week to public hearings and documentary procedures to dispose of the appeals. Citizens have used these provisions very actively, as evidenced by 2,848 appeals made to the RTIC during 2017-2020. RTIC has concluded 69.0% of appeals, showing a very high level of performance compared to other appellate bodies²⁰. These appeals have been received from all corners of the country, showing the level of penetration of RTI throughout the society²¹.

The proactive disclosure obligations on the part of the Ministers and the public authorities have been lagging. The RTIC, too, had no time to vigorously pursue the promotion of proactive disclosure as it was occupied in the hearing of appeals under reactive provisions. Ministries continue to publish on their websites institutional information, e.g. internal regulations, powers and functions; operational information, organisational structure, and the names and contact information of executive grade public officials and their remunerations and news and updated with news and events of their organisation, which an average citizen did not normally seek after. Some ministries did not maintain and update their websites, while the situation of departments, authorities, corporations and institutions was not much different from ministries. In addition to websites, there are numerous online and other tools such as printed media, electronic media, social media, TV, radio, pamphlets, posters, regular publications, record rooms, Facebook etc. which could be used to provide citizens with useful information proactively.

The progress of implementation of proactive disclosure measures has not been found satisfactory when compared to findings of the baseline research conducted by Verité Research in 2017 and research carried out after three years by RTIC in 2020. The results of the two studies are not exactly comparable as the sample size, and the types of public authorities covered vary. However, both studies based the assessment of online proactive information on the categories and subcategories identified by Regulation 20, and the scheme of the score of both studies are similar. A key finding is that 89.0% of public authorities ranked 'moderately unsatisfactory' in 2017, dropping to 46.7% in 2020. Public authorities ranked 'moderately satisfactory' accounted for 46.7% in 2020 as against 5.4 % in 2017. Further, the results of these two types of research are confined to online disclosure only, whereas many other methods exist for disclosing information proactively.

The problem

Proactive disclosure of information is a key requirement under the RTI Act of Sri Lanka. It enables the public to access vital information on public services without a fee. Verité Research found in 2017 that the online proactive disclosure of content across public authorities was 'moderately unsatisfactory', as 89% of the selected public authorities scored below 40%. Research by RTIC in 2020 found that the percentage of the moderately unsatisfactory category has declined to 43%²². Content apart, there have been no notable improvements. The majority of primary websites lacked financial information and decision-making and regulatory information inhibiting the public's ability to hold the government accountable in terms of its planned policies and investments. The limited disclosure of information on public accessibility, such as Public Services and Public Participation prevents citizens from accessing timely services or attending public meetings or consultations. Many public authorities have not disclosed any information on projected budget, income and expenditure, or financial accountability, while the least amount of information is given regarding open meetings, tenders and copies of contracts, reports on completion of contracts, remunerations of executive grade officers, fees and deadlines etc.

Low levels of online proactive disclosure directly relating to RTI reflect weaknesses in RTI implementation across public authorities. Disclosures of information pertaining to section 9 of the RTI Act were low. Access to information listed in Regulation 20 is crucial in guaranteeing transparency of accountability of public authorities and ultimately in assuring the citizens' right to access information. Completeness and correctness of details published on websites are crucial factors. Public service information, publications, leaflets have been published on 50% of the websites monitored. Usability of such public service information is questionable since many public authorities have failed to upload forms and disclose fees and deadlines for applications on their websites. Lacking

such essential information on digital platforms is a failure of the public authority to comply with legal obligation to disclose information proactively.

The adverse effects of low performance of implementing the proactive disclosure provisions impact on citizens as they cannot optimise their welfare, on public authorities as they cannot properly discharge their functions according to the law and with cost effectiveness, on the Government as it cannot achieve its targeted in socio-economic development of the people and finally on the state in fostering a culture of transparency and accountability in public authorities and promoting a society in which the people of Sri Lanka would be able to more fully participate in public life through combating corruption and promoting accountability and good governance²³.

THE OBJECTIVE AND METHODS

The main objective of this study is to ascertain the present status of public authorities' proactive disclosure of information in terms of the RTI Act, analyse factors that cause low performance in disclosing information proactively and to develop a mechanism for public authorities to address the issue. Specific Objectives are 1. To ascertain trends in using proactive disclosure provisions since inception of RTI Act and the present, 2. To Examine factors that cause the low performance of proactive disclosure mode, and 3. To develop a mechanism for public authorities to use the proactive disclosure procedure effectively to benefit the citizen. Secondary data, particularly results of three studies in 2017, 2020 and 2021 undertaken by Verité Research, RTIC and RTIC-UNDP, respectively, have been analysed using descriptive methods.

The results of the first two studies have been compared with the present study to identify the level of satisfaction related to content disclosure on the websites. Since these are two different research studies, i.e. baseline study undertaken by Verité Research in 2017 and the study by RTIC in 2020, it is required to mention the criteria applied to identify the satisfaction level. The monitoring framework of the first study covers two dimensions: (i) the information content disclosed and (ii) the usability of the information. Each dimension is rated based on several criteria and combined in an overall score. Eleven categories of information have been used to assess the online proactive disclosure under 30 subcategories. Public authorities were ranked according to their scores across the subcategories and categories. The assessment was language neutral, as content availability was assessed regardless of the language in which the information was disclosed. The ranking was assessed under five grades, Unsatisfactory, Moderately Unsatisfactory, Moderately Satisfactory, Satisfactory and Highly Satisfactory (Verité Research, 2017).

RTIC research, while similar substantively, did not limit to ascertaining the content; hence, the methodology was developed to score the public authorities contingent on the extent or degree of the disclosure of updated information. It values public authorities on a scale of 1 – 5 for information disclosed under each subcategory. In terms of online proactive disclosure of information, public authorities were assessed under five grade criteria similar to the Verité research.

The second and third objectives of this study were to examine factors that cause the low performance of the proactive disclosure mode and to develop a mechanism for public authorities to use the proactive disclosure procedure effectively to benefit the citizen. Results of the third study by RTIC-UNDP conducted mid-2021, involving 15 state institutes consisting of five types of organisations, viz ministry, department, authority, board and district secretariate, with the participation of 2,280 government officers working in head offices and regional and district level offices, used to identify factors that cause low performance of proactive disclosure (RTIC, 2021). Qualitative data was collected from 14 key informants involved in bringing in RTI law and since enforcement in its implementation within RTIC and other related stakeholder agencies. Fifteen focus group discussions were conducted with the three ministries, three departments, three authorities, three boards /corporations and 3 district

secretaries during an online training program in early 2020, including proactive disclosure. These qualitative data were analysed to identify the low-performing factors and to develop a mechanism for the use of public authorities.

ANLYSIS AND RESULTS

In 2017, the year in which the RTIC commenced its operation, The World Bank and Verité Research, developed and tested a methodology to objectively measure the online proactive disclosure requirements of the RTI Act. This report ranked 55 public authorities, i.e. 53 cabinet portfolios and the President and Prime Minister's Offices, on fulfilling their online proactive disclosure obligations, based on a pilot assessment conducted between 19th June 2017 and 31st July 2017. This report was the first of its kind and can be considered as a baseline though limited to one type of public authority, *central government ministry*, and one mode of proactive disclosure, *online*. The study analysed online proactive disclosure of information pertaining to eleven categories of information, which were further divided into 30 subcategories. A scoring scheme has been devised with three types of information viz 1: up-to-date information, 2: complete information 3: up-to-date and complete information. Public authorities received scores for content disclosure, usability and an overall composite score.

The results could be taken as the baseline for online proactive disclosure of information as public authorities had no time to introduce the same under RTI Law which came to force in 2017. The study was confined to 55 central government ministries only, whereas estimated 3000 public authorities function in the country in terms of the RTI Act. On the other hand, central government ministries, compared to all other public authorities, had well-functioning and consistently updated websites.

The study found that in terms of content disclosure, 49 out of the 55 public authorities (or 89%) scored only between 11% and 40% placing them in the 'moderately unsatisfactory' band. Only 03 public authorities (or 5.5%) scored over 40%, falling in the 'moderately satisfactory' band. Three (03) public authorities scored less than 10%, falling in the 'unsatisfactory band'.

An assessment of adherence to obligations under sections 8 and 9 of the RTI Act, compared with Regulation No. 20, suggests that public authorities were relatively more likely to disclose types of information emerging from a statutory requirement. However, public authorities disclosed significantly more information in subcategories emerging from section 8 of the RTI Act than section 9 of the Act. Aside from information pertaining to detailed project costs, hardly any information has been disclosed under other subcategories emerging from section 9 of the Act, such as notification of project commencement and terms and conditions of investment. Public authorities scored relatively higher in terms of usability in comparison with content. Usability measures: (a) language accessibility, (b) ease of access, and (c) format. Overall, 20% of public authorities scored in the 'moderately satisfactory' band. The majority (75%) of public authorities scored within the 'moderately unsatisfactory' band. 5% of public authorities received 'unsatisfactory' scores, which strongly limits effective access and the potential use and reuse of public sector information. The language in which most information was disclosed was English, followed by Sinhala and Tamil. Yet gaps in trilingual accessibility of information remain, as the highest language accessibility score was 50%.

In a study undertaken by RTIC with the support of UNDP in June 2020, around three years later, online proactive disclosed information from 30 websites of five types of public authorities has been analysed. Thirty public authorities have been randomly selected as the sample consisting of a proportionate number of ministries, departments, authorities, corporations, district secretariats and divisional secretariats. The official websites have been monitored under 15 main categories and 37 subcategories as set out in Regulation 20. The research was not limited to ascertaining the content; hence, the methodology was developed to score the public authorities contingent on the extent or degree of the disclosure of updated information. It values public authorities by a scale of 1 – 5 for information disclosed under each subcategory.

In terms of online proactive disclosure of information, 14 out of 30 public authorities (or 46.7%) were at a ‘moderately satisfactory’ level. While another 14 public authorities (or 46.7%) were rated in the ‘moderately unsatisfactory’ level, only two public authorities (or 6.6%) reached the ‘satisfactory level’. None of the public authorities of the sample has received over 150 out of 185 marks to reach the ‘satisfactory’ level. Most public authorities (76%) have disclosed their institutional information, such as the legal basis of the institution, internal regulations, powers and functions, to reach the levels between ‘moderately satisfactory’ to ‘satisfactory’ vide Table-1.

Table 1: Online content disclosure of Public Authorities

Public authority	Total score out of 185	Score as a percentage	Performance level	
MINISTRIES	Ministry of Urban Development, Water Supply and Housing Facilities	95	51	Moderately satisfactory
	Ministry of Environment and Wildlife Resources	105	56	Moderately satisfactory
	Ministry of Public Administration Home Affairs	93	50	Moderately satisfactory
	Provincial Councils & Local Government			
	Ministry of Defense	86	46	Moderately satisfactory
	Ministry of Education	98	52	Moderately satisfactory
	Ministry of Ports and Shipping	68	36	Moderately unsatisfactory
DEPARTMENT	Department of Inland Revenue	115	62	Satisfactory
	Department of Labour	96	51	Moderately satisfactory
	Department of Motor Traffic	86	46	Moderately satisfactory
	Department of Prisons	86	46	Moderately satisfactory
	Department of Pensions	88	47	Moderately satisfactory
	Department of Police	107	57	Moderately satisfactory
BODY CORPORATIONS AUTHORITIES	Central Environmental Authority	105	56	Moderately satisfactory
	National Medicines Regulatory Authority	116	62	Satisfactory
	Vocational Training Authority	75	40	Moderately unsatisfactory
	Tourism Development Authority	95	51	Moderately Satisfactory
	Road Development Authority	75	40	Moderately unsatisfactory
	Urban Development Authority	51	27	Moderately unsatisfactory
	Ceylon Electricity Board	69	37	Moderately unsatisfactory
	National Water Supply and Drainage Board	107	57	Moderately Satisfactory
	National Lotteries Board	61	32	Moderately unsatisfactory
	Agriculture and Agrarian Insurance Board	69	37	Moderately unsatisfactory
	Export Development Board	68	36	Moderately unsatisfactory
Sri Lanka Transport Board	95	51	Moderately satisfactory	
DISTRICT/DIVISIONAL SECRETARIATS	Gampaha District Secretariat	60	32	Moderately unsatisfactory
	Nuwara Eliya District Secretariat	54	29	Moderately unsatisfactory
	Trincomalee District Secretariat	68	36	Moderately unsatisfactory
	Matale District Secretariat	68	36	Moderately unsatisfactory
	Maharagama Divisional Secretariat	37	20	Moderately unsatisfactory
	Bentota Divisional Secretariat	68	36	Moderately unsatisfactory

Source: RTIC Research 2020

Only 27% of the public authorities have disclosed updated operational information such as strategies and plans, policies, activities and procedures, reports and evaluations to a ‘satisfactory level’. Public authorities most commonly disclose on the subcategory of ‘activities and procedures’. In terms of budgetary information, 70% of the public authorities from the sample do not maintain updated details of their projected budgets and actual income and expenditure on their websites. Overall, 50% of the institution have uploaded details on services offered to the public and related leaflets, forms and publications. Nonetheless, information on fees for the services and deadlines are not available on the websites of 93% of the public authorities. Websites of 63% of the public authorities monitored have details on the right of access to information, processing of requests and contact details of the information officers.

DISCUSSION

The results of the two studies are not exactly comparable as the sample size, and the types of public authorities covered vary. However, both studies based the assessment of online proactive information on the categories and subcategories identified by Regulation 20, and the scheme of allocating scores of both studies were similar. A key finding is that % of public authorities ranked ‘moderately unsatisfactory’ (or 89%) in 2017 declined to 46.7% in 2020. Public authorities ranked ‘moderately satisfactory’ level for 46.7% in 2020 against 5.4 % in 2017.

Statutory obligations on proactive disclosure emerging from sections 8 and 9 of the RTI Act apply to all ministries. Section 8 refers specifically to a ‘Minister’s duty to publish a report’, which includes: ‘the particulars relating to the organisation, functions, activities and duties of the Ministry of such Minister and of all the public authorities falling within the functions so assigned.’ Furthermore, section 8 requires ministries to publish information in all three languages. Section 9 requires every minister to inform the public about the initiation of projects three months prior to project commencement. Regulatory obligations on proactive disclosure emanate from Regulation No. 20, published under the RTI Act. These regulations elaborate the statutory obligations under section 8 and section 9.

(i) Statutory obligations on proactive disclosure emerging from Section 8

Statutory obligations on proactive disclosure emerging from Sec 8 of the RTI Act include information on 1. the Mandate, 2. Functions and powers, 3. Decision-making procedures, 4. Description of services offered to the public, 5. Accessing public services, 6. The projected budget for the current year, 7. Disbursements in the previous year, 8. Information Officer’s and Designated Officer’s contact information, 9. Fee schedule, and 10. Minister’s report as per section 8 of the RTI Act. Verité Research (2017) ranks public authorities in terms of online proactive disclosure under these subcategories of information, taking into account both content and language accessibility, only one Ministry received a ‘satisfactory’ score, while 14 public authorities (26%) received a ‘moderately satisfactory’ score, and 38 public authorities (72%) received a ‘moderately unsatisfactory’ score. RTIC (2020), on the other hand, reports that the moderately unsatisfactory score declined to 43%. Most public authorities (76%) have disclosed their institutional information, such as the legal basis of the institution, internal regulations, powers and functions, to reach the levels between ‘moderately satisfactory’ to ‘satisfactory’. This shows that 42% of public authorities did not have adequate disclosure, particularly in respect of categories: (4). Description of services offered to the public, (5). Accessing public services, and (9). Fee schedule changes constantly require updates as they change over time and are interactively accessible to citizens in a user-friendly manner.

(ii) Statutory obligations on proactive disclosure emerging from Section 9

Statutory obligations on proactive disclosure emerging from Sec 9 of the RTI Act include information on 1. Notification of project commencement, 2. Pre-feasibility and feasibility studies of projects, 3. Terms and conditions of investment, 4. Detailed project costs, and 5. Monitoring and evaluation reports. Verité Research (2017) ranks public authorities in terms of online proactive disclosure under these subcategories of information without taking ‘official languages’ which are not specified, but taking only content disclosure, 100% public authorities within the ‘moderately unsatisfactory’ band, i.e. all scoring below 40%. The available close comparative figure for 2020 is 43 % public authorities scoring below 40% (moderately unsatisfactory). RTIC 2020 reports that only 27% of the public authorities have disclosed updated operational information such as strategies and plans, policies, activities and procedures, reports and evaluations to a ‘satisfactory level’. Public authorities most commonly disclose details on the subcategory of ‘activities and procedures’. Within this band, too, 22.6 % of Public authorities (12) scored between 16-32 %, while the great majority 77.4 % (41) scored just 11% showing the very low level of disclosure.

(iii) Statutory obligations on proactive disclosure emerging from both Section 8 and Section 9

When a combined ranking (both Sec 8 and Sec 9) is calculated by Verité Research (2017) on the fulfilment of statutory obligations, 45 public authorities (85%) scored in the 'moderately unsatisfactory' band, while only 8 public authorities (15%) scored in the 'moderately satisfactory' band.

(iv) Statutory obligations on proactive disclosure emerging from Regulation 20

Proactive disclosures emerging under Regulation No. 20 include information under 16 key themes vide Annex-I. Verité Research (2017), as there is no specific requirement to disclose information in the 'official languages', only ranked according to content disclosure. Only three public authorities (5%) received a 'moderately satisfactory' score, while 42 public authorities (76%) had a 'moderately unsatisfactory' score. Seven public authorities received an 'unsatisfactory' score, while three public authorities (5%) had no content available. RTIC (2020) reports moderately unsatisfactory scores, having declined to 43%, while Moderately satisfactory scores increased to 43%.

(v) Overall statutory obligations on proactive disclosure

When the overall level of compliance with respect to obligations under (a) sections 8 and 9; and (b) Regulation No. 20 was considered, Verité Research (2017) found that there was relatively more information published in compliance with sections 8 and 9 of the RTI Act compared to information disclosures under Regulation No. 20 alone. However, higher information disclosure emerging from statutory obligations was seen as largely driven by compliance with section 8. RTIC (2020) report has only covered Regulation 20. However, it consists of categories of Sections 8 and 9 as well. As per Verité Research (2017), overall, in terms of content and usability, 49 public authorities (89%) received a 'moderately unsatisfactory' rating, scoring 11%-40%, while three public authorities (5%) received an 'unsatisfactory' rating scoring below 11%. Only three public authorities scored above 40%. RTIC (2020) found a decline in the 'moderately unsatisfactory' category to 43%, while the 'moderately satisfactory' category improved to 43%. Overall, the very low proactive disclosure level is shown as the 'moderately satisfactory' category is still just above 40%.

(vi) Most up to date vis a vis Least amount released

Verité Research (2017) shows that public authorities provided the most up-to-date and complete information in respect of Budgets, Expenditures and Finances (category score of 67%), Institutional Information (49%) and Public Policy, Legislation and Regulation (35%). The least amount of information was disclosed in Prior Disclosures of Information (0%), Prior Disclosures of Public Investments (13%), and Categorisations of, and Systems for, Accessing Information (14%). Notably, these three categories are directly related to the right to information. There is an 'unsatisfactory' level of RTI-relevant online proactive disclosure of information across public authorities. RTIC (2020), in terms of budgetary information, 70% of the public authorities from the sample do not maintain updated details of their projected budgets and actual income and expenditure on their websites. Overall, 50% of the institutions have uploaded details on services offered to the public and related leaflets, forms and publications. Nonetheless, information on fees for the services and deadlines are not available on the websites of 93% of the public authorities. Websites of 63% of the public authorities monitored have details on the right of access to information, request process and contact details of the information officers.

(vii) Ranking Content Disclosures

Verité Research (2017) maintains that when content disclosure was monitored by awarding the highest possible score for stipulated categories of up-to-date and complete information, regardless of the language. No public authority received a score higher than 43% for content disclosure. Twenty public authorities (36%) scored between 25% and 43%, while 31 public authorities (56%) scored between 10% and 24% for content disclosure. Four public

authorities (7%) scored between 0% and 9%. RTIC (2020) maintains that 50% of the institutions have uploaded details on services offered to the public and related leaflets, forms and publications. Nonetheless, information on fees for the services and deadlines are not available on the websites of 93% of the public authorities. Websites of 63% of the public authorities monitored have details on the right of access to information, request process and contact details of the information officers.

(viii) Factors related to low performance of Proactive Disclosure

The issue that causes low performance is poor standards of record management. A system of proper cataloguing and indexing of paper and digital records generated and received by the respective public authority with regular updating and ready access to its key staff members in most of the public authorities is yet to be materialised. Records are managed by various units, branches, divisions of head office or regional, district or divisional offices by giving file names and numbers. However, a total inventory or index of records, which is updated regularly indicating at least the created date, location, the officer having the physical custody, type of information, duration of the retention period, mode of disposal etc. is not maintained by a majority of public authorities.

As a result, it is difficult for the public authority to determine which record can be proactively disclosed and take action to disclose accordingly. When an information request is received by the Information Officer²⁴ and an appeal is received by the Designated Officer²⁵, there is no such inventory for them to glance through and ascertain the location, officer holding the information, types of information etc. Such an inventory, preferably updated digitally, is required to implement the RTI provisions within the procedure in the RTI Act.

The absence of an interactive, preferably electronic system, to quickly identify a certain item of information; that has been created or come to the possession of the public authority; as a record or document, to ascertain where it is located / stored, in whose custody, in what form, whether proactively disposable or restricted, and to retrieve it for the purpose of disclosure of information to citizens either reactively or proactively remains a critical issue. A connected issue is the difficulty of updating, preferably automatically, information on records, documents etc for the purpose of timely disposing / destroying to ensure that public authority maintain only records that are pending in action and within the time period legally required to retain before destroying.

The absence of clear demarcation of records of the respective public authority between (a) proactively disposable records and (b) records only reactively releasable on request to enable immediate action to disclose such identified information proactively and to keep other restricted information in an easily retrievable manner and in safe custody is another issue. In the absence of such a demarcation quick and timely updating of websites becomes difficult.

The lack of awareness on the part of state officials with regard to terms of 'record management' and 'proactive disclosure' as required in terms of the RTI Act is another serious issue. A survey²⁶ carried out involving 15 state institutes consisting of five types of organisations, viz ministry, department, authority, board and district secretariate, with the participation of 2,280 persons working in head offices and regional and district level offices, in mid-2021, has found that though their awareness of the RTI Act was very high on average at 72% in all types of organisations, their awareness on proactive disclosure concept was unsatisfactory, vide Table 2.

Table 2: Awareness on the proactive disclosure of information by type of institute

	Ministry	Department	Authority	Board	Dist-Secy	Average
Yes	31.9	42.1	42.6	25.2	57.7	40
No	68.1	57.9	57.4	74.8	42.2	60

Source: RTIC (2021)

It has been found in the same survey that they did not have a clear knowledge of the requirement to retain public documents, as shown in Table 3.

Table 3: Awareness on the requirement to retain public documents

Awareness	Ministry	Depart	Authority	Board	Dist secy
1) All documents should be kept forever	1.4	1.7	3.4	3.8	2.1
2) 10 years from the date of creation	16.5	3.4	29.0	25.4	18.1
3) 12 years from the date of creation	25.9	16.7	27.7	40.2	37.1
4) As per the approved disposal schedule	55.1	76.5	37.8	29.9	42.8
5) 02 years after the file is closed	1.1	1.7	2.2	0.8	0.0
Total	100.0	100.0	100.0	100.0	100.0

Source: RTIC (2021)

Further, almost 3/4th of the problems relating to record management arose from (i) informal storage practices, (ii) time consumed in searching documents and (iii) failure in maintaining the record room properly, vide Table 4.

Table 4: Main problems faced by organisations in relation to records management

Main problem faced by organisations	Ministry	Department	Authority	Board	Dist secy
1) Informal storage practices	30.0	30.2	33.9	27.2	29.0
2) Searching for records is time-consuming	19.1	22.2	29.7	24.8	19.7
3) Failure to properly maintain the record room	25.4	34.9	27.9	25.9	23.6
4) None of the above is applicable	25.4	12.7	8.6	22.1	27.8
Total	100.0	100.0	100.0	100.0	100.0

Source: RTIC (2021)

Their lack of understanding of the definition of the term record is another critical issue. In Table 5, only item 5 is considered a record. What is in item 6 is not a record but data before the authority decides to recognise it as a record by inserting it into a file. All other items are not falling under the definition of the term record. Therefore, a wide gap of around 80% in the definition of a record is to be bridged.

Table 5: Awareness of definition of the term 'record'

Awareness of definition of the term 'record'	Ministry	Department	Authority	Board	Dist secy
1) Books from the library of your institution	6.5	22.2	9.45	8.6	9.95
2) Magazines kept in the reception area	2.6	11.1	0.85	2.1	10.4
3) Personal emails	1.0	0.0	2.7	1.2	0.0
4) Advertising material	15.6	11.1	0.9	8.3	3.1
5) The 2022 budget estimate file	29.1	18.9	15.9	32.8	42.8
6) Temporary drafts created for your use/not filed	45.2	36.7	70.3	46.9	33.8
Total	100.0	100.0	100.0	100.0	100.0

Source: RTIC (2021)

(ix) Towards developing a mechanism for public authorities

Based on the above analysis, it has been found that there is a need to strengthen the public authorities to enable them to address the key issues that cause low performance. A mechanism to expedite the process is needed, and as a necessary foundation, systematic data management at each public authority is found as the first step. Based on the legal provision in the RTI Act, a matrix has been developed to address the issues focused above and presented in Annex-III. Public authorities are expected to use the proactive disclosure procedure effectively to benefit the citizen. Addressing the above issues is vital to implement provisions relating to record management and the proactive disclosure policy enshrined in the RTI Act.

CONCLUSIONS

The key factor causing the low proactive online disclosure is found as the absence of proper identification of 'record' or 'information'. Section 24 of National Archives Law (NAL) defines records, and Section 43 of the RTI Act defines 35 types of information that a citizen may legally request reactively or public authority may disclose proactively. NAL requires public offices to prepare Retention Schedules, Common and Agency-specific, and RTI Act requires to catalogue and index all information for the purpose of disclosing information to citizens. Public authorities are required to prepare vital information of records or information such as type, who created, where created, stored where and how, under whose custody, purpose and period of retention. Most of the public authorities do not follow these provisions; instead, they open files in various branches, and there is no systematic disposal of action over files. As a result, public authorities are unable to determine whether particular information could be disclosed proactively or released on request, subject to limitations.

Public authorities do not identify their records systematically, for which a records inventory is required. A high-level survey is needed to ascertain the types of information created/ received by the public authority and stored. For this purpose, records definitions in the RTI Act²⁷ and NAL²⁸ can be used as appropriate to the respective public authority. It is also observed that public authorities only proactively disclose by uploading to website documents such as Acts, Regulations, Rules, Guidelines, Institutional and operational publications, pamphlets, publicity material etc. which are clearly identifiable. The utility of these documents is low as these are available in many other methods, internet etc. For an average citizen or a client of the public authority, what is required is information on products, services, and fees charged for the day-to-day services needed for daily life, and this information changes over time. When a new government comes to power, new ministers take over the office, and new programs implement vital information required for citizen changes. Some variables change due to exchange rate, demand and supply, weather conditions, currency rates, interest rates, and daily fees. There is hardly any disclosure of such dynamic information sought by citizens. This problem can also be added if proper information schedules are maintained.

There are numerous information items which could be proactively disclosed under Section 8, 9 and Regulation 20²⁹. There is no single document to ascertain the number of such items of information, their sub-categories and several other key details relating to individual records / information such as [1], Records/Information required under Proactive Disclosure [2] After identification as an item of information appropriate for proactive disclosure. Such information could be entered into a Proactive Disclosure schedule. This could be an electronic spreadsheet. This schedule will show ways to disclose information proactively (vide Annex-III).

Proactive disclosure of information is a key requirement under the RTI Act of Sri Lanka. It enables the public to access vital information on public services, government spending and decision-making without the payment of a fee. The online proactive disclosure of content across public authorities was 'moderately unsatisfactory', meaning the score below 40% of the 40-50% selected public authorities. Regarding public accountability, most primary websites lacked financial information; and decision-making and regulatory information. This lack of information on public authorities' websites is likely to inhibit the public's ability to hold the government

accountable in terms of its planned policies and investments. However, certain categories of substantive information, such as Budgets, Expenditure and Finances, and Public Policy, Legislation and Regulation, were most often found on other websites.

Furthermore, the limited disclosure of information on public accessibility, such as public services and public participation, can prevent citizens from accessing timely services or attending public meetings or consultations. Low levels of online proactive disclosure directly relating to RTI reflect weaknesses in RTI implementation across public authorities. Public authorities disclosed relatively more information on statutory obligations than regulatory obligations. However, disclosures of information pertaining to Section 9 of the RTI Act were low. Public authorities fared relatively better in terms of the usability of information – including language accessibility, ease of access, and format – with 20% of public authorities ranking within the ‘moderately satisfactory’ band. English emerged as the language with the highest level of information disclosure, followed by Sinhala and Tamil. However, no public authority scored more than 50% for accessibility across the three languages. These gaps in online proactive disclosure impede public access to trilingual information.

POLICY RECOMMENDATIONS

A key policy implication arising out of the conclusions of the study is the need to manage records in the public authorities. Section 7 (1) of the RTI Act directs public authorities to maintain all its records duly catalogued and indexed “...as is consistent with its operational requirements ...” to facilitate the right of access to information. 7(3) All records being maintained shall be preserved (a) records already in existence, for a period of not less than ten years and (b) new records created after the Act, for a period of not less than twelve years of the RTI Act and (5) every public authority shall endeavour to preserve all its records in electronic format within a reasonable time, subject to the availability of resources.

It is recommended that all public authorities maintain (a) a general records schedule [common to all agencies] and (b) an agency schedule [unique to the agency] in the given format in Annex-II, preferably in electronic format, and to update the same on a daily basis. These are not new introductions, as the Department of National Achieves has issued circulars to prepare and maintain Retention Schedules of Records. This will help to identify records or information generated / received by the public authority and to disclose proactively in a selected method so that the citizen will receive updated useful information in a user-friendly manner in an efficient way. The second key policy recommendation is that the public authority maintains a Proactive Disclosure Matrix, as shown in Annex-III, preferably in electronic format and updates the same on a daily basis. This will help to identify records or information generated / received by the public authority which should be disclosed proactively; the method used, languages, whether electronic or hard copies, location, format etc. will help to ensure that the citizen will receive updated, useful information in a user-friendly manner in an efficient way. The above two steps would complete the institutional arrangements within the public authority to facilitate proactive disclosure and provide information by Information Officer on request.

END NOTES

1. Act No 12 of 2016
2. Extraordinary Gazette No. 2004/66 on 3-2.2017
3. UNESCO -18 July 2019-<https://sdg.iisd.org/news/UNESCO>
4. Article 14A
5. Article 14A of the Constitution
6. Section 5 of RTI Act
7. Section 5(4) of RTI Act

8. Section 5 of RTI Act
9. Ibid., ss 5(c), (i), (k)-(n).
10. Global Right to Information Rating, 'Indicator 31,' <http://www.rti-rating.org/country-data/by-indicator/?indicator=31>.
11. Right to Information Act No. 12 of 2016, s 4
12. Sec 43 RTI Act
13. Sec 8
14. Extraordinary Gazette No. 2004/66 on 3-2.2017
15. Section 15(d)
16. ibid
17. Sub Section 4 of Regulation 20
18. Subsection 5 of Regulation 20
19. Subsection 6 of Regulation 20
20. RTIC Annual Reports-230, 800, 1089, 729 appeals made to the RTIC during 2017, 2018, 2019 and 2020 respectively
21. Ibid-
22. These results are not exactly comparative, only indicative as sample size, sample composition , type of public authorities of the two researches are vary.
23. The Preamble RTI Act
24. S. 23 (1) (a) of RTI Act, An official appointed to entertain information requests of citizens
25. S. 23(1) (a) of RTI Act, An official appointed to hear appeals made by citizens regarding their information requests
26. Final Report: RTIC-UNDP Consultancy Project: Technical Advice to Implement Proactive Disclosure Policy and Record Management Guidelines- Key Outcomes and Next Steps, May-September 2021- RTIC, Sri Lanka (RTIC,2021)
27. Sec 43 of RTI Act: "information" includes any material which is recorded in, in any form including records, documents, memos, emails, opinions, advices, press releases, circulars, orders, log books, contracts, reports, papers, samples, models, correspondence, memorandum, draft legislation, book, plan, map, drawing, diagram, pictorial or graphic work, photograph, film, microfilm, sound recording, video tape, machine readable record, computer records and other documentary material, regardless of its physical form or character and any copy thereof; There are provisions in the NAL to prepare a Retention Schedule or General Record Schedule- common to all state agencies eg. Audit, fiscal, correspondence, administration, while Agency specific Schedule- unique to the agency can be prepared to inventorise agency specific records/ information eg. For hospital, bed tickets etc
28. Sec 24 As any original or copy of any manuscript, paper, letter, register, report, book, magazine, map, chart, plan, drawing, picture, photograph or any other record or part thereof either handwritten, drawn, printed or produced in any other way on paper or on any other material except granite and officially received or produced or prepared in any public office in the course of its official functions and includes any cinematograph, film, recording, tape, disc or production in any other media received in any public office."
29. Regulation No. 20 published in the Gazette Extra Ordinary No. 2004/66 of February 3, 2017.

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Annex 1:

Regulation No. 20

Proactive Disclosure of Information

01. In accordance with the power to direct a Public Authority to provide information in a particular form under Section 15(d) of the Act and in keeping with the overriding principle of Proactive Disclosure, all Public Authorities shall routinely disseminate, at a minimum, the following key information including through a digital or electronic format;
- i. Institutional information: legal basis of the institution, internal regulations, functions and powers.
 - ii. Organisational information: Organisational structure including information on personnel, and the names and contact information of executive grade public official their remunerations, emoluments and allowances.
 - iii. Operational information: strategy and plans, policies, activities, procedures, reports and evaluations, including the facts and other documents and data being used as a basis for formulating them.
 - iv. Decisions and acts: Decisions and formal acts, particularly those that directly affect the public including the data and documents used as the basis for these decisions and acts.
 - v. Public services information: Descriptions of services offered to the public, guidance, booklets and leaflets, copies of forms, information on fees and deadlines.
 - vi. Budget information: Projected budget, actual income and expenditure (including salary scales pertaining to the emoluments and related allowances of officers and employees of executive rank and above,) and other financial information and audit reports.
 - vii. Open meetings information: Information on meetings, including which are open to the public and how to attend these meetings.
 - viii. Decision making & public participation: Information on decision making procedures including mechanisms for consultations and public participation in decision making.
 - ix. Information on subsidies: Information on the beneficiaries of subsidies, the objective, amounts, and implementation.

- x. Public procurement information: Detailed information on public procurement processes, criteria and outcomes of decision making on tender applications; copies of contracts, and reports on completion of contracts.
 - xi. Lists, registers, databases: Information on the lists, registers, and databases held by the public body. Information about whether these lists, registers, and databases are available online and/ or for onsite access by members of the public.
 - xii. Information about information held: An index or register of documents/ information held including details of information held in databases.
 - xiii. Information on publications: Information on publications issued, including whether publications are fee of charge or the price if they must be purchased.
 - xiv. Information about the right to information: Information on the right of access to information and how to request information, including contact information for the responsible person in each public body.
 - xv. Disclosed information: Information which has been disclosed pursuant to a request and which is likely to be of interest to others.
 - xvi. The above information shall include all relevant facts taken into consideration while formulating important policies or announcing decisions which affect the public.
02. In addition to the categories listed in clause 01, Public Authorities shall endeavour to include in their Section 8 reports such information as may be of interest to the public, among other things so as to limit the need for members of the public to resort to the use of this Act to obtain that information.
 03. All Public Authorities shall periodically update the information referred to above.
 04. Any citizen may, if he/she finds, upon inspection of the information provided by Public Authorities in terms of Sections 7, 8, 9 and 10 of the Act and pursuant to the duty of Proactive Disclosure contained in this Regulation, that the information is improper and/or false and/or has not been updated, complain to the Head or the CEO of the relevant Public Authority. If the Head or the CEO of the Public Authority fails to rectify the same, the citizen may make an application to the Commission within three months of the said disclosure for rectification of the said improper/ false/outdated information for reasons stated.
 05. If upon inquiry into the reasons stated, the Commission finds merit in the complaint, the Commission shall call upon the said Public Authority to rectify the same and report to the Commission within one month of the said order of the Commission.
 06. Details of the inquiry and follow-up action (if any) shall be included in the report of the activities of the Commission required to be prepared and thereafter to be tabled before Parliament and sent to the President in terms of Section 37 of the Act.

Annex 2: (a) General records schedule [common to all agencies]; (b) Agency schedule [unique to the agency]

(A) GENERAL RECORDS SCHEDULE [COMMON TO ALL AGENCIES]; (B) AGENCY SCHEDULE [UNIQUE TO THE AGENCY]																		
NO	WHAT RECORDS DO YOU HAVE? 35 types - Sec 43 eg records	WHO CREATED THEM		WHEN RECORDED CREATED	WHERE ARE THEY STORED		How records are managed?				What is the purpose of record?				Custody		Kept for how long?	
		Generated by Agency	Received by Agency	date created	IF HARD MATERIAL	IF SOFT MATERIAL	Client files	Project Documents	Invoices	General Correspondence	Statute	Regulations	Management reporting	Program Administration	Who is responsible	Location	Disclosure proactively	10 Years prior to RTI
R/1				2010												Y/N		
R/2				2016														
R/3				2017													2027	
				2018													2027	
				2019														2029
																		2030
																		2031

Annex 3: RTI Act- PROACTIVE DISCLOSURE MATRIX

RTI- PROACTIVE DISCLOSURE MATRIX							
NAME OF PUBLIC AUTHORITY							
Category under Regulation 20 [1]	Records/Information required under Proactive Disclosure [2]	Methods [INDEX 1-11] [3]	Official languages [INDEX 1-5] [4]	Available Electronic Form [Y/N] [5]	Available for public inspection [Y/N] [6]	Copies issued to a citizen [Y/N] [7]	Differently-able persons [INDEX 1-....] [8]
1. Institutional information:	1.1 Legal basis of the institution 1.2 Internal Rules & Regulations 1.3 Internal instructions & manuals 1.4 Functions and powers 1.5 Mandate (vision & mission)						
2. Organisational information:	2.1 Organisational structure 2.2 Functions, activities and duties of public authority 2.3 -DO- names and contacts of executive grade officials 2.4 Norms for functions, performance and exercise of powers 2.5 Remunerations, emoluments and allowances of 2.2						
3. Operational information:	3.1 strategy and plans 3.2 policies 3.3 activities and duties 3.4 procedures 3.5 reports, evaluations and data						
4. Decisions and acts:	4.1 Decision making procedure 4.2 Decisions and formal acts, directly affecting public 4.3 Data and documents used as basis for 4.1						
5. Public services information:	5.1 Descriptions of services offered to the public 5.2 Accessing public services 5.3 Guidance, booklets and leaflets re 5.4 Forms, information on fees and deadlines re 5.1						
6. Budget information:	6.1 Projected budget (current year) 6.2 Actual income and expenditure (Last year) 6.3 Salary scales of emoluments and allowances of executive rank and above 6.4 Financial information and audit reports						
7. Open meetings information:	7.1 Information on meetings 7.2 Meetings open to the public 7.3 How to attend open meetings						
8. Decision making & public participation:	8.1 Information on decision making procedures 8.2 Mechanisms for public consultations						

	8.3 Public participation in decision making
9. Information on subsidies:	9.1 Information on the beneficiaries of subsidies 9.2 Objective, amounts, and implementation
10. Public procurement information:	10.1 Details of public procurement processes 10.2 -Do- criteria 10.3 Outcomes of decisions on tender applications 10.4 Copies of contracts 10.5 Reports on completion of contracts
11. Lists, registers, databases:	11.1 Information on the lists and registers 11.2 -Do- databases held by the PA 11.3 Lists and registers available online onsite access 11.4 Databases available online onsite access by public
12. Information about information held:	12.1 An index or register of documents/ information held 12.2 Details of 12.1 are held in databases.
13. Information on publications:	13.1 Information on publications issued 13.2 Publications free of charge or the price
14. Information about the right to information:	14.1 Information on access to RTI 14.2 Facilities to citizens for obtaining information 14.3 Information Officer's Designation Officer's contact 14.4 How to request information 14.5 Fee Schedule
15. Disclosed information:	15.1 Information disclosed pursuant to a request
16. The above information shall include:	16.1 All facts considered when formulating important policies affecting public
(1) Minister's report as per section 8 of the RTI Act	(1) Minister's report as per section 8 of the RTI Act
(2). Information Disclosure emerge from section 9 of the RTI Act:	1. Notification of project commencement 2. Pre-feasibility and feasibility studies of projects 3. Terms and conditions of investment 4. Monitoring and evaluation reports 5. Detailed project costs
(1) INDEX FOR METHODS Column-(3) 1. Website 2. Printed media 3. Electronic media 4. Social media 5. TV 6. Radio 7. Phamplets 8. Posters 9 Regular Publications 10. GS, AGA, Las (11) Record Room	
(2)INDEX FOR LANGUAGES Column(4): 1. Sinhala, 2. Tamil 3. English, 4. Bi-lingual, 5 Tri-lingual	
(3)INDEX for DIFFERENTLY ABLED: Column (8)	